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

TIMOTHY BALLARD,

Plaintiff,

vs.

CELESTE BORYS, SASHALEIGHA
HIGHTOWER, MARY HALL, KRISTA
KACEY, BREE RIGHTER, KIRA LYNCH,

Defendants.

COMPLAINT AND JURY DEMAND

(Tier 3)

Case No.

Judge

Plaintiff Timothy Ballard makes the following allegations:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Timothy Ballard (“Plaintiff” or “Mr. Ballard”) is an individual residing in Utah County, Utah. He is the founder of Operation Underground Railroad (“OUR”). He has been

involved in undercover investigative operations which have helped rescue many women and children from the horrible and dark world of sex trafficking.

2. Defendant Celeste Borys (“Ms. Borys”) is an individual residing in Utah.
3. Defendant Sashaleigha Hightower (“Ms. Hightower”) is an individual residing in Utah.
4. Defendant Mary Hall (“Ms. Hall”) is an individual residing in Utah.
5. Defendant Kira Lynch (“Ms. Lynch”) is an individual residing in Utah.
6. Defendant Krista Kacey (“Ms. Kacey”) is an individual residing in Utah.
7. Defendant Bree Righter (“Ms. Righter”) is an individual residing in Utah.
8. This Court has jurisdiction pursuant to Utah Code §§ 78A-5-102 and 78B-6-401 *et seq.*
9. Venue is proper in this county pursuant to Utah Code §78B-3a-201(1)(a)&(b).

FACTUAL ALLEGATIONS

“If you stop telling lies about me, I’ll stop telling the truth about you.”
Adlai Stevenson, 1952.

10. Mr. Ballard incorporates the previous allegations by reference.
11. True victims of sexual assault are further victimized when non-victims make false allegations of being assaulted. Sadly, this is the case here. Mr. Ballard has been victimized by a vicious onslaught of false allegations of sexual assault.
12. In July 2023, the movie “Sound of Freedom” was released to the world. While Mr. Ballard did not write, produce, or act in Sound of Freedom, the movie is based on work Mr. Ballard and OUR did in approximately 2014. It grossed over \$250 million in the box office, greatly

increasing public awareness of sex trafficking, and the despicable demand for it that exists within the United States of America. Unfortunately, it appears there are wealthy and powerful people connected to this dark and evil underworld who do not want to be exposed. In the months following the release of Sound of Freedom, well-known personalities in Utah began calling for Mr. Ballard to run for the senate seat that was to be vacated by Mitt Romney. On the heels of these developments, Mr. Ballard's team received word that millions of dollars had been unleashed to tear down Mr. Ballard. Indeed, a whirlwind of false accusations, bolstered by "anonymous" interviews, press conferences, press releases, and lawfare court filings, were launched at Mr. Ballard.

13. Now, after having waited nearly a full year for any of the Defendants to withdraw their false claims against Mr. Ballard and come forward with the truth, Mr. Ballard reluctantly brings this suit. Rather than coming clean with the truth, Defendants have doubled down on their false claims, providing statements in press releases, press conferences, and media interviews, falsely stating that they were sexually assaulted by Mr. Ballard. The false claims have to stop, and this lawsuit is intended to begin putting a stop to them.

Couples Ruse – Operation Bodyguard

"I've worked on various missions with Tim Ballard specifically ranging from different countries, different continents, and during my time working with him there has been zero inappropriate behavior, any sexual contact, any inappropriate sexual contact whatsoever, before, during or after a mission. Everything was kept very respectful, very professional," she said. "In fact, I think the OUR team went above and beyond to make sure the safety of both the operators and the victims and anybody involved in a mission."
(Sept. 25, 2023 KSL.com report of Nataliya video)

14. In the world of undercover operations targeting sex trafficking, there are not a whole lot of options for how to deceive a trafficker to believe the undercover operative is one of them. The trafficking world is evil, vile, explicit, etc. One cannot convince a trafficker of genuineness without appearing to be sexually perverted. One way to do so is, unfortunately, the traditional way: there are unethical operatives who have habitually engaged in sexual relations with traffickers, prostitutes, and trafficking victims with the excuse that they are doing what has to be done to infiltrate the ring. Mr. Ballard has never been willing to engage in any sexual relations with anyone in the trafficking world, whether it be participants or victims. The couples ruse tactic was designed to protect operatives such as Mr. Ballard, so that they can fool traffickers into believing they are sexually perverted, but never actually engage in any sexual contact with anyone in the trafficking world.

15. Had Mr. Ballard desired to simply fulfill deviant and perverted sexual desires, there are many in the trafficking underworld eagerly willing to fulfill such desires. There would be no need for Mr. Ballard to employ a complex scheme to avoid sexual relations with traffickers if his true desire was to engage freely and frequently in sexual relations.

16. With the couples ruse, men and women undercover operatives pretend to be in an intimate relationship with each other, and “block” for each other in the presence of traffickers, to maintain the cover of looking like they belong in the trafficking world, but not actually participating in it. For example, when a prostitute expects that the operative would engage in intercourse, the female ruse partner jumps in with jealousy, or a desire herself to engage in relations with the operative, which pushes the prostitute out of the picture. This has been used successfully

on multiple occasions, as many of the defendants have themselves confirmed (before deciding to falsely claim the opposite).

17. Of course the couples ruse requires a high degree of trust between ruse partners, and each could potentially be vulnerable to false claims by the other, given the intimate relations they pretend to engage in with each other.

18. Fortunately, contrary to the Defendants' recently-fabricated false claims, there is an abundance of evidence contradicting any claims of abuse or assault.

Celeste Borys

“I have been working with Tim Ballard for almost one year. I have felt safe being Tim’s partner in every operation I have been on; I have never been taken advantage of. He has always respected me and all the other operators around me.”

Celeste Borys (2 weeks before filing her lawfare suit)

19. Ms. Borys served as an undercover operative and Mr. Ballard’s executive assistant (EA) while working for OUR. When she lost her position with OUR in July of 2023, despite now claiming she had been sexually assaulted multiple times by Mr. Ballard, she voluntarily chose to follow Mr. Ballard to continue as his EA.

20. Ms. Borys, unfortunately, developed an infatuation for Mr. Ballard that was not reciprocated as she desired. Mr. Ballard viewed her as a close friend but did not have romantic desires for her. Rather, he was and is always devoted to his wife Katherine, and his family of 9 children.

21. Ms. Borys did not tell Mr. Ballard of her romantic feelings for him, but she told others. On July 13, 2023, she expressed in writing to her friend that she was jealous of Tim’s wife Katherine (although she claims she was not jealous, here is her quote): “Why does everyone put

Katerine on a friggin pedestal she's not perfect? I'm not jealous. It's just annoying as shit! 'She gives up so much blah blah blah. Does he not give up anything. Uuuggghhh.'” All quoted materials for Ms. Borys are attached as Exhibit 1.

22. On July 20, 2023, to the same friend, Ms. Borys fully confessed, “I’m [in] love with my boss who is married, most popular guy in the world. How did that happen?” She also hinted at what may become a motivation to later lie and claim Mr. Ballard assaulted her: “I have two maxed out CC.”

23. On September 2, 2023, Ms. Borys giddily appeared on a podcast, talking about the operations she had been on with Mr. Ballard. She attested that “miracles happen on every single op . . . it’s like Jesus is helping every single op that I’ve never been scared, I’ve never been afraid.” She also described at least one specific operation, describing it as “such a great case,” during which she “helped to infiltrate . . . a trafficking organization that’s trafficking North Korean children through Europe, Mexico and into Los Angeles.”

24. On September 9, 2023, Ms. Borys texted with a friend who had been an OUR undercover operator. He said to Ms. Borys, “I was told some things that I have come to feel/learn are wrong and misleading. I was at a point where I was trying to figure out things for myself and have come to feel that some people were making Tim out to be terrible. . . . I heard things from Tim stealing hundreds of dollars from OUR to him sexually assaulting individuals while on operations.” Ms. Borys responded, “it’s so sad. I’ve been doing operations since last October. That’s how I landed being tims [sic] EA. Logistically it was easier. And turns out I’m a pretty good operator lol. **BUT, I can assure you. All the rumors are disgusting and are not true. I know cause I’ve been there.**” (emphasis added.) Mr. Ballard was unaware of this communication, but

is grateful it exists as it is a clear and strong admission by Ms. Borys that she was NEVER subjected to any misconduct by Mr. Ballard.

25. On September 10, 2024, Ms. Borys submitted a friendly resignation letter to Mr. Ballard, confirming that Mr. Ballard was “not just my boss but also my friend.” She stated, “I can’t tell you how grateful I am for all the experience you have provided in my position here with you. . . I am more than happy to help transfer whatever is needed over the next two weeks to another EA.”

26. On September 25, 2023, more than two weeks after her resignation letter, Ms. Borys voluntarily provided input to Mr. Ballard’s church leaders. She prepared a lengthy, detailed statement that included the following clear and unequivocal admission: **“I have been working with Tim Ballard for almost one year. I have felt safe being Tim’s partner in every operation I have been on; I have never been taken advantage of. He has always respected me and all the other operators around me.”** (emphasis added).

27. On October 10, 2023, Ms. Borys suddenly flipped, and filed a complaint against Mr. Ballard claiming that, long before her admissions that Mr. Ballard “never” took advantage of her and has “always respected” her, Mr. Ballard sexually assaulted her. She filed her lawsuit anonymously, but later made public appearances and disclosed her identity.

28. Through counsel, Ms. Borys released her complaint, together with a lengthy personal statement about her allegations, to the press.

29. Over time, Ms. Borys has evolved her claims to include new and more outlandish allegations against Mr. Ballard, all of which are false.

30. Among other public statements, Ms. Borys has claimed in press conferences, press releases, and media interviews, each of the following (these examples are from her complaint submitted to the press, and a press conference held on or about November 21, 2023):

- a. “I was molested and sexually assaulted by Tim in four different states five different countries in the span of 10 months.”
- b. “Tim manipulated and abused and brainwashed me to a point where I didn’t know left from right and right from wrong.”
- c. “The truth is the only evil I really saw [on operations] was Tim Ballard and what he did to me. Looking back now I know it was all an elaborate ploy just to justify Tim’s wicked desires.” (In context, this included the assertion that the operations Mr. Ballard participated in did not include gathering intelligence to bust trafficking rings.)
- d. “Ballard . . . committed batter and sexual assault” on her.
- e. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

31. All of the above statements are false, and Ms. Borys knew them to be false when she made them.

32. Unfortunately, Ms. Borys’s despicable conduct did not end with her false accusations.

33. While she served as EA for Mr. Ballard, Ms. Borys had access to Mr. Ballard’s emails and electronic files, with instructions to access current emails and files only, to help Mr.

Ballard keep current on his calendar and on ongoing communications with people. Any permission to access Mr. Ballard's electronic files ended after Ms. Borys no longer worked for Mr. Ballard.

