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**IN THE FOURTH JUDICIAL DISTRICT COURT  
UTAH COUNTY, STATE OF UTAH**

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TIMOTHY BALLARD,

Plaintiffs,

v.

AMY MORGAN DAVIS

Defendant.

**DEFENDANT'S ANSWER**

Civil No.: 240404685

Judge: Denise M. Porter

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Defendant Amy Morgan Davis, by and through counsel, hereby answers  
Plaintiff's Complaint and alleges as follows:

**INTRODUCTION**

Timothy Ballard has brought this case in retaliation to being held accountable for

his sexual harassment, grooming, battery and assaults, and COUPLES RUSE fraud. The entire text thread<sup>1</sup> between Ballard and Defendant show that Ballard was using his modus operandi of trafficking and grooming women and then discarding them:

1. He meets a woman he finds attractive.
2. He suggests that there is an upcoming OP in a foreign country and that she would be perfect as his COUPLES RUSE partner.
3. He sends his trusty side-kick, Matt Cooper, to have the woman sign an NDA.
4. He explains that the COUPLES RUSE requires he and the woman to practice in compromising situations in strip clubs, both in and outside of Utah.
5. Once the woman questions his tactics, he reports her to OUR management and ghosts the woman.

Ballard has used this grooming tactic with JJ, Kira Lynch, Celeste Borys, Sashleigha Hightower, Krista Kacey and Mary Hall and others.

Had Ballard chosen to attach all the texts between he and the Defendant, it would be observed that Ballard was asking Defendant to go to strip clubs and exotic massage parlors. Defendant declined as she was uncomfortable. He was telling others within OUR that he really wanted to go on an “OP” with Defendant because he found her to be attractive. People within OUR told Ballard, in texts and verbally, to stay away from Defendant because she has a traumatic brain injury and should not be taken to a third

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<sup>1</sup> See [https://drive.google.com/file/d/1dqVG1MNYHU0Z3vaiwYJ8X\\_IK5Xp2eup1/view?usp=drive\\_link](https://drive.google.com/file/d/1dqVG1MNYHU0Z3vaiwYJ8X_IK5Xp2eup1/view?usp=drive_link) for the entire text thread. Hard copies are attached hereto as Exhibit A.

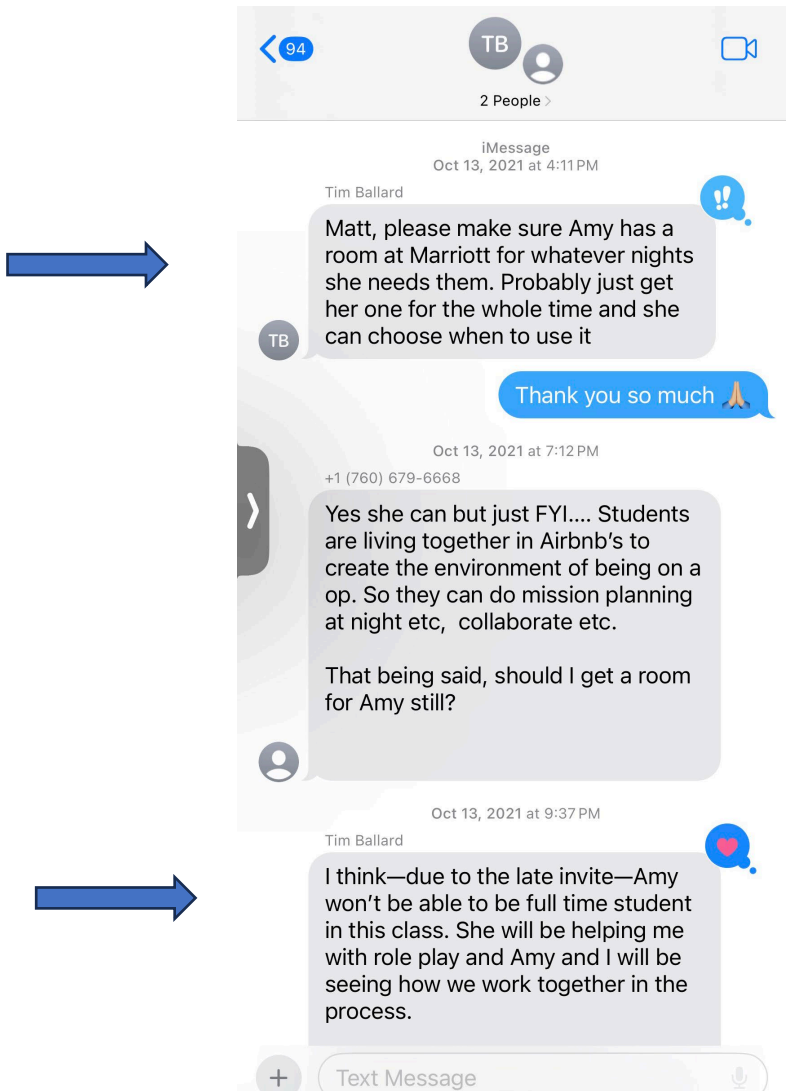
world country and placed in dangerous conditions. Ballard ignored them as he often did and began grooming Defendant. After getting Defendant to sign an NDA to be “trained”, Ballard was begging Defendant to go to strip clubs with him to “practice” the COUPLES RUSE.











