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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

**CELESTE BORYS, MARY HALL,
 SASHLEIGHA HIGHTOWER,
 KRISTA KACEY, KIRA LYNCH, and
 BREE RIGHTER,**

Plaintiffs,

v.

**AERIAL RECOVERY, a Tennessee
 Non-Profit Corporation; TIMOTHY
 BALLARD, an individual, and DOES 1
 through 100,**

Defendants.

**SECOND AMENDED COMPLAINT FOR
 ANTI-TRAFFICKING**

Case No. 2:24-cv-00794-RJS

Judge: Robert J. Shelby

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Celeste Borys is a resident of Salt Lake County, State of Utah.
2. Plaintiff Mary Hall is a resident of Salt Lake County, State of Utah.
3. Plaintiff Sashleigha Hightower is a resident of Salt Lake County, State of Utah.
4. Plaintiff Krista Kacey is a resident of Utah County, State of Utah.
5. Plaintiff Kira Lynch is a resident of Utah County, State of Utah.
6. Plaintiff Bree Righter is a resident of the State of Virginia.
7. Defendant Timothy Ballard is an adult citizen and resident of Utah and founder of Operation Underground Railroad, Inc. (O.U.R.)¹
8. Defendant Aerial Recovery is a Tennessee non-profit corporation.
9. This Court has subject matter jurisdiction under 28 U.S.C. § 1331, as the case arises under federal law, specifically the TVPRA, 18 U.S.C. §§ 1595.
10. Venue is proper in this Court under 28 U.S.C. § 1391, because Defendants reside in this District and a substantial part of the events giving rise to the claims occurred within this District.

FACTUAL ALLEGATIONS

“That’s trafficking itself, and it’s so deeply, deeply disturbing.”²

~ Utah Governor Spencer J. Cox when asked about
The Couples Ruse on KSL Radio

¹ Due to Mr. Ballard’s status as a well-known individual, and to avoid confusion with Elder Ballard, Plaintiffs refer to Mr. Ballard by Tim or Tim Ballard instead of Mr. Ballard throughout.

² https://drive.google.com/file/d/1yn-4JGdPl_89FckrZCgdmk-SyljEd2Js/view?usp=drive_link
See also Slide 1 of Exhibit G, attached hereto and provided to the Court for a hard copy of this video.

11. Plaintiffs Celeste Borys, Mary Hall, Sashleigha Hightower, Krista Kacey, Kira Lynch, and Bree Righter lay federal forced labor allegations at the feet of Timothy Ballard and Aerial Recovery, for obtaining the labor or services, or otherwise benefitting from the Plaintiffs' labor in The Couples Ruse. 18 U.S.C.A. § 1595.

12. This "scheme, plan, or pattern" convinced Plaintiffs that if they did not work with Tim Ballard and others in "The Couples Ruse," others—including trafficked women and children—would continue to be illegally trafficked, suffering "serious harm." 18 U.S.C.A. § 1589(a).

13. The definition of "serious harm" here embraces "all harm," including "physical," "reputational," and "psychological" harm, among others. 18 U.S.C.A. § 1589(c)(2). The harm must be "sufficiently serious" that a reasonable person "of the same background and in the same circumstances" would feel compelled to continue performing the labor to avoid the harm to self or others. *Id.*

14. Plaintiffs Celeste Borys, Mary Hall, Sashleigha Hightower, Krista Kacey, Kira Lynch, and Bree Righter further lay federal sex trafficking "by force, fraud, or coercion" allegations at the feet of Timothy Ballard, and Aerial Recovery, for knowingly recruiting, harboring, transporting, providing, obtaining, maintaining, or benefitting from the Plaintiffs' participation in The Couples Ruse, including "participating in a venture" falling under the terms of Act. 18 U.S.C.A. § 1591 (a).

15. Plaintiffs allege that Defendants knew that force, threat of force, fraud, or coercion would be used the cause Plaintiffs to engage in a commercial sex act affecting interstate commerce.

16. Here the term “coercion” is statutorily defined as “any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person.” 18 U.S.C.A. § 1591(e)(B).

17. A “commercial sex act” is “any sex act” where anything of value is given to or received by any person. 18 U.S.C.A. § 1591(e)(3).

18. The definition of “serious harm” here similarly embraces “any harm,” including “physical,” “reputational,” and “psychological” harm, among others. 18 U.S.C.A. § 1591(5). As above, the harm must be “sufficiently serious” that a reasonable person “of the same background and in the same circumstances” would feel compelled to continue performing the labor to avoid the harm to self or others. *Id.*

19. Finally, “participation in a venture” includes knowingly assisting, supporting, or facilitating the scheme. 18 U.S.C.A. § 1591(4).

20. Plaintiffs were hand-selected and groomed to qualify to work with Tim Ballard to save women and children through participation in The Couples Ruse.³ In their jobs as Couples Ruse operators, Plaintiffs exchanged acts that were sexual in nature for value as part of their work, including intentional touching of the genitalia, groping, masturbation, oral sex, simulated sex, simulated oral sex, and dancing with sexual touching. Plaintiffs did this under the fraudulent guise that their sexual acts were necessary to save children who were in serious danger.

³ https://drive.google.com/file/d/17y-SzJKuIP807yLe1-zAWUawcfZ6ggU/view?usp=drive_link
See also Slide 2 of Exhibit G

21. Plaintiffs were psychologically groomed to participate. Tim told most of the Plaintiffs they were “special” and that each one of them was the only one who could do this very important work of saving God’s children. Tim assured Plaintiffs that this secret sexually charged scheme was spiritually sanctioned by God and by well-regarded church leaders and that they had been picked by God to save captive women and children.⁴

22. Plaintiffs were sexually manipulated. Tim required Plaintiffs to let him make unwanted sexual advances toward them as part of their testing, which increased in inappropriateness as training progressed. Tim asked Plaintiffs to show how badly they wanted to save children and how far they would go through accepting his unwanted sexual advances. Tim attested that he and his wife Katherine would go as far as it took. They had to be willing to do “whatever it took.” On operations, Tim placed Plaintiffs in dangerous scenarios, which increased in peril, making the female operators more fearful for their lives, and increasing their willingness to participate in greater sexually explicit acts with Tim and others to walk out alive.

23. Unfortunately for all parties, The Couples Ruse was never more than the fruition of the sexual fantasies of an unsatisfied husband. But through The Couples Ruse, Tim placed Plaintiffs in situations that Tim had told them would be “life-or-death,” groomed them spiritually and emotionally, sexually exploited them, and never delivered on the promise to save women and children.

⁴ For an example of this, attached is a voice message that Ballard left for one of his trafficking victims, claiming that they did not need to obey the rules because the rules were for liability purposes and Ballard was a prophet who could violate the rules. https://drive.google.com/file/d/1tgnR6zX-PtXHLuhQFg5Vi9mfeKDgjrMR/view?usp=drive_link
See also Slide 3 of Exhibit G.

Defendants are civilly liable for fraudulently inducing Plaintiffs' forced labor and sexual participation in The Couples Ruse.

INTRODUCTION

"the most powerful person in the world is the storyteller"

~ Jim Cavaziel, *The Sound of Freedom*

24. Operation Underground Railroad (O.U.R.) was founded to tell a story: a story about vulnerable women and children, a story about dangerous predators, and a story about Tim Ballard.

25. This is the other side of the story.

26. In 2013, a well-regarded church leader discovered Tim Ballard. The church leader had an affinity for Tim and shared his last name.⁵ Within Tim's church, that leader was known as Elder Ballard, or President Ballard.⁶

27. Elder Ballard wanted Tim to help him to change evangelical attitudes about Mormons in America.⁷ To accomplish that end, at Elder Ballard's request, Tim founded O.U.R. to be a Mormon missionary tool.

⁵ https://drive.google.com/file/d/174GUIJi6dTIJyxFS1PK3e2NCjY0faInd/view?usp=drive_link
See also Slide 4 of Exhibit G.

⁶ https://drive.google.com/file/d/1PT0fUgq0rxorQqHKZL_ceJ5iJEDRZZw3/view?usp=drive_link
See also Slide 5 of Exhibit G.

⁷ Ballard's wife Katherine describes the scheme:
https://drive.google.com/file/d/1BJ-oQ8DfsBorsEsSdtMfPgka1uTyrgiv/view?usp=drive_link
See also Slide 6 of Exhibit G.

28. This was the idea: O.U.R. and its employees would create a show that would endear evangelicals to Tim. Later, they would reveal that Tim was Mormon. Evangelicals would accept Mormons because they accepted Tim. Elder Ballard and Tim hoped this show—and Tim’s celebrity—would change evangelical attitudes about Mormons in America.

29. Ryan Fisher—a friend of Tim Ballard and fellow believer in something called “The American Covenant”—knew about this plan from the beginning. He became aware that Elder Ballard planned to make “Tim Ballard” a household name to increase Mormonism’s chances of being accepted by other Christians. He knew that Elder Ballard and Tim dreamed up O.U.R., that it would be a non-profit organization known for rescuing trafficked children, and that the funding would go toward filming media to popularize Tim and put Tim’s image and heroism front and center on American screens.⁸

30. According to Ryan, Elder Ballard personally requested that wealthy members of the Church help fund O.U.R. Among them was Glenn Beck, who gave Tim an income while he transitioned out of his government job at Department of Homeland Security. The proselytizing origins of O.U.R.’s founding were never made known to donors, volunteers, employees, or the public.

⁸ See Declaration of Ryan Fisher, attached hereto as Exhibit A.

31. O.U.R. filmed and published *The Abolitionists*—a documentary style show featuring Tim Ballard attempting a failed child sex sting operation in Colombia. After *The Abolitionists* was released, Tim’s operation techniques were widely condemned as “reckless” and “dangerous.” Insiders were concerned that Tim and O.U.R. “were creating a market for child exploitation wherever they went, . . . taking advantage of desperate people in desperate situations,” rather than catching known traffickers. *The Abolitionists*’ popularity did not take off.

32. After *The Abolitionists* failure, Ryan was invited to a private meeting with Tim and Elder Ballard to receive an “unofficial calling” to make another television show with a national audience. Elder Ballard gave Tim a special blessing, and Tim began calling himself “The Prophet of the American Covenant.” He also threatened Ryan—who owned a tour company—and stole his tour company out from under him, taking his own guests on exclusive tours of sites Ryan had deemed important to the connection between the Book of Mormon and the founding of America. Years later, Ryan learned that Tim had threatened many other O.U.R. employees to “keep them silent” during his criminal investigation. Ryan Fisher’s account is found in his attached declaration.

33. As the founder of O.U.R., Tim used his clout and reputation as a former government operative to implement a new tactic that would help him become more successful in his attempts to uncover trafficking rings. This new tactic was called The Couples Ruse.⁹ Tim developed this tactic with his associates at Aerial Recovery.

⁹ https://drive.google.com/file/d/13vrLCEVgUM07-X5ygNpMQwCzmZJ46bkd/view?usp=drive_link
See also Slide 7 of Exhibit G.

34. Defendant Aerial Recovery and Tim developed the “Couples Ruse¹⁰” together¹¹, which Ballard then used with his organization.

35. At least one former employee of Aerial Recovery has testified that he was required to train people in the Couples Ruse though he knew it had no basis for use in any undercover operation.¹²

¹⁰ See Declaration of Aaron Asay, attached hereto as Exhibit B.

¹¹ For a more thorough description of the trafficking scheme of Ballard, see the expert report of Dawn Hughes, attached hereto as Exhibit C. Ms. Hughes was an expert in the P Diddy case also.

For a description of why the Couples Ruse in and of itself, had no merit as an anti-trafficking tactic, see the expert report of Greg Rogers, attached hereto as Exhibit D.

¹² See Declaration of Aaron Asay, attached hereto as Exhibit B.

