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If you do not respond to this document within applicable time limits, judgment could be entered against you as requested.

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Attorneys for Plaintiffs

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

WW, MK, DM, HDT and DS,

Plaintiffs,

v.

TIMOTHY BALLARD, an individual;
OPERATION UNDERGROUND
RAILROAD, INC., a Utah non-profit
corporation; LIBERTY AND LIGHT dba
THE SPEAR FUND, a Utah non-profit
Corporation; ROCKWELL GROUP, INC., a
Utah corporation; NAZARENE FUND, INC.

FIRST AMENDED COMPLAINT

(Tier 3)

Civil No.: 230907617

Judge: Chelsea Koch

JURY DEMANDED

dba THE NAZARENE FUND, a Utah corporation; SLAVE STEALERS, LLC, a Utah limited liability company; CHILDREN NEED FAMILIES FOUNDATION, a Utah non-profit corporation; DEACON, INC., a Nevada corporation; JANET RUSSON, an individual; CRAIG ANDERSON, an individual; JULIAN ANN BLAKE, an individual; WES MORTENSON, an individual; BENJAMIN PACK, an individual; MARK REYNOLDS, an individual; STEPHAN FAIRBANKS, an individual; MARK BLAKE, an individual; BRAD DAMON, an individual; MATTHEW OSBORNE, an individual; MATTHEW COOPER, an individual; and JOHN and JANE DOES 1-100,

Defendants.

Plaintiffs WW, DS, HDT, MK, and DM,¹ by and through counsel, hereby complain against Defendants and allege as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff WW is an adult citizen and resident of the State of Utah.
2. Plaintiff DS is an adult citizen and resident of the State of Utah.
3. Plaintiff HDT is an adult citizen and resident of the State of Utah.
4. Plaintiff MK is an adult citizen and resident of the State of Utah.

¹ Plaintiffs bring these claims using pseudonyms pursuant to protect their safety from the general public and from the Defendants, given their propensity to intimidate those who dare to stand up to them. These are not the real initials of the victims. Once a proper protective order is in place, Plaintiffs will provide their identifying information to Defendants. Given that Ballard committed the acts complained of, he already knows their identities and despite his efforts to blast his face in social and mainstream media, should understand the importance of keeping the identity of a scared and sexually victimized woman, private. Likewise, Defendant The Spear Fund, an alter-ego of Tim Ballard, issued a statement to the press stating that it knows the identities of these women.

5. Plaintiff DM is an adult citizen and resident of the State of Utah.
6. Defendant Timothy Ballard, aka Tim Ballard ("Ballard") is an adult citizen and resident of the State of Utah.
7. Defendant Operation Underground Railroad, Inc. ("OUR") is a Utah non-profit corporation.
8. Defendant Rockwell Group, Inc. is a Utah corporation.
9. Defendant Nazarene Fund, Inc. dba The Nazarene Fund is a Utah corporation.
10. Defendant Liberty and Light dba The Spear Fund, which claims to be a "trusted 501c(3)" working to "end human trafficking in our time," is a Utah non-profit corporation.
11. Defendant Slave Stealers, LLC, is a Utah Limited Liability Company.
12. Defendant Children Need Families Foundation is a Utah non-profit corporation.
13. Defendant Deacon, Inc., is a Nevada corporation.
14. Defendant Ballard is the alter-ego and face of the above--named corporate and company entities, which will be collectively referred to as "OUR" as Ballard wore many hats within the companies and no distinctions between the companies were made.
15. Defendant Janet Russon is an adult citizen and resident of the State of Utah.
16. Defendant Craig Anderson is a member of OUR's board and is an adult citizen and resident of the State of Utah.
17. Defendant Julian Ann Blake ("J.A. Blake") was a member of OUR's board and is an adult citizen and resident of the State of Utah.
18. Defendant Wes Mortenson is a member of OUR's board and is an adult citizen and resident of the State of Utah,

19. Defendant Benjamin Pack is a member of OUR's board and is an adult citizen and resident of the State of Utah.

20. Defendant Mark Reynolds is a member of OUR's board and is an adult citizen and resident of the State of Utah.

21. Defendant Stephan Fairbanks is a member of OUR's board and is an adult citizen and resident of the State of Utah.

22. Defendant Mark Blake ("M. Blake") is a member of OUR's board and is an adult citizen and resident of the State of Utah.

23. Defendant Brad Damon is a member of OUR's board and is an adult citizen and resident of the State of Utah.

24. Matthew Osborne is a current or former principal of OUR and is an adult citizen and resident of the State of Utah.

25. Matthew Cooper is a current or former employee of OUR and is an adult citizen and resident of the State of Utah.

26. This Court has jurisdiction pursuant to Utah Code § 78A-5-102.

27. Venue is proper pursuant to Utah Code § 78B-3-307.

28. Pursuant to Rule 26(c)(3) of the Utah Rules of Civil Procedure, the amount in controversy exceeds \$300,000 qualifying this claim for Tier 3 discovery.

FACTUAL ALLEGATIONS

“One of the saddest lessons of history is this: If we’ve been bamboozled long enough, we tend to reject any evidence of the bamboozle. We’re no longer interested in finding out the truth. The bamboozle has captured us. It’s simply too painful to acknowledge, even to ourselves, that we’ve been taken. Once you give a charlatan power over you, you almost never get it back.” – Carl Sagan

29. Timothy Ballard is an American activist, speaker, and author.
30. Ballard claims to have worked for the Central Intelligence Agency (CIA) and as a special agent in the United States Department of Homeland Security.
31. Ballard founded the non-profit organization Operation Underground Railroad ("OUR") in 2013 that claims to “lead the fight against human trafficking and sexual exploitation worldwide.”
32. Ballard founded the non-profit corporation Light and Liberty dba The Spear Fund as a landing spot for him after being fired by OUR; it operates as the alter-ego of Tim Ballard.
33. The other corporate defendants were created by Ballard in order to funnel the donations coming into OUR into corporate profits and shareholder distributions.
34. At all relevant points in time, Ballard was the CEO, and or manager/member of the above consortium of companies and Ballard was the alter-ego and face of these companies.
35. At all relevant points in time, Defendants Anderson, J.A. Blake, Mortenson, Pack, Reynolds, Fairbanks, M. Blake and Damon are and were members of OUR’s board (collectively "The Board") and owed fiduciary duties to Plaintiffs, and donors.
36. At all relevant points in time, Defendants Osborne and Cooper are and were principals and/or employees of OUR and had actual knowledge of Ballard’s and/or OUR’s misconduct and misrepresentations.

