

EXHIBIT D

IN THE FOURTH JUDICIAL DISTRICT COURT, PROVO DEPT.
IN AND FOR UTAH COUNTY, STATE OF UTAH

TIMOTHY BALLARD,

Plaintiff,

v.

KIRA LYNCH, et al

Defendant.


DECLARATION OF GREG ROGERS

Civil No.: 240405154

A true and accurate copy of my expert opinions is attached hereto as Exhibit A. I make this statement voluntarily and under penalty of perjury under the laws of the State of Utah and the United States of America.

DATED this 17 of July, 2025.

Greg Rogers



2 Shots Private Investigations

801-577-7756 / S2lockback@yahoo.com

16/23/2025

I served as a Special Agent of the Federal Bureau of Investigation (FBI) from 1988-2017. The vast majority of my career was devoted to working violent crimes and undercover work. I was also the Chief Division Counsel (CDC) of the Oklahoma City Office of the FBI from 1999-2001, and the Salt Lake City Office of the FBI from 2004-2006. I also served as an Assistant United States Attorney in the Western District of Texas from 1990-1994 working on the Drug Unit. Due to the large number of undercover operations I worked, beginning in 1997, I was asked to be a founding member of the Child Sex Tourism Team targeting Americans who traveled overseas to abuse children. As a member of that team, I made repeated trips to conduct undercover operations in Cambodia, Thailand, the Philippines, and Indonesia from 2008 until my retirement. I also served as the Undercover Coordinator of the Salt Lake City Office of the FBI from 2013 until my retirement. In that capacity I reviewed and made decisions concerning the validity and propriety of all undercover operations in our division.

I have reviewed the complaints in the civil case involving Tim Ballard and Ballard's various media interviews concerning that case. Among the numerous excuses Ballard used to explain his unacceptable behavior with his subordinate coworkers was a technique he called the "couple's ruse." For a number of reasons, a couple's ruse is not an acceptable undercover technique to be used in child sex tourism or child human trafficking cases:

1. Foreign sex traffickers are very careful in setting up meetings with potential clients. In Southeast Asia those meetings are often initiated in legal sex tourism clubs involving adults. In those clubs, pedophiles get acquainted with the "pimps" working in those clubs who collect the "bar fines" when a client pays for an evening with one of the adult dancers. Eventually the pedophiles see if the pimp can arrange for "younger" entertainment. In all of the years I operated undercover in those clubs, I never met a pedophile who had travelled there with his spouse or significant other. The vast majority of active pedophiles do not let their families know that they are pedophiles.

2. The owners and managers of the sex tourism clubs do not conduct surveillance on clients. In fact, I was never once asked where I was staying while in-country. Had I been asked, I would not have correctly identified which hotel. That being the case, there was no valid or operational reason for Ballard and his coworkers to stay in the same room, shower together, participate in couple's massages, and pretend to be married.
3. State and federal agency undercover policies prohibit sexual activity between undercover agents. Being a former federal agent, and alleging he actually worked undercover operations while so employed, Ballard should have been well aware of the good reasons for those policy prohibitions.
4. There are circumstances where undercover operatives do collaborate with other undercover operatives who pose as spouses or a significant other. For instance, in cases where I infiltrated militia groups where most of the members were married or motorcycle gangs where most members also had girlfriends with them on rides, I would also introduce a female undercover into those groups as my spouse or girlfriend. In those cases, we always stayed in separate motel rooms and followed all applicable policies concerning no sexual activity. Further, the individuals playing those roles were trained and certified undercover operatives.

For the aforementioned reasons, it is my opinion that the "couples ruse" was an unprofessional, unethical, manipulative ploy used by Ballard for his own personal sexual gratification and had nothing to do with an undercover scenario designed to result in a successful operation.