36. Tim fraudulently induced Plaintiffs by exploiting his credibility as a former Homeland Security agent¹³, his political¹⁴ and religious connections¹⁵, and his anti-trafficking reputation to recruit them for what he falsely represented as legitimate undercover rescue missions. These supposed rescue operations were a complete fabrication—a façade¹⁶ Ballard used to obtain sex, labor, and services from the Plaintiffs through fraud and coercion.

¹³ Ballard used to claim that he was an agent of the CIA.

<https://www.deseret.com/2014/12/26/20555455/heroes-2014-ex-cia-officer-uses-crime-fighting-skills-to-bust-child-sex-rings/>) but he had to back away from that claim after the media exposed him for only being an unpaid summer intern.

<https://www.fox13now.com/news/fox-13-investigates/operative-or-intern-tim-ballards-story-of-working-for-the-cia-keeps-changing>

Ballard misrepresents his experience at HSI, also as testified to by his supervisor at HSI, Jon Lines:

“He was not a seasoned veteran undercover operative. That’s laughable. And I don’t want to make light of what has happened in the situations that we are here for. It’s laughable that he would make those claims, and the unfortunate reality is there are people that were well-intended, the public that believed his claims of being a legitimate undercover operator with extensive experience, internationally and domestic, to investigate human trafficking violations. Even his work as an Internet Crimes Against Children agent was very nominal and routine and was nothing above anything any other agent that is assigned to those units are doing.” *See* Jon Lines Deposition at pp. 14-15, attached hereto as Exhibit E.

¹⁴ https://drive.google.com/file/d/17OIIAXRLk-oIhoAetrEADQPfQvda9_Aj/view?usp=drive_link which shows Utah Attorney General Sean Reyes vouching for Ballard and his organization. *See also* Slide 8 of Exhibit G.

¹⁵ https://drive.google.com/file/d/1JduDy0l3CkW22cDTToySS9rnHsHrYLoZ3/view?usp=drive_link which shows Mormon Apostle Elder/President M. Russell Ballard (no relation) promoting Tim Ballard at Brigham Young University Idaho. *See also* Slide 9 of Exhibit G.

https://drive.google.com/file/d/1lqfVVBs3sDtsnoXOlkTYOvAqQIZLJjTl/view?usp=drive_link which demonstrates Ballard’s relationship with Elder Ballard and Ballard’s view that he has a divine calling. *See also* Slide 10 of Exhibit G.

https://drive.google.com/file/d/1OFUhKFFZn80QLVeiTusfiGNpnchtLg_D/view?usp=drive_link which shows Ballard’s wife, using Elder Ballard’s name to justify her husband’s actions. *See also* Slide 11 of Exhibit G.

37. Tim systematically coerced Plaintiffs through escalating sexual demands. He initially misrepresented that their role required only superficial physical contact, then progressively demanded sexual touching, oral sex, and intercourse¹⁷ under the false pretense that such acts were “necessary to maintain their cover.” Tim reinforced his coercive control by invoking false spiritual authority, manipulating the Plaintiffs’ desire to “save children,”¹⁸ and isolating them through restrictive nondisclosure agreements that prevented them from seeking help or revealing the abuse.

38. Under these fraudulent pretenses, Plaintiffs were compelled to provide unwanted sexual conduct and services. Tim reinforced his manipulation by claiming divine authority, telling victims that sexual contact was permissible because he was a “prophet.”¹⁹

39. One of these sexual assaults occurred to Plaintiff Celeste Borys while Ballard was attending the Board of Directors meeting of Aerial Recovery, in Nashville, Tennessee.²⁰

¹⁶ https://drive.google.com/file/d/1_rX789VQSWt0XN4YE4pu4gNPvCk9YQgd/view?usp=drive_link which shows Ballard in his undercover disguise in Mexico, listening to mariachis. *See also* Slide 12 of Exhibit G.

¹⁷ *See* Text Messages between Ballard and one of his Couples Ruse partners “JJ”, which shows how Ballard would manipulate women into believing his requests were reasonable. Attached hereto as Exhibit F.

¹⁸ Indeed, Ballard used this tactic in the New York Times article claiming that the Plaintiffs’ claims against him “‘have done great harm to the mission of rescuing children.’ ... ‘Their actions are causing children to suffer, to be raped, to be tortured.’” *To The Women, He is an Anti-Trafficking Hero. Women Tell a Different Story*, New York Times, September 9, 2024. Attached hereto as Exhibit K.

¹⁹ https://drive.google.com/file/d/1tgnR6zX-PtXHLuhQFg5Vi9mfeKDgirMR/view?usp=drive_link *See also* Slide 3 of Exhibit G.

²⁰ *See* Declaration of Aaron Asay, attached hereto as Exhibit B.

40. Tim's co-employees and counselors knew that Ballard was sexually abusing his Couples Ruse partners but could not do anything about it because of Tim's position in the Mormon Church, the protection he was given by the Utah Attorney General Sean Reyes and because most of the decision makers in his organization were his family members.²¹

41. Tim escalated this abuse to outright sexual assault on multiple occasions.²² Following an investigation by the law firm of Holland & Hart, that concluded Tim had engaged in sexually inappropriate conduct, Ballard resigned in order to avoid being terminated from his position.

42. The Mormon Church subsequently publicly denounced and then privately excommunicated Ballard, though Ballard initially refused to admit such, but after recently being denied readmission into the Church, he has admitted his excommunication²³, turning on the Church claiming it was involved in the assassination of Charlie Kirk and is now involved in the Satanic Ritual Abuse of children.

²¹ See the text messaging of Ballard's counselor, Kelly McCaleb, attached hereto as Exhibit H.

²² For example, a Sexual Violence Protective Order was entered against Ballard for the rape of Plaintiff Celeste Borys; the State of Utah's Crime Lab confirmed that Ballard's semen was found on Ms. Borys' skirt. See Order, attached hereto as Exhibit G. Ballard's attorney confirms it was Ballard's semen, but claims that Ballard used the skirt to masturbate on after engaging a high-end sex worker into a sexually compromised situation. https://drive.google.com/file/d/1Uv1Nu9TxWheja_4dTslpASPmfRddr4qA/view?usp=drive_link
See also Slide 13 of Exhibit G,

This is the high-end sex worker that Ballard was with when he allegedly masturbated.
https://drive.google.com/file/d/19vKlau778UZsXZV5D1S4SAZEucTCNhrR/view?usp=drive_link
See also Slide 14 of Exhibit G.

²³ https://drive.google.com/file/d/1ykkGuDfWcQVvIJsY4uJbt8o13inR1jKn/view?usp=drive_link
See also Slide 15 of Exhibit G.

43. Despite knowing that Ballard was accused of multiple sexual assaults, Aerial Recovery hired Ballard and Janet Russon, Ballard's personal purported psychic, who provided him with intelligence on various matters²⁴, including potential legal threats and locations of trafficked children.²⁵ Aerial Recovery also hired Matt Cooper, Ballard's self-described bodyguard. Ballard has appeared with Aerial Recovery logo hats and t-shirts, threatening and harassing the Plaintiffs on social media.²⁶ He has appeared at religious events wearing an Aerial Recovery hat.

44. As the promotional movie poster demonstrates, Aerial Recovery is putting out a movie with Tim just next month, called the Hidden War.²⁷

45. Tim would tell his female recruits the same story: that he relied on The Couples Ruse to avoid having to touch victims, that he received spiritual instruction to implement this ruse by divine guidance, and that the scheme was sanctioned by Elder Ballard of The Church of Jesus Christ of Latter-day Saints—a trusted spiritual advisor.

²⁴ https://drive.google.com/file/d/1C_Z8jhgc5Kixxww6UHcckq0TwMMJsBsr/view?usp=drive_link
See also Slide 16 of Exhibit G.

²⁵ https://drive.google.com/file/d/1sIIzoJeigX9lZ-gPg9UfJ1uhqO4V6fhZ/view?usp=drive_link
for Janet Russon's reading, talking through the long dead Eliza Hamilton, that JJ would not make public her claims of improper use of the Couples Ruse.
See also Slide 17 of Exhibit G.

²⁶ *See also* Slides 5 and 7 of Exhibit G.

²⁷ *See* Exhibit I.

46. Tim would tell the women that The Couples Ruse was important to protect Tim’s chastity and marital covenants and that their role in The Couples Ruse was to act as his ladylove, a jealous woman who would refuse him to partake of the fruit of the children and women he meant to save. If these women ever felt endangered, they could call off the mission at any time. Their code word was “Fuck me.”

47. Despite admitting on his own social media platforms that it is a myth that human traffickers abduct their victims off the streets or kidnap them²⁸, to get into character, Tim would become “Brian Black,” a foul-mouthed character “fucking” whichever woman accompanied him on the trip. They would visit dark and seedy places, behaving as dark and seedy people—and the women would need to prove to him beforehand that they could do it—to save the children.

48. Tim had a type: wounded. Most of the women were divorced. Many of them were single moms. Many of them were recovering from sexual trauma or emotional abuse. Most of them were Mormon or had been at some point. Each of them had a good reason to risk their lives and emotional safety to engage in this work. Many of them were looking for a second chance to do something meaningful. All of them wanted to save the children.

49. Knowing that, Tim told each of them a story about themselves: they were special. Each one of them was the only one: the only one he had been guided to, the only one he felt that way about, the only one he needed to do this important work. He told them that their relationship was unique, that they were the best at doing what they did, and that he needed them—not a professional—to be his partner. He could not rescue women and children without *them*.

²⁸ See Exhibit J.

50. Tim told them that if they did not participate, women and children would remain in harm's way. But he would need to touch them, turn them on, and they would need to turn him on in return. He told them he needed to know how far they would go so that his life would not be in danger.

51. Tim, thus, required them to pass tests. These tests were emotional, sexual, and psychological, in nature.

52. To convince Tim that they could successfully save children, Tim put them through sexual chemistry tests. Traffickers could smell pheromones, so they would have to "practice" developing their chemistry. Tim would tell them they had to turn him on so much that he would want to "fuck them," and he would require them to show their attraction to him. If the women resisted, he would tell them he had to know that they could do it to show him that they could save the children without putting him at risk. If they did not desire him convincingly, either Tim, his partner, or others could be harmed. It was "life-or-death" chemistry.

53. Tim would isolate them from others and from each other. They were not allowed to talk to each other. They could not tell anyone where they were going on operations or with whom. The women were made to sign an NDA—sometimes multiple NDAs. They promised not to compromise the operation by talking to anyone else about their involvement in The Couples Ruse—even senior O.U.R. employees. There were serious consequences if they answered questions from O.U.R. employees or spoke to one another other about what they were going through. They could put others' lives at risk and violate their NDAs.

54. The women were not allowed to have their cell phones with them on operations or during local trainings. One of them was asked to turn off her security cameras at home. Tim blocked one of the female operators' husbands without her consent and without her knowing.

55. The Plaintiffs were not trained and were left in the dark on operations. They relied on Tim for resources and transportation in and out of the country. Most of the time, they did not speak the language. They could not understand the conversations. They were told that if they did not play along, children's lives were at risk. When they got scared, timid, or feared for their lives, they were told they had impeded the success of the operation, putting children's lives at risk.

56. Tim always began training immediately. Tim needed a new partner urgently, because, he claimed, his old partner had "fallen in love with him." He told the Plaintiffs his old partners were "crazy," obsessed with him, and that he had to call it off with them. He told Plaintiffs this story about each other. He told some of them that former partners had wanted to marry him if Katherine died. He also told them he would marry them if Katherine died.

57. The other side of that story was that when the women could no longer stomach Tim's sexual advances and the emotional, sexual, and psychological abuse that accompanied the training and the operations, Tim would tell them that he had retired from doing operations to spend more time with his family. But he would then tell everyone else that his partner had fallen in love with him, was trying to marry him, and that he needed everyone to distance themselves from her.

58. Plaintiffs were told that if they told anyone what Tim did to them, Tim would lie. He would deny it, and it would be their word against his. They had one stone, but Tim claimed to have a thousand.