37. OUR raised money in order to have conducted multiple sting operations to purportedly rescue trafficked women and children ("OPS"), with OPS being conducted outside the United States.

38. Many of these OPS included wealthy men with no military training, who wanted an "experience vacation" where they dropped into third-world countries to rescue trafficked children, with photo opportunities and stories in the local newspapers of their heroics, all the while flying first class.

39. While promotional and media materials made the OPS appear to be paramilitary drop-ins to arrest traffickers and rescue children, what most OPS consisted of was going to strip clubs and massage parlors across the world, after flying first class to get there, and staying at 5-star hotels, on boats, and at VRBOs across the globe.

40. These OPS were a fund-raising machine, though they were more show than substance, and the entire OUR enterprises were funded by donors for these OPS, many of whom held bake sales and literally donated their "widow's mite" to OUR and Tim Ballard.

41. Ballard became the de facto and most recognized face of anti-child trafficking, which everyone agrees is a most noble cause.

42. Ballard became a character of mythical proportions with unquestioned legitimacy.

43. Ballard was appointed as a special advisor to Ivanka Trump in October 2017.



44. Ballard was invited by President Trump to join a White House anti-trafficking advisory board.



45. Ballard was appointed to the White House Public-Private Partnership Advisory Council to End Human Trafficking in 2019.

46. One of Ballard's closest friends is Utah Attorney General Sean Reyes, with Reyes promoting Ballard, until just recently, to be the next United States Senator from the State of Utah.



47. According to General Reyes' web page, Reyes is the top law enforcement official in Utah, charged with protecting "consumers from those who abuse the law", again providing credibility to Ballard and OUR that was not warranted.

48. General Reyes has repeatedly vouched for OUR and Tim Ballard, even participating in an alleged OP in Colombia, which was well publicized in Utah, giving Ballard the cover of the top law enforcement officer in the State of Utah to carry out his purposes, including the COUPLES RUSE, even while consumer complaints and criminal investigations were coming into his office regarding the improprieties of OUR and Ballard.

49. General Reyes gave undue credibility to OUR and Tim Ballard with foreign leaders. *See* Exhibit F.



50. Complaints of fraud and sex abuse by OUR and Tim Ballard were coming into the Attorney General's office, and it was determined that the Davis County Attorneys' Office would conduct a criminal investigation of Tim Ballard and OUR, as the Attorney General of the State of Utah had a conflict of interest because of his involvement and support of Tim Ballard and OUR.



51. OUR began claiming credit on its webpage and blog posts for work that other organizations were performing. *See Exhibit G.*

52. When these organizations started criticizing OUR on social media for its fraudulent hijacking of Plaintiff's organization's work, OUR and Tim Ballard began attacking them.

53. Some of these organizations reached out to the Davis County Investigation team based upon their experiences with OUR's and Tim Ballard's dishonesty and attacks, and what OUR was actually doing.

54. The Davis County Attorneys' office issued subpoenas to some of these Complainants for them to provide certain documents and testimony related to its investigation of OUR. *See* Exhibit H.

55. Upon learning of these complaints, Attorney General Reyes would step in, and rather than investigate what OUR and Tim Ballard were doing, would intimidate the complainants

56. Some of these complainants became very nervous, which anxiety was justified as both Plaintiff and Troy Rawlings were threatened with a lawsuit by OUR and Tim Ballard, and OUR and Tim Ballard hired a law firm in San Francisco to sue Troy Rawlings.

57. At this same time, others who had made complaints against OUR and Tim Ballard (critical and highly credible witnesses), began withdrawing their complaints based upon fear of retribution by OUR and Tim Ballard, thus impeding the Davis County Investigation. *See* Exhibit I.

58. The Davis County Investigation revealed that OUR and Tim Ballard were aware that allegations were being made that Ballard failed his CIA polygraph test, was on an unpaid intern at the CIA, and was fired from the CIA. *See* Exhibit J at p. 6, ¶ 58 (b).

59. OUR and Tim Ballard were aware that eight different women had complained to the Davis County Investigation that Ballard had engaged in sexual affairs with them. *Id.* at p. 6, ¶ 58 (a).

60. OUR and Tim Ballard were aware that the Davis County Attorney believed that Katherine Ballard had tampered with witnesses to impede them from cooperation with the Davis County Investigation. *Id.* at p. 7, ¶ 58 (f).

61. Troy Rawlings also believed that General Reyes “was guilty of witness tampering.”

62. Rawlings alleged to have written communications from AG Reyes to a witness requesting the witness not to cooperate with Rawlings in the Investigation.” *Id.* at p. 7, ¶ 58 (h).

63. OUR went to its de facto general counsel, Sean Reyes, and asked that a special prosecutor be appointed to prosecute Troy Rawlings. *See* Exhibit K.

64. Troy Rawlings went to Attorney General Sean Reyes and informed him of OUR’s threat to sue him, which General Reyes immediately informed Tim Ballard and OUR of Troy Rawlings’ concerns and deemed Mr. Rawlings’ statements as “false.” *See* Exhibit J at p. 5, ¶ 49.