Ballard begged and pressured Defendant to come to his phony training at the downtown Marriott, where she believed she was going for legitimate training, not understanding that he was grooming her and that the COUPLES RUSE was a tactic that Ballard invented from scripture study and prayer for his sexual gratification. At that hotel, with NDA's in hand and appearing to be a legitimate anti-trafficker, Ballard sexually assaulted Defendant. Not realizing that his sexual touching was not part of any legitimate training and after being ghosted by Ballard, she tried to show him she could be

flirtatious with him. Ballard uses these texts of her trying to prove herself worthy of being an “Operative” to try and destroy this woman as he is doing to the other women he has sexually assaulted.

### **FIRST AFFIRMATIVE DEFENSE**

Plaintiff’s Complaint should be dismissed with prejudice for failure to state a claim upon which relief can be granted.

### **SECOND AFFIRMATIVE DEFENSE**

With respect to the specific allegations of Plaintiff’s Complaint, Defendant hereby admits, denies or otherwise states as follows:

1. Defendant denies paragraph 1. Ballard performs fake raids, hires escorts for his own sexual pleasure, and paints it as undercover investigative operations whereby he claims he has rescued prepubescent children and women from sex slavery so he can make movies and books.
2. Defendant admits paragraph 2.
3. Defendant admits paragraph 3 in that this is a Court of general jurisdiction.
4. Defendant denies that venue is proper, as the location of where Ballard sexually assaulted Defendant was in Salt Lake County.
5. Defendant denies paragraphs 4-31.
6. Defendant admits paragraph 32.
7. Defendant denies paragraphs 33-37.

### **THIRD AFFIRMATIVE DEFENSE**

The truth is a defense to defamation claims. The truth is that Ballard is a serial sex predator and he groomed, sexually assaulted, and attempted to traffick Defendant.

### **FOURTH AFFIRMATIVE DEFENSE**

To the extent Plaintiff is requesting punitive damages against Defendant, such damages must be stricken because Defendant did not engage in any intentionally fraudulent or willful and malicious conduct nor did she engage in any conduct manifesting a knowing and reckless indifference toward and disregard of the rights of others.

### **FIFTH AFFIRMATIVE DEFENSE**

Any award for punitive damages must be stricken or reduced by remittitur or other similar judicial process to the extent such award fails to (1) bear a reasonable and rational relationship to plaintiff's proven actual damages and/or (2) fall within accepted ratios between actual damages and punitive damages.

### **SIXTH AFFIRMATIVE DEFENSE**

Any punitive damages award must be stricken as excessive and unconstitutional pursuant to the Due Process Clause of the Fourteenth Amendment to the United States Constitution and/or Utah Constitution.

### **SEVENTH AFFIRMATIVE DEFENSE**

Plaintiff's punitive damage request must be stricken pursuant to the Excessive Fines Clause of the Eighth Amendment to the United States and/or Utah Constitutions.

DATED this 26 day of September, 2024.