59. Tim asked them if they believed in past lives. Tim believed he had been married to some of them in past lives. Tim believed he would become the prophet of the Mormon church and the President of the United States. Tim had a psychic working with him. Tim led his operations based on revelations of-the-moment—what he called “downloads.”

60. Tim purported to have the support high-level of Mormon church leaders, Attorney General Sean Reyes, and sitting President Donald Trump.

61. Tim has shamelessly and ruthlessly lied about the Plaintiffs, blaming them for his poor decisions.²⁹

62. The following accounts are merely the tip of the iceberg. But they provide narratives that meet the elements of forced labor and sex trafficking.

PLAINTIFFS' ACCOUNTS

Plaintiff Celeste Borys

I moved over to being all things Tim Ballard, employee and Operator. He would constantly tell me I was the best operator, no one had done Ops like me

²⁹ https://docs.google.com/presentation/d/1AtN-LgQJJy5HRZ7EfmFQo5HkAgMS1W6s/edit?usp=drive_link&ouid=103847432177829297954&rtpof=true&sd=true

^e
See also Slide 25-32 of Exhibit G.

before, we were going to save so many kids, he had never trusted anyone as much as he trusted me, and everyone had betrayed him.

He said he would put a bullet in his brain if I ever brought up the need to move positions.

I felt fingers inside me. When I comprehended that, I stood up and went to the bathroom. I heard the girls leaving. I got in the shower and cried.

Tim came into the bathroom. It was a glass door, and I turned around because I didn't want him to see me or see me cry, but he said, "You did so good; you are such a badass. No female operator did as good as that."

"We are going to save so many kids," he said.

63. Celeste Borys's face appeared to Tim Ballard in a vision as an answer to prayer. (Borys 1–2. ³⁰) He told Borys that his female partner had backed out of an assignment and he was praying to God asking who he should bring in when Borys' face appeared to him. (Borys 1–2.) He tracked her down at the office, introduced himself, and asked her if she had ever considered doing operations. Borys worked in the finance and operations department. She said, "No way!" (Borys 1.) Tim explained that the role was not breaking down doors; he merely needed her to "pose as a girlfriend when they are having conversations at a party." (Borys 1.) Borys agreed to help. (Borys 1.)

³⁰ The statement of the Plaintiffs are attached to the original complaint and are likewise attached hereto. Ms. Borys statement is attached as Exhibit L.

64. Tim asked if she could fly to San Clemente, CA, for a training. (Borys 2.) Tim told her to keep everything very secret, which was not odd to Borys because nobody at O.U.R. talked about the operations. (Borys 2.) “It was all very secretive,” she explained. (Borys 2.)

65. He came to her hotel room, and she felt very uncomfortable being alone with a strange man; she thought she should feel better about it because he was Tim Ballard. (Borys 2.)

66. On the bed in the hotel room, Tim introduced Borys to The Couples Ruse. He explained that on “Ops” he went by Brian Black. (Borys 2.) She was there to “block for him” in strip clubs and massage parlors, relieving the bad guys of any suspicion that he is actually a “good guy.” (Borys 2.) He told her the safe word was “Fuck me,” and that traffickers can smell pheromones, so their chemistry must be real. (Borys 3.) Tim said the rules were “no kissing” and “no touching private parts.” (Borys 3.)

67. Tim told her about chakras and tantric massages. (Borys 3.) He lifted her shirt, told her she had a hot body, laid her back on the bed, and began kissing her neck—which he said would help him avoid kissing her mouth. (Borys 3.) He showed her how to “fake fuck” with clothes on. (Borys 3.) He wrapped her legs over his neck and began to thrust, explaining it would look like his “dick was sliding in” her. (Borys 3.) He tried to normalize this behavior by claiming that another female partner came up with this technique, and that it works all the time. (Borys 3.) He told her they were able to save “hundreds of kids this way.” (Borys 3–4.)

68. Tim did not disclose any of this to her before she came to California. (Borys 3.) Borys felt uncomfortable—but wanted to be part of an organization that was helping to take down “this huge trafficking ring coming out of North Korea.” (Borys 4.) She stayed and trained with Matt Cooper. (Borys 4.) In a hot tub on the property, Tim told her that he saw “angels all around them” and that what they were doing was “not wrong.” (Borys 4.) He told her to keep everything private. (Borys 4.)

69. Borys was not allowed to talk to anyone about her work with Tim. Tim once called the CEO of O.U.R. and yelled at him for checking in with Borys. (Borys 4.) Her operations were secret, and no one from O.U.R. knew that she was going on missions with Tim—including her direct supervisor. (Borys 4–5.)

70. Tim had her spying on all of her friends at the office, and there was always someone Tim wanted to spy on. (Borys 5.)

71. Borys worked days in the office and nights and weekends with Tim. (Borys 5.) She did not receive extra compensation for her work with Tim. This made things difficult with her husband. (Borys 5.) If she mentioned compensation, Tim promised her that “one day you will make lots of money.” (Borys 5.) That was not her goal, and she felt bad for bringing it up if she ever did. (Borys 5.)

72. Borys accompanied Tim on a practice trip when he accepted an award. They practiced getting sexy massages on that trip. (Borys 5.) Tim got naked and asked her why she was not also naked. She took off her shirt and received a massage. (Borys 5.) Borys does not speak Spanish, but Tim told her he was complimenting her girlfriend's hot body to the massage therapists and asked them how they masturbate. (Borys 6.) They giggled and took Borys' clothes off and started touching her. She closed her eyes, wishing it were over. (Borys 6.) Tim was fascinated by the education. (Borys 6.) Borys felt fingers inside of her, and she jumped up and ran to the bathroom and cried. (Borys 6.) Tim complimented her on what a badass she was and told her, "you are going to save so many kids." (Borys 6.) He told her he got a name. But she never heard that anything came of that name. (Borys 6.)

73. When they were on location during foreign operations, Borys usually did not speak the language. She did not feel free to leave the country, because donor money would be wasted, more kids would be trafficked, and it would compromise the operation. She did not have the resources to leave in the first instance. O.U.R. had put a limit on her company card, and Mike Porenta told her she could not use the MS Williams card for operations. That card also had a limit. Borys was not allowed to tell her family or anyone else she knew where she was going, because, she was told, that would put her in danger. Only Tim, Matt Cooper, or Mike Porenta could take them out of the country or help her to get around. Tim once took her phone and blocked her husband. She did not know until she got home.

74. They travelled to Mexico for a practice op. (Borys 6.) Matt Cooper was on this trip with Tim and Borys in an Airbnb. (Borys 7.) Tim reminded her to keep everything secret, that it was all for “the new covenant.” (Borys 6.) Once in Mexico, they ordered two escorts who apparently knew traffickers. (Borys 7.) Tim asked one of the escorts to train Borys on how to be an escort. Tim got naked with the escort while she demonstrated how to please men on Tim. (Borys 7.) The next night, Borys was made to get boudoir shots of herself and send them to a group WhatsApp. She was told that if she did this, she would have a connection with traffickers. (Borys 7.) She got the boudoir shots and sent them to the escort. (Borys 8.)

75. Borys’ second practice operation was in London. Tim was excited about escorts at this point. He had Borys make escort advertisements with her real photo on them and had Borys order escort services for him. (Borys 8.) He told her to wait downstairs for twenty minutes, and by the time she arrived in the room, the escort and Tim were already done and getting out of the shower. (Borys 8.) Borys told Matt Cooper she did not feel comfortable on the operation when Tim was alone with escorts. (Borys 8.)

76. During one practice OP while in Nashville, Tennessee for an Aerial Recovery board meeting, of which Tim sat upon, Ballard broke into her AirBnB and raped her.³¹

77. They travelled to London for Borys’ first real operation. (Borys 8.) They invited an escort they suspected of being trafficked over to their room. Tim introduced her to Borys, turned on the shower, and made sounds to make it seem like she and Tim were having sex. (Borys 9.) They went to a party to extract information. (Borys 9.) None of this—or the necessity of her prior training trips—made sense to Borys. (Borys 9.)

³¹ See Exhibit U.

78. On an op in Mexico City, Borys was disgusted when Tim and Matt Cooper met with two escorts while Borys was running errands. (Borys 10.) She was upset because her personal information was used at the front desk and not her undercover name. (Borys 10.) She suspected Tim was giving the escorts what they came for when he went off alone with them. (Borys 10.) She caught Matt Osborne alone in a room with an escort with makeup on his face. (Borys 10.) After reconvening with Tim and the escorts, Borys discovered Tim in a robe freshly showered. (Borys 11.) Tim claimed he only masturbated when his escort went to get a condom and told the escort “You’re just so hot I had to do this instead.” (Borys 11.) Tim claimed he extracted information about kids being trafficked, and when Borys did not respond favorably, Tim told her she should be grateful because he had just taken one for her, so hopefully “we can save some kids now.” (Borys 11.) Tim elaborated on how much he was sacrificing for the cause. (Borys 11.) Borys felt bad for feeling disgusted by Tim. (Borys 11.)

79. They went on an op to practice getting sexy massages in Korea Town. Tim left Borys alone at the massage where Borys’s private parts were filmed without her knowledge. (Borys 15.) She was upset she did not have him there to protect her or to be her blocker when he was never supposed to leave her alone. (Borys 15.)

80. On a trip to Miami, where Borys was supposed to meet Tony Robbins, Tim’s attorney flew out to tell Tim that he had a sexual harassment complaint against him at O.U.R. (Borys 12.) Tim began dry heaving and throwing up. (Borys 12.)

81. Tim asked Borys to draft a complaint regarding the person who made a sexual harassment complaint against Tim. (Borys 13.) She never did. (Borys 13.) Borys suspected Tim drafted Katherine's complaint because he was editing it while reading it aloud on the phone with her. (Borys 13.)

82. During the internal investigation, Tim isolated Borys from the rest of the company. (Borys 14.) All the information she had about the sexual harassment suit came from Tim. (Borys 14.) Borys knew that if she elaborated on anything in her interview, it could ruin O.U.R. and all operations would stop. (Borys 14.) That meant no kids would be saved. (Borys 14.)

83. Borys eventually became Tim's personal assistant and operator. (Borys 14.) She got all of her updates through Tim. (Borys 14.) She saw nobody from the office. (Borys 14.)

84. Tim made her feel necessary to the work. Tim consistently told Borys she "was the best operator, no one had done Ops like me before, we were going to save so many kids, he had never trusted anyone as much as he trusts me, and everyone had betrayed him." (Borys 15.) He said he would take a bullet to the brain if she ever moved positions in the company. (Borys 15.)

85. Borys was with Tim when he got his termination letter from O.U.R., but Tim told her he resigned from O.U.R. due to a conflict with *Sound of Freedom* and to begin working on SPEAR Fund. (Borys 16.) If she asked questions, he responded with a crisis. (Borys 16.) Borys was told that Tim resigned from O.U.R. for her. (Borys 16.) Tim told her that O.U.R. would give Tim a grant for a year to pay for her salary. To this day, she has not received compensation for her work with Tim or SPEAR Fund. (Borys 16.) She was told she was resigning, but her letter from O.U.R. read more like a termination letter. (Borys 16.) She never got clear answers from Tim or O.U.R. (Borys 16.) Tim had total control over the narrative of her O.U.R. resignation. (Borys 16.)

86. Borys distanced herself from friends and family because she could no longer relate to them after working with Tim. (Borys 17.) He would tell her that their work “was in the name of God through revelation and saving children.” (Borys 17.) Tim told her to maintain secrecy, to keep everything private for the greater good, and that they had been married in past lives. (Borys 17.)

87. Borys prioritized Tim’s personal crises and work over her personal life and family. (Borys 17.) Her association with Tim Ballard has cost her relationships, her marriage relationship, and time away from her family for one year. She burned bridges without knowing it and went into debt for him, which he refused to pay off. (Borys 17.) He made her feel guilty asking for a paycheck. (Borys 17.)

