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IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH

<p>CELESTE BORYS and MICHAEL BORYS, Plaintiffs, v. TIMOTHY BALLARD, et al., Defendants.</p>	<p>PLAINTIFFS' MOTION FOR AN ORDER TO HAVE THE UTAH STATE CRIME LAB RELEASE THE DNA REPORT</p> <p>(Hearing Requested)</p> <p>Case No. 230907663 Judge Todd M. Shaughnessy</p>
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Plaintiffs, by and through counsel of record, hereby moves this Court for an order, requiring the Utah State Crime Lab to release the DNA Report from the semen left on Plaintiff's skirt.

RELEASE REQUESTED:

That this Court issue an order that the Utah State Crime Lab Release State Crime Lab Report.

STATEMENT OF FACTS

1. In January of 2023, Plaintiff Celeste Borys was Ballard's Executive Assistant and his COUPLES RUSE partner, while both Ballard and Ms. Borys were employed by Defendant Operation Underground Railroad.
2. Ballard has made it very clear that the COUPLES RUSE had rules so that he could maintain his covenants with his wife Katherine.¹
3. A reading by Ballard's psychic Janet Russon indicates that because Ballard was a "prophet," he did not have to obey the COUPLES RUSE rules.²
4. Beginning in November of 2022, Ballard started using the COUPLES RUSE to sexually assault Plaintiff Celeste Borys, who believed that Ballard was being honest that this was a legitimate undercover tactic.
5. At the same time, another COUPLES RUSE partner, JJ, came forward with text messages that indicated that Ballard was having sexual relations with JJ.
6. At the same time, Ballard came to Plaintiff and explained that they needed "to sit down and talk about how to balance ops/HP relationship vs. CEO/EA relationship. We need to be very careful! We need to compartmentalize. So much hangs in the balance! At

¹https://drive.google.com/file/d/1yCIUGyGBjUMeGRJ1JUeH7C3LUsf4jjNT/view?usp=drive_link

²https://drive.google.com/file/d/1TM7UeSx84cdHQZENIFoJGDL6DFNFxqGN/view?usp=drive_link

least I knew this – I have an almost impossible – to- understand faith and trust in you that usually takes almost a lifetime for me to get with someone.”³

7. During one of these sexual assaults in Lindon, Utah County, Utah, Plaintiffs allege that Ballard ejaculated onto Celeste Borys’ leather skirt. Plaintiffs set forth this event in paragraph 150 of their first amended complaint.
8. Ballard responded in his answer by denying “that he ever assaulted Ms. Borys, on any date” and by self-servingly claiming that “Ms. Borys is simply upset that she had fallen in love with Mr. Ballard, that Mr. Ballard did not feel the same way about her and is now seeking to blame him”⁴
9. On or around November 1, 2023, Plaintiff Celeste Borys reported a sexual assault to the Utah County Sheriff’s Office (UCSO).⁵
10. On or around November 20, 2023, as part of the ongoing investigation, Petitioner provided an article of clothing to UCSO.
11. That article of clothing was sent to the Utah State Crime Lab for testing.
12. The Utah State Crime Lab identified a sperm sample on the article of clothing.
13. Over two weeks ago, the Utah County Detective verified to Plaintiffs, that the DNA was a match to Ballard’s DNA.⁶
14. As a sex assault victim, Plaintiff believes she is entitled to the results.⁷
15. Plaintiff has requested law enforcement to provide the results to her.

³ See Text Messages, attached hereto as Exhibit A.

⁴ See Answer at ¶ 150.

⁵ See Lindon Police Initial Report, attached hereto as Exhibit B.

⁶ See Text Message, attached hereto as Exhibit C.

⁷ See Text Message, attached hereto as Exhibit D.

16. However, law enforcement has declined to provide Ms. Borys the test results for the time being as there is a pending criminal investigation.⁸
17. Plaintiff has sent a GRAMA request to obtain the results.⁹
18. At the same time, Ballard has released social media posts, raging about having a cache of arms and shooting people in vital organs, causing Plaintiff great fear given that she has been assaulted multiple times by Ballard.¹⁰
19. In order to protect Ms. Borys and the general public from Ballard, Plaintiffs' counsel has asked both the Utah County and Salt Lake District Attorneys for the DNA results, with no response from either.¹¹
20. The Utah State Crime Lab Report regarding the article of clothing and DNA analysis thereof is necessary to prove or disprove elements of these claims, especially the pending equitable motion to terminate this case filed by Defendant Ballard, and the underlying merits of sexual assault.
21. Public Interest in the Utah State Crime Lab Report outweighs any privacy concerns regarding its release.