**ALL UTAH LAW PLLC**

/s/ Suzette Rasmussen  
Suzette Rasmussen

**MORTENSEN MILNE**

/s/ Alan W. Mortensen  
Alan W. Mortensen  
Christopher J. Cheney

Plaintiffs' Address:  
c/o MORTENSEN/MILNE  
68 South Main Street, Suite 700  
Salt Lake City, UT 84101

# **EXHIBIT A**



Tim >

Oct 13, 2021 at 10:08 PM

Any questions at all?? 10:08 PM

I'll be at Marriott hotel from like noon on.....the official opening session I believe is like 5p 10:09 PM

So if u can come before that would be aweome. We have a lot more to talk about to prep 10:09 PM

If not we will start up training after the session 10:09 PM

Well there is a lot to talk about...I honestly have no idea what to ask really good all seems very different to me but I'm happy to try 10:18 PM

Ok. We will talk tomorrow 10:26 PM

Any way you can come before 5 10:26 PM

No I have work until 6pm 10:39 PM

K. See u when I get there 10:46 PM

Just text 10:46 PM

You\* 10:47 PM

Okay sounds good. Is it ok if I come



2:20

49

New iMessage

Cancel

To: (760) 679-6668

Oct 7, 2021 at 12:11 PM

I can try! It's a little hard with my schedule but I'll have time after 3pm



Ok



Oct 8, 2021 at 3:48 PM

I'm so sorry...last night my cold progressed. Wondering if Monday is possible or even tmr (Saturday) to meet



Monday

Thank u



Oct 8, 2021 at 5:43 PM

Text me your email

[Amymorgantalent@gmail.com](mailto:Amymorgantalent@gmail.com)

Your last name is Morgan?

Middle



iMessage



2:20

49

New iMessage

Cancel

To: (760) 679-6668

iMessage  
Oct 5, 2021 at 2:28 PM

Hey Amy this Matt with OUR. Are you able to make it today?

Hi Matt! So today is my day off but if you can't wait around I'm also free Thursday - I'm just finishing an appt in Layton and then was going to head over but whatever works bestb

What time do you think you can be here?

Is 4 okay?

Let me see

Or 3:30pm

3:30 or 4 is ok

Thx so much

Let me know when you pull up

Ok I'm my way

FTA?

+ iMessage



I invited u late to this so I don't want to get in the way of your schedule



10:50 PM

My plan was to hang out after the session which ends around 8 or so. Then we can talk and do some practicals at bars or something

10:51 PM

But I can flex around your schedule

10:51 PM

Who's your therapist

10:52 PM

I'm Always looking



10:52 PM

Funny, one of the couples ruse we do is in massage parlors. Couples massage in order to infiltrate and get intel about girls they sell

10:52 PM

We have our couples in massage places to practice



10:53 PM

It it has to be a place that doesn't know u of course



10:53 PM

Oh it's just with message envy

10:56 PM



iMessage





Tim >



Over communication is best

8:52 PM

We will have lots of time to talk  
Thursday too.....or whenever this  
week if u want to stop by



8:53 PM

One min

9:08 PM

exotickittyslc.com



9:32 PM

9:32 PM

Oct 11, 2021 at 10:44 PM

I'm just getting home...I'll message  
u on breaks tmr 🤔

10:44 PM

Oct 12, 2021 at 8:13 PM

Tim...

8:13 PM

Hey!!!

8:14 PM

You good???

8:14 PM

Don't you be bailing on me now 😊

8:15 PM

No! Of course not

8:18 PM

Yes I'm good...just long days

8:18 PM

Good!!!

8:18 PM



iMessage



Cash



Oct 12, 2021 at 8:13 PM

Tim... 8:13 PM

Hey!!! 8:14 PM

You good??? 8:14 PM

Don't you be bailing on me now 😊 8:15 PM

No! Of course not 8:18 PM

Yes I'm good...just long days 8:18 PM

Good!!! 8:18 PM

I've been sick and watching kids and doing my mom's hair late last night then really morning...just always so much 8:19 PM

I'm sorry 8:19 PM

All good!! 📢❤️ 8:20 PM

We may want to do some practice before the scenarios 8:21 PM

Yes 8:21 PM

I'm not sure I can go to a strip club



Tim >



know u of course

10:55 PM

Oh it's just with massage envy

10:56 PM

Meaning, we sometimes practice in Utah or somewhere in US

10:56 PM

So we are ready for real deal in foreign target

10:57 PM

Hmm I see...

10:57 PM

I mean I'm happy to practice

10:57 PM



Let's talk all about this when u get in tomorrow

10:58 PM

Oct 14, 2021 at 4:03 PM

How are you

4:03 PM

How's your schedule looking today

4:03 PM

No pressure in any thing

4:03 PM

Not wrapped in set yet...