88. O.U.R. knew what Borys was being exposed to in keeping her in operations with Tim Ballard and moving her into a role where she would be more available to him. (Borys 17.)

89. Tim's recurring comments to Borys, include that (1) Traffickers can smell pheromones, (2) this is all for the New Covenant, (3) I see angels all around, (4) Katherine chose you, (5) these aren't our real bodies. Jesus gave us our bodies to use in the Couples Ruse; our bodies are a tool; (6) I would do anything to save a child, How far would you go? (7) Janet and Lori said you would never turn on me, (8) You are the only one who could ruin me, (9) I wanted to put a bullet in my brain before you, and (10) I will put a bullet in my brain if you ever leave me (constantly said this).

90. Ms. Borys has obtained a sexual violence protective order from Commissioner Luhn³², which was affirmed by Judge Sanchez.³³

³² See Order, attached hereto as Exhibit Q.

³³ See Order, attached hereto as Exhibit R.

Plaintiff Mary Hall³⁴

I remember being pushed up against the office door. Ballard was up against me, and he was sort of grinding his body against mine. It was obvious that he had an erection. . . .

At this point I was very uncomfortable, but again I felt like I could not fail this test. I needed to prove that I could handle what he was doing. If I was not strong enough to handle this and deal with this, then I would not be able to go out and rescue women and children.

91. Mary Hall got involved with Tim Ballard to save children. (Hall 1.) At the time, Hall was going through a divorce and living in her parents' basement. (Hall 12.) She had lunch with her friend who worked at O.U.R., and Hall mentioned that she was interested in "saving women and children who were victims of violence or trafficking." (Hall 1.)

92. A couple of weeks later, Hall was contacted by Matthew Cooper. (Hall 1.) She told Cooper that she wanted to be on the ground saving children. (Hall 1.) Cooper invited Hall to the O.U.R. gym. (Hall 1.)

93. Tim Ballard arrived, and Hall spoke with him one-on-one in the back room. (Hall 2.) He told Hall about the nature of the work and briefly touched on The Couples Ruse. (Hall 2.) She told Tim that because she was a professional actress, she believed she could be quite good at it. (Hall 2.) Tim made plans to immediately begin "training" Hall "in a different way" later that evening. (Hall 2.)

³⁴ Ms. Hall's statement is attached as Exhibit M.

94. She signed an NDA that day. “He said that we could not talk about this stuff ever. I signed an NDA and left it there at the gym.” (Hall 2.) She never received a copy. (Hall 2.)

95. Hall interacted and trained with both Tim and Matt Cooper, or Coop: “I drove with Coop to the strip clubs in Salt Lake City for this type of training. (I don’t remember the names of all the clubs and bars, or the order, but I know we went to these clubs for sure: Trails Gentlemen’s Club, Exotic Kitty Gentlemen’s Club, The American Bush).” (Hall 3–4.)

96. She was tested to see if she would go along with things sexually and could gather information at the bars and clubs. “Coop, (redacted), and I would hold hands, sit next to each other, and just generally pretend to be a couple. Nothing overtly inappropriate ever happened while I was training with Coop. I felt like he was in character while still keeping things professional for the most part.” (Hall 4.)

97. Hall saw Ballard and another women there who were also acting out “the COUPLES RUSE as well—just more extreme (lap sitting, going into private rooms in the back, dances, etc.).” (Hall 5.) Hall explained that “Tim had asked (redacted) to give him a lap dance. She was supposed to show him that she could do the job—so even though she was hesitant, she did it in order to prove herself. She started giving him a lap dance, but shortly after she started, Ballard’s son ended up coming inside. He walked into the club’s back room and saw his dad and (redacted) together like that.” (Hall 5.) This upset Hall because “(redacted) had not wanted to do it in the first place and had been reassured multiple times that Ballard’s son would not be coming inside or see them acting out the COUPLES RUSE. (Redacted) was freaking out a bit and came and told me what had happened.” (Hall 5.)

98. Tim complimented Hall's ability to participate and invited her to be his partner. Tim "said I was a badass and had done an awesome job the night before. Then they sat down and he started talking to Hall about The Couples Ruse and how important it was, telling her "exactly how" intimate scenarios with him would be. (Hall 6.) "He asked me over and over if I would be willing to act out certain sexual acts, continually getting more explicit." (Hall 6.)

99. Tim told her the stakes were life-and-death and that she needed to be willing to do anything with him. He "made it clear" that she could not tell anyone about the things that were happening between them. (Hall 6.) Disclosing that information had life-or-death consequences to the both of them. (Hall 6.) "He also made it seem like it could be a life-or-death situation if I was not willing or able to act out certain sex acts well enough." (Hall 6.) He started pushing the idea of practice chemistry with each other. (Hall 6.) Tim told Hall about other female operators "in situations where they had to be completely naked in the rooms in front of each other while getting massages." (Hall 6.)

100. Tim told Hall that the point of The Couples Ruse "was for you to be able to block for each other. Meaning that on OPS, you would intercept sexual touches from traffickers or sex workers." (Hall 6.) He explicitly described the sexual scenarios that could unfold. (Hall 6.) "He told me that he wanted to train me to be his new primary partner on OPS. I would be paid for my time as a contractor with the organization [O.U.R.]" (Hall 6.)

101. Tim warned Hall that “operators before me had fallen in love with him. That some had . . . pushed for a relationship with him. He told me that other partners before me had gone a bit crazy and he had to end things.” (Hall 6.) Tim had a no kissing on the lips rule, but “He made it seem that everything else besides maybe full-on penetrative sex would potentially be expected.” (Hall 7.)

102. Tim made sure that Hall was committed to the cause. “During all of this, I felt like everything was a test. Every question or act was proving myself.” (Hall 7.) Hall had gotten personal with Tim and explained her personal background and why “helping on operations as an operator was so important to me.” (Hall 7.) “Saving women and children truly meant so much to me as a person on a personal level.” (Hall 7.)

103. As part of her testing, Hall had to convince Tim she was attracted to him. Tim wanted her to tell him she was attracted to him, and he wanted to hear that he turned her on. “He needed to be able to practice. He would say that it was really important for us to have intense chemistry. He wanted to know if I was attracted to him and wanted to make sure that he would be able to turn me on. I was really uncomfortable with these questions obviously, but at that time in my mind I felt like it was a test. And I didn’t want to fail this test.” (Hall 7.) After Tim made sexual advances on her, he began to question her. “He wanted to know if I had been turned on during that or if I was still turned on and worked up. He wanted to know if I was attracted to him physically as well, and if he was good looking.” (Hall 9.) “It all felt like a test to me, so I tried to say what he wanted to hear and react the right way.” (Hall 9.)

104. Tim told her she had to do sexually explicit things with him to save women and children who were in serious danger. “Tim then became more open about things that could happen or that I could expect on OPS and that I would have to be willing to do these things in order to save children. This included being naked in front of each other, touching each other, imitating sex acts, talking dirty to each other, and all sorts of things of that nature. It was presented to me as, ‘If we were in a life-or-death situation, would you be willing to do XYZ. . .?’ And of course if it came down to saving women and children I would be willing to do it.” (Hall 7.)

105. Hall allowed Tim to make unwanted sexual advances as part of “a test,” so that she had the chance to save trafficked kids. Tim immediately started running his hands up and down her legs, all the way up her thighs. “I was pretty shocked he was touching me so intimately. I guess in my mind I hadn’t thought that he would begin practicing then. I guess I had assumed that he wouldn’t need or want to practice until at least we were heading on an operation.” (Hall 8.) But Tim needed immediate confirmation that she desired him.

106. Tim pushed, grabbed, and rubbed “pretty much my entire body,” Hall states, and then pushed her up against the office door. “Ballard was up against me, and he was sort of grinding his body against mine. It was obvious that he had an erection.” He kissed her and ran his mouth over her shoulders, neck, and “other parts of my body,” she says. (Hall 8.) “At this point I was very uncomfortable, but again I felt like I could not fail this test. I needed to prove that I could handle what he was doing. If I was not strong enough to handle this and deal with this, then I would not be able to go out and rescue women and children. And that was not an option for me. . . . I didn’t understand why we had to be practicing right then.” (Hall 8.)

107. Matthew Cooper knew that Tim was crossing the line. During one of the assaults, Tim worked his way down Hall's body until he was kneeling and pulling at her jeans. He lifted up her shirt and was "licking and kissing" her stomach, "getting lower" on her body and tugging at her jeans when Cooper "pushed the door open." Tim casually played it off. But she "felt like Coop knew exactly what was going on." (Hall 9.)

108. Hall trusted Tim because of his government background. Hall kept thinking "about how he had a government background and that they had probably taught him these techniques and that I should trust him." (Hall. 9.)

109. Tim told Hall that practicing sexual "chemistry" was necessary to the operation. Hall met with Tim and "he started wanting to practice some more." He told Hall that they would need to practice their chemistry "consistently in order to be a secure team together." (Hall 11.)

110. Hall explained that isolation from other operators and secrecy was necessary. "I had been warned that I couldn't talk to people and things that had happened. I had signed an NDA." (Hall 10.)

111. Tim asked Hall if they could go to her house to get comfortable with each other, but Hall was living in her parents' basement. (Hall 12.)

112. After speaking with another female operator about Tim's lick-attack at the office, Hall eventually told Matthew Cooper that she believed Tim needed "some help" and established boundaries. (Hall 10.) Tim became upset and dropped Hall. (Hall 12.)

Plaintiff Sashleigha Hightower³⁵

I knew I was going to be raped if I did not get out, as the female kept grabbing me so forcefully that I fell on the bed. I knew that I had to get myself out, so I made up a story that there was a meeting we had to get to. Ballard said, “what meeting?”

I left Ballard and went outside.

Ballard got upset with me saying, “Why’d you leave? We were so close to getting information.”

I told Ballard I feared I was going to be raped and was upset he didn’t help. Ballard told me he would never have let it go too far, and I again felt bad for doubting Ballard, and I worried I stopped the opportunity for kids to be saved.

113. Sashleigha Hightower was a single mom (Hightower 4) when she met Tim Ballard via Instagram; she suspected the man she was dating might be involved in trafficking, and she did not know who else to turn to. (Hightower 1.)

114. Tim met her at his office in Lehi to talk about her concerns. (Hightower 1.) He asked if she had ever considered going under cover, because he saw on Instagram that she was an actress. (Hightower 1.) She told him she would think about it. (Hightower 1.)

³⁵ Ms. Hightower’s statement is attached as Exhibit N.

115. Tim had her sign an NDA immediately and told her “how important it was that she never speak a word to ANYONE, not even friends or boyfriends, ‘because people’s lives were on the line.’” (Hightower 1.) She was not given a copy of the NDA “to protect women and children and the OPS.” (Hightower 1.)

116. Tim told her about The Couples Ruse and claimed it came to him through “revelation from God,” because it was too brilliant for him to have thought up. (Hightower 2.)

117. Tim told Hightower that in The Couples Ruse, they would both “cockblock” for “each other.” (Hightower 2.) He explained that they would be going to massage parlors and doing kinky and deviant things, but that they could not kiss or touch each other’s genitals. (Hightower 2.) He explained that he would maybe put his arms around her or put his hand in her back pocket, but that it would be safe because there would always be teams around them. (Hightower 2.) She would also “watch and report” on activities during sting operations. (Hightower 2.)

118. Tim explained that cops were terrible actors, so he preferred to work with real people and that traffickers could “smell cops a mile away.” (Hightower 2.)

119. Tim asked what she thought about it, and she responded that because she was a rape survivor herself, she “felt strongly that she should help women and children.” (Hightower 2.) Tim responded by saying “I feel like you have to be hand selected from God because there are so many I can’t trust. We have thousands of applications every week, but I can’t just bring in anyone.” (Hightower 3.) She confessed that made her feel important. (Hightower 3.)