34. After suing Mr. Ballard, Ms. Borys, knowing she had no ongoing permission or authority to access Mr. Ballard's electronic files, surreptitiously accessed and searched thousands of his electronic documents. She identified upwards of 100 files as of interest to the lawsuits she and others were pursuing against Mr. Ballard. She then stole them by downloading, copying and distributing them to her attorneys for use in media attacks and lawsuits brought by her and others. Mr. Ballard only learned of this theft after some of the documents were published by attorneys for Ms. Borys, who published them for use in cases brought on behalf of multiple women, not just Ms. Borys.

35. Electronic files stolen by Ms. Borys included private and confidential financial information, sacred religious blessings, attorney-client communications, and other documents belonging to or rightfully in the possession of Mr. Ballard. None of the documents suggests in any way that any of the false statements made by Ms. Borys or any of the other women are true. Mr. Ballard has never sexually assaulted anyone.

36. Ms. Borys has also recently claimed that she did not want to participate in the September 2, 2023 podcast, and that she strongly objected to Mr. Ballard and other team members to doing so. She claims now that all the things she said during the podcast – which strongly refute what she now claims – were under duress and coercion, and that she was lying on the podcast out of fear of Mr. Ballard.

37. Ms. Borys's claims about the podcast are false. The videos show her happily and comfortably participating. Multiple witnesses who were there viewed her and her demeanor

before, during and after the podcast, and universally confirm she was enthusiastic about her participation in the podcast, and after the podcast, wanted it to be released to the public as soon as possible.

38. Todd Tueller has gone on record declaring the following:

- a. “We were with Celeste before, in the same room as her and Tim during the podcast, and we were with Celeste and others after the podcast that day.
- b. Celeste demeanor was happy upbeat and positive. She was expressing her desire to set the record straight regarding her involvement with child rescue and Tim Ballard in a way that was positive and in defense of both Tim and child rescue.
- c. She had talked of the importance of this podcast for sometime before September 1 as we accompanied her and others traveling in South America to promote the new movie Sound of freedom.
- d. We can say that we both heard her speak highly of Tim and of the child rescue efforts that she was personally involved with.
- e. Her demeanor that day, both prior to the podcast certainly during the podcast and post podcast was very upbeat and positive.
- f. We were in a room watching her entire podcast with Tim and she was supportive happy and complementary of the work that she and Tim had done together to rescue children undercover.
- g. We listened and watched the entire podcast and her positive tone and defensive position regarding Tim and child rescue never changed.

- h. Upon completion of the podcast, she was very positively energized and hugged us both with congratulations and high five mentality.
- i. Celeste mentioned she thought she did a good job and was happy with the results. Some of these conversations happened without Tim being in the room as he was busy on the phone and doing other work.
- j. After the podcast, Celeste continue to be upbeat and positive the remainder of the day as others shared their experiences and being taped for the podcast, including Todd in Tiffany Tueller.
- k. The studio was fairly small and one could hear activity from the hallway all the way to the videotaping room. There were a number of people in that relatively limited space. For example, it was very difficult to have phone conversations without interrupting other people in the space or being heard by others that were present.
- l. Celeste mentioned several times how important it was for her to get on tape her positive experiences and the truth of child rescue with Tim Ballard and was anxious to have the podcast published. She was happy, friendly and supportive of this days and weeks before, during and directly after the podcast. The podcast should be watched in its entirety and speaks for itself and represents her comments that I heard before the podcast as well as after. It was complementary of Tim Ballard and showed the teaming with him in a very positive light.
- m. I (Todd Tueller) did recall that l Celeste was offered to have her face blurred out in n the video to protect her identity and she insisted on not doing that in

order speak the truth of the reality of child rescue and the efforts that her and Tim went through to rescue these children.

- n. We saw absolutely no indication of being forced to participate or coached in her witnessing or any cohesion of any sort. In fact what we witnessed was the opposite in terms of her desire to be involved in supporting Tim and supporting this effort.”

39. After the podcast, on September 19, 2023, Ms. Borys texted with an OUR employee that she really wanted her podcast to be published: “I need MY podcast out. It talks about me and the escort OP.”

40. Ms. Borys’s claims that she was forced into doing the podcast, that she said things she did not really believe, and that she did not want the public to hear what she said, are all false.

41. Ms. Borys, together with Ms. Kacey, Ms. Hightower, Ms. Hall, and Ms. Lynch, has publicly stated that Mr. Ballard “would also claim to the women that Defendant Janet Russon told him that he had been married to them in a previous life.” This is false, and Ms. Russon has confirmed in writing the true story behind that false claim.

42. As Ms. Russon confirms in her statement:

Bree Righter

“Matt Cooper is an incredible human being. He could not have been better to work with during the Op. There is zero way it could have felt less awkward or more safe. Boundaries were perfect.”

*Ms. Righter to a friend after the Ops
(she now claims Mr. Cooper assaulted her and Mr. Ballard encouraged it)*

43. Ms. Righter was an undercover operator for OUR.

44. She was involved in multiple operations and knows that the operations were and are real, that real victims of sex trafficking were rescued, and that OUR (including Ms. Righter) were involved in gathering intelligence to take down real trafficking rings.

45. She was with Matt Cooper as a partner using the couples ruse tactic on operations.

46. Unsolicited, Ms. Righter said the following to a friend of hers about Matt Cooper: “Matt Cooper is an incredible human being. He could not have been better to work with during the Op. There is zero way it could have felt less awkward or more safe. Boundaries were perfect.” All quoted materials for Ms. Righter are attached as Exhibit 2.

47. There are also numerous text messages between Ms. Righter and Mr. Cooper, all of which refute Ms. Righter’s recently-invented defamatory claims.

48. When perhaps other motivations got the best of her, Ms. Righter completely flipped, claiming instead that Mr. Cooper assaulted her, and Mr. Ballard is the one who encouraged the assault.

49. She filed a lawsuit on or about November 20, 2023, released the lawsuit to the press, and on November 21, 2023, participated in a press conference making various false claims against Mr. Ballard and others.

50. Among other defamatory statements, she made the following false statements about Mr. Ballard:

- a. “Ballard used OUR and its OPS to fund his personal fantasies of grandeur.”
- b. “Ballard attempted to goad Defendant Cooper to be more sexually aggressive in the COUPLES RUSE with Plaintiff, which led to Plaintiff being sexually

touched by Defendant Cooper under false pretense both at the lavish resort and while going to strip clubs and massage parlors in the British Virgin Islands.”

- c. “Ballard was present” when Righter suffered an injury in training “and refused to call an ambulance because he wanted no record of the event occurring at OUR’s training.”
- d. Ballard “solicited, instructed, commanded, encouraged and/or intentionally committed battery and sexual assault of” Ms. Righter (by allegedly having Mr. Cooper assault her).
- e. “They [including Ballard] defrauded all of us. . . . They’re not rescuing children. They’re making a morality play for money.”

51. All such statements are false and defamatory.

52. As referenced above, Ms. Righter’s own written text statements at the time confirm Mr. Cooper never did anything remotely approaching “assault” to her, and Mr. Ballard certainly never goaded Mr. Cooper to do so.

53. Further, numerous witnesses and documented evidence confirms Mr. Ballard was not present when Ms. Righter was injured at the October 16, 2021 training. For example, the statement by Christian Hughes confirms he was the videographer filming the events. He confirms Mr. Ballard was never present at the event:

- a. “I was present at the aforementioned event and was responsible for filming the activities Bree Righter participated in a wrestling activity on the mat, during which she sustained an injury. Upon reviewing the footage captured during the event, I can confirm that Tim Ballard was not present at the venue at

the time of Bree Righter's injury. The footage clearly shows that Tim Ballard did not engage with Bree Righter at any point during the event, nor did he provide or deny assistance to her. Based on the evidence from the recorded footage, it is my assertion that the claims made by Bree Righter regarding Tim Ballard denying her healthcare are unfounded."

54. Mr. Ballard could not have acted in the callous ways Ms. Righter claims, as he was not even there. Importantly, Ms. Righter's numerous texts at the time confirm she was very well taken care of by OUR and its people when she was injured. She is the one who did not want to take an ambulance or go to the hospital because she was worried about the cost. Mr. Cooper took her there at her request, but also assured her OUR would pay any and all bills. Mr. Cooper texted an OUR executive: "Bree does have insurance, she has a \$500 deductible and didn't want to come to the hospital because of that. Am I okay to use a OUR card for that?" The OUR executive responded, "Yes . . . Whatever costs come after we will cover." Ms. Righter later texted Mr. Cooper, "I hope you know ... That day I got hurt would have been a million times worse if you hadn't been with me." Months later, in March 2022, Ms. Righter asked Mr. Cooper, "May I give your number to my potential employer as a reference for my work at OUR?" Mr. Cooper responded, "Of course."

55. Ms. Righter later chose to participate in another OUR operation in Thailand.

56. Ms. Righter was happy with OUR, with Mr. Ballard, with Mr. Cooper, and with how well they treated her. She was happy, that is, until she decided to join forces with other women and make false claims against Mr. Ballard and others.

Krista Kacey

“We kept all of the boundaries there. I will read them: No kissing on the lips, touching or exposing private parts including breasts and genitalia, and any other thing you can imagine. We kept really strict boundaries.”

(Ms. Kacey after operations in Cancun, Cozumel, and BVI)

57. Ms. Kacey was an operator on multiple undercover investigations and worked with Mr. Ballard as his couples ruse partner. Ms. Kacey also organized and conducted trainings for OUR for other operators to learn undercover tactics including the couples ruse.

58. Ms. Kacey participated in operations referred to as Maya and Maya II in March and April 2021, and in Cancun, Cozumel, and BVI in May and June 2021. After completing those operations, she recorded a personal video, in which she acknowledged that, as a couples ruse partner with Mr. Ballard, “We kept all of the boundaries there. I will read them: No kissing on the lips, touching or exposing private parts including breasts and genitalia, and any other thing you can imagine. We kept really strict boundaries.” Links to all cited videos for all Defendants can be found here: <https://drive.google.com/drive/folders/1PcLswmShPq2c1YATmmltxqUROpAsKfh?usp=sharing>.

59. Ms. Kacey also did a video together with Mr. Ballard. In that video, she confirms, “we had very serious rules as always, no kissing on the lips, no touching private parts outside or inside clothing and I attest that we kept those rules. We didn’t to any of those things to each other,” that “we were very respectful to one another,” and that Mr. Ballard “was totally respectful, yes. Absolutely. Followed the rules.”

60. By March 18, 2022 Ms. Kacey had also participated in operations referred to as Miami/Cancun/Cozumel, Cancun, Nueva Luna (Cancun), and Media Luna (DR). As to all operations she had participated in thus far, on March 18, 2022 Ms. Kacey stated, in writing:

- a. The “Couples Ruse’ is a Cover for Status and Cover for Action technique employed by OUR undercover operators. It will require a male, female pair posing as a couple under a false pretense that they are romantically involved. The couple will create the appearance of being romantically involved as they deem appropriate. The Couples Ruse will be used by OUR operatives to infiltrate human trafficking criminal networks. The operators will use their status as a couple to engage traffickers and trafficking victims without abusing victims or engaging in harmful illicit activities where male operators would normally be expected to do so. The Couples Ruse has proven effective in allowing OUR operators to gain access and intelligence into trafficking organization.
- b. She confirmed that “The undercover operators and undercover operator trainees will not and have not engage[d] in the following acts with each other: Kissing on the lips, touching or exposing private parts including Breast and Genitalia.”
- c. And she acknowledged that “both persons participating in the couples ruse will not violate and have not violated the limitations of the Couples Ruse as defined in this agreement.”