4:13 PM

On set\*

4:24 PM

Oct 14, 2021 at 6:22 PM

iMessage input field with camera, app store, cash, and other app icons below it.

4:19 🚗



< 242



Tim >



Ohhhh haha I'm not sure

6:30 PM

One min

6:30 PM

5

6:30 PM

I'm outside

6:30 PM

And rhying

6:31 PM

Oct 6, 2021 at 10:53 PM

WOW. What an incredible show - I got a little teary toward the end... worth the drive to see it 🙌 It was so inspiring to see everything in action 🎬🕶️❤️ Thank u for inviting me. I wanted to hear you speak but had to run right when the movie ended. Talk soon

10:53 PM

Oct 7, 2021 at 8:14 AM

So glad you liked it!

8:14 AM

When u free tomorrow? We may do some more interviewing and maybe some hand to hand combat stuff with coop

8:15 AM

Combat!?

9:05 AM



iMessage



We need to get together and talk more and show u videos and over communicate everything to make sure you are 100 comfortable with how this all works

8:27 PM

Do u have any other thoughts? Questions? We can start with why the strip club scene wouldn't work for u.....then back into from there

8:36 PM

Everyone agreed strip club too much for the training. We just want to make all the candidates as uncomfortable as possible to see how they do

8:37 PM

Simultaneously u and I will figure out how we do together going up against the candidates who come in

8:37 PM

When are u free again

9:01 PM

I'm free tmr for a bit

9:05 PM



iMessage



2:20

49

New iMessage

Cancel

To: (760) 679-6668

Your last name is Morgan?

Middle 😊

Ok. What's your last name. Going to email you some stuff

For the training



Amy Davis

Sounds like they already sent you paper work for the training. Get that filled out and returned as soon as you can

Training starts Thursday

Okay yes I'll work on that tmr first thing

Delivered

Thanks



Oct 13, 2021 at 10:20 AM

Hey Amy have you been able to complete sign up process? Any question on the training sign up



iMessage





Tim >



How long are the trainings?

7:41 P

Evenings?

7:41 P

Thursday night- Sunday afternoon

7:41 P

But u can skip around things

7:42 P

Okay nice. Thank you ❤️

7:42 P

Friday and sat night and Sunday will be scenarios

7:42 P

Also—if you like it as we are working together, may have op second week November in Dominican Republic

7:43 P

Will u at karate be free Friday and sat night

7:44 P

At least\*

7:44 P

Or one of those nights?

7:44 P

Just need to plan . U of course are welcome to attend it all.....baby just let me know when u for sure are in

7:44 P

Maybe\*

7:44 P



iMessage



Oct 26, 2021 at 3:47 PM

Tell me when to come k!

3:47 PM

Hey! Are you a sound Thursday

4:30 PM

Matt and I will be in Draper Our gym to do some training

4:31 PM

I have a job dang it...maybe that night? If you're free

4:41 PM

What time u done

4:43 PM

Waiting for my call sheet but I'll message you as soon as I know k

4:55 PM

Oct 28, 2021 at 7:39 PM

Just wrapping on set today...it was a long ahooot 😓

7:39 PM

Tell me if you want me to come tmr k 🙏

7:42 PM

Nov 3, 2021 at 4:47 PM

I have a break tmr 😊

4:47 PM

Hey! How are you? We are out of town this week.

5:10 PM



iMessage





Tim >



Simultaneously u and I will figure out how we do together going up against the candidates who come in

8:37 PM

When are u free again

9:01 PM

I'm free tmr for a bit

9:05 PM

I don't want to push it

9:08 PM



Better to just wait until Thursday after the opening session?

9:08 PM

We can get u a hotel room city creek Marriott. The classroom stuff is at the hotel and the practicals in SLC

9:09 PM



We can run though some practice after the session Thursday night. Maybe hit some clubs and stuff to get our groove and plan together

9:09 PM

What's your opening tomorrow

9:10 PM



Sorry to bombard u.....do u have or know where we can get magnet earrings. Chain necklace. And tatoo

9:41 PM

Maybe temp hair dye

9:41 PM



iMessage



2:13



< 94



2 People >

Yes that will be perfect 🙏

Tim Ballard

We will do practice scenarios at night, k?