120. Tim told her there was an urgent operation and he needed somebody quickly. (Hightower 3.) He put her on a text thread with Matthew Cooper and told her to call him “Brian.” (Hightower 3.) Her operative name was “Kelli,” and Hightower felt compromised when Matt Cooper called her by her real name. (Hightower 3.) She was confused when Tim disregarded her concern after explaining the seriousness of the operations before. (Hightower 3.) They both reassured her she was safe, even though her name was compromised. (Hightower 4.)

121. Tim instructed Hightower to buy “slutty” clothes for her character and gave her cash to do this. (Hightower 4.) Hightower felt honored when Brad and Tim told her she could be a speaker for the organization. (Hightower 4.)

122. Tim explained that they needed to get to know one another so that they could create a convincing relationship to be able to convince the traffickers. (Hightower 4.)

123. Tim tested Hightower by mentioning that a person whom she trusted deeply could *not* be trusted, along with many other people in his organization. (Hightower 4.) That made her feel sad. (Hightower 5.)

124. Tim warned her that other female operatives had fallen in love with him, and he found it necessary to change operators often. (Hightower 5.) He told her he “buried” a journalist who wrote a negative article about him. (Hightower 5.) He repeated that it was imperative that nothing got leaked, and the leaking information could put everyone’s lives at risk. (Hightower 5.) He demanded everyone use Signal and that all messages were to be deleted nightly for everyone’s safety. (Hightower 5.)

125. To get to know her, Tim asked her questions about her relationship, her children, and her childhood trauma. (Hightower 5.) He told her it would make an amazing story and began caressing her thigh. (Hightower 6.) She tensed up but sensed he was testing her. (Hightower 6.) She kept talking as he stroked her neck. (Hightower 6.) Tim got frustrated that she was not responding warmly to his touch and demanded, “Why are you not responding?!?” (Hightower 6.) She responded that it was because she knew he was testing her, and he then demanded to know if she was attracted to him. (Hightower 6.) When she responded that she was not attracted to him in that way, Tim asked how she could convince child traffickers of their chemistry if she was not attracted to him? (Hightower 6.) She explained that she was an actress and that she never practiced chemistry privately outside of being on set in front of the camera or crew. (Hightower 6.) Tim told her that she needed to be attracted to him to convince traffickers they were a “kinky couple,” to know that the donor dollars would not be wasted, and to make sure they did not fail to save kids. (Hightower 6.) She felt bad for doubting Tim, so she told him she would turn it on to convince him she could do it. (Hightower 6.) She approached him in the hallway and spoke to him seductively. (Hightower 7.) Tim got excited and told her she could do this. (Hightower 7.) Tim instructed her that the code word was “Fuck Me.” (Hightower 9.)

126. Tim told her she needed to be “on” from the moment they got inside a plane because people could be watching every move they make. (Hightower 7.) They got spray tans and prepared for an operation in Puerto Vallarta, Mexico. (Hightower 7.) Mike Porenta made travel arrangements for this trip. (Hightower 7.)

127. They stayed at Glenn Beck's house on the way where Hightower heard Tim telling Beck about removing a cancer from O.U.R. and complaining to Beck that everyone was out to get him. (Hightower 8.) He said he'd hit rock bottom. (Hightower 8.)

128. On the airplane, Tim was "all over" Hightower with "his hands wrapped through her legs" on the plane. (Hightower 8.) The next day, Tim groped her in the car. (Hightower 8.) His hand got very close to her groin area. (Hightower 8.) She explained that he "didn't have to be so close" and he pulled back. (Hightower 8.)

129. On location, Hightower was told that she was in "unsafe territory," that there were traffickers watching them everywhere, and that they needed to stay with Tim "at all times." She did not know her way around, and she believed the only safe place was the safe house. She did not have access to resources to leave, because she was a single mom with very little income. Tim and Mike Porenta provided all transportation, "picks ups, drop offs, paid for food, stay, entry to anywhere, massage parlors, strip clubs, information, etc." She did not speak the language. She was also not allowed to tell anyone where she was going, what she was going, or that she was with Tim Ballard. She was not allowed to bring her personal phone while she was out, and she kept all of her identification and passport at the safe house. She was the only other person staying in the house with Tim Ballard on the op. She was told to stay next to Tim the entire time and that deleting all communications every night was vital to their safety.

130. When they arrived, they first went to a massage parlor, and Hightower told him she did not want to get naked. (Hightower 8.) Tim told her to stay in her underwear, but that they would have to share a massage table. Tim told her he assured her he would cover for her and tell the massage therapists she could not take her bra off because of a recent surgery. (Hightower 9.) When the women came into the room, they took their clothes off down to their underwear, and Tim started asking for “young girls.” (Hightower 9.) When one of the women undid her bra, she asked “Brian” to tell them why she needed to keep her bra on. (Hightower 9.) Tim only told them in English, and the women did not understand. (Hightower 10.) Tim said the code word, and Hightower immediately pretended to be jealous, telling the “escorts” not to touch Tim. (Hightower 10.) One of the women “went straight for” Hightower’s crotch, and Tim did not protect her, so she repeated the code word again. (Hightower 10.) Tim did not protect her, and she believed that meant she was in “extreme danger” and that they might be “compromised.” (Hightower 10.) Hightower jumped on top of Tim topless and angrily yelled at the women. (Hightower 10.) They left, and she immediately got dressed and left. (Hightower 10.) She had a panic attack. (Hightower 10.) Tim gave her a moment to breathe and went to the next parlor. (Hightower 10.)

131. Tim told her that he and his operators would “accidentally kiss” sometimes, to try to convince her that she did not need to feel bad about jumping on top of him topless in the parlor. (Hightower 11.) He told her sometimes they would snuggle in bed because their work was so traumatic. (Hightower 11.) Sometimes he would even have to go “ejaculate” when “things got too steamy.” (Hightower 11.) She told Tim that would not be her. (Hightower 11.)

132. They had similar situations over the course of three days in many parlors. (Hightower 11.) Tim “screamed” her accolades, telling her he could not believe what she was able to do what she did, because she got “so many phone numbers” that would “save so many children.” (Hightower 11.)

133. Hightower did not feel safe with Tim. In one parlor, a woman grabbed her breasts and crotch, and Tim watched after she said the code word. (Hightower 11.) Hightower felt unsafe when an older female trafficker wanted to “partake” of her and kept grabbing her so forcefully that Hightower fell onto a bed. (Hightower 11.) She made up a story about a meeting so that she could leave, and Tim got upset, denying they had a meeting. (Hightower 12.) Tim claimed they were “so close to getting information.” (Hightower 12.) He reassured her he would “never have let it get too far,” and she felt bad for interrupting an opportunity for Tim to save kids. (Hightower 12.)

134. Tim confided in her about his marriage. He told her that things were not the best with Katherine. (Hightower 12.) He said Katherine knew about The Couples Ruse, but she did not ask questions because she was willing to do anything to save children. (Hightower 12.) She asked Tim why he still went out on operations even though he told everyone else that he did not, and Tim responded that Elder Ballard had sanctioned The Couples Ruse and it was his calling to participate in it. (Hightower 12.)

135. Hightower told Matthew Cooper that she was concerned about Tim. (Hightower 13.) She told him Tim had been distracted, failed to protect her, and spoke about her betraying him the whole time. (Hightower 13.) Hall told Tim he should stay home and heal with his family, and that his PTSD was apparent. (Hightower 13.)

136. At one point on the trip, Hightower saw an operative going back to his room with a stripper. (Hightower 13.) Hightower was exhausted and went back to a safe house. (Hightower 13.) Tim left her alone and went out for a few hours with some men. (Hightower 13.) Hightower brought these concerns to “Omar” and Tim and explained that that behavior would “take down” O.U.R. (Hightower 14.)

137. Tim told Hightower that a person she was very close to was the operative who had fallen in love with him, and that was why he needed a new operator. (Hightower 14.)

138. When Hightower returned home, she knew she had been re-traumatized by her operation. (Hightower 14.) Tim asked for her to accompany him on more trips, but she refused. (Hightower 14.) Tim responded by telling her that she made “the most difference out of any other operator” and that he needed her back out there with him. (Hightower 14.) He offered to pay for her therapist. (Hightower 14.) Tim insisted she come back out with him even though she said no. (Hightower 14.)

139. Tim asked her to be the female face of O.U.R. and to be a public speaker, and Hightower was very excited about that offer. (Hightower 15.) Hightower recommended a female friend to replace her who met with Tim and Matthew Cooper. (Hightower 15.) But she came to Hightower concerned after Tim had pushed her up against a wall and licked her stomach and took his son to a strip joint to practice a fake op. (Hightower 16.) Hightower began questioning her own experiences with Tim and knew that she could no longer be a part of O.U.R. (Hightower 16.) Her friend had told Matthew Cooper and Tim her boundaries, and after that “they dropped her.” (Hightower 16.)

140. Tim told her he had stopped doing operations, but then asked for a private meeting with her and told her he was doing his own ops. (Hightower 16.)

141. Hightower asked whether he had rescued any children from the ops that they had gone on, and Tim said, “it just takes time, but” they are “making progress.” (Hightower 16.)

142. She wanted to tell Matt Osborne her concerns about Tim, but she could not trust anyone. (Hightower 16.) Tim Ballard was a huge deal compared to her, and he would deny everything “and she would be buried.” (Hightower 16.)

143. Tim has cowardly and shamelessly attacked Ms. Hightower from his attorney Mark Eisenhut’s office and also while apparently drunk in a vehicle after a pretend raid.³⁶

³⁶ https://drive.google.com/file/d/1r-S8EZfd-naK3bqjwiT_THq3ZYuXwJf/view?usp=drive_link
See also Slide 18 of Exhibit G.

Plaintiff Krista Kacey³⁷

I was the only one he could trust to operate with him. I was the only one who could see things as they really were. I was the only one he knew would not permit him to cross boundaries; the only one who could be trusted to protect him, even from himself. I was the only one whose perspective he valued. I was the only one to whom he had felt a spiritual connection. I was the only one who could be as convincing as I was in the role I played. I was the only one who he was sure would not betray him . . .

Tim made me believe I was special to him, . . . this continued love bombing cemented in me a desire to do whatever was needed for the cause of saving children since I believed I was the rare operator who could.

144. Krista Kacey met Tim Ballard in 2020 after he spoke publicly about the power of prayer. (Kacey 7.) A year later, he connected with her again and remembered her face. (Kacey 7.) He asked her “what’s your story?” (Kacey 7.) She recounted to him the details of her divorce after her husband relapsed into sex addiction, and Tim showed her a video of a woman whom he claimed to have just rescued “because we’re not sex addicts,” he said. (Kacey 7.) He said that because he was not a sex addict, he could go into dark places and fight: Kacey felt like Tim was fighting for her. (Kacey 7.)

³⁷ Ms. Kacey’s statement is attached as Exhibit O.

145. Tim started asking Kacey to touch up his hair and fake tattoos on operations with him. (Kacey 7.) Kacey agreed, and Tim asked her if she would consider going out as an operator with him, because he was not attracted to the other operator, “and that could throw off the operation because their relationship isn’t believable.” (Kacey 8.) She expressed hesitancy, but Tim assured her there was nothing to worry about. (Kacey 9.) He told her she was essentially his bodyguard “with the purpose of protecting both him and Katherine” by protecting their relationship. (Kacey 9.) Kacey felt excited to be trusted with the chance to participate in something she “felt passionate about and could make such a direct impact.” (Kacey 10.) She felt she could do this well because she was firm in her boundaries and integrity. (Kacey 9.) Tim told her he would start slow, just holding hands, and asked her to pray about it. (Kacey 10.)