65. Even as more fraud complaints came into General Reyes, he would immediately send them to Tim Ballard on his personal email, instead of his official Utah email. *See* Exhibit L.

66. At this time, Tim Ballard was ignoring his in-house counsel’s advice that what he was doing was illegal and unethical and could subject him to criminal liability from the Davis County Investigation and the Department of Justice. *See* Exhibit M.

67. Ballard claims to be blessed by Thom Harrison, both while Thom was alive, and through Spear President Ken Krogue, claiming to anoint Ballard as a chosen one, not subject to the jurisdiction of government and church authorities. *See* Exhibits N and O.

68. Ballard has been, until recently, business associates and close friends with Apostle and Acting President of the Quorum of the Twelve Apostles M. Russell Ballard (“President Ballard”) of The Church of Jesus Christ of Latter-Day Saints (“Mormon” or “Mormon

Church").²

69. President Ballard has cited Tim Ballard to students at Brigham Young University Idaho, as an expert of Book of Mormon Prophet Nephi and the Mormon view of American History.



70. Tim Ballard has met with President Ballard in the Church Administration Building in Salt Lake City, to discuss OUR's work.

71. The Davis County Investigation, according to OUR's own internal documents, revealed that Elder M. Russell Ballard and other authorities from the Mormon Church, provided Mormon tithing records to OUR to help OUR target wealthy donors and wealthy Mormon

² Because the full name of the church includes the name of deity, Plaintiffs' counsel will refer to The Church of Jesus Christ of Latter-Day Saints as it is more commonly known, the "Mormon" church, in order to limit the use of the sacred name of Jesus Christ. No disrespect is intended by the apparent informality.

Church Wards. *Id.* at p. 7, ¶ 58 (f).

72. Ballard has spoken to many Mormon Church groups across the country, including athletic teams at Brigham Young University.

73. Ballard has authored at least three purported historical books promoting Mormon Nationalism that have been published and sold by the Mormon Church-owned Deseret Book, which were big sellers in the Mormon community and further created the myth of Tim Ballard.

74. Ballard's enmeshment with the Mormon Church further provided him credibility and status in Utah, where the Mormon Church is the largest and founding denomination of the State.

75. Despite the very public distancing recently of the Mormon Church from Tim Ballard, the Mormon Church continues to promote OUR.

76. For example, on October 15, 2023, OUR's President, Defendant Osborne, gave a 'Fireside' on "grooming tactics," "extortion schemes," and other matters, in the New Braunfels 2nd Ward in Texas.

THE CHURCH OF
JESUS CHRIST
OF LATTER-DAY SAINTS

New Braunfels 2nd Ward

The 1st Ward has extended an invitation to all adults and youth 14+ (accompanied by a parent) to attend a devotional tomorrow October 15th at 7pm.

Matt Osborne, O.U.R. President, will address topics including:

- Internet Safety
- Grooming Tactics
- Extortion Schemes
- Situational Awareness
- Conversation Openers

Please see the attached flyer for additional information.

You received this email because you made your email address available to your local Church leaders. It was sent by Nathan Hirschi Manning, whose calling is Ward Assistant Executive Secretary.

77. Tim Ballard became friends with Glenn Beck, an American conservative political commentator, radio host, entrepreneur, and television producer. Glenn Beck donated significant amounts of money to begin OUR.

78. Tim Ballard and Glenn Beck formed Defendant company Nazarene Fund to fight Christian causes across the globe, and Beck gave Ballard almost unlimited access to the Glenn Beck media network, which further contributed to Ballard's credibility.

79. Beck, along with Attorney General Reyes, (who should have been looking at arresting and prosecuting Tim Ballard after the sexual assaults and fund raising being thrown upon the citizens of the state of Utah by Tim Ballard), became a fixer for Tim Ballard when the extent of his sexual depravity became known to the Mormon Church.

Nonupdate update

Glenn Beck <glb@glennbeck.com>
To: Tim Ballard <timblainballard@gmail.com>

Sat, Sep 16 at 6:31 PM

Tim,
I have spoken to Elder Andersen, who is out of the country, Mike Lee a few times and Sean Reyes today.

First, Elder Andersen did not have any information that was new as he has been out of the country. He said he knew that this was urgent and would be talking to some of the Brethren and would get back to me this week. He indicated that the language of betrayal was disturbing, but he knew very little beyond this. He was very concerned about you as well as the church and promised to get back to me as soon as he heard anything. He did urge caution for everyone until we know more from the Church authorities. I urged him that time was of the essence. He understood and said he would do all he could from where he was.

Second, I spoke to Mike and Sean several times today as well. I feel strongly that we KEEP OUR POWDER DRY until we know exactly what is happening with the Church. ANY false or inaccurate statements or speculation from anyone on your side Tim, again ANY, will prove deadly to the cause of Justice. I believe you should speak to Sean and Mike about an attorney outside of Utah, with NO Mormon ties to avoid conflict, that can soft pitch the idea that you are asking for the church to be clear and go through the usual church 'court' process. That it is disturbing that you found out about this the same way everyone else did. One of the things that you love about our faith is that The Lords house is a House of order. So you welcome the order to return so you may continue as a saint in Good Standing which I currently am. They and you should deny any lies that are being spread. But, (be careful here) you don't think it is a coincidence that you have been seriously considering a run for Senate as these accusations come forward. YOU pray that you your family and the church are protected from secret combinations that wish our faith and our country harm. AGAIN BE CAREFUL here.

A soft statement should be made on Monday. As we have PROOF what happened within the church. When you have the truth, when Sean has proof of what he needs, Mike has what evidence he needs to prove anything political. (I might consider a credible investigator) Then and only then should you move forward.

This very well may be the first shot across the bow to let all of us know, Satan has the unrighteous placed in all high places. We need to be very strategic about any moves from here. We are playing chess now. The days behind us I fear will soon feel like we were playing candy land.