TB

Which will prep us for scenarios on Friday and/or Saturday

TB

So bring club type clothes. I'll be in earrings, tattoos etc

Oct 14, 2021 at 7:31PM

Matt should I still plan for tonight at the Marriott? Do you mind sending the address? If not no worries I'll be free this weekend.

Thanks again 😊

Tim Ballard

Let's plan to do one on one training tomorrow night. Good?

Your room is booked so feel free to come tonight or whenever

TB

Confirming: Matt, her room is open right?

Oct 14, 2021 at 10:48PM

+1 (760) 679-6668



Text Message



Oct 13, 2021 at 9:37 PM

Tim Ballard



I think—due to the late invite—Amy won't be able to be full time student in this class. She will be helping me with role play and Amy and I will be seeing how we work together in the process.

So as to avoid any issues or questions as to why Amy gets to skip out on certain classes, best to get her a room at Marriott. Make sense ?



+1 (760) 679-6668

Yes

Tim Ballard



So she will be more like "staff" then student.



Sound good Amy?

Yes that will be perfect 🙏

Tim Ballard

We will do practice scenarios at night , k?



Which will prep us for scenarios on Friday and/or Saturday



Text Message

2:12



< 94



2 People >

iMessage  
Oct 13, 2021 at 4:11 PM

Tim Ballard



Matt, please make sure Amy has a room at Marriott for whatever nights she needs them. Probably just get her one for the whole time and she can choose when to use it

TB

Thank you so much 🙏

Oct 13, 2021 at 7:12 PM

+1 (760) 679-6668

Yes she can but just FYI.... Students are living together in Airbnb's to create the environment of being on a op. So they can do mission planning at night etc, collaborate etc.

That being said, should I get a room for Amy still?



Oct 13, 2021 at 9:37 PM

Tim Ballard



I think—due to the late invite—Amy won't be able to be full time student in this class. She will be helping me with role play and Amy and I will be seeing how we work together in the process.



Text Message

Coop will bodyguard / chaperone 8:32 PM

Okay 8:44 PM

So....like a real club 8:44 PM

Hells yeah!!! 8:50 PM

Aren't u excited 8:50 PM

The candidates will be instructed to access kids through the trafficking couple who offices in a bar or strip club, etc. we will be playing that couple 8:51 PM

If we pull it off and it works....we will be slotted to go operational second week of November in DR 8:52 PM

Ask any questions that come to mind 8:52 PM

Over communication is best 8:52 PM



We will have lots of time to talk Thursday too.....or whenever this week if u want to stop by 8:53 PM

One min 9:08 PM

exotickittvsle.com 📍 9:32 PM

We may need to practice a bit before the scenarios begin..... 8:04 PM

We will probably set up in a dirty bar or club.....cool? 8:04 PM

We can practice Thursday night after the training opening. Then we can work it Friday-Sunday 8:10 PM

Okay yes sounds like something I've never done before haha 8:20 PM

That's what we will practice first 😊 8:23 PM

😊 8:24 PM

Let's go clubbing Thursday night, 8:26 PM

Find our groove in dirty places 8:26 PM

Wow that would be definitely or of my groove! Haha 8:27 PM

Coop will bodyguard / chaperone 8:32 PM

Okay 8:44 PM

So...like a real club 8:44 PM

4:11 🚗



< 241



Tim >



Oct 20, 2021 at 6:47 PM

Cool! I'll let coop know. I'm out of town this week.....but coop may be available for training!

6:47 PM

iMessage

Oct 20, 2021 at 11:19 PM

How about next week? I'm home all next week we can meet in the OUR gym and Matt can train u and we can chat



11:19 PM

Let me know what day next week we can chat and workout with coop. We have a badass gym in Draper



12:10 AM

Oct 21, 2021 at 10:58 AM

Tuesday or Wednesday I'm free so far...I'll plan on one of those days



10:58 AM

Oct 26, 2021 at 3:47 PM

Tell me when to come k!

3:47 PM

Hey! Are you a sound Thursday

4:30 PM

Matt and I will be in Draper Our gym



iMessage



Cash



4:17 🚗



< 241



Tim >



I'm sorry!! I didn't know u were back. Let's chat in the am. And we can talk about scenarios tomorrow night.