LAW AND ARGUMENT

Defendant Timothy Ballard has filed a motion to terminate this case, claiming that Ms. Borys stole documents from him. Ballard paints himself as a world hero who has been sabotaged by his Executive Assistant Celeste Borys, who like other COUPLES RUSE partners, fell in love

⁸ See Text Message, attached hereto as Exhibit E.

⁹ See GRAMA Request, attached hereto as Exhibit F.

¹⁰ <https://drive.google.com/file/d/1xYr4NnJqlrg23388U7TRbR4MQJu1lNhN/view?usp=sharing>
https://drive.google.com/file/d/177Mi4So-TzRxORf27s7gNWCakT40i4mI/view?usp=drive_link
https://drive.google.com/file/d/1TOB2g7tF5nzL06ubSZOTampH2cKCF1_c/view?usp=drive_link

¹¹ See June 24, 2024 letter, attached hereto as Exhibit G.

with him. Plaintiffs have disputed this characterization, showing that Ballard is a serial sex assaulter and a man who uses donations from the public to conduct smear campaigns of everyone who dares cross him. The State Crime Lab Report is relevant to the present case, in order for this Court to take judicial notice that Mr. Ballard’s semen and DNA were found on Plaintiff’s skirt, after he has both legally and publicly denied that he ever had any sexual contact with Plaintiff Celeste Borys. The information is also relevant to the “stolen documents” arguments made by Ballard.

I. THE CLEAN HANDS DOCTRINE REQUIRES THAT THE DNA REPORT IS RELEASED.

Terminating sanctions are a remedy available under this Court’s “inherent equitable powers.”¹² “The unclean hands defense is an ‘ordinance that closes the doors of a court of equity to one tainted with inequitableness or bad faith relative to the matter in which he seeks relief....’”¹³ “The doors of a court of equity must be closed ‘to one tainted with inequitableness or bad faith relative to the matter in which he seeks relief.’”¹⁴” a high likelihood of helping to prove or disprove elements of the claims. The State Crime Lab Report will provide crucial forensic evidence, as it details the identification of a sperm sample on an article of clothing and has matched the sperm sample to the DNA of defendant Timothy Ballard. The evidence found in the State Crime Lab Report is likely to help determine the legal elements of these claims and is therefore relevant to the case.

¹² *Yan Sui v. Marshack*, 691 F. App’x 374 (9th Cir. 2017).

¹³ *Derma Pen, LLC v. 4EverYoung Ltd.*, 76 F. Supp. 3d 1308, 1321 (D. Utah 2014), quoting *Precision Instrument Mfg. Co. v. Automotive Maint. Mach. Co.*, 324 U.S. 806, 65 S.Ct. 993, 89 L.Ed. 1381 (1945).

¹⁴ *Dean Witter Reynolds Inc. v. Variable Annuity Life Ins. Co.*, 373 F.3d 1100, 1111 (10th Cir. 2004), Cf. *Adams v. Gateway, Inc.*, No. 2:02-CV-106 TS, 2006 WL 2563418, at *5 (D. Utah Mar. 22, 2006) (Sanctions should not be imposed where the petitioning party lacks clean hands).

II. **THE DNA EVIDENCE IS RELEVANT TO THE MERITS OF WHETHER BALLARD SEXUALLY ASSAULTED PLAINTIFF.**

Defendant has both publicly and, in the pleadings, denied that he ever inappropriately touched or sexually assaulted Celeste Borys. “DNA testing has an unparalleled ability both to exonerate the wrongly convicted and to identify the guilty.¹⁵” The DNA evidence is clearly relevant to the merits of the case and as such, this Court should order the report released.

III. **THE DNA EVIDENCE IS RELEVANT TO THE PUBLIC INTEREST AND PROTECTION.**

Ballard, and his wife Katherine, have successfully dismissed the claims of Katherine because, in part, she claimed that she was brought into the case to “silence her comments about important, **public issues**.¹⁶” Plaintiffs agree that the issue of whether Tim Ballard sexually assaulted the Plaintiff, and others, is a very important public issue.