146. Tim told Kacey he received a divine impression that he was supposed to ask her to be an operator, and she trusted that he could have received revelation from God. (Kacey 10.) Tim told her what this role would require of her as an active member of the Mormon church, and he was impressed that she was willing to do “whatever was required for the cause” because her “highest standard is to sacrifice everything necessary for the Lord and His purposes” and she could “conceive of no greater purpose than to free God’s children in captivity.” (Kacey 11.) Kacey was “increasingly willing to participate without question of the personal cost.” (Kacey 11.)

147. Tim told Kacey about The Couples Ruse, that it was an answer to prayer. (Kacey 11.) Kacey knew that he had a close personal relationship with Elder Ballard and that Elder Ballard gave Tim blessings regularly. (Kacey 11.) Tim represented that Elder Ballard thought The Couples Ruse was “brilliant” and sanctioned it. (Kacey 11–12.) Tim confirmed that she would only need to be sexual with him and not with any other man—and then only to the extent necessary. (Kacey 12.) They would abide by strict standards and trust each other. (Kacey 12.) Tim assured her he never has to drink alcohol. (Kacey 12.)

148. Kacey was very concerned about Katherine, and Tim assured her that Katherine helped choose her. (Kacey 13.) He told her he had shown Katherine her picture, and she felt strongly that she “was the one.” (Kacey 13.) But Tim confided in Kacey that he wished Katherine would get a body wax because it was so much more appealing, told Kacey that he was 100% waxed, so his whole body is her canvas, and asked Kacey to go shopping for sexy clothes. (Kacey 12–13.)

149. Tim explained all of the boundaries that would help them in their roles: no kissing on the mouth, no communication outside of the ops, no undressing or touching private parts. (Kacey 13.) Kacey was happy to know that he took this seriously for her “protection as well.” (Kacey 13.) Tim warned Kacey about another operator who had fallen in love with him, who he had to fire. (Kacey 14.) Tim verbally attacked anyone who stood up to him or had “betrayed” him, and it was a regular lesson on how to behave with him. (Kacey 14.)

150. Tim explained to Kacey that “more than” just her life “would be in danger.” (Kacey 15.) He told her that he was taking “a very serious risk bringing me along.” (Kacey 15.) She could never tell anybody what they did because it could “literally ruin” him. (Kacey 16.) He assured her that if she ever told anybody about their operations, he would have to deny it, and of course everyone would side with him. (Kacey 16.) Kacey resolved to never betray him. (Kacey 16.) She trusted him by virtue of him being Tim Ballard. (Kacey 16.)

151. Tim recorded video of them on the ops “for both of their protection.” (Kacey 14.) He recorded that they had each treated each other appropriately and asked her to say the same. (Kacey 14.) In time, Tim and Matthew Cooper wrote up a Couples Ruse Agreement, asking for signatures. (Kacey 14.)

152. Tim began by expressing real concern for his temple covenants with Katherine. (Kacey 16.) But soon she witnessed his “degeneration into moral decay, mental illness, and harm to himself and countless others.” (Kacey 17.) Kacey participated in many ops with Tim, and Tim started constantly trying to turn her on. (Kacey 17.) He asked about her sex life, what turns her on, whether she masturbates, and what she was willing to do with her boyfriend. (Kacey 17.) Tim felt “jealous” of Kacey’s boyfriend and “rejected” when Kacey did not respond to his touch. (Kacey 17.)

153. Tim began to express that he was unhappy in his relationship with Katherine, and that he wanted her to be more exploratory. (Kacey 19.) Specifically, he wanted to explore oral sex with her, and she would not. (Kacey 19.) He told Kacey on the first mission that if anything happened to Katherine, he would marry her. (Kacey 19.)

154. Tim made Kacey believe she “was special to him.” (Kacey 5.) Tim told Kacey she was “the only one he could trust to operate with him.” (Kacey 4.) He told her she was “the only one who could be trusted to protect him, even from himself.” (Kacey 5.) She was also “the only one to whom he had felt a spiritual connection.” (Kacey 5.) She was “the only one who could be as convincing as [she] was in the role [she] played” and “the only one who he was sure would not betray him.” (Kacey 5.) She was “the gold standard” among operators, “called by God for this specific time.” (Kacey 5.)

155. Tim’s continued praise cemented in her a “desire to do whatever was needed for the cause of saving children” since she believed she was “the rare operator who could.” (Kacey 5.)

156. Tim continually reminded her that she was in “life-or-death” circumstances which could “compromise your personal safety as well as that of others.” (Kacey 6.) But her personal safety was compromised. (Kacey 19.) During one op in Budapest, she injured her foot and was financially devastated when she could not walk and run her business. (Kacey 19.) At one point, she was left behind on an operation in a foreign country. (Kacey 19.) Tim was surprised when he found her at the house after returning to grab something. (Kacey 19.) She eventually felt like an afterthought.

157. Kacey was “risking and sacrificing for something that was becoming so clearly about creating a story” and not about rescuing others. (Kacey 19.) Tim began to tell her that it was their responsibility to become “storytellers.” (Kacey 20.)

158. She did not know if any of their missions led to anything worthwhile. (Kacey 20.) The only thing they seemed to accomplish was “chemistry.” (Kacey 20.)

159. Tim became increasingly perverse and aggressive. (Kacey 20.) At one point, a topless stripper tried to seduce them while Tim faked oral on her—and she had a trauma response when they left the club. (Kacey 30.) Kacey became afraid when they were in a hotel room alone and he dry humped her, finally leaving the bed to go masturbate. (Kacey 20.) Another time when he was dry humping her alone, she tried to leave and he pulled her back under him and kept trying to orgasm. (Kacey 20.) Once when they were preparing for an operation, Tim told her he wanted to show her a tantric technique. (Kacey 20.) He promised not to touch her, but then he pressed his finger “just behind” her vagina and tapped six times. (Kacey 20.)

160. Tim lied to Kacey about a fifteen-year-old boy he claimed to save from trafficking on an operation. An aftercare worker later confirmed that the first time the boy was propositioned was the evening he met Tim. (Kacey 32.)

161. Tim began “pushing all boundaries” and “was very convincing that frequent sexual boundary breeches were essential.” (Kacey 27.) Kacey was led to believe that Tim had been practicing The Couples Ruse for years, and that it was standard operating procedure. (Kacey 27.)

162. Tim began drinking regularly, justifying oral sex³⁸ on ops, and bed sharing with others, creating dangerous situations “precarious enough” that he could “vehemently argue these actions were necessary to accomplish the mission” that would “make all the difference in saving countless lives.” (Kacey 23.) At one point, he established a new “boundary”: Kacey removing her top and faking oral sex with Tim while he was naked and drunk.³⁹ (Kacey 32.) Kacey describes a “horribly disgusting” situation where she “had to fend for Tim and even take the touching and sucking from the other women.” (Kacey 33.) Another time, Kacey had to fake an orgasm during a massage on a table while a “John” watched. (Kacey 33.) And Tim wanted to discuss trying out a “new technique” where he would place “his dick underneath” her to mimic having sex. (Kacey 33.)

163. Kacey finally drew a line when Tim suggested she ask a massage therapist to “strip down” for them during their massage. (Kacey 24.) Tim began to speak disparagingly about Kacey after that. (Kacey 24.)

164. Tim started telling the others lies about her, and because she was unable to talk to other women about their experiences with Tim, she was unaware. (Kacey 28.) She did not know, for example, that Tim had told others that she had fallen in love with him, had tried to kiss him, and had tried to seduce him in bed. (Kacey 28.)

³⁸ Aaron Asay confirms that Tim admitted such to him.

³⁹ Tim has an alcohol problem, even appearing on talk shows completely inebriated. https://drive.google.com/file/d/15cFsv23ZCsJtnlJyZVXhiGbfVVHsAcu/view?usp=drive_link
See also Slide 18 of Exhibit G.

Plaintiff Kira Lynch⁴⁰

He just kept talking to me about how safe he felt with me; how he could talk to me about anything; how he wanted to tell me his deepest, darkest secrets. He said that he felt like he could relate to me and rely on me; that I was the only one right now that he could talk to and even feel safe with.

He was often making comments though that were like, "Please don't come after me. I don't want to sue you. You know if you went to the public and told them all these secrets that I'm telling you, that you would have your small moment of fame, but it wouldn't look good. It would look like we're having an affair. You would just look bad."

And I would just kind of ask him why he would say that. He would just say, "Everyone that I love turns on me. Everyone that I love makes up stories about me."

I was trembling. I asked him multiple times to stop. He kept saying to me, "Just trust me, you can just trust me right now."

All I could think to say was "just stop."

⁴⁰ Ms. Lynch's statement is attached as Exhibit P.

165. Kira Lynch was a single mom when she met Tim Ballard. (Lynch 1, 3.) Katherine, his wife, met her first when she opened the door and let her in to style Tim's hair at a house Tim was convalescing in. (Lynch 2.) Tim asked Lynch what she knew about him and was shocked to discover that she did now know who he was. "I'm actually a big deal," he told her. (Lynch 2.) He told her he was friends with many Apostles, including Elder Ballard, and that he knew "President Trump personally." (Lynch 2.) He was an author who had written book on the New and Everlasting Covenant. (Lynch 2.) He told Lynch about what O.U.R. did, and she told him she admired the work they were doing. (Lynch 3.)

166. He asked if she wanted to be involved in a cause like that how she would feel about going on operations with him. (Lynch 3.) He explained The Couples Ruse to her. He told her The Couples Ruse was sanctioned by Elder Ballard, and that God had told him to do it in answer to prayer. (Lynch 3.) He said "God knew our hearts and souls and what we were wanting to accomplish, which was to only help the children." (Lynch 3.) Lynch felt special that he was asking her to be a part of such important work. (Lynch 3.)

167. Tim told her there were risks. He had an operator who fell in love with him, and she quit "before any lines were crossed." (Lynch 3.) Tim was about to interview twenty different people to see if they would be his partner, but because he already felt comfortable with her, he would like her to be his partner. (Lynch 3.) She said "yes, that sounds amazing." (Lynch 3.) He asked her to sign an NDA. (Lynch 3.)

168. When they got together to sign the NDA, Tim explained that they would need to get to know each other so they could trust each other. (Lynch 4.) They would be “put in dangerous situations,” and they needed to be able to trust each other. (Lynch 4.) Tim started touching her hand, then her leg, then her back. (Lynch 4.)

169. She and her friend were both going to be trained at the same time, so they got together with Matt Cooper and Tim to play games and act like couples. (Lynch 5.) Tim started kissing her neck and forehead and grabbing her butt. (Lynch 5.) Matt was not doing that to his partner. (Lynch 5.) But she trusted him because he was Tim Ballard and everyone around him told her how amazing he is. (Lynch 5.) She decided to trust the process. (Lynch 5.) At one point in the evening, Tim asked Matt to leave, and Tim got even more handsy with Lynch. (Lynch 6.) She asked, “wait, aren’t we supposed to be just talking and getting to know each other?” (Lynch 6.) Tim replied, “Why don’t you talk?” (Lynch 6.) Lynch started asking him about his wife and what she knew about The Couples Ruse. (Lynch 6.) Tim said “not much.” (Lynch 6.) He told Lynch that it was a calling from God, that Katherine trusted him, and that she knows he’s the man for the job. (Lynch 6.) He proceeded to tell her that sometimes he would have to shower naked with his partners, grind like they were having sex, pretend to finger someone at a bar, and have his partner rub him over his genitals. (Lynch 6.)

170. Tim explained that it because it was a calling from God, he can have the Spirit with him while he does it. (Lynch 6.) Tim told her “Once you understand and you see the good and the kids, you will get there.” (Lynch 6.) He told Lynch she could trust him because “a line has never been crossed with him and a partner before” and that she could “feel safe with him.” (Lynch 7.) She felt very uneasy but decided to trust the process. (Lynch 7.)