61. All quoted materials for Ms. Kacey are attached as Exhibit 3. Thus, consistent with her statement that Mr. Ballard “was totally respectful,” she affirmed that she had never experienced

any “assault” or other form of abuse from Mr. Ballard or any other couples ruse operative, and that she would not participate in any such activities going forward.

62. In the summer of 2023, when rumors of allegations of sexual assault were circulating, Todd and Tiffany Tueller met with Ms. Kacey in their home. The Tuellers submitted a statement that attests that Krista told each of them, “Tim and I did not cross the lines. I would have nothing to confess to my Stake president [referring to her religious leader] regarding what we did.”

63. Mr. Tueller goes on to testify: “I asked her knowing what she knows now if she were to do it all over again. Would she change anything? She said ‘no.! I would not change anything because a lot of children were rescued from trafficking.’”

64. As to any other women alleging anything inappropriate, Mr. and Mrs. Tueller attest: “She indicated that she had no first-hand witness of any inappropriate behavior between Tim [and] other women. She just heard from another woman their claimed experience and she felt responsible for not providing better training to create boundaries that may have avoided what she understood may have happened.”

65. On December 3, 2022, months after she had completed her final involvement in operations with OUR and all alleged assaults would have been in the past, Krista flew on her own dime to attend an OUR gala in Scottsdale Arizona where she stood and accepted acknowledgement of her fine work as an operator. She posed for photos with Mr. Ballard and other OUR team members, and video was recorded of her accepting the recognition. OUR is in possession of this evidence, which will be gathered in due course.

66. After all of the above affirmations, Ms. Kacey suddenly flipped. She joined forces with others to launch a vicious and false attack on Mr. Ballard and others.

67. Specifically, on or about September 28, 2023, attorney Suzette Rasmussen held a press conference on behalf of an unspecified number of anonymous women, in which she claimed to be reading a statement on behalf of the women, which, on information and belief, may have included Ms. Lynch, Ms. Hightower, Ms. Hall, and Ms. Kacey (and Ms. Davis, who is named in a different lawsuit). In the press conference, Ms. Rasmussen claimed the women she represents are affirming they were subjected by Mr. Ballard to “sexual harassment, spiritual manipulation, grooming, [and] sexual misconduct.”

68. On or about October 9, 2023, Ms. Lynch, Ms. Hightower, Ms. Hall and Ms. Kacey (and Ms. Davis) filed a civil complaint against Mr. Ballard. They did so anonymously, without disclosing their identities. In the civil complaint, they each submitted a personal statement (identifying themselves by initials that do not match their names). They each claimed through their attorney in a press release that each personal statement “sets forth in painful detail” each of their interactions with Mr. Ballard.

69. This complaint was not only filed in court, but was also attached to a “Press Release” dated September 9, 2023 (which appears to be a typo and should say October 9, 2023), with contact information for Attorney Ms. Rasmussen and a statement indicating “Today, five women filed a lawsuit . . . against Tim Ballard The complaint accompanies this Press Release.” It further states “Each of the five women provided their own statement that sets forth in painful detail how Tim Ballard manipulated and sexually assaulted them, under the guise of fighting childhood trafficking. . . . These five brave women . . . want the world to know the truth.” They

claim Mr. Ballard is “a sexual predator,” and that “Tim Ballard literally trafficked them for his own sexual and egotistical gratification”

70. As set forth above, she was represented by an attorney in a press conference; she then filed a complaint, and a personal statement which included “painful detail” of all purported incidents of assault she suffered at the hands of Mr. Ballard or others. She also recently gave an interview to the New York Times.

71. Contrary to the written statement she made immediately after the operation in March 2022 in the Dominican Republic, she told the New York Times that her experience in the DR was “horribly traumatic.” According to the New York Times, “For hours, she said, they were physically interacting with the sex workers — touching and groping without technically having sex — with no apparent progress in gaining information about child victims. Afterward, she recalled, Mr. Ballard bragged that they had managed to have what amounted to an orgy without engaging in full sex — a claim she knew was only technically true. After that, she made a decision to avoid working with Mr. Ballard on undercover operations.”

72. The truth is, she remained open and obviously friendly towards Mr. Ballard at all times, and never once suggested she wished to avoid operations with him. And, of course, if she was so horribly traumatized, she would not have submitted all the statements outlined above, or continued to participate in operations, or help train other operators, or tell Mr. and Mrs. Tueller that she and Mr. Ballard never crossed any lines, and that she would not do anything differently.

73. Defamatory statements Ms. Kacey made against Mr. Ballard include, but are not limited to, the following:

- a. Mr. Ballard “became increasingly sexually perverse and aggressive” with her.

- b. Mr. Ballard “began pushing all boundaries and asserting that behaviors outside of the initial rules were to be employed as needed. Tim found sufficient reasoning and was very convincing that frequent sexual boundary breeches were essential.”
 - c. Mr. Ballard “asks Janet about our relationship in past lives.”
 - d. Mr. Ballard discussed with Ms. Kacey “this genius ‘new technique [redacted] came up with’ where he places his dick underneath me and it totally looks like we’re having sex but we’re not, so they’re all completely fooled.”
 - e. “Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.”
 - f. Mr. Ballard “committed battery and sexual assault” on her.
 - g. Mr. Ballard “made fraudulent statements” to her, including that “the COUPLES RUSE . . . helps in fighting human trafficking,” which statements she claims are “false.”
 - h. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.
74. The above statements are all false.

Kira Lynch

“❤️”

*Kira Lynch “loved” Mr. Ballard’s message
(just hours after she now claims she was assaulted)*

75. Ms. Lynch was training to potentially become an undercover operative with OUR. She did not ultimately qualify, primarily because she was not able to segregate acting from reality.

76. On or about October 28, 2021, into the early morning hours of October 29, 2021, Ms. Lynch engaged in training with Matt Cooper, Mr. Ballard and multiple other undercover operatives and trainees. She was enthusiastically engaged in the training, sending messages to people during the training evidencing her enthusiasm.

77. In the late afternoon of October 29, 2021, Mr. Cooper texted Ms. Lynch to check on her. She responded, “Hi Matty! You are so sweet. I finally got a tiny nap in. I’m doing good!” All quoted materials for Ms. Lynch are attached as Exhibit 4.

78. She remained in friendly and enthusiastic contact with Matt Cooper and Mr. Ballard. She knew Mr. Cooper to be Mr. Ballard’s security and “right hand man,” as he was almost always with Mr. Ballard.

79. In December of 2021 she shared with Mr. Cooper and Mr. Ballard that she was getting a breast implant surgery to augment the size of her breasts.

80. A few days after the surgery, she asked Mr. Cooper if she could attend a showing of a documentary called Triple Take, at which both Mr. Cooper and Mr. Ballard would be in attendance. Mr. Cooper agreed, and invited her and her mother.

81. She engaged in conversations and interactions with Mr. Cooper and Mr. Ballard that caused concerns about her sexual proclivities and the potential negative impact they may have on her ability to be an effective undercover operator.

82. At one point she showed them an image of various types of vaginas and asked them to guess which type she had. On another occasion she showed Mr. Ballard an image of an explosion and said that represented her masturbating with his image in her mind.

83. She also proudly disclosed that she had engaged in an affair with one of her religious leaders, which broke up that man's marriage.

84. On or about January 7, 2022, Mr. Ballard went to meet with Ms. Lynch at her home, where she was to provide a haircut for Mr. Ballard and wax services to remove his chest and stomach hair in preparation for his family vacation. Ms. Lynch asked Mr. Ballard to remove his belt for the wax services.

85. Before Mr. Ballard left her home, Ms. Lynch asked Mr. Ballard "want to get naked?" She offered to have him "see my boobs," referring to the fact that she had just gotten a breast augmentation. Mr. Ballard declined, and quickly made his way out of the house. He left his belt behind.

86. Early the next morning, just hours after he departed from Ms. Lynch's home, Mr. Ballard texted Ms. Lynch and Mr. Cooper, saying that he was going to leave his phone behind while he was on vacation with his family starting that day. Ms. Lynch responded "❤️" to the message. Mr. Ballard also texted Ms. Lynch to see if he could get his belt from her home. He asked for her address. She gave him the address, and he went to get his belt.

87. The next day, January 9, 2022, Ms. Lynch texted Mr. Cooper asking to get more operative training, "When can we go shooting?" "I want to get really really good." She offered to cut Mr. Cooper's hair in exchange for shooting training.

88. Due to the events of the prior evening, Mr. Ballard intentionally avoided any further contact with Ms. Lynch, and eventually blocked her so that she could not message or call his phone.

89. Ms. Lynch stayed in contact with Mr. Cooper thereafter, asking if she could meet with him to get more training, asking about Mr. Ballard (as she was not hearing from him any longer), asking Mr. Cooper to help her with various needs, etc.

90. Mr. Ballard reported to Mr. Cooper and others what had occurred with Ms. Lynch, and she was never invited to participate in an actual operation.

91. Years later, Ms. Lynch began making defamatory statements publicly about Mr. Ballard.

92. As set forth above, Ms. Lynch was represented by an attorney in a press conference; she then filed a complaint anonymously, and a personal statement which included “painful detail” of all purported incidents of assault she suffered at the hands of Mr. Ballard or others.

93. In her personal statement which was published widely via the press release, Ms. Lynch claimed: Mr. Ballard assaulted her in her bedroom while waiting for an Uber for the October 28/29 training; Mr. Ballard assaulted her in an Uber on the way to the October 28/29 training; Mr. Ballard had Ms. Lynch give him a lap dance during the October 28/29 training which Mr. Ballard’s son watched; Mr. Ballard assaulted her at her home (referring to the January 7/8 alleged incident).

94. In her publicly disclosed lawsuit, she specifically alleged that there was never any sexual “penetration” – no actual rape or sexual intercourse. Her original October 9, 2023 statement was consistent with that claim. As to the January 7/8 incident, she said she was “not even sure if at first I thought that I was sexually assaulted.” However, since her original October 9, 2023

statement regarding the January 7/8 incident, Ms. Lynch has dramatically altered her factual claims, including that she now completely contradicts herself, and falsely claims there was actual “penetration” and thus full intercourse rape.

95. Others of her publicly disseminated statements include:

- a. “Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.”
- b. Mr. Ballard “committed battery and sexual assault” on her.
- c. Mr. Ballard “made fraudulent statements” to her, including that “the COUPLES RUSE . . . helps in fighting human trafficking,” which statements she claims are “false.”
- d. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

96. Ms. Lynch, Ms. Hightower, Ms. Hall, and Ms. Kacey each caused the above statements to be disseminated to the press. Multiple media outlets published the statements on October 9, 2023 and thereafter.

97. The above statements Ms. Lynch made are all false.

Sasha Hightower

“Nothing Happened”

Ms. Hightower’s words explaining her successful couples ruse with Mr. Ballard, and that no sexual contact occurred between them

98. Ms. Hightower was an undercover operator with OUR.

99. Up until she decided to make false claims and defamatory statements, she was happy with her experiences at OUR and interactions with Mr. Ballard.