Utah Code Ann. § 63G-2-202(7) states that protected records *shall* be released despite their protected status if their disclosure is in the public interest. “A governmental entity *shall* disclose a record pursuant to the terms of a court order signed by a judge from a court of competent jurisdiction...(d) to the extent...*the interests favoring access*, considering limitations thereon, *are greater than or equal to the interests favoring restriction of access*; and (e) where access is restricted by a rule, statute, or regulation...the court has authority independent of this chapter to order disclosure.” Utah Code Ann. § 63G-2-305(25) states and protects “records, other than personnel evaluations, that contain a personal recommendation concerning an individual if disclosure would constitute a clearly unwarranted invasion of

¹⁵ *Dist. Attorney's Off. for Third Jud. Dist. v. Osborne*, 557 U.S. 52, 129 S. Ct. 2308, 2310, 174 L. Ed. 2d 38 (2009).

¹⁶ See Katherine Ballard’s Motion to Dismiss the First Amended Complaint, at p. 1. (“Plaintiffs have sued Katherine Ballard to silence her comments about important, public issues.”)

personal privacy, or disclosure is not in the public interest.”

Here, the release of the Utah State Crime Lab Report is in the public interest, as its release would foster transparency and would provide crucial evidence in this case which could help to prove or disprove necessary elements of the claims.

In the case of *Deseret News Pub. Co. v. Salt Lake County*,¹⁷ reports detailing inappropriate sexual behavior by a Salt Lake County Clerk Office employee were requested but their release was denied. The Court found that “the public interest in governmental accountability will often prevail over the interest of insulating an official from unwanted intrusion into sexually related conduct. The legitimate public interest in the release of the Floros investigative report provides a separate and significant basis for releasing it.”

Here, the release of the Utah State Crime Lab Report is similar to the reports from *Deseret News Pub. Co. v. Salt Lake Cnty.*, as its release serves the public interest by promoting governmental accountability and would help to provide important context to the claims of this case.

CONCLUSION

Release of the Utah State Crime Lab Report would provide crucial forensic evidence to this case and help to prove or disprove elements of the claims. Furthermore, release of the Utah State Crime Lab Report is supported by Utah Code Ann. § 63G-2-101 *et. al.*, and the findings from *Deseret News Pub. Co. v. Salt Lake Cnty.*, as the interests favoring access are greater than or equal to the interests favoring restriction of access. The release of the DNA evidence would

¹⁷ *Deseret News Pub. Co. v. Salt Lake Cnty.*, 2008 UT 26, 182 P.3d 372.

foster increased transparency in the criminal justice system, and it will serve the public interest.

DATED this 12th day of July, 2024.

ALL UTAH LAW PLLC

/s/ Suzette Rasmussen

Suzette Rasmussen

Alan W. Mortensen

Christopher J. Cheney

Joshua S. Ostler

Mike Green

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of July 2024, I caused a true and correct copy of the foregoing to be filed electronically through the Court Green Filing system and served upon all counsel of record.

/s/ Audrey Taoipu

EXHIBIT A

9:48



TB >



that's what I am now 😎).....either way, I need to be re-registered for automatic internet and also I need to be getting the points that are mine: most sure why I was kicked off

I'm Really really happy you are my EA 🙏🥰🙏. It's perfect !

We need to sit down and talk about how to balance ops/ HP relationship vs CEO/EA relationship. We need to be very careful! We need to compartmentalize. So much hangs in the balance! At least I knew this ---I have an almost impossible-to-understand faith and trust in you that usually takes almost a lifetime for me to get with someone (I know few people who have been more bizarrely betrayed that I). But for some reason, I know you will NEVER. Can u believe I have only really known you since Fall of

last year!! WTF!?\$?

just want to have a very honest
and raw conversation this week ...
Is that ok?? Can u arrange it?



Text Message



10:06



TB



I don't know know what fucking do

I know that I will NOT bring her on
op. Bodyboard

No way

The only people I can Trust are
those who can compartmentalize

She can't

Also—she doesn't hVe the IT
factor for ops.

Selfishness

It would be Bad so bad. In her
head it would be like temptation
island reality tv show.

Edited

I'm not saying that to be mean.

You should say "what's op bodygurd" never heard

Too late for that



Text Message



9:56



TB >



Oh boy!

This isn't good.