171. Tim encouraged her to “dress slutty” and told her “multiple times” that she needed to “hurry and pretend and fall in love.” (Lynch 7.) Tim and Matt came over the night before a training and told her they just “loved hanging out with her,” and she enjoyed hanging out with them. (Lynch 7.) They told her stories about their operations. Lynch shares that, “It felt like I was a part of a cause that was really changing people.” (Lynch 8.)

172. When they were getting ready to leave, Tim asked Matt to go out to the car so he could be alone with Lynch. (Lynch 8.) Lynch was nervous, and Tim told her she needed to be able to kiss his neck and grab his ass “so we don’t get ourselves in a bad situation.” (Lynch 8.) So she started to kiss his neck, and he responded, “I need you to grab my ass.” (Lynch 8.) Then he pushed her up against the door and started grinding on her when he “was hard.” (Lynch 8.) When she snapped at him and pushed him away, he justified his behavior, saying “This is what I wanted to show you, this is what I’m talking about and sometimes this happens and it’s going to naturally happen, and I just want you to be aware of that.” (Lynch 8.) Matt grabbed Tim, and he told her “I still need you to learn how to grab my ass,” and when she patted it back, he warned, “don’t ever pat my ass again.” (Lynch 8.) Lynch felt conflicted. (Lynch 9.)

173. Lynch started training with Tim and Matt Cooper. Blaine, Tim's son was there, too. Another woman was there, too. (Lynch 10.) Tim told Lynch that the other woman had requested to be his partner and asked if she was jealous. (Lynch 10.) Lynch asked if she wanted to be the other woman's partner, and he said "no I want to be your partner." (Lynch 10.) Lynch said she could be whoever's partner she needed to be, and Tim became upset that she was not jealous. (Lynch 10.) He told her she was supposed to be jealous and "It's a privilege to be my partner." (Lynch 10.) He did not find it funny that Lynch was not jealous, and "he started bringing a spiritual side into it." (Lynch 10.) Lynch felt privileged to be his partner and felt "blessed" after that. (Lynch 10.) Lynch signed another NDA. (Lynch 10.)

174. Lynch became nervous and got a sick stomach. (Lynch 10.) But Tim told her had a dream about "some really amazing things that we did to save some children." (Lynch 11.) He confirmed to Lynch that she could trust him. (Lynch 11.)

175. While they were getting ready for an test op in her bathroom, Tim pushed her onto her bed. She asked what he was doing, and he said "I want to see how far you're willing to go." (Lynch 12.) He told her she needed to be "very comfortable with" him. (Lynch 12.) He lifted her skirt up above her stomach and started kissing her stomach. (Lynch 12.) She expressed hesitancy, and she said "we might have to do this" and "we have to show them we're a really sexual couple." (Lynch 12.) He told her she could not shy away from it. (Lynch 12.) He kept saying "I need you to show me, I need you to show me." (Lynch 12.) He would start grinding on her, kissing her neck, and asking her to kiss his neck and his stomach. (Lynch 12.) He reminded her to be in character at all times. (Lynch 13.)

176. Tim took her on an op with his son, Blaine, who had recently returned from a Mormon mission. (Lynch 11.) Lynch was not comfortable with that. (Lynch 11.) She was assured that Blaine would just be handling phones and that he would be on the outside. (Lynch 11.)

177. That night, Tim took her to strip clubs and gave her assignments to talk to certain people. (Lynch 13.) He got them a private room with a stripper, and Lynch was mortified. (Lynch 14.) She had to sit on Tim's lap while the stripper was giving Tim a lap dance. (Lynch 14.) The stripper rubbed her breasts on Lynch, and Lynch said she needed to "fuck my man," which was their code word. (Lynch 14.) When they left, Tim said, "I'm sorry, was that too much?" She tried to remind herself she was doing this for the kids and that it would feel amazing if she could actually pull this off. (Lynch 14.) The next strip club was vile, dirty, and gross, and Lynch excused herself to go cry in the bathroom. (Lynch 15.) Tim asked if she was okay, and she said, "yes." (Lynch 15.) They left Matthew Cooper and went into a back room. (Lynch 15.) When a woman came in and asked if they wanted a dancer, Tim said "Actually, she is going to dance" for us, and told me I needed to give him a lap dance. (Lynch 15.) She started giving Tim a lap dance, and Blaine, Tim's son, walked in. (Lynch 15.) Lynch lost it. She told everyone "we are all done." (Lynch 15.) She found Blaine staring at a dancer's vagina "and he's a deer in the headlights," grabbed him and told him they needed to go. (Lynch 15.) An older gentleman Lynch did not know came up to her and apologized. "He was clearly a part of the OUR team." (Lynch 15.)

178. The next day Tim assured her she was fantastic and that he wanted to keep working with her. (Lynch 16.) After that, they spoke about spiritual things. (Lynch 16.) Lynch had been struggling with God and her spirituality and confided in Tim that she had depression and anxiety. (Lynch 17.) He confided in her that he had had a major meltdown. (Lynch 17.) she felt he relied on her heavily for his mental stability. (Lynch 17.)

179. Tim told Lynch he felt safe with her, that he could tell her anything, that he wanted to tell her his darkest secrets, and that she was the only one he could talk to and feel safe with. (Lynch 17.) Even so, he often made comments like “please don’t come after me, I don’t want to sue you.” (Lynch 18.) He warned her that if she went public, it would look bad for her. (Lynch 18.) He told her that everyone loves “to turn on him” and makes up stories about him.” (Lynch 18.)

180. Lynch wanted to trust him and for him to feel like he had a friend, and she wanted to help him with his relationship with his wife, because she had seen the sadness in Katherine’s eyes. (Lynch 18.) Tim told her that sex was difficult with him and Katherine. (Lynch 19.) Katherine did not like to be naked with him or to be waxed, because she did not want to look like a little girl. (Lynch 19.) He always wanted to talk with her about his sex life with Katherine, and Lynch would try to encourage him to talk to Katherine about it. (Lynch 20.)

181. Tim told her about the operator that had fallen in love with him. (Lynch 18.) She was not attracted to Tim, so she felt no risk of falling in love with him like other partners had. (Lynch 18.)

182. Tim told her about a psychic friend who said that one day he would be a prophet of the LDS church and President of the United States. (Lynch 19.)

183. When Lynch saw Katherine at a Gala, Katherine did not know that Lynch was an operator, even though Tim told Lynch that Katherine had picked her. (Lynch 22.) She ran into someone from O.U.R. in the halls who told her that if Matt and Tim tried to take them out to strip clubs, “that is not something you should be doing.” (Lynch 22.)

184. When she got together with Matt and Tim, they would make her turn off her phone. (Lynch 23.) Tim would also make her turn off her security camera. (Lynch 23.) She wanted to talk to someone that night about her experiences with Tim, and so she and her friend turned off their phones to talk freely. (Lynch 23.) She discovered that things he had been doing were inappropriate. (Lynch 23.)

185. Lynch told Tim she was blindsided by the fact that everyone at the Gala knew who she was and that she was Tim’s operative. (Lynch 23.) She felt like the no-communication rule applied only to her. (Lynch 23.) She told Tim she was warned not to go to strip clubs with him. (Lynch 23.) Tim told her the training program was new, and they had different ideas about it. (Lynch 23.) He said that he is the head of the company, and he will do “whatever he wants.” (Lynch 23.)

186. Suddenly, the ops started changing dates. (Lynch 24.) Tim started distancing himself, and they talked openly. Tim told her it was so hard “when you are doing all this good because evil just comes at you so hard.” (Lynch 25.) He reassured her that he and Katherine had prayed about Lynch being his operative while they were in the temple. (Lynch 24.) Lynch felt guilty for talking to her friend and felt guilty for feeling sick when she was in the strip club. (Lynch 25.)

187. He eventually told Lynch that he would not be going on ops anymore. (Lynch 24.) But he wanted Lynch to partner with somebody else. (Lynch 26.) At one point, Lynch became suspicious Tim was a narcissist, and she texted him a book to read on narcissism. (Lynch 26.) When she got together with him to give him a wax, he put his head in her neck and kissed her. (Lynch 26.) She said “ah, what are you doing?” and he apologized. (Lynch 26.)

188. One of Lynch’s friend’s husbands had requested a meetup with Tim, and she had scheduled it before. They arrived at her house, and Tim began being incredibly vulgar. “He was saying horrible, awful evil things about things he would want to do to kids. Tim’s face changed. His demeanor changed. He was showing [friend] that that’s what it would be like. But not only that, it was like Tim couldn’t get out of the mode. He couldn’t change back.” (Lynch 27.) Tim “started freaking out. He was opening my cupboards and slamming them.” (Lynch 27.) Matt asked Lynch to go upstairs, and Lynch could hear Tim yelling. (Lynch 27.) Later, Matt told her it was fine to come back down. (Lynch 27.)

189. Later before a family trip, Tim came over to Lynch’s home to get his hair cut. (Lynch 27.) “He seemed very intense and out of sorts. He was pacing my living room. He looked stressed out. He was a little red in the face, and he started breathing heavily, like he was having a panic attack.” (Lynch 27.) Lynch put her hand on his chest and tried to calm him down. (Lynch 28.) She gave him a hug, and he started breathing normally again. (Lynch 28.) Then he pulled her in closer and she said “Tim, you’re okay.” (Lynch 28.) He responded, “No, this is what I want.” (Lynch 28.)

190. Lynch moved to the other side of the room, and Tim followed her, kneeling in front of her and asking if she believed they “came back reincarnated as other people in different lifetimes.” (Lynch 28.) He said he believed that he had been married to her in another lifetime, and that was why he was so physically attracted to her. (Lynch 28.) He asked her if Katherine died or if they got divorced, did she think they could get married? (Lynch 28.) Lynch was in shock. Tim was still kneeling before her. He put his hand under her shirt, and she told him to stop and that it hurt. (Lynch 28.) She had received breast implants about a month earlier, and touching was painful. (Lynch 28.) He said, “I’ll be careful.” (Lynch 28.) She was trembling and scared. Lynch asked him “multiple times to stop,” but he just kept saying “you can trust me right now.” (Lynch 28.)

191. Tim pulled her top off and said “I just want to see you.” (Lynch 29.) He unclipped her bra, and she tried to get away from him, telling him it was hurting her, and he took his shirt off and grabbed her, hugging her. (Lynch 29.) He said “I just need to feel you. I just need to be skin-to-skin.” (Lynch 28.) Lynch was terrified. She said “Tim, this isn’t you.” (Lynch 29.) And he yelled and said “I don’t even know who I am. Nothing feels like me.” (Lynch 29.)

192. Lynch kept saying “you’re okay, you’re okay” and tried to back away. (Lynch 28.) But he started following her. (Lynch 29.) He told her that he knew she wanted him, too, that he could feel it. (Lynch 29.)

193. Tim Ballard started undoing his pants and took off his belt, grabbed Lynch, and forced himself on top of her lying on the stairs. (Lynch 29.) He pulled her pants down to her knees or calves. (Lynch 29.) She squeezed her legs together as tight as she could, and he started telling her how beautiful she was. (Lynch 29.) Lynch began to feel trapped and tried to get him to look at her in the face. (Lynch 29.) He would not look; he just kept talking to himself. When he finally looked at her, she said, “Tim, you don’t want to do this. Please. Tim.” (Lynch 29.)

194. Suddenly he stood up, grabbed his shirt, zipped up his pants, and walked out the door. (Lynch 29.)

195. At first, Lynch did not know she had been sexually assaulted. (Lynch 29.) She believed she had done something wrong and felt bad for him. (Lynch 29.) She wondered what she had done to make him think she wanted that. (Lynch 30.) She started questioning whether it even happened. (Lynch 30.) But he later texted asking if he could come pick up his belt that he forgot at her house. She blocked it from her mind. (Lynch 30.)⁴¹

196. Then in the summer of 2023, she saw Tim in Salt Lake City. (Lynch 30.) Lynch could not understand the look of terror on his face when she saw him. (Lynch 30.)