100. She participated in one undercover operation for OUR, as a couples ruse partner with Mr. Ballard. After the operation, she did two things that are now important in light of her recent claims: (1) She participated in a debrief which Mr. Cooper recorded. In the debrief, she explained how the couples ruse worked as planned on their operation, and that on the fly during the operation she came up with and executed an idea that worked very well. Specifically, she said on the video:

- a. “They were trying to give a massage and I just kind of had this crazy idea. I basically told them ‘I need to F*** my boyfriend, you need to get out. They were in there for 10 min, because I’m not going to lie, they were too aggressive. They started taking our clothes off. They were like massaging really close and I was like okay, I gotta get out of this stat. I was what do I do? I gotta f*** my boyfriend. They were like can we watch, and I was like no, no, no, just alone, please get out. He had to tell them because their English wasn’t the best. So they leave.”

101. (2) Ms. Hightower also recorded her own video immediately after the operation, to document how it went. She recorded herself producing blood at-will from her mouth, and explained she used that technique to put blood on the bed at the brothel to make the prostitutes think she and Mr. Ballard had sex. However, she confirmed, “Nothing happened.” They protected their cover by convincing the prostitutes they had intercourse, but in actuality, “Nothing happened.”

102. To further corroborate that Ms. Hightower felt happy with how her couples ruse experience went with Mr. Ballard, after the operation Ms. Hightower recruited her good friend, Mary Hall, to join OUR's October 2021 training so that Ms. Hall could also become a couples' ruse partner. Certainly, if Ms. Hightower felt she had been subjected to abuse while acting out the couples ruse, she would never have invited her good friend to be subjected to the same abuse.

103. However, nearly two years after her successful couples' ruse experience, Ms. Hightower joined several other women in making up false claims to harm and defame Mr. Ballard and others.

104. As set forth above, she was represented by an attorney in a press conference; she then filed a complaint, and a personal statement which included "painful detail" of all purported incidents of assault she suffered at the hands of Mr. Ballard or others.

105. Sadly, Ms. Hightower's statement included details that jeopardized the very real operation she and Mr. Ballard were involved in down in Mexico. As Ms. Hightower confirms in her debrief interview, she was able to get the intel they were seeking, including that she was shown photos of young girls who had already been sold for sex. The details disclosed in the lawsuit caused Mexican authorities, and Mr. Ballard, extreme concern, due to the confidential nature of the investigation and the high probability that traffickers would realize they were infiltrated based on the information disclosed in the filing. The Mexican authorities chose to rush the operation to a conclusion sooner than they would have liked. In the summer of 2024 they successfully rescued 14 girls from being trafficked, the youngest was age 12. They intended to rescue approximately 50 trafficked girls, had the operation not been outed and brought to a sudden conclusion. The Mexican authorities expressed gratitude to Mr. Ballard for his participation and help in the

operations, and outrage towards those involved in exposing confidential information that jeopardized the safety of 50 trafficked girls.

106. Publicly disseminated statements by Ms. Hightower include:

- a. “Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.”
- b. Mr. Ballard “committed battery and sexual assault” on her.
- c. Mr. Ballard “made fraudulent statements” to her, including that “the COUPLES RUSE . . . helps in fighting human trafficking,” which statements she now claims are “false.”
- d. She “said the code word” during the operation she was on with Mr. Ballard, and “Ballard did not respond to protect her, so she repeated it again.”
- e. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

107. Ms. Hightower caused the above statements to be disseminated to the press. Multiple media outlets published the statements on October 9, 2023 and thereafter.

108. The above statements Ms. Hightower made are all false.

Mary Hall

*“Still looking forward to working with you all & getting trained!”
(Nov. 11, 2021, Ms. Hall to Mr. Ballard and Mr. Cooper
after the dates she now claims assault)*

109. Ms. Hall was recommended by her friend Sasha Hightower. Ms. Hall attended an October 28, 2021 OUR training night for potential engagement as an undercover operator as a

couples ruse partner. She was coupled with Mr. Cooper during the training. Also with her during the training were Mr. Ballard, Ms. Lynch, and others. Ms. Hall was happy with the training and asked to move forward with more training so that she could go on operations.

110. After the training night, Ms. Hall remained in communication with Mr. Ballard and Mr. Cooper.

111. On November 11, 2021, Mr. Ballard informed Ms. Hall that he had met with his team and family and decided it's better for him not to be doing undercover work for now. He added, "But we are still much looking forward to having you trained and working with you." In other words, she could still be a couples ruse partner with other OUR operators. All quoted materials for Ms. Hall are attached as Exhibit 5.

112. Ms. Hall responded, "Hey! I appreciate the update. You've got to do what you feel like is best for you/your family/your team in this moment & I respect that. 😊 definitely still looking forward to working with you all & getting trained!"

113. Shortly after November 11, 2021, Mr. Cooper and Ms. Hall spoke on the phone. Ms. Hall indicated she was busy with a work project for the next couple of months. Thereafter, the holidays were quickly approaching, and then Mr. Cooper and Mr. Ballard both became busy for an extended period of time with new developments in Ukraine. With no further contact from Ms. Hall, the relationship was never continued.

114. Ms. Hall never went on any operations.

115. Nearly two years after her last contact with Mr. Cooper or Mr. Ballard, despite having indicated an eagerness to move forward with training as an operative, Ms. Hall suddenly

flipped. She joined forces with her friend Ms. Hightower and others to launch a vicious and false attack on Mr. Ballard and others.

116. As set forth above, she was represented by an attorney in a press conference; she then filed a complaint, and a personal statement which included “painful detail” of all purported incidents of assault she suffered at the hands of Mr. Ballard or others. She also appeared herself at a press conference and spoke to the press, with other women.

117. In her personal statement, which she published through the press, she now claims that she told Mr. Ballard that he should “seek some help for his mental health sake.” She claims she also told Coop of her concerns about Mr. Ballard’s mental health, and that “Coop talk to Tim and Coop told him what I had said about him potentially seeing a therapist or seeking mental health. Tim then confronted me and said “Oh I heard you think I’m crazy? I heard you told Coop I am losing my mind. . . that I am completely crazy.” All of the above is false. She never spoke with Mr. Cooper or Mr. Ballard about alleged concerns for Mr. Ballard’s mental health. Rather, she is making that up now to defame Mr. Ballard.

118. She claims that despite allegedly experiencing the above conflict with Mr. Ballard, he thereafter “invited [her] to go to the OUR gala,” that she was unable to attend, and the last she heard from Mr. Ballard or Mr. Cooper was on November 11, 2021 (as set forth above).

119. She claims she made multiple attempts thereafter to contact just Mr. Cooper, and that she was very “disappointed” that he did not follow up with her to further train her. None of this, of course, makes any sense if she believed she had been abused, battered, and assaulted by Mr. Ballard during the training.

120. Defamatory statements Ms. Hall made include, but are not limited to, the following:

- a. She told Mr. Ballard, and Mr. Cooper, that Mr. Ballard needs to “seek some help for his mental health sake.”
- b. “I remember then being pushed up against the office door. He was up against me and he was sort of grinding his body against mine. It was obvious that he had an erection.”
- c. “He then lifted up my shirt and was licking and kissing my stomach and getting lower on my body, still tugging at my jeans as if gauging my reaction. At this point, the door was pushed open from the outside and he had to back up away from me. Coop pushed open the door and came inside and was just looking at us both. Tim kind of just played it off casually. I did not know what to say or do. I felt like Coop knew exactly what was going on.”
- d. “Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.”
- e. Mr. Ballard “committed battery and sexual assault” on her.
- f. Mr. Ballard “made fraudulent statements” to her, including that “the COUPLES RUSE . . . helps in fighting human trafficking,” which statements she claims are “false.”
- g. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

121. The above statements are all false.

**FIRST CAUSE OF ACTION
(Defamation against Ms. Borys)**

122. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

123. Ms. Borys published all of the statements set forth above, including, but not limited to:

124. “I was molested and sexually assaulted by Tim in four different states five different countries in the span of 10 months.”

125. “Tim manipulated and abused and brainwashed me to a point where I didn’t know left from right and right from wrong.”

126. “The truth is the only evil I really saw [on operations] was Tim Ballard and what he did to me. Looking back now I know it was all an elaborate ploy just to justify Tim’s wicked desires.” (In context, this included the assertion that the operations Mr. Ballard participated in did not include gathering intelligence to bust trafficking rings.)

127. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

128. All of the above statements by Ms. Borys were and are false.

129. The statements by Ms. Borys are not subject to any privilege.

130. Ms. Borys published these statements with knowledge the statements were false, or with reckless disregard of whether they were false or not.

131. The defamatory statements made by Ms. Borys caused substantial harm to Mr. Ballard, and will continue to cause future damages, including lost income, and other special and general damages in amounts to be proven at trial.

132. At the time she made the above statements, Ms. Borys had actual knowledge that they were false, or actually entertained serious doubts as to whether they were true. Ms. Borys's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Borys in favor of Mr. Ballard.

SECOND CAUSE OF ACTION
(Violation of Computer Fraud and Abuse Act against Ms. Borys)

133. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

134. Ms. Borys criminally violated the Computer Fraud and Abuse Act, 18 U.S. Code Sec. 1030 *et seq.* Such act allows civil claims for violations.

135. Ms. Borys intentionally accessed Mr. Ballard's computer (which term is defined to include his Google data storage and communications services), without authorization (or in excess of any claimed authorization) and obtained information from such computer.

136. Mr. Ballard's computer is used in interstate and foreign commerce.

137. By obtaining and publishing information she accessed on Mr. Ballard's computer, Ms. Borys caused substantial harm to Mr. Ballard in an amount to be proven at trial, but far in excess of \$5,000 (the minimum amount for civil claims under the Computer Fraud and Abuse Act).

138. Ms. Borys's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Borys in favor of Mr. Ballard.

THIRD CAUSE OF ACTION
(Violation of Utah Computer Abuse and Data Recovery Act against Ms. Borys)

139. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

140. Ms. Borys criminally violated the Utah Computer Crimes Act, Utah Code Sections 76-6-702 *et seq.* She also violated the civil Computer Abuse and Data Recovery Act, Utah Code Sections 63D-3-101 *et seq.*

141. Ms. Borys had permission to access Mr. Ballard's protected computer, within the instructions given her, while she was an "employee, agent, or contractor" of Mr. Ballard or his entity. Such permission was revoked when she ceased to be an "employee, agent, or contractor" of Mr. Ballard or his entity.

142. After her permission was revoked, Ms. Borys intentionally accessed Mr. Ballard's protected computer, with the intent to cause harm to Mr. Ballard.

143. By obtaining and publishing information she accessed on Mr. Ballard's protected computer, Ms. Borys caused substantial harm to Mr. Ballard in an amount to be proven at trial.

144. Ms. Borys's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Borys in favor of Mr. Ballard.

FOURTH CAUSE OF ACTION
(Invasion of Privacy against Ms. Borys)

145. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

146. Ms. Borys intentionally accessed without authorization Mr. Ballard's private electronic files in which Mr. Ballard had a reasonable expectation of privacy.