You have known the importance of your calling. The gates of hell have opened over and over for you, Kathleen and the family. Know that God loves you and is with you. Let Him be your sword and shield. He is not unaware of your plight. If the days in which we live are indeed what we think they are, The Lord will clean out his own house first.

The truth, the whole truth and nothing but the truth WILL SET US FREE and will be the only thing that will stand the purification. Let us LOVE all those that hate and persecute us. May we all be on our knees for you and your family, as well as those brothers and sisters that are lost in darkness.

Glenn Beck
If you want something you've never had.
You will need to do something you've never done.

'every leader is telling a story about what he or she values in the way they behave. When leaders choose to be positive in the face of intense adversity, the story tends to be widely shared, and often repeated.' Walt Disney

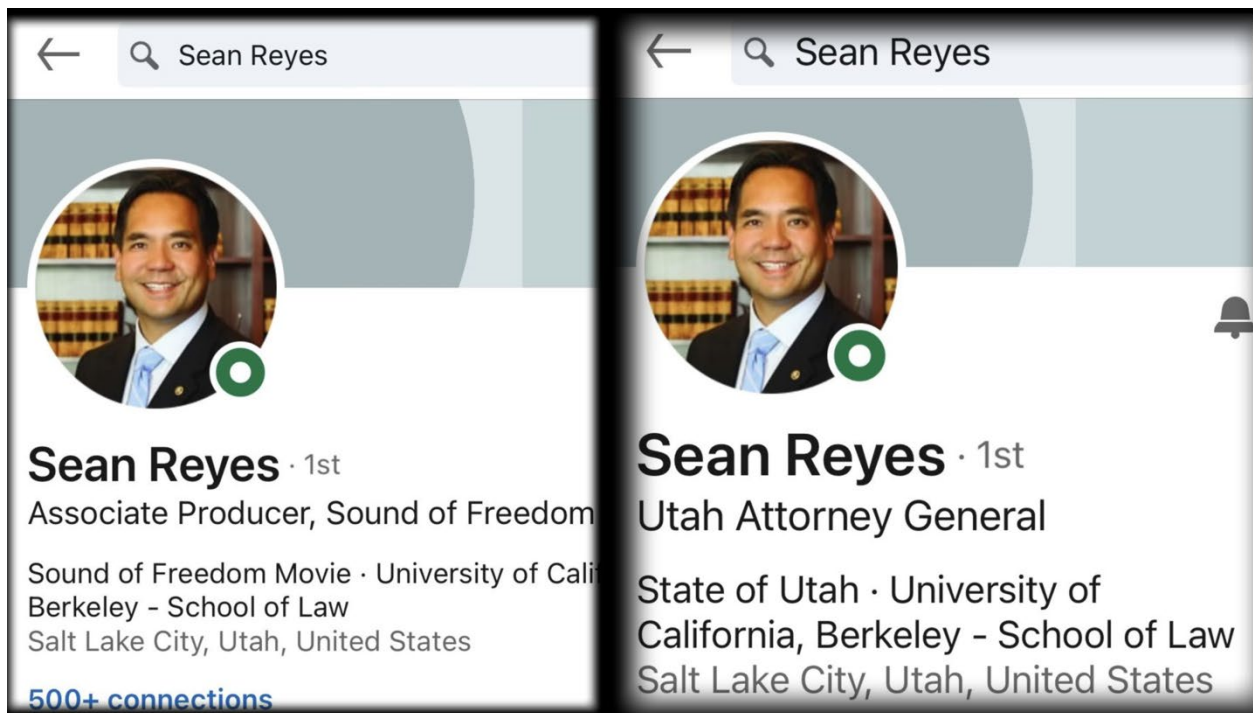
80. Since learning of Ballard’s implementation of the COUPLES RUSE, Glenn Beck called it “really bad stuff” and feels duped by Ballard.

81. Tim Ballard became friends with Tony Robbins, an American author, coach, and speaker, who raised staggering amounts of money for Ballard.

82. Documentaries were made of Tim Ballard and OUR, and in 2023, a feature film produced by Mormon-based Angel Studios called, *Sound of Freedom*, was released.

83. The film claimed to portray the work Tim Ballard has done, and the movie has been hugely successful across the globe, adding to the myth of Tim Ballard.

84. Attorney General Reyes being listed as an associate producer.



85. One Utah artist painted pictures of Ballard and his wife, again enhancing the credibility of Ballard to an almost Mother Teresa altitude:



86. OUR reported to the IRS \$6.9 million in revenue in 2016, \$22.3 million in 2019, \$45 million in 2020, \$52.930 million in 2021 and \$56.773 million in 2022.

87. In the IRS 990 form, it is reported that Tim Ballard received a salary of \$525,958 in 2022, yet former employees claim that Ballard earned over \$14,000,000 through his for-profit companies (some of which was funneled from the non-profit entity).

88. OUR was making staggering profits as Ballard opened "for profit" companies, defendants, which were alter-egos of OUR and Ballard and that allowed Ballard to line his pockets with the widow's mite.

89. In order to find and save trafficked children, Ballard would receive psychic information from psychic defendant Janet Russon about where the OPS should occur, along with reassurance and justification of everything Ballard did, while predicting the future situations the operatives would be in, so that they could plan the next OP. Ms. Russon claims that she spoke to a dead prophet named Nephi, who directed her about where to locate the trafficked children.