My heart goes out to her because she is hurting. She's confused on so many levels and I know why. I can tell you on person. (from my perspective and my experience with this)

Aside from that what is she asking of you exactly? Leave your wife and you guys can be together? This isn't good or healthy. When you cut this off. BECAUSE you have to!!!! What is she going to do? Is she strong enough to get over it in a healthy way? I'll tell you how I think I can help?!

I found a place for your car. We have to take it before we head downtown. 3700 S 100 west

9:56



TB



She wants to go on ops so we can connect. Wtf !! That's not why we go undercover....it's about the mission. The chemistry stuff is important and helpful on many fronts....but it had to be about mission. And she's not good at it. She said she will learn how to , and then admits that she wants to do it for the other benefits

Yikes 🤔

She is being so selfish.

She can't do what u do. She can't pull it off! No way.

It's about her feelings now. It's always about saving kids. That's how we keep things in perspective. She is being so selfish.

I would never.

I don't want to hurt her ..but I need help to contain tbis



Text Message



EXHIBIT B



Lindon Police Department

Officer Report for Incident 23LI03824

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*****PROTECTED RECORD NOTICE*****

This document is a PROTECTED RECORD under UCA 63G-2-305(10),(11) and (25). Further or secondary release would interfere with an ongoing criminal investigation or case, jeopardize the life or safety of the individual, and/or is a clearly unwarranted invasion of personal privacy, Release or dissemination of any summaries, transcripts and video/audio recordings or CJC interviews are also prohibited unless authorized by UCA 77-37-4(5) and (6).

Nature: SEX ASSAULT

Address: 1280 W 200 SOUTH ST; delayed
1021

Location: LI500

Lindon UT 84042

Offense Codes:

Received By: Terry M PR

How Received: T

Agency: LIPD

Responding Officers:

Responsible Officers: Farley D (LI)

Disposition: ACT 11/01/23

When Reported: 16:00:01 11/01/23

Occurred Between: 15:57:27 11/01/23 and 16:00:56 11/01/23

Assigned To:

Detail:

Date Assigned: **/**/**

Status:

Status Date: **/**/**

Due Date: **/**/**

Complainant: 201867

Last: THOMPSON

First: CELESTE

Mid: MARIE

DOB:

Dr Lic:

Address:

Race:

Sex:

Phone:

City:

Alert Codes:

Offense Codes

Officer Report for Incident 23LI03824

Reported:

Observed: CITA Citizen Assist

Additional Offense: CITA Citizen Assist

Circumstances

ARBUS Business District

Responding Officers:

Unit :

Farley D (LI)

13J12

Responsible Officer: Farley D (LI)

Agency: LIPD

Received By: Terry M PR

Last Radio Log: **:** **/**

How Received: T Telephone

Clearance: RTI Refer To Investigations

When Reported: 16:00:01 11/01/23

Disposition: ACT **Date:** 11/01/23

Judicial Status:

Occurred between: 15:57:27 11/01/23

Misc Entry:

and: 16:00:56 11/01/23

Modus Operandi:

Description :

Method :

Involvements

Date	Type	Description	
11/01/23	Cad Call	16:00:01 11/01/23 SEX ASSAULT	Initiating Call

Officer Report for Incident 23LI03824

Reported:

Observed: CITA Citizen Assist

Additional Offense: CITA Citizen Assist

Circumstances

ARBUS Business District

Responding Officers:

Unit :

Farley D (LI)

13J12

Responsible Officer: Farley D (LI)

Agency: LIPD

Received By: Terry M PR

Last Radio Log: **:**:** **/**/**

How Received: T Telephone

Clearance: RTI Refer To Investigations

When Reported: 16:00:01 11/01/23

Disposition: ACT **Date:** 11/01/23

Judicial Status:

Occurred between: 15:57:27 11/01/23

Misc Entry:

and: 16:00:56 11/01/23

Modus Operandi:

Description :

Method :

Involvements

Date	Type	Description	
11/02/23	Name	RASMUSSEN, SUZETTE	Contact
11/02/23	Name	BALLARD, TIMOTHY BLAIN	Suspect
11/01/23	Name	THOMPSON, CELESTE MARIE	Complainant

Narrative

I spoke to the complainant who was requesting to set a meeting with an officer to report a sexual assault. The complainant stated she would feel better speaking to an Officer face to face. A meeting was set with a Detective for the next day. I have forwarded this case to investigations for the interview.