147. Ms. Borys then stole and published many of Mr. Ballard's private files. The private files stolen and published by Ms. Borys included private and confidential financial information, sacred religious blessings, attorney-client communications, and other documents.

148. By accessing, stealing, and publishing Mr. Ballard's private information, Ms. Borys caused substantial harm to Mr. Ballard in an amount to be proven at trial.

149. Ms. Borys's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Borys in favor of Mr. Ballard.

**FIFTH CAUSE OF ACTION
(Defamation against Ms. Lynch)**

150. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

151. Ms. Lynch published all of the statements set forth above, including, but not limited to:

- a. Mr. Ballard assaulted her in her bedroom while waiting for an Uber for the October 28/29 training;
- b. Mr. Ballard assaulted her in an Uber on the way to the October 28/29 training;
- c. Mr. Ballard had Ms. Lynch give him a lap dance during the October 28/29 training which Mr. Ballard's son watched;

- d. Mr. Ballard assaulted her at her home (referring to the January 7/8 alleged incident).
- e. “Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.”
- f. Mr. Ballard “committed battery and sexual assault” on her.
- g. Mr. Ballard “made fraudulent statements” to her, including that “the COUPLES RUSE . . . helps in fighting human trafficking,” which statements she claims are “false.”
- h. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

152. All of the above statements by Ms. Lynch were and are false.

153. The statements by Ms. Lynch are not subject to any privilege.

154. Ms. Lynch published these statements with knowledge the statements were false, or with reckless disregard of whether they were false or not.

155. The defamatory statements made by Ms. Lynch caused substantial harm to Mr. Ballard, and will continue to cause future damages, including lost income, and other special and general damages in amounts to be proven at trial.

156. At the time she made the above statements, Ms. Lynch had actual knowledge that they were false, or actually entertained serious doubts as to whether they were true. Ms. Lynch’s conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Lynch in favor of Mr. Ballard.

**SIXTH CAUSE OF ACTION
(Defamation against Ms. Righter)**

157. Plaintiff incorporates herein all prior allegations as if fully set forth herein.
158. Ms. Righter published all of the statements set forth above, including, but not limited to:
- a. “Ballard used OUR and its OPS to fund his personal fantasies of grandeur.”
 - b. “Ballard attempted to goad Defendant Cooper to be more sexually aggressive in the COUPLES RUSE with Plaintiff, which led to Plaintiff being sexually touched by Defendant Cooper under false pretense both at the lavish resort and while going to strip clubs and massage parlors in the British Virgin Islands.”
 - c. “Ballard was present” when Righter suffered an injury in training “and refused to call an ambulance because he wanted no record of the event occurring at OUR’s training.”
 - d. Ballard “solicited, instructed, commanded, encouraged and/or intentionally committed battery and sexual assault of” Ms. Righter (by allegedly having Mr. Cooper assault her).
 - e. “They [including Ballard] defrauded all of us. . . . They’re not rescuing children. They’re making a morality play for money.”
159. All of the above statements by Ms. Righter were and are false.
160. The statements by Ms. Righter are not subject to any privilege.
161. Ms. Righter published these statements with knowledge the statements were false, or with reckless disregard of whether they were false or not.

162. The defamatory statements made by Ms. Righter caused substantial harm to Mr. Ballard, and will continue to cause future damages, including lost income, and other special and general damages in amounts to be proven at trial.

163. At the time she made the above statements, Ms. Righter had actual knowledge that they were false, or actually entertained serious doubts as to whether they were true. Ms. Righter's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Righter in favor of Mr. Ballard.

**SEVENTH CAUSE OF ACTION
(Defamation against Ms. Hightower)**

164. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

165. Ms. Hightower published all of the statements set forth above, including, but not limited to:

- a. "Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission."
- b. Mr. Ballard "committed battery and sexual assault" on her.
- c. Mr. Ballard "made fraudulent statements" to her, including that "the COUPLES RUSE . . . helps in fighting human trafficking," which statements she now claims are "false."
- d. She "said the code word" during the operation she was on with Mr. Ballard, and "Ballard did not respond to protect her, so she repeated it again."

- e. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

166. All of the above statements by Ms. Hightower were and are false.

167. The statements by Ms. Hightower are not subject to any privilege.

168. Ms. Hightower published these statements with knowledge the statements were false, or with reckless disregard of whether they were false or not.

169. The defamatory statements made by Ms. Hightower caused substantial harm to Mr. Ballard, and will continue to cause future damages, including lost income, and other special and general damages in amounts to be proven at trial.

170. At the time she made the above statements, Ms. Hightower had actual knowledge that they were false, or actually entertained serious doubts as to whether they were true. Ms. Hightower's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Hightower in favor of Mr. Ballard.

**EIGHTH CAUSE OF ACTION
(Defamation against Ms. Kacey)**

171. Plaintiff incorporates herein all prior allegations as if fully set forth herein.

172. Ms. Kacey published all of the statements set forth above, including, but not limited to:

- a. Mr. Ballard "became increasingly sexually perverse and aggressive" with her.
- b. Mr. Ballard "began pushing all boundaries and asserting that behaviors outside of the initial rules were to be employed as needed. Tim found sufficient

reasoning and was very convincing that frequent sexual boundary breeches were essential.”

- c. Mr. Ballard “asks Janet about our relationship in past lives.”
- d. Mr. Ballard discussed with Ms. Kacey “this genius ‘new technique [redacted] came up with’ where he places his dick underneath me and it totally looks like we’re having sex but we’re not, so they’re all completely fooled.”
- e. “Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.”
- f. Mr. Ballard “committed battery and sexual assault” on her.
- g. Mr. Ballard “made fraudulent statements” to her, including that “the COUPLES RUSE . . . helps in fighting human trafficking,” which statements she claims are “false.”
- h. Ballard claimed that Janet Russon told him that he had been married to one or more of the women in a previous life.

173. All of the above statements by Ms. Kacey were and are false.

174. The statements by Ms. Kacey are not subject to any privilege.

175. Ms. Kacey published these statements with knowledge the statements were false, or with reckless disregard of whether they were false or not.

176. The defamatory statements made by Ms. Kacey caused substantial harm to Mr. Ballard, and will continue to cause future damages, including lost income, and other special and general damages in amounts to be proven at trial.

177. At the time she made the above statements, Ms. Kacey had actual knowledge that they were false, or actually entertained serious doubts as to whether they were true. Ms. Kacey's conduct was willful and malicious, intentionally fraudulent, and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of others, including Mr. Ballard. Accordingly, punitive damages should be awarded against Ms. Kacey in favor of Mr. Ballard.

PRAYER FOR RELIEF

Wherefor, Mr. Ballard prays for judgment against each Defendant as follows:

- 178. For general damages according to proof;
- 179. For special damages according to proof;
- 180. For punitive damages in an amount sufficient to punish and deter each Defendant and others in similar situations from engaging in such conduct in the future;
- 181. For costs and attorney's fees as allowed by law; and
- 182. For such other relief as the Court deems just and equitable.

Dated: October 8, 2024

CALL & JENSEN

/s/ Mark L. Eisenhut
Mark L. Eisenhut

Attorneys for Timothy Ballard

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial for all claims set forth in this Complaint or in any subsequent or amended complaints filed in this action.

Dated: October 8, 2024

CALL & JENSEN

/s/ Mark L. Eisenhut
Mark L. Eisenhut

Attorneys for Timothy Ballard

EXHIBIT 1

Contains:

- Affidavit of Janet Russon
- Text message Ms. Borys to Ms. Russon "Katherine on a friggin pedestal"
- Text message Ms. Russon and Ms. Borys "Im love with my boss"
- Ms. Borys Resignation Letter
- Ms. Borys Letter to Church re Defending Mr. Ballard
- Text message Ms. Borys to Emily re I need my podcast out
- Email re Tueller and Tiffany Affidavit
- Text message Ms. Borys and Tyson re fired OUR while on paternity leave

Affidavit of Janet Russon

I, Janet Lynn Burgess-Russon witness and swear that the following account of events is true and correct.

- In any or all legal filings by attorneys Suzette Rasmussen and Alan W. Mortensen, in which I am named, included or referenced, I state unequivocally, that I have never in my lifetime said that any individual was "married to" or had a "relationship to or with" another individual in a "past life" or "past lives".
- I have never spoken with any of the Plaintiffs about "past lives". I have never met or conversed in any form with most of the Plaintiffs. Those among the list of Plaintiffs with whom I have met, conversed, texted, or messaged are Krista Kasey and Celeste Borys. I have never had a conversation about "past lives" with either of these individuals.
- Other Plaintiffs reference me as having told Tim that they were involved with Tim in either a past life "relationship" or "marriage". This and any statement that I purported to make to the Plaintiffs regarding "past life or past lives" is not true.
- The genesis of this concept comes from a conversation with a female Operator who went on one operation on or around February 2023, before the Plaintiffs filed. This former Operator, JJ, told me on a phone call, while she was on an operation, that SHE believed she was married to Tim in a past life. She asked me to validate this revelation which she said was "from God". I responded, "If you believe that JJ, then that is your belief." I knew from previous conversations with her (text messages provided upon request), that SHE JJ, was hyper focused on trying to create any connection with Tim Ballard that she could justify or validate, often using spiritual or religious references and vernacular to support her beliefs. In one such conversation, she asked me if I thought she was crazy.
- Upon question, I asked JJ who she thought she was in the past life she was referring to. She said, "Elizabeth". I asked her, "Elizabeth, who?" to which she replied, "Elizabeth Tilly". Though JJ knew little about this person, I do know of this historical figure from early Colonial American history. Elizabeth Tilly was a passenger on the 1620 voyage of the Mayflower. She was born in 1607 and died in 1687. She survived the 66 day Mayflower voyage that first arrived in Cape Cod, MA in 1620, and later, Plymouth. I then asked this Operator who she thought Tim was in the past life she was referring to. She answered as I thought she would and said, "John Howland". John Howland also survived the two month voyage and did in fact become Elizabeth Tilly's husband in 1623, in the New World or Plymouth, MA.
- On another occasion (there are many), in conversation, JJ confided in me that she believed she and Tim Ballard would be married in THIS life. JJ shared that she felt God inspired her saying, "I think it's from God...". JJ asked me, "How do I make that happen?" I replied, "You don't" and I reminded her that the likelihood of that coming to pass was minimal at best. I said, "You are married with 3 children and Tim is happily married to Katherine with 9 children." I asked her a question saying, "JJ, what if it never happens? Would you be alright if it never happened?" She appeared to have an ah-ha moment and said, "Wow, what if it never happened!". We continued to talk and she said she felt much

better. She references the positive and relieved emotions she experienced, and the words of her response from this conversation, in a text thread with me (available upon request).