90. Ballard used OUR and its OPS to fund his personal fantasies of grandeur.
91. Ballard began a program for women accompanying him on OPS and called the program "THE COUPLES RUSE."
92. Ballard claims that the COUPLES RUSE was an undercover tool to prevent detection by pedophiles when Ballard would not engage in sexual touching of the trafficked women offered up to him in strip clubs and massage parlors across the world.
93. Ballard would choose a woman who worked at OUR or with OUR, or would invite a well-intentioned volunteer, to be trained in the COUPLES RUSE.
94. The women he chose had no formal training in paramilitary activities or operations, but he knew they were devoted to the OUR mission of saving women and children from traffickers.
95. Ballard claims that he implemented strict rules regarding the COUPLES RUSE: no kissing on the lips and no touching or exposing private parts.
96. Ballard soon began abusing the COUPLES RUSE and eventually used the ruse as a tool for sexual grooming.
97. As part of either an OP or practice for the OP, Ballard would often share a bed with a woman posing as his girlfriend or invite her to shower in his bathroom, even though accommodations at designated "safe houses" provided separate bedrooms and bathrooms.
98. Before they ever went undercover together, Ballard insisted that he first needed to ensure that he and his female counterparts in the COUPLES RUSE had physical "chemistry" that would be obvious to those they would meet during an operation.
99. Ballard encouraged female operatives to participate in tantric massages before and

while on a COUPLES RUSE.

100. Ballard claimed to be so concerned about the believability of the COUPLES RUSE that he frequently asked women to "practice" their COUPLES RUSE long before a mission ever took place.

101. To that end, Ballard flew women across the country, where they would "practice" their sexual chemistry through tantric yoga, couples' massages with escorts, and lap dancing on Ballard's lap.

102. OUR's president Matt Osborne, and others from OUR, also participated in the COUPLES RUSE with escorts in a 5-Star Mexico City hotel.



103. General Reyes participated in foreign OPS where the COUPLES RUSE was being implemented where he stayed at the same safe house as Ballard and his “ruse” girlfriends, and was aware of the COUPLES RUSE, which given that General Reyes is the highest law enforcement officer in Utah, validated that the COUPLES RUSE was a legitimate law enforcement tactic.

104. Ballard also frequented strip clubs in the Salt Lake Valley with these women to practice the COUPLES RUSE.

105. Ballard included his son, who had just returned from serving a mission for the Mormon Church, to the strip clubs, without Ballard’s wife’s knowledge.

106. At the strip clubs, Ballard would pay for and receive lap dances, and ingest alcohol and pills at these practice "Ruse Ruses" on OUR’s dime with donor monies.

107. Ballard engaged in a ploy where he would tell the women that if they were offered alcohol, which is forbidden by the Mormon Church, that she should take the drink and then open mouth, kiss him and spit the alcohol into his mouth, and then he would spit it out when the traffickers were not looking.

108. However, Ballard was doing the exact opposite—he was consuming excessive amounts of alcohol (tequila) of his own volition, which he drank at strip clubs, massage parlors, and on trips, to the point of passing out. For example, he missed a \$250,000 speaking engagement a few weeks ago because he was drunk and missed his flight.

109. Through these COUPLES RUSES, both in the office and in the field, Ballard

eventually engaged in coerced sexual contact with several women and propositioned others.

110. Ballard participated in several sexual acts with the exception of actual penetration, in various states of undress while on an OPS mission.

111. Ballard developed a sexual position where it appeared he was having full on sexual intercourse with his COUPLES RUSE victims, while not actually penetrating.

112. While inside private accommodations, when no one else was around that they needed to fool, Ballard would claim that he and his female partner had to maintain the appearance of a romantic relationship at all times in case suspicious traffickers might be surveilling them at any moment.

113. Ballard requested the women he invited to act as his significant other, to first have a Brazilian wax.

114. Ballard would ask each woman, "Is there anything you wouldn't do to save a child?"

115. To further convince the women of his need for them on the next OPS mission, Ballard would badmouth previous female partners, claiming that the women who had allegedly gone on COUPLES RUSES in the past were "crazy," and claiming that they had fallen in love with him along the way.

116. Ballard used these mythical stories to motivate the women in his COUPLES RUSE to prove their mettle and their devotion to the cause by trying to outdo their supposed predecessors.

117. When these women found themselves questioning the legitimacy of tactics involving sexual contact, they often doubted their own instincts, relying on Ballard's breadth of

knowledge about rescue missions to convince themselves that such tactics were normal.

118. Other employees of OUR would warn these women not to question Ballard or their lives would be put in danger.

119. Ballard would also tell the women that engaging in sex play with him would improve their marriage, even as he also told them not to tell their husbands about what they were doing (or it would compromise the mission, children, their lives, and other informants' lives).³

120. Ballard would repeatedly warn these women that if they failed in their COUPLES RUSE mission, they would have wasted the hard-earned money that honest donor had entrusted to OUR or be caught or killed by the cartel.

121. Ballard would also tell these women that Janet Russon and/or Katherine had chosen them to be part of the COUPLES RUSE.

122. Ballard would use spiritual manipulation to coerce them into sexual contact.

123. Almost all of the women involved are or were Mormon.

124. Ballard began to claim that President M. Russell Ballard had given Ballard permission to do the COUPLES RUSE as long as there was no sexual intercourse or kissing on the lips, and had given him a special priesthood blessing as such.

125. OUR management adopted and accepted the COUPLES RUSE as a standard policy and procedure of the company and allowed Ballard unrestrained allowance on how he enacted the COUPLES RUSE.

126. Ballard would also claim that a passage from the Book of Mormon, in which a

³ In the mind of the victims, this was very real and serious as the cartel was essentially all knowing and seeing.

man kills another man on the promptings of the Holy Spirit, demonstrates that sometimes the Holy Spirit asks people to perform "unconventional" tasks.

127. Ballard would also claim to the women that Defendant Janet Russon told him that he had been married to them in a previous life, and so their conduct was appropriate.

128. Additionally, Ballard would get ketamine treatments and have a scribe come in with him while he would talk to the dead prophet Nephi and issue forth prophecies about Ballard's greatness and future as a United States Senator, President of the United States, and ultimately the Mormon Prophet, to usher in the second coming of Jesus Christ.