Responsible LEO:

Approved by:

Name Involvements:

Suspect : B89204

Last: BALLARD

First: TIMOTHY

Mid: BLAIN

DOB:

Dr Lic:

Address:

Race:

Sex:

Phone:

City:

Complainant : 201867

Last: THOMPSON

First: CELESTE

Mid: MARIE

DOB:

Dr Lic:

Address:

Race:

Sex:

Phone: ,

City:

Contact : 260330

Last: RASMUSSEN

First: SUZETTE

Mid:

DOB:

Dr Lic:

Address:

Race:

Sex:

Phone:

City:

EXHIBIT C

New iMessage

Cancel

To: Sargeant [REDACTED]



Sat, Jun 22 at 10:02 AM

Hi [REDACTED]

I hope your family event went well yesterday!

First, thank you for calling me on Thursday night to provide the results of Tim's DNA as a match with the semen on Celeste's skirt.

You stated you need to wait until next week to speak to your lieutenant because he's in Florida at a training in order to get the written verification to Celeste from the state crime lab, but she would like that report sent to her as soon as possible, or sent to me as per "deception."

EXHIBIT D

New iMessage

Cancel

To: Sargeant



You stated you need to wait until next week to speak to your lieutenant because he's in Florida at a training in order to get the written verification to Celeste from the state crime lab, but she would like that report sent to her as soon as possible, or sent to me as her "designee".

This statute provides the victim with the right to the information. Can you please provide that? Thank you! I know you understand how important this is to the victim.

EXHIBIT E

New iMessage

Cancel

To: Sargeant [REDACTED]



Fri, Jun 21 at 10:44 AM

Hi! Can we get the verification letter?

The crime lab does not provide anything to anyone other than law-enforcement. I will need to check with my Lieutenant before I can release anything and he is in training in Florida through next week. So I won't be able to do anything until I meet with him.

Detective [REDACTED] said that you reached out to him asking him for it. No other agency can release this information. We are trying to set up a meeting with all of us for next week.

EXHIBIT F

Crime Lab GRAMA Request :: C063191-071124

Utah Department of Public Safety <publicsafetyutah@govqa.us>

Thu, Jul 11 at 8:55 PM

To: [REDACTED]

Dear Celeste Borys:

Thank you for your interest in public records of Utah Department of Public Safety. Your request has been received and is being processed in accordance with the Government Records Access and Management Act (GRAMA), Utah Code Ann. § 63G-2-101 et seq. Your request was received in this office on 7/11/2024 and given the reference number C063191-071124 for tracking purposes.

Records Requested: June 20, 2024, Timothy Blain Ballard positive DNA Semen test results Celeste Borys- (Victim requesting) 801-[REDACTED]

Your request will be forwarded to the relevant department(s) to locate the information you seek and to determine the volume and any costs associated with satisfying your request. You will be contacted about the availability and/or provided with copies of the records in question. PLEASE NOTE: The Government Records Access and Management Act (GRAMA), Utah Code Ann. § 63G-2-101 et seq. does not require a governmental body to create new information, to do legal research, or to answer questions.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed. Again, thank you for using the Public Records Center.

Utah Department of Public Safety

To monitor the progress or update this request please log into the [Public Records Center](#)





DEPARTMENT OF PUBLIC SAFETY
BUREAU OF CRIMINAL IDENTIFICATION
 4315 South 2700 West, Taylorsville, Utah 84129

GOVERNMENT RECORDS REQUEST FORM

Name of Requester: Celeste Borys _____

Daytime Phone Number: [REDACTED] _____

Mailing Address: [REDACTED] _____

Email Address: [REDACTED] _____

Description of records sought: *(Describe the records with reasonable specificity.)* _Timothy Blain Ballard Positive DNA Semen Record

Reason you believe you are entitled to access these records: On June 20, 2024, PD confirmed that Timothy Blain Ballard's DNA semen results were positive on the evidence I brought in for testing. These results can protect me and other women from a serial rapist! I need this record to show the court factual evidence. Please help me!