- After informing Tim of this conversation with JJ, he called the Sheriff's office in his city, (record available upon request), to report that JJ may have delusional or misguided thinking and asked for added surveillance. He also asked his children not to accept any homemade goods that might come to their residence.
- Note: When this Operator JJ, said she was "married to Tim in a past life", I immediately knew she was not focused on the mission of the operation, the planned rescue of children or the trafficker who was about to deliver them on the Operation. She was focused on Tim Ballard. I tried several times, over days, before and after the referenced conversation, to refocus this Operator JJ, to the mission. With each conversation, I informed Tim Ballard that this individual was not mission centric. Tim canceled the mission and deemed it "burned" since this Operator was distracted and unable to complete the Operation. It was from this particular Operator JJ, that I, for the first time, heard references made between past lives, Tim Ballard and myself.
- Since that time, the Plaintiffs in these cases have repeated and recycled what I believe to be this Operator's words regarding me, attributing her statements of "past life or past lives" and a past life relationship with Tim Ballard, to me instead of to herself. The Plaintiffs have repeated JJ's words, statements and sentiments, third hand.

Kindly,

Janet Lynn Burgess-Russon

< C Celeste Borys ▾



They made me stay
at a different hotel.

7:12 PM

Also. Why does
everyone put
Katherine on a
friggin pedestal
she's not perfect?
I'm not jealous. It's
just annoying as
shit! "She gives up
so much blah blah
blah. Does he not
give up anything.

Uuuggghhh"

Why am I so agree
lately?

7:14 PM



9:14

LTE



< C Celeste Borys ▾



Thursday, July 20

Let's talk tomorrow!



12:00 AM

He bought a 1 way
ticket to Alaska

9:35 AM

One way. I didn't
finish his email.

9:37 AM

Im love with
my boss who is
married, most
popular guy in the
world. How did that
happen??

I have two maxed
out CC

Not on the bank



<  Celeste Borys ▾

my boss who is married, most popular guy in the world. How did that happen??

I have two maxed out CC

Not on the bank accounts, I don't even know how to get into the bank account.

I woke up just realizing all of this.

9:44 AM

How can I help?
What do you want to do?



From: "Celeste Borys" ·

To: "Tim Ballard"

Subject: The future

Date: Mon, 11 Sep 2023 00:11:53 +0000

Importance: Normal

Hi,

I need to write and let you know I need to resign as your EA. I believe we both knew this day was coming sooner than later. It is now time for me to move on while you go in the direction you are going. I should explain a couple of reasons because you are not just my boss but also my friend. I need stability in my life right now. I need to know when and how paychecks are coming in. To be completely transparent with you, the more people that have circled around you recently have made it difficult for me to do my job correctly or at all, the more I find myself being everyone else EA except yours, which is not why I am here. I'm afraid I have to disagree with some of the directions and people who are a big part of your workforce, which brings negativity, which no one needs right now. Especially you! It would be best if you were around all things positive.

I can't tell you how grateful I am for all the experience you have provided in my position here with you. In many ways, I can take it with me wherever I end up in a large capacity. I am more than happy to help transfer whatever is needed over the next two weeks to another EA or whatever that looks like for you, whether that would be the Feraci team, i.e., his EAs, Todd, Porenta, Janet, or maybe someone from the outside. Just let me know how to proceed with this transition; I am happy to do so.

Sincerely,

--

CELESTE BORYS

Executive Assistant to Tim Ballard



Celeste Borys ·

(no subject)

1 message

Celeste Borys <

Mon, Sep 25, 2023 at 12:27 AM

To: "mcoopa25@gmail.com" <mcoopa25@gmail.com> Tim Ballard ·

To Whom It May Concern,

My name is Celeste; I am Tim Ballard, Executive Assistant and an UnderCover Operative. I learned about Human Trafficking and how prevalent it is three years ago. All I wanted to do was get involved in 1 way or another to help end it. I started with an event I hosted. My passion for the mission took over, and I eventually ended up selling my salon and working at OUR full-time, managing volunteers for the Western United States and Canada.

I then moved to the COO/CFO Executive Assistant role. I tell you this because it is a massive factor in why my testimony matters here. Being Simon, COO/CFO Executive Assistant, allowed me to be involved in daily operations and Financials. I oversaw and was the doorkeeper to many things and every department at O.U.R. Six months into this position, I started training for UnderCover Operations while keeping my current job. In my first operation, which I was preparing for, we used the "couples ruse." tactic. This allows male and female operators to go into places and get intel in a way you couldn't get if you were to go solo as a male or female.

Having a partner protects you and other operators on the mission with you. People seem to forget that being a trafficker is dark. These people are smart. They can tell if you are fake or if you are real. If we were to send in male operators to a spa where they were having kids perform sex, they would expect that male operator to participate; the male operator would have to say no and leave immediately as the traffickers would know they were not real "buyers" Lives would be in danger because no one would buy children to say "no." If you have a partner, you can play off each other and block each other from getting in trouble while trying to get intel. It is very strategic and unpredictable, and you must trust each other. This is acting, and we manage to do this every single time without touching or kissing. There is no set outcome when going to buy a child. It is purely based on lots of training, trust, and prayer.

The couple's Ruse is a well-thought-out process. It comes with training, and you have to trust your partner. Traffickers are raping and selling children for sex and are smart! You have to be believable; they will be able to tell if you are acting or fake! Leading up to an operation, details are being made, including locations, safe houses, prep houses, prep locations, tattoo artists, makeup artists, camera crew, flights, backup operators, and so forth. We also all have "burner" cell phones that we use only on operations. These cell phones also need credibility, so leading up to all operations, we have to preload back and forth to either the couple acting as a couple on the OP or the group going in general. The reason is that traffickers have the technology to lift content from your phone to get intel. They also have grabbed phones out of our hands to look at accuracy, text messages, pictures, and flights to assure them we are not cops or undercover operatives. This is such an important detail that has saved lives before. My biggest OP was due to the help of having a pre-loaded burner phone with text messages and content showing history leading up to us being on the Operation with the traffickers.

As I continued Operations, I became Tim Ballard's Executive Assistant. It made sense; I was on many current Operations and the day-to-day while we were in Utah. This made it easy as an EA and an Operator to collaborate from all angles for Tim and his day-to-day and Tim Ballard brand, i.e., books, speaking events, and the release of SOF. At a point, we built a team called the "Founders Group," which consisted of a couple of people to help me out with Tim's ongoing and current projects.

The Founders Group kicked off their first meeting in our Miami, OUR office; while they were there, there was some discussion on the possibility of potentially bringing OUR employees on Operations to get a feel and see firsthand what they are like on an appropriate basis. It is one thing to have passion and explain something you know of, but it's another thing to witness your passion firsthand and explain it to people. That was the goal here when the idea was to bring employees, if appropriate, to operations. We had a long-time employee very interested, and Tim thought bringing her along as the couple ruse would be a good fit with the current OP that was coming up. I was on this OP all but the last two days in which I have text messages of the whole group and their constant whereabouts. Operations can be tough if you are unprepared, especially when going undercover and acting as a trafficker. I can see how it can mess with your mind and confuse you on why you were there and what you accomplished, especially if there is no follow-up therapy. As a couple of weeks passed, this individual would text and call Tim Ballard more and more. He would send them to me each time and ask for help to address it. I explain some of this because I want to give some context of what the Couples Ruse tactic is, why and how it works, along with how being on operations or operations, in general, can confuse you and mess with your mind if you are not ready, trained or got the right therapy directly after.

12/29/23, 12:35 PM

Gmail - (no subject)

I have been working with Tim Ballard for almost one year. I have felt safe being Tim's partner in every operation I have been on; I have never been taken advantage of. He has always respected me and all the other operators around me. Tim has devoted much of his life to helping everyone around him. All these negative media, lies, and accusations are doing nothing but tearing families apart, not rescuing children, and exposing tactics that we use every day to save children that we might not be able to use anymore. Child Trafficking is the darkest, most dangerous, and most disgusting thing on this earth. Going in to meet a trafficker with polite manners and tea will not save a child. You have to speak their language, look like them, and get in their head. It is a place where the average person can't go and most likely can't understand the world, but thank goodness we have people who can go to that world and do understand it; otherwise, we wouldn't be able to save children. You can't teach this anywhere. It is a gift God has given certain people to do, so can we please stop exposing the tactics and clear Tim Ballard's good name so we can continue saving children?

Thank you

Sincerely,

--

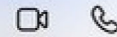
CELESTE BORYS

Executive Assistant to Tim Ballard

8:43

SOS 21%

< Celeste 1d



Tue, Sep 19

A grown adult woman who willingly and begged to go now crying out manipulation

How dangerous is Alan 5:47 PM

Listen. Help me with this on what you think. . Last yr we did a OP in Mexico. The girl trafficking the girls was via escorts. So I got infiltrated through escorting a fake website we made. I had to take boudoire photos. The photos are only on my burner. My burner got left at OUR and they never let me back in to get it. I asked coop to wipe the cloud 3 months ago. Checked with him over the weekend and he never did.

I was NOT naked. All in lingerie but you know how it could be used. It was a classic boudoir photoshoot.

My husband new I did it at the time even. He saw all the pictures. That's what kills me with him doing this to me now.

5:50 PM



I need MY podcast out. It talks about me and the escort OP.

I think Tim even mention the pictures.

5:52 PM

Hold on. On a call. Not ignoring. Haven't read

5:55 PM

Let's get it out then!!!



Message





FW: Tueller Affidavit declaration

-----Original Message-----

From: Todd Tueller <

Sent: Wednesday, October 2, 2024 8:44 PM

To:

Subject: Affidavit declaration

We (Todd and Tiffany Tueller) declare the following:

1. We were with Celeste and Tim and others when they did the podcast on September 1.
2. We were with Celeste before, in the same room as her and Tim during the podcast, and we were with Celeste and others after the podcast that day.
3. Celeste demeanor was happy upbeat and positive. She was expressing her desire to set the record straight regarding her involvement with child rescue and Tim Ballard in a way that was positive and in defense of both Tim and child rescue.
4. She had talked of the importance of this podcast for sometime before September 1 as we accompanied her and others traveling in South America to promote the new movie Sound of freedom.
5. We can say that we both heard her speak highly of Tim and of the child rescue efforts that she was personally involved with.
6. Her demeanor that day, both prior to the podcast certainly during the podcast and post podcast was very upbeat and positive.
7. We were in a room watching her entire podcast with Tim and she was supportive happy and complementary of the work that she and Tim had done together to rescue children undercover.
8. We listened and watched the entire podcast and her positive tone and defensive position regarding Tim and child rescue never changed.
9. Upon completion of the podcast, she was very positively energized and hugged us both with congratulations and high five mentality.
10. Celeste mentioned she thought she did a good job and was happy with the results. Some of these conversations happened without Tim being in the room as he was busy on the phone and doing other work.
11. After the podcast, Celeste continued to be upbeat and positive the remainder of the day as others shared their experiences and being taped for the podcast, including Todd and Tiffany Tueller.
12. The studio was fairly small and one could hear activity from the hallway all the way to the videotaping room. There were a number of people in that relatively limited space. For example, it was very difficult to have phone conversations without interrupting other people in the space or being heard by others that were present.
13. Celeste mentioned several times how important it was for her to get on tape her positive experiences and the truth of child rescue with Tim Ballard and was anxious to have the podcast published. She was happy, friendly and supportive of this days and weeks before, during and directly after the podcast. The podcast should be watched in its entirety and speaks for itself and represents her comments that I heard before the podcast as well as after. It was complementary of Tim Ballard and showed the teaming with him in a very positive light.
14. I (Todd Tueller) did recall that Celeste was offered to have her face blurred out in the video to protect her identity and she insisted on not doing that in order to speak the truth of the reality of child rescue and the efforts that her and Tim went through to rescue these children.
15. We saw absolutely no indication of being forced to participate or coached in her witnessing or any cohesion of any sort. In fact what we witnessed was the opposite in terms of her desire to be involved in supporting Tim and supporting this effort.