197. She began having weird flashbacks. Then, when *The Sound of Freedom* came out, and Tim Ballard was everywhere, she got very sick. (Lynch 30.) Her friend who was aware of Tim leaving O.U.R. asked if Lynch wanted to talk to a lawyer. (Lynch 30.) Lynch started crying and did not know why. (Lynch 30.) She was afraid to call her friend, but she was not okay. (Lynch 30.) She knew something bad had happened. (Lynch 30.)

⁴¹ See Exhibit S.

198. She confided in her friend, and her friend told her, “Well, you were sexually assaulted.” (Lynch 31.) Lynch got off the phone with her friend, and everything started coming back to her. (Lynch 31.) After meeting Tim, she has been continually sick, has lost her job, has lost her clients of 22 years, and has ceased functioning. (Lynch 31.)

199. Lynch does not want this to happen to other people. She would like to recover and move on with her life. (Lynch 30.)

Plaintiff Bree Righter

The burner phone she was using, it turned out, was one that Kailyn already used for a previous operation in Mexico; no one had even bothered to change the sim card. What concerned Righter was the way this suggested a worryingly poor level of operational security—not only couldn't OUR keep track of which operative kept which phone, she'd been provided with a potentially compromised one.

"These things are digitally trackable," Righter says. "If the cartels were on to them and watching, they would know precisely where this fucking phone was if they wanted to." ⁴²

200. Bree Righter met Tim Ballard on the first day of O.U.R.'s new operator "selection." Righter was a licensed social worker who had served six years in the Marines and had volunteered as part of an anti-hijacking team in South Africa. She also had specialized tactical training related to work with a government agency.

201. Tim was impressed with her and wanted her on his team, which was over the Caribbean and Mexico. She was excited about the operation and happy to be working with Tim.

⁴² Righter's account is taken from Vice's article titled *A Private Island, Downloads from God, and the "Couples Ruse": Inside the Dangerous World of Tim Ballard's Operation Underground Railroad* available at <https://www.vice.com/en/article/tim-ballard-sound-of-freedom-grooming-sexual-abuse-undercover-couples-ruse-operation-underground-railroad/> .

202. Tim introduced her to The Couples Ruse. She was told that the female's job in the ruse was to "cock-block" for the male operators. "I'm thinking it's a way to have a woman be involved and talk to other women," she said, "like other women traffickers, to be able to infiltrate the whole female side of that world and have that happen in a way that makes sense in a way that's actually safer for the operator." But "that's not what it was."

203. As part of her immediate training, Righter was taken straight to a strip club. Cooper interacted with her and signed off on her ability to do the job. Tim told Righter he wanted to take her on an operation that would begin in only ten days. Righter was thrilled.

204. As part of the hiring process, she met with Kevin Kozak, O.U.R.'s new director of international operations. She was impressed when she learned she would be given month-long undercover training course. She believed the organization was legitimate, and the training solidified that belief. Kozak refused, however, to let her go with Tim without the training. That meant the impending trip was not in the cards for Righter. She was very disappointed, but she was also impressed with Kovak's insistence on her training.

205. When she told Tim, Tim refused to hear any of it. Tim told her he was Kovak's boss, that she didn't need the training, and that she was coming with him. Righter heard Kovak had been fired and she was going to be a major part of the Caribbean operation. She began to sense "Okay, I'm not sure that Tim's girls are anything more than a pretty face."

206. Righter was paired with Matthew Cooper in the British Virgin Islands operation. Righter stayed on a private island owned by Britini Turner and Jeremy Locke of Aerial Recovery. While she was on the island, she did not feel free to leave on her own. She only had access to her personal credit card and would not have been able to fund leaving the island on her own if necessary. She relied entirely on Tim and Ariel Services for transportation.

207. The accommodations there were lavish, and she learned that Tim had grown accustomed to traveling that way.

208. Righter began to grow concerned about the operational safety almost immediately. She learned Tim took an untrained hairstylist into a meeting with a cartel in Mexico and then sent her through customs on a commercial flight with a recording of the meeting on her phone. Tim lost track of which operator had which burner phone, and he texted her sexually suggestive messages. Tim also directed Righter to engage in communications with a foreign national that could encourage him to traffic women and girls that were not already trafficked. Righter described Tim's planning and execution as "amateurish and dangerous."

209. She learned that Tim carried the heavy weight of believing he was a "prophet of God," and that coupled with running O.U.R. and "being famous" required him to travel with a therapist, which Righter appreciated.

210. She learned that Tim ran the operation based on "revelation." During their first week on the island, Tim sequestered himself and received what he called "downloads from God. When he "emerged from prayer," he would tell his team he was receiving "important missives" from heaven. "Powerful information today, guys," he'd say.

211. Tim gave Righter and Matt Cooper constant pressure to “practice” their chemistry. Walking by them, he would ask “Why aren’t you guys touching each other?” She remembers a “shitty, nasty grin” spreading across his face when he walked past the two reclining on a couch. Righter began to suspect that Tim wanted to catch her in the act with Cooper. He would consistently surprise them, give them nods and winks, and encourage them to “get close.” When they spent a few days living aboard a private Catamaran, Tim unexpectedly “burst into the room” three to four times each night. She and Cooper were fully clothed. She thought that it was “weird, and inappropriate, and creepy.”

212. Righter kept waiting for training. She expected that at some point, she would be trained, and she was told “not to worry” when asking tactical questions about the mission. She was told that there would be plenty of time for training later. She began to suspect that she was not being trained on tech and policies “because there were none.”

213. Righter heard about a 70-page “target report” that provided intelligence on the basics of their operation. When she asked to view it, she was told “that [Tim] believed reading the report was a waste of time.” “God,” he said, “would tell them who their targets were.”

214. Tim was distracted and aloof. He spoke about his thoughts and feelings and how difficult everything was for him; he ruminated on people “who said bad things about him.”

215. Righter explained that, citing “God’s will,” Tim assigned her “on the fly” to be the primary contact with a suspected trafficker. That happened only hours before they were set to meet with him. Tim told Righter that according to a “spiritual download he had received,” she would be carrying the weight of the operation. She would interact with the suspect, ask him to set up parties with women, and maintain a relationship with him via an OUR-provided burner phone—even after she returned to the United States.

216. This concerned Righter, because it meant that rather than finding women who had already been trafficked, she could potentially be “creating a market” for trafficking victims.

217. Then Tim began texting her sexually charged message on her burner phone. She discovered that Kailyn had been using that phone in Mexico, and that Tim was now confused about which operator had which phone. This disclosed a “worryingly poor level of operational security—not only couldn’t OUR keep track of which operative kept which phone, she’d been provided with a potentially compromised one.” This compromised Righter’s personal safety, in her mind: “These things are digitally trackable. If the cartels were on to them and watching, they would know precisely where this fucking phone was if they wanted to.”

218. It also concerned her that the photos her suspected trafficking contact sent her could potentially contain child pornography. “I know damn well at this point that we don’t have any permission,” she said. “I know absolutely that if I’m sent child sexual abuse material I’m in big fucking trouble.” Righter called and asked the Caribbean coordinator what to do, but her faith in the organization was so low, that she decided to hold onto the phone rather than turn it in as asked. “If I send it back, they’re just going to wipe the phone and give it to some other dipshit operator, like me.”

219. When Righter expressed her concerns to O.U.R. employee Matt Osborne—telling him that Tim was “crazy as hell and dangerous”—Matt responded that “the best they could do was try to keep him from doing too much harm to himself or others.”

220. Righter was badly injured at an O.U.R. training when a man “twice her size” drove his knee into her eye, crushing “her orbital bone and knocking her eye out of alignment.”

221. According to the *Vice* article, O.U.R. “raked in a quarter of a billion dollars in donations over a decade by depicting volunteers like [Righter] as the thin line protecting thousands of women and children from sexual slavery.”

222. Tim continues to commit his shams worldwide, being involved in bribing an Argentine cabinet member,⁴³ threatening his victims with guns in Mexico while intoxicated,⁴⁴ and blaming the assassination of an Ecuadorian politician on one of his victim’s husbands.⁴⁵

⁴³ https://drive.google.com/file/d/14XIDYyYrdGgmNGllpibtHw8HRvnaOU5m/view?usp=drive_link
Slide 34.

See also Exhibit T, attached hereto.

⁴⁴ https://drive.google.com/file/d/1aRLch3za08kuzYbWCvRE9IOrJeRHeYEZ/view?usp=drive_link
See also Slide 19 of Exhibit G.

https://drive.google.com/file/d/1Y_3TrGXMy3ir0W2BaO16JmZhHqqPYVH/view?usp=drive_link
See also Slide 20 of Exhibit G.

https://drive.google.com/file/d/1eExB3DCriwm8iYv1cgOihG_Cb5jVibp/view?usp=drive_link
See also Slide 21 of Exhibit G.

⁴⁵ https://drive.google.com/file/d/1SduFbdvRB1P1qevpWdHyiqR1_RIc7mKU/view?usp=drive_link
See also Slide 22 of Exhibit G.

COMPLAINT

FORCED LABOR

Against all defendants

223. Plaintiffs re-allege and incorporate by reference all preceding paragraphs.

224. This action is brought under the Trafficking Victims Protection Reauthorization Act of 2003 (TVPRA), which provides a civil remedy for victims of trafficking “with respect to peonage, slavery, involuntary servitude, or forced labor.” 18 U.S.C. §§ 1590, 1595.

225. Tim Ballard and the other Defendants knowingly recruited, transported, harbored, and engaged Plaintiffs for labor and services through means of fraud, coercion, and deception, in violation of 18 U.S.C. §§ 1589 and 1590, or are beneficiaries of their participation in The Couples Ruse.

226. Defendants used The Couples Ruse to fraudulently induce Plaintiffs’ forced labor in direct violation of the federal Trafficking Victims Protection Reauthorization Act.

227. Plaintiffs were recruited by Tim Ballard and Defendants to participate in a scheme intended to cause them to believe that if they did not perform the labor or sexual services contracted to perform, that others would suffer serious harm.

228. Defendants’ conduct has caused severe emotional, psychological, and physical harm to Plaintiffs.

229. Plaintiffs are entitled to compensatory and punitive damages as well as attorney fees and costs under the TVPRA.

SEX TRAFFICKING BY FORCE, FRAUD, OR COERCION

Against all defendants

230. Plaintiffs re-allege and incorporate by reference all preceding paragraphs.

231. This action is brought under the Trafficking Victims Protection Reauthorization Act of 2003 (TVPRA), which provides a civil remedy for victims of trafficking “with respect to peonage, slavery, involuntary servitude, or forced labor.” 18 U.S.C. §§ 1591.

232. Tim Ballard and the other Defendants knowingly recruited, transported, harbored, and engaged Plaintiffs for sexual services through means of fraud, coercion, and deception, in violation of 18 U.S.C. §§ 1589 and 1590, or are beneficiaries of their participation in The Couples Ruse.

233. Defendants used The Couples Ruse to fraudulently manipulate Plaintiffs’ to provide sexual services in direct violation of the federal Trafficking Victims Protection Reauthorization Act.

234. Defendants’ conduct has caused severe emotional, psychological, and physical harm to Plaintiffs.

235. Plaintiffs are entitled to compensatory and punitive damages as well as attorney fees and costs under the TVPRA.

PRAYER FOR RELIEF

This Court should enter judgment against Defendants and award Plaintiffs the following relief:

- 236. Compensatory damages for physical, emotional, and psychological injuries sustained by Plaintiffs;
- 237. Punitive damages to punish and deter future unlawful conduct;
- 238. Reasonable attorneys' fees and costs as provided by law;
- 239. Any such further relief as this Court deems just and proper;
- 240. Any other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all issues so triable.

DATED: November 21, 2025.

/s/ Alan Mortensen

ALAN MORTENSEN

Counsel for Plaintiffs

/s/ Suzette Rasmussen

SUZETTE RASMUSSEN

Counsel for Plaintiffs