Requester Signature: Celeste Borys

Date: July 11 2024

Information Section

Dissemination of information from a criminal history record or warrant of arrest information is limited to those entities described in Utah Code Ann. § 53-10-108(1). If you wish to obtain a copy of your criminal history record you must complete an Application for a Criminal History Record and pay the required fee. If you wish to obtain a copy of any other records maintained by BCI, you may complete this form and submit it to BCI at the address above.

Identification must be provided prior to release of a protected or private record pursuant to Utah Code Ann. § 63G-2-202.

You may be required to pay a reasonable fee to cover the actual cost of providing these records as provided in Utah Code Ann. § 63G-2-203(2). The current DPS fee schedule approved by the Utah State Legislature is as follows:

Black and white copies	DashCam Video/DVD
- \$5.00 for 1 to 10 pages	- \$25.00 per video/DVD
- \$25.00 for 11 to 50 pages	Photos
- \$.50 per page every page thereafter	- \$25.00 for CID
Color Copies	- \$2.00 per printed page (1,2, or 4 per page)
- \$1.00 per page for color copies	- \$1.00 per developed negative

EXHIBIT G



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Adaptability

June 24, 2024

CONFIDENTIAL AND PRIVILEGED CORRESPONDENCE

VIA EMAIL and US MAIL

Jeffrey S. Gray
UTAH COUNTY ATTORNEY
100 East Center Street, Suite 2100
Provo, Utah 84606

VIA EMAIL and US MAIL

Sim S. Gil
SL DISTRICT ATTORNEY
35 East 300 South
Salt Lake City, Utah. 84111

Re: Tim Ballard/DNA Testing/Guns

Dear Messrs. Gray and Gil:

Suzette Rasmussen and I represent Celeste Borys, who was sexually assaulted and trafficked several times by Tim Ballard, in a civil lawsuit against Ballard. Celeste has been very cooperative in providing accounts of these sexual assaults to your respective detectives. She also provided DNA proof of one of Ballard's sex assaults in Lindon, which Ballard denies (at least in the civil lawsuit) ever happened.

We have received confirmation from your detectives that the DNA testing came back from the State Crime Lab as being a sure match for Tim Ballard. While Celeste has known that those would be the DNA results, the fact that no arrest has been made in the face of his social media posts bragging about the weapons he has at his disposal, is terrifying to Celeste. It should also be noted that Ballard is an admitted drug addict and hallucinogenic user. By all accounts, he is an alcoholic. You will note in the videos provided that his shirt is on inside-out and he appears dirty and impaired. He is mentally delusional, believing he is a prophet, talks with dead people and receives counseling from Thom Harrison, whose followers include the Daybells, Ruby Franke and Jodi Hildebrandt. We need to protect Celeste and our other sex assault clients from this unhinged man.

The purpose of this letter is:

1. To make immediate arrangements to obtain the written DNA results from the State Crime Lab as soon as possible. It is known that Ballard has had a cozy relationship with the Utah County Sheriff's Office in the past, which was bragged about by Ballard to Celeste quite

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often. Celeste wants to obtain these results before they could possibly disappear. As a victim, she is entitled to this information.

2. To determine when Tim Ballard is going to be arrested. Given all the testimony by several victims, and now DNA confirmation that he was sexually abusing these women, he is an at-large rapist. Celeste, and our other clients who have been sexually assaulted by Ballard, are terrified, as should be the entire state.
3. To determine whether we can work with your offices in a coordinated effort to deal with the press and public that will undoubtedly result because of his arrest and the DNA match.

I am attaching a copy of the chapter from Ballard's yet unpublished book, whereby he admits that he has abused drugs. I am also attaching text messages showing that he abuses alcohol. I am also attaching the text messages between he and another operator, showing that Ballard is a sexual predator and liar.

We would like to have a meeting today if possible, to discuss these issues. Thank you.

Sincerely,

/Alan/

Alan W. Mortensen

Enclosures

Cc: Suzette Rasmussen

P.S. Here are the Instagram Posts I referenced above:

Ballard Bragging about shooting:

<https://drive.google.com/file/d/1xYr4NnJqlrg23388U7TRbR4MQJu1INhN/view?usp=sharing>

Ballard Using Guns in Mexico 2 -

https://drive.google.com/file/d/177Mi4So-TzRxORf27s7gNWCakT40i4mI/view?usp=drive_link

Ballard Drug Cache -

https://drive.google.com/file/d/1TOB2g7tF5nzL06ubSZOTampH2cKCFI_c/view?usp=drive_link