129. Ballard would also claim to his female Ruse partners that if his wife Katherine were to die, he would immediately marry them.

130. Ballard told one of his victims that when his wife would question what Ballard was doing with these women, Ballard would tell his wife that his female partners kept falling in love with him and wanted to kill Katherine so that they could be together.

131. Ballard would insist that the women stay silent about their alleged sexual encounters with him because if they told anyone, it would put everyone's lives at risk on the OPS mission, it was necessary to save the trafficked children, and because he was blessed by President Ballard to be a future President of the United States and then the Prophet of the Mormon Church.

132. After the women were coerced into engaging in sexual activity with Ballard, he used their encounters to his advantage, sending texts to some of the women that would say something to the effect of "We will have so much s*** on each other we will be deterred into silence on all things forever."

133. Ballard gave the women burner phones to use and had them use Signal, a

messaging app that keeps communication private, and he frequently demanded that the women erase the digital traces of his conversations with them each night.

134. Ballard also threatened the women that he was tracking them with their burner phones and company phones he provided.

135. Additionally, he required the women he asked to go on OPS as part of the COUPLES RUSE to sign Non-Disclosure Agreements (NDA), claiming it was required to protect the safety of the children and the participants.

136. Ballard would then threaten to sue the women if they ever disclosed anything about his tactics, practice OPS, or the COUPLES RUSE.

137. At least two marriages have broken up as a result of Tim Ballard's actions with these women.

138. Ballard offered to pay for the divorce attorney of one of his victims, and he had a henchman call and threaten her husband on voice message, resulting in the police being called and an investigation conducted.

139. Finally, in the Spring of 2023, some of the female employees of OUR who had been on these Couple Ruse OPS or practices, came forward to OUR management.

140. OUR had its law firm, Holland & Hart, conduct an "external" investigation, which investigation verified the victims' claims.

141. OUR terminated Tim Ballard.

142. OUR's board of directors, most of whom are related to Tim Ballard or are his good friends, opposed the firing and came to Ballard's aid.

143. A joint plan was hatched between OUR and Ballard, whereby he would resign

ostensibly because of the appearance of a conflict of interest with the release of *Sound of Freedom*, in which he has a financial interest in, and Ballard would take a very lucrative severance agreement and remain the face of OUR so it could continue to raise money. *See* Exhibit O.

144. As part of the plan, everyone was required to sign a NDA.

145. With his image intact, Ballard began The SPEAR Fund, where he is able to continue raising money from well-intentioned people wanting to end human trafficking.

146. OUR remained silent, using his face and the worldwide opening tour of *Sound of Freedom* to raise money, and allowing Ballard to continue his grooming, drinking and sexual deviancy; all on the donors' dime.

147. Rather than turn Ballard into the police for his criminal conduct, OUR paid Ballard \$618,000 and gave him a Jeep Grand Cherokee to resign from OUR. *See* Exhibit P.

148. Upon belief and suspicion, Ballard was given full discretion to the content of his resignation letter, was given editorial discretion over OUR's statements about his departure, a consulting agreement to continue working with OUR by paying money from OUR to Liberty & Light and giving Ballard control over who the new CEO of OUR would be. *See* Exhibit Q.

149. Finally, some of the victims of Ballard's sexual exploits are boldly coming forward and are filing this action for their damages, holding the defendants responsible for their outrageous behaviors, to punish the defendants for their actions, to try and prevent them from acting in this fashion again, and to bring light to who and what Tim Ballard is so that the humble, very well-intentioned donors across the world can decide with eyes open, whether to donate to Ballard and his organizations.

150. After the initial filing of the lawsuit, OUR did not step up and accept accountability for its actions that allowed Ballard to grow as a sexual monster, but rather issued a press release targeting the only female lawyer on the legal team that represents the Plaintiffs, and without disclosing to the public its behind-the-scenes damage control measures, nor publicly denying any of the specific allegations.

151. Upon reasonable belief and inquiry, upon learning of the COUPLES RUSE and how Ballard used it, the Mormon Church excommunicated Ballard.

152. The Defendants, including and especially Ballard, engaged in a fraud in order to engage in sexual relations with the Plaintiffs, the fact of which are specifically set forth in each of the Plaintiffs statements that are attached and incorporated herein.

153. WW's statement is incorporated herein and is attached as Exhibit A.

154. DS's statement is incorporated herein and is attached as Exhibit B.

155. DM's statement is incorporated herein and is attached as Exhibit C.

156. MK's statement is incorporated herein and is attached as Exhibit D.

157. HDT's statement is incorporated herein and is attached as Exhibit E.

158. There are other victims of Tim Ballard's COUPLES RUSE that are not part of this case and if and when these victims join the case, the Complaint will be amended.

FIRST CAUSE OF ACTION
**(SEXUAL ASSAULT AND BATTERY BY ALL PLAINTIFFS AGAINST DEFENDANT
TIM BALLARD)**

159. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

160. Defendant Ballard, intentionally, knowingly, or recklessly, committed battery and

sexual assault of Plaintiffs, as all sexual touching was done under the COUPLES RUSE in order to help save trafficked children and women.

161. As a direct and proximate result of the wrongful conduct of Ballard, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

162. As a direct and proximate result of the wrongful conduct of Ballard, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages all to their special damages in a reasonable sum.

SECOND CAUSE OF ACTION
(CONSPIRACY TO COMMIT BATTERY AND SEXUAL ASSAULT BY ALL PLAINTIFFS AGAINST DEFENDANTS BALLARD, OSBORNE and COOPER)

163. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

164. The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was done with the knowledge of Defendants' management and board members.

165. The Defendants intentionally, knowingly, or recklessly, solicited, instructed, commanded, encouraged and/or intentionally committed battery and sexual assault of the Plaintiffs, all for the sexual gratification of Tim Ballard, using the COUPLES RUSE doctrine fraudulently for sexual gratification and not for any legitimate purpose of OUR.