We declare that the above is true and are pleased to further share what we witnessed.

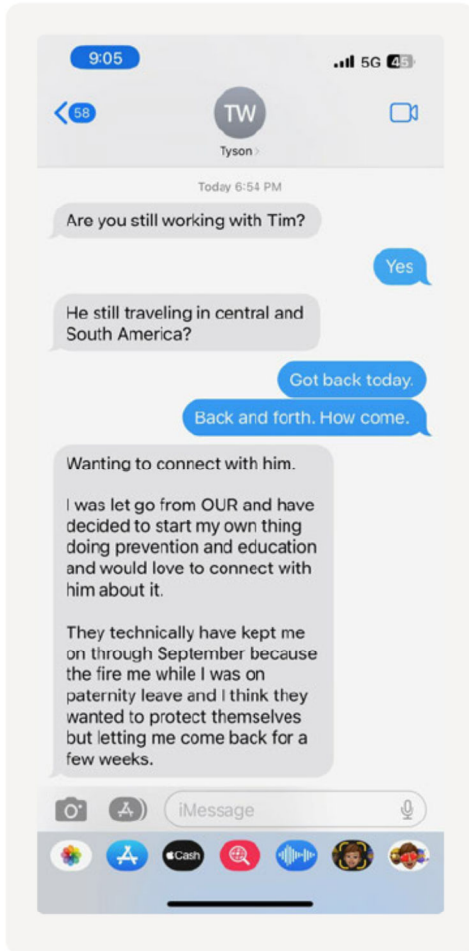
Todd Tueller and Tiffany Tueller.

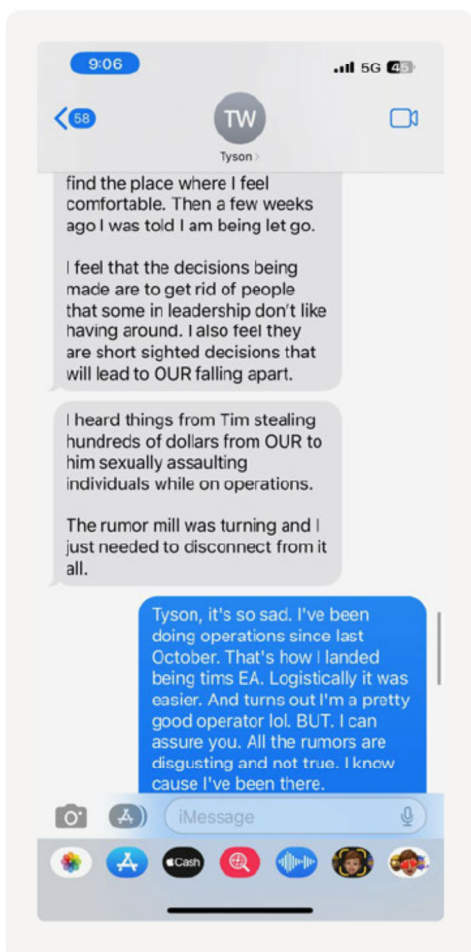
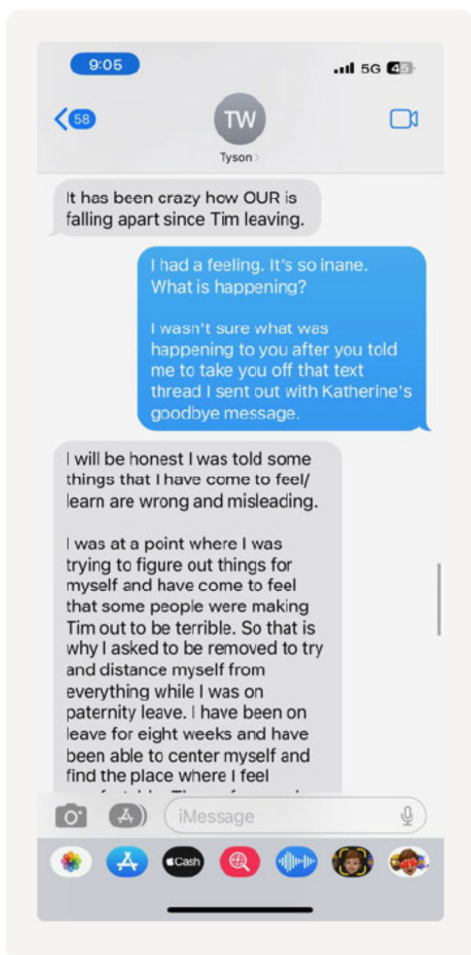
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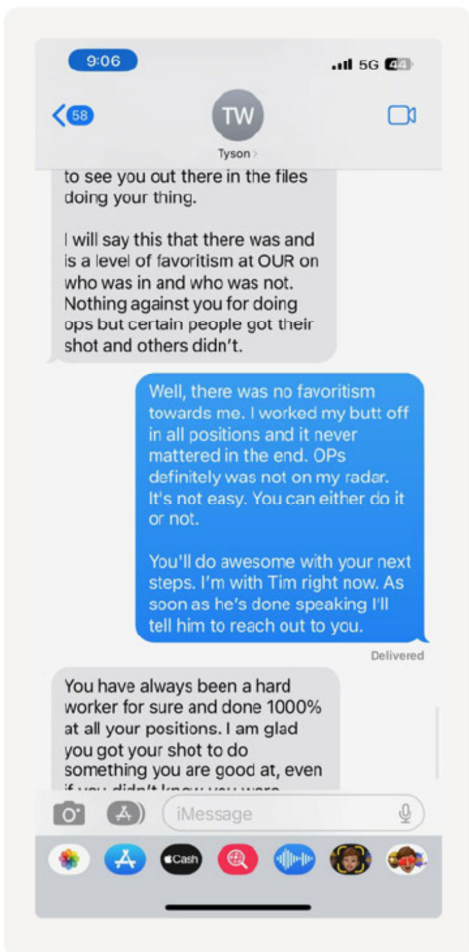
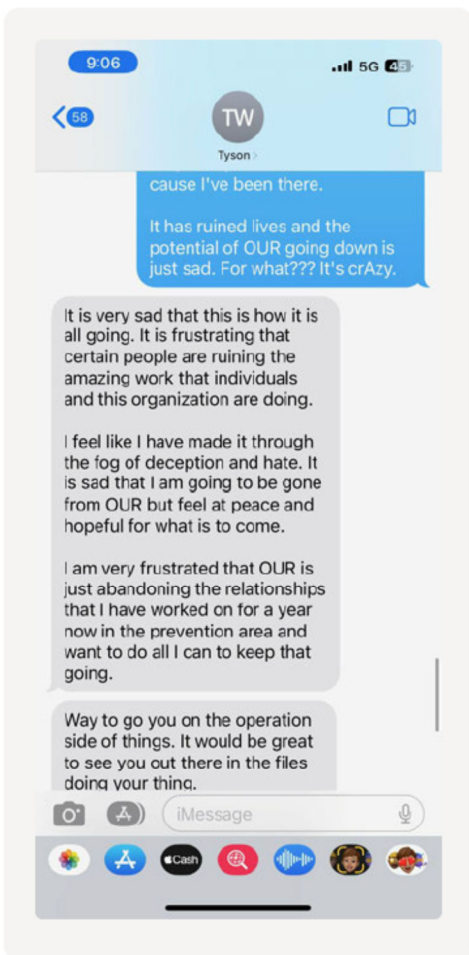
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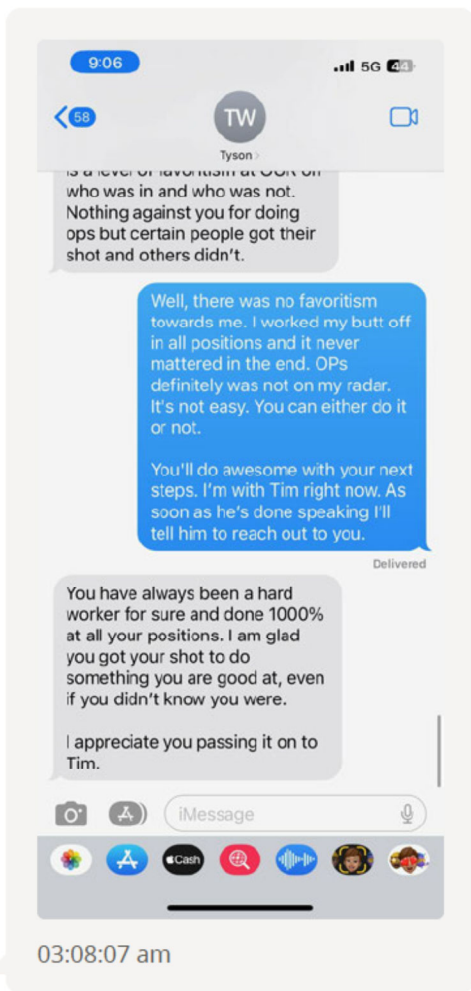
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Celeste B









CB

EXHIBIT 2

Contains:

- Text re Matthew Cooper is an incredible human being
- Email from Christian Hughes re Ballard Not Present for Bree Righter Injury
- Text with Mr. Cooper and Simon re Bree Hospital
- Text from Ms. Righter to Mr. Cooper thanking for help with injury
- Text from Ms. Righter to Mr. Cooper re Referral for Job

shit. Here's an old example.
Unsolicited random text from Bree
after you guys did the BVI op:

I see you 10:57 AM



10:57 AM ✓✓

On a slightly unrelated note... I would like to state for the record that Matthew Cooper is an incredible human being. He could not have been better to work with during the Op. There is zero way it could have felt less awkward or more safe. Boundaries were perfect.

10:59 AM

I didn't ask her anything about it, we were talking about other life crap





Legal statement || October training

Edward Christian

Legal Statement Regarding Incident Involving Bree Righter

I, Christian Hughes, hereby declare the following statement regarding the incident involving Bree Righter that occurred during the undercover operator training event for Operation Underground Railroad on Oct 16, 2021.

1. I was present at the aforementioned event and was responsible for filming the activities for the purpose of creating a training video.
2. During the event, Bree Righter participated in a wrestling activity on a mat, during which she sustained an injury.
3. Upon reviewing the footage captured during the event, I can confirm that Tim Ballard was not present at the venue at the time of Bree Righter's injury.
4. The footage clearly shows that Tim Ballard did not engage with Bree Righter at any point during the event, nor did he provide or deny assistance to her.
5. Based on the evidence from the recorded footage, it is my assertion that the claims made by Bree Righter regarding Tim Ballard denying her healthcare are unfounded.