1:29 AM

Text when u are up and ready to hang

1:30 AM

We don't start session until 10am

1:30 AM

Okayyy 🙌

1:31 AM

Oct 16, 2021 at 10:10 AM

Morning! ☀️

10:10 AM

Oct 16, 2021 at 1:43 PM

I just got rejected haha

1:43 PM

I thought we were doing demonstrations/clubbing tonight and working together but maybe I was confused. So sorry - I didn't realize it was all day training or would have made sure to be there.

1:46 PM



Coming up now...#1014

2:31 PM

Oct 17, 2021 at 5:17 PM



iMessage



4:12 🚗



< 241



Tim



Oct 15, 2021 at 12:15 AM

Hey! 12:15 AM

I'll be at hotel in 5min 12:15 AM

Wanna chat or wait until tomorrow 12:15 AM

Sorry I was washing my face 😊 12:19 AM

No problem 12:21 AM

I'm just getting back to hotel 12:21 AM

Wanna hang for a bit? Or do u.  
We'd to crash 12:21 AM

Coop has some paperwork to bring  
to u so we can be ready for  
tomorrow. 12:37 AM

He's coming to u 12:37 AM

Oct 15, 2021 at 10:10 AM

Is there complimentary bf this  
morning I think I missed it - I'm so  
tired still 10:10 AM

Oct 15, 2021 at 12:59 PM

Sorry just saw this 12:59 PM



iMessage



4:10 🚗



< 241



Tim >



Nov 22, 2021 at 1:41 PM

Hey!! No not you AT ALL. I'm not partnering with anyone at all. I'm totally out of doing undercover work altogether. Had I stayed in, for sure I would have loved to partner with you. We would have killed it together!

I'll check out Startup!



Hope you are doing well!

Dang! I definitely feel Rejected haha

...I get it. You're busy.. you have a family. I'm just a nobody trying keep up with people like you. Doing my thing- making my own living! I'm just proud to say I am there and it's taken a hell of a lot of work. On my own without the help of anyone. So for whatever that's worth! I'm

Completely fine standing alone.

And btw I came to that event to support you. Because I was impressed with you and you invited me. And then nothing. And now this. Just seems misleading



iMessage





Tim >



what's your opening tomorrow

3:40 PM

Sorry to bombard u.....do u have or know where we can get magnet earrings. Chain necklace. And tatoo

9:41 PM

Maybe temp hair dye

9:41 PM

I need u to get me all disguised up before we hit the streets

9:41 PM

Oct 13, 2021 at 3:56 PM

Hey

3:56 PM

Did u want us to get u a hotel room At Marriott city creek? All the candidates are staying there

3:56 PM

And meetings are there

3:56 PM

For tmr?

3:57 PM

Thursday- Sunday

3:57 PM

I can stay tmr night yes

3:59 PM

Sounds like a nice break actually

3:59 PM

What about the other nights. U gonna be training with me Friday and Saturday too??

4:00 PM

iMessage input field with camera, app store, cash, and other app icons at the bottom of the screen.



Tim >



Oct 13, 2021 at 3:56 PM

Hey 3:56 PM

Did u want us to get u a hotel room  
At Marriott city creek? All the  
candidates are staying there 3:56 PM

And meetings are there 3:56 PM

For tmr? 3:57 PM

Thursday- Sunday 3:57 PM

I can stay tmr night yes 3:59 PM

Sounds like a nice break actually 3:59 PM

What about the other nights. U  
gonna be training with me Friday  
and Saturday too?? 4:00 PM

Yes of course 4:05 PM

Just not all day 4:05 PM

I'll double check on times ok 🤗 4:05 PM

😊 🙏 4:06 PM

📷 🗨️ iMessage 🎤



4:17 🚗



< 241



Tim




Oct 11, 2021 at 7:35 PM

Hey!

7:35 PM

How are you

7:35 PM

Kids gone? Cold gone? 

7:36 PM

Aww yes...and I had a modeling job today. Tmr starting the 3 day makeup job and then I'm free 🙏

7:40 PM

Feeling much better. Sister gets home tonight..

7:40 PM

Great!!

7:40 PM

So you free Thursday-Sunday? I'm planning some of the scenarios we will work together

7:41 PM

How long are the trainings?

7:41 PM

Evenings?

7:41 PM

Thursday night- Sunday afternoon

7:41 PM

But u can skip around things

7:42 PM

Okay nice. Thank you ❤️

7:42 PM

Friday and sat night and Sunday will

7:42 PM



iMessage