166. The Defendants conspired and combined together for the purpose of Defendant Ballard being allowed to have sexual relations with the Plaintiffs.

167. The object of the conspiracy was illegal and carried out as the result of a calculated plan between the Defendants.

168. There was a meeting of the minds among said Defendants with regard to the COUPLES RUSE and how to allow Ballard to sexually abuse the Plaintiffs.

169. Upon belief and inquiry, it is believed that Defendants Ballard, Osborne and Cooper conducted such actions in an ultra-vires fashion from their positions at OUR, though OUR was certainly negligent in allowing it to happen once it realized what Ballard was doing.

170. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

171. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages all to their special damages in a reasonable sum.

THIRD CAUSE OF ACTION
(FRAUD BY ALL PLAINTIFFS AGAINST DEFENDANTS BALLARD, OSBORNE and COOPER)

172. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein and more specifically, incorporate the statements attached hereto for the specificity of the fraud.

173. Said Defendants made fraudulent statements and actions based upon the COUPLES RUSE.

174. Said Defendants' actions and statements towards Plaintiffs were fraudulent and were done for their sexual gratification and pleasure.

175. Said Defendants made representation(s) about the COUPLES RUSE, who approved it and how it helps in fighting human trafficking, which were false, and said

Defendants knew to be false, for the purposes of inducing the Plaintiffs into participating or attempting to have them participate, in the COUPLES RUSE, so that Defendants could act out his sexual proclivities.

176. Defendants knew that the Plaintiffs would act on their representations in ignorance of their falsity and the Plaintiffs did rely upon said representations and were induced to act, all to their injury and damage.

177. Upon belief and inquiry, it is believed that Defendants Ballard, Osborne, and Cooper conducted such actions in an ultra-vires fashion from their positions at OUR, though OUR was certainly negligent in allowing it to happen once it realized what Ballard was doing.

178. As a direct and proximate result of the wrongful conduct and frauds of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

179. As a direct and proximate result of the wrongful conduct of said Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

FOURTH CAUSE OF ACTION
**(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS BY ALL PLAINTIFFS
AGAINST DEFENDANTS BALLARD, OSBORNE and COOPER)**

180. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

181. The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was done with the knowledge and Defendants' management and board members.

182. The conduct of the Defendants Ballard, Osborne and Cooper, as set forth herein,

was outrageous and intolerable in that it offended the generally accepted standards of decency and morality.

183. Upon belief and inquiry, it is believed that Defendants Ballard, Osborne and Cooper conducted such actions in an ultra-vires fashion from their positions at OUR, though OUR was certainly negligent in allowing it to happen once it realized what Ballard was doing.

184. As a direct and proximate result of the wrongful conduct of said Defendants plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

185. As a direct and proximate result of the wrongful conduct of said Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

FIFTH CAUSE OF ACTION
**(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS BY ALL PLAINTIFFS
AGAINST ALL DEFENDANTS EXCEPT BALLARD)**

186. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

187. The COUPLES RUSE was an institutional doctrine of OUR and its affiliated companies and was done with the knowledge and Defendants' management and board members.

188. The conduct of the Defendants, as set forth herein, was negligent and violated the standards of care required to protect the plaintiffs.

189. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

190. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

SIXTH CAUSE OF ACTION
(NEGLIGENT SUPERVISION AND RETENTION OF BALLARD BY ALL PLAINTIFFS AGAINST "OUR" DEFENDANTS)

191. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

192. At the time the sexual assaults by Ballard were performed under the guise of the COUPLES RUSE, the OUR defendants were responsible for hiring, appointing, retaining and supervising Ballard.

193. Said defendants negligently allowed Ballard to continue and develop The COUPLES RUSE as an institutional doctrine of OUR and its affiliated companies and was done with the knowledge of Defendants' management and board members.

194. The conduct of the Defendants in retaining and supervising Ballard after it became aware of how Ballard was abusing the COUPLES RUSE, as set forth herein, was negligent and violated the standards of care required to protect the plaintiffs.

195. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

196. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

SEVENTH CAUSE OF ACTION
(NEGLIGENCE BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)

197. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

198. The Defendants owed duties of care to Plaintiffs that they negligently breached by allowing the COUPLES RUSE in the first place and by allowing Ballard to use the COUPLES RUSE to abuse women.

199. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

200. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

EIGHTH CAUSE OF ACTION
(PREMISES LIABILITY BY ALL PLAINTIFFS v. OPERATION UNDERGROUND RAILROAD)

201. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

202. Plaintiffs were business invitees upon Operation Underground Railroad's premises and were owed duties of care to care for Plaintiffs' well-being and safety.

203. Defendant Operation Underground Railroad, by allowing the COUPLES RUSE to knowingly occur on its premises, violated the duties owed to Plaintiffs.

204. As a direct and proximate result of the wrongful conduct of Defendant Operation Underground Railroad, Plaintiffs have suffered severe emotional distress, permanent injury, loss

of self-esteem and other injuries, all to their general damages in reasonable sums.

205. As a direct and proximate result of the wrongful conduct of Defendant Operation Underground Railroad, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

NINTH CAUSE OF ACTION
(BREACH OF FIDUCIARY DUTIES BY ALL PLAINTIFFS AGAINST THE BOARD DEFENDANTS)

206. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

207. The Board Defendant are members of the board of Defendant Operation Underground Railroad.

208. The Board Defendants owed the Plaintiffs a duty of protection, loyalty, duty of care, and utmost good faith, as this is a non-profit organization.

209. The Board Defendants breached these duties by directing company assets and permission to Tim Ballard to carry out the COUPLES RUSE and negligently allowed Tim Ballard to sexually assault his female victims using the indicia and resources of OUR.