I affirm that the above statements are true to the best of my knowledge and belief.

Signed,

Christian Hughes
09/08/2024



Oct 16, 2021 at 12:42 PM

So Bree does have insurance, she has a \$ 500 deductible and didn't want to come to hospital because of that.

Am I okay to use a OUR card for that?

Yes

Ok.

I apologize. She clarified that it's a \$500 ER CO-Pay.

No worries

Just get a receipt

Or make one

Whatever costs come after we will cover

Ok. She is being transferred to another hospital for facial specialist to further asses and may require a surgery. She has fracture on orbital bone.

Oct 16, 2021 at 3:36 PM

Wow!

Holy cow, that is a hard hit



iMessage



< 28



Bree Righter

last seen yesterday at 10:49 PM



8:24 PM

Thank you for rooting for me 😊 8:24 PM

I know you are in my corner 8:24 PM

You know it! 8:25 PM ✓✓

I hope you know... That day I got hurt would have been a million times worse if you hadn't been with me 8:25 PM

Aaah shucks. That's sweet to say. 8:26 PM ✓✓

It is the absolute truth. I might not have shown it... But I would have been so much more scared. 8:27 PM

I take care of my people 8:28 PM ✓✓

9:11



BR

Bree Righter



anyone about this conversation

Mar 22, 2022

11:52 AM



Did you ever pass on to Tim that I wanted him to call me directly along with my phone number?

Or did he decide to reach out?

11:55 AM

I gave him your phone number per his request. You said you didn't mind if he called

11:56 AM



Yes absolutely. Great

Just clarifying. I appreciated that we spoke directly

That's all good

I just wanted to see if he realized on his own that is what was best

11:56 AM

Mar 31, 2022

May I give your number to my potential employer as a reference for my work at OUR. I think she will just verify that I have actually worked with OUR and that I'm not a shit bird.

2:11 PM

Of course

2:12 PM



Thank you! 😊

2:12 PM



Message



EXHIBIT 3

Contains:

- OUR Undercover Operations Couples Ruse Agreement
- Todd Tueller Affidavit re Ms. Kacey

OUR Undercover Operations: Couples Ruse Agreement

Couples Ruse

The "Couples Ruse" is a Cover for Status and Cover for Action technique employed by OUR undercover operators. It will require a male, female pair posing as a couple under a false pretense that they are romantically involved. The couple will create the appearance of being romantically involved as they deem appropriate. The Couples Ruse will be used by OUR operatives to infiltrate human trafficking criminal networks. The operators will use their status as a couple to engage traffickers and trafficking victims without abusing victims or engaging in harmful illicit activities where male operators would normally be expected to do so. The Couples Ruse has proven effective in allowing OUR operators to gain access and intelligence into trafficking organizations.

Couples Ruse Limitations

The undercover operators and undercover operator trainees will not and have not engage in the following acts with each other: Kissing on the lips, touching or exposing private parts including Breast and Genitalia.

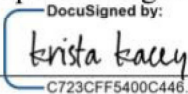
Acknowledgment

By signing this Agreement, you acknowledge you understand the Couples Ruse, its limitations, and that both persons participating in the couples ruse will not violate and have not violated the limitations of the Couples Ruse as defined in this agreement.

OUR Operator Printed Name

Krista Kacey

OUR Operator Signature

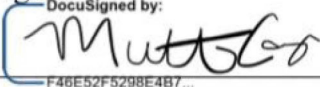
DocuSigned by:

C723CFF5400C446...

Date 3/18/2022

Witness Printed Name

Matthew Cooper

Witness Signature

DocuSigned by:

F46E52F5298E4B7...

Date 2/20/2022

I, Todd Tueller and Tiffany Tueller attached to the following:

1. Both Tiffany and I attended training for undercover couples operations to rescue children. This training was conducted in Budapest and was led by Arial a nonprofit organization that had been involved in child rescue. Tim Ballard was present at the training, but was not conducting the training. There were at least eight other individuals who were attending the training as well, including another couple. Mel Gibson stopped in to witness the training and participate. Most the training was conducted by Jeremy Lock, who has extensive undercover surveillance and undercover operation experience and training. It was our understanding that this was not the first time a training of this nature was conducted.
2. Krista was present for this training, and her role was as an experienced undercover operative to share her insights and experience.
3. in that training session, Tim publicly announced her as being responsible for undercover operative, couples training, and managing the undercover teams. This because of her extensive experience.
4. On a separate occasion, Krista came to our house to discuss her feelings regarding Tim Ballard and her involvement in child rescue
5. During that conversation, she said "Tim and I did not cross the lines. I would have nothing to confess to my Steak president regarding what we did."
6. I asked her knowing what she knows now if she were to do it all over again. Would she change anything? She said "no.! I would not change anything because a lot of children were rescued from trafficking"
7. She indicated that she had no first-hand witness of any inappropriate behavior between Tim other women. She just heard from an other women their claimed experience and she felt responsible for not providing better training to create boundaries that may have avoided what she understood may have happened.

Warm regards,

Todd Tueller Tiffany Tueller

EXHIBIT 4

Contains:

- October 2021 Text Messages Ms. Lynch with Mr. Cooper
- December 2021 Text Messages Ms. Lynch with Mr. Cooper
- January 2022 Text Messages Ms. Lynch with Mr. Cooper
re Shooting
- Text Messages Ms. Lynch and Mr. Ballard - Likes message
after alleged rape

Friday, October 29, 2021

Me

Hey shikira I was just calling to say hi and check on ya. Hope you have a good Halloween weekend

4:35 PM

Kira

Hi Matty!!
You are so sweet. I finally got a tiny nap in. I'm doing good!

4:51 PM

Me

Good I'm glad to hear your doing ok. Feel free to call or text me any questions or concerns any time.

4:52 PM

Kira

I will for sure. Thank you.


4:55 PM

Tuesday, November 9, 2021

Me

Address

8:57 PM

Saturday, November 20, 2021

Kira

Hey are you doing okay?

8:52 AM

Me

Yes I'm okay thank you for asking.

8:59 AM

Kira

Okay, I'm your friend and here for you!

9:03 AM

Me



Thank you Kira.

9:09 AM

Friday, December 3, 2021

Kira

Is the gate closed

2:05 PM

Kira

Should we go around?

2:05 PM

Me

1984

2:06 PM

Me
Code 2:06 PM

Kira
Matty?? 2:17 PM

Me
Yes 2:17 PM

Kira
Can you hear me calling you 2:17 PM

Monday, December 6, 2021

Me
Good luck Kira. Thoughts and prayers 2:14 PM

Kira
Your the best 5:57 PM

Me
I know 5:57 PM

Kira
And funny 5:57 PM

Kira
I'm druggist 5:58 PM

Me
I also know that too 5:58 PM

Me
Good 😊 5:58 PM

Me
Fly high 5:58 PM

Kira
I can't see good to fly high 5:58 PM

Me
For this flying you can close your eyes 5:59 PM

Kira
Haha I would dyie 6:12 PM

Friday, December 10, 2021

Kira

What showing are you doing tonight?

10:15 AM

Me

Triple take

11:21 AM

Me

Documentary

11:21 AM

Kira

Can I come?

11:31 AM

Me

Of course

11:34 AM

Kira

What time

11:36 AM

Me

11:36 AM

Kira

Can I bring my mom and maybe one friend

11:37 AM

Me

Sure

11:37 AM

Me

Don't be mad if there's not room

11:37 AM

Me

I think there will be I just can't account for other people inviting other people

11:37 AM

Kira

That's what I'm wondering. I just wanted to be safe

11:38 AM

Me

7167 S. Center Park Drive, West Jordan, Utah 84084

11:38 AM

Kira

What time should we come?
Are any of our shooting friends coming?

1:14 PM

From: [REDACTED] (owner)

Kira, coop can help U of your kids continue to be kept from u. I'm shutting down this phone for the week. I'm giving it to Cooper who will be manning it for the week.

Coop, if u get any imprinted messages forward to Dmitri. I promised Kathrine I would not bring my phone. Focusing on her and kids.

Status: Sent

1/8/2022 4:49:27 AM(UTC-8)

Source Info:
Timothy's iPhone/mobile/Library/SMS/sms.db : 0x27BBB5 (Table: message; Size: 284352512 bytes)

From: [REDACTED] (owner)

Important*

Status: Sent

1/8/2022 4:49:50 AM(UTC-8)

Source Info:
Timothy's iPhone/mobile/Library/SMS/sms.db : 0x27BB73F (Table: message; Size: 284352512 bytes)

From: + [REDACTED] Matt Cooper
To: + [REDACTED] (owner)

Liked "Kira, coop can help U of your kids continue to be kept from u. I'm shutting down this phone for the week. I'm giving it to Cooper who will be manning it for the week.

Coop, if u get any imprinted messages forward to Dmitri. I promised Kathrine I would not bring my phone. Focusing on her and kids."

Participant	Delivered	Read	Played
+ [REDACTED]		1/16/2022 5:42:54 PM(UTC-8)	

Status: Read

1/8/2022 7:27:04 AM(UTC-8)

Source Info:
Timothy's iPhone/mobile/Library/SMS/sms.db : 0x27BFED1 (Table: message, handle; Size: 284352512 bytes)

From: + [REDACTED] Kira Lynch
To: + [REDACTED] (owner)

Loved "Kira, coop can help U of your kids continue to be kept from u. I'm shutting down this phone for the week. I'm giving it to Cooper who will be manning it for the week.

Coop, if u get any imprinted messages forward to Dmitri. I promised Kathrine I would not bring my phone. Focusing on her and kids."

Participant	Delivered	Read	Played
+ [REDACTED]		1/16/2022 5:42:54 PM(UTC-8)	

Status: Read

1/8/2022 8:09:09 AM(UTC-8)

Source Info:
Timothy's iPhone/mobile/Library/SMS/sms.db : 0x27C0ED1 (Table: message, handle; Size: 284352512 bytes)

10:17



< 116



Kira >



funeral. I'll check in tomorrow to see what I can do.

Thank you! You are the best! ❤️

Matty you just be with your family! If I need you tomorrow I will call you promise!
I'm sorry you are at a funeral

As you wish

I will never be the friend that commands your attention away from your family unless I really need it.
Night night booty!

HA
HA

Always tight!

Jan 9, 2022 at 2:39 PM

When can we go shooting?

U DJ t need to shoot your already too good

Haha

U don't*



iMessage



EXHIBIT 5

10:08



< 124

MH

T



2 People >

T

overseas. when he is back u will pick up training!

We spoke already. See you next week

Tim Flip

Mary, when I was interviewing you I did so under the plan that I would be training you to be my partner in the couples ruse undercover ops. Since thst time, I've met with my team and family and we decided it's better for me not to be doing an undercover work for now—partly due to the liability that comes with being the public face and the growth of my public profile. Damn!! I was really liking where we were going. But we are still much looking forward to having you trained and working with you. 🙏

T

Matt will be in touch

Nov 11, 2021 at 8:28 AM

MH

Hey! I appreciate the update. You've got to do what you feel like is best for you/your family/your team in this moment & I respect that. 😊 definitely still looking forward to working with you all & getting trained!

MH



iMessage