TENTH CAUSE OF ACTION
(FALSE IMPRISONMENT BY ALL PLAINTIFFS AGAINST BALLARD, OSBORNE and COOPER)

210. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

211. In conducting the COUPLES RUSE, said defendants were willfully detaining Plaintiffs, without their consent, without the authority of any Court order or law and under false premise.

212. Said Defendants' imprisonments of Plaintiffs were false and manifested a knowing and reckless indifference toward and a disregard of the rights of the Plaintiffs.

213. As a direct and proximate result of the wrongful conduct of said Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

214. As a direct and proximate result of the wrongful conduct of said Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special damages in a reasonable sum.

ELEVENTH CAUSE OF ACTION
(NEGLIGENCE PER SE BY ALL PLAINTIFFS AGAINST ALL DEFENDANTS)

215. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

216. In conducting the COUPLES RUSE, defendants were knowingly and willfully trafficking the participants in violation of Utah law.

217. Utah Code Ann. § 76-5-308 provides that "an actor commits human trafficking for labor if the actor recruits, harbors, transports, obtains, patronizes, or solicits an individual for labor through the use of force, fraud, or coercion.

218. Defendants trafficked the Plaintiffs for Ballard's own sexual gratification.

219. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have suffered severe emotional distress, permanent injury, loss of self-esteem and other injuries, all to their general damages in reasonable sums.

220. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiffs have incurred and will yet incur medical and therapy expenses, and lost wages, all to their special

damages in a reasonable sum.

TWELFTH CAUSE OF ACTION
(PIERCING THE CORPORATE VEIL BY ALL PLAINTIFFS AGAINST ALL CORPORATE DEFENDANTS)

221. Plaintiffs incorporate the preceding allegations and the attachments to this complaint, as if fully set forth herein.

222. Defendant Tim Ballard and the Corporate Defendants are alter egos of each other.

223. The Corporate Defendants and Defendant Tim Ballard should all be treated as one entity to prevent Defendants from using the corporate fiction as a tool to inflict civil harm upon Plaintiffs.

224. The corporate fiction of the Corporate Defendants should be disregarded because they have been used as part of an unfair device to achieve an inequitable result.

225. The corporate structures of the Corporate Defendants should not shield fraud, evasion of existing obligations, circumvention of statute, and the like. As a result, the corporate veil should be pierced to provide that all Corporate Defendants are jointly and severally liable for the damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. For general damages in an amount to be proved at trial;
2. For special damages in an amount to be proved at trial;
3. For punitive damages against all defendants in an amount sufficient to punish them and to deter them and others in similar situations from engaging in such conduct in the future; and
4. For such other costs, interest, expenses, attorney's fees, and other relief the Court

finds appropriate under the circumstances.

JURY DEMAND

Pursuant to Rule 38(b) of the Utah Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury in this case and submit herewith the applicable fee.

DATED this 2nd day of November, 2023.

ALL UTAH LAW PLLC

/s/ Suzette Rasmussen

Suzette Rasmussen

GREEN LAW PLLC

/s/ Michael K. Green

Michael K. Green

MORTENSEN & MILNE

/s/ Alan W. Mortensen

Alan W. Mortensen

Lance L. Milne

Christopher J. Cheney

Joshua S. Ostler

EXHIBIT A

STATEMENT OF WW

On April 19, 2021, WW reached out to Ballard via Instagram because she was dating a man that she thought might be involved in trafficking.

WW didn't know who else to turn to about her suspicions, but she trusted that Ballard and OUR were the right resources to report it to since they work with law enforcement to fight trafficking.

On April 20, 2021, Ballard responded via Instagram and invited WW to his office in Lehi [525 Sunrise Way] to discuss her concerns.

As WW came into Ballard's office, she perceived that OUR employees were suspicious and leery of her.

WW gave Ballard information about the man she had been dating, with whom she had growing suspicions.

Ballard told WW to give him the man's phone number, and he would give it to his guys to check him out.

Ballard then said he noticed from WW's Instagram profile that she was an actor. Ballard asked if WW had ever considered going undercover.

WW answered "no," but that she would definitely consider it.

Ballard had WW sign an NDA and told WW how important it was that she never speak a word to ANYONE, not even friends or boyfriends, "because people's lives were on the line." He explained further the gravity and severity of what was at stake in order to protect women and children and the OPS. WW was not given a copy of this NDA.

Ballard then proceeded to tell WW that female operators are crucial to OUR's work. Ballard told WW about a tactic they used, called the COUPLES RUSE.

Ballard explained that they were running into problems on operations (OPS) when male operators did not engage in sex acts. He said that if male operators don't touch the women or children, the traffickers would figure out that it was a sting and would create danger for all.

Ballard told WW how the COUPLES RUSE came to him by revelation from God, as there was no way he could have thought up such a brilliant ruse.

Ballard then told WW that if she would act like the jealous girlfriend, then she could "block" for Ballard and Ballard would "block" for her.

Ballard explained that WW was like the "cock blocker."

Ballard expounded by saying that he would take women into couples massage parlors or strip clubs and act as a kinky couple ready to do sexual and deviant things, but that there would be no kissing and no touching genitals, except for his arms around the woman's waist, "maybe on your back pocket, etc.," and that it would be super safe because there would be a team around the corner watching everybody's safety.

Ballard explained to WW that if she agreed to go on an OP, she would be part of the communications, by watching and reporting on activities surrounding the sting.

Ballard told WW that he preferred to hire actors because cops could not act very well, resulting in the traffickers not being fooled.

Ballard explained that traffickers can smell cops miles away.

Ballard asked WW what she thought, and she responded that she was on board because she was a rape survivor herself and felt strongly that she should help women and children.

Ballard responded by asking, “You are a survivor yourself? Wow!!! That would be a powerful story.” He also said, “I feel like you have to be hand selected from God because there are so many I can’t trust. We have thousands of applications every week, but I can’t just bring in anyone.” To be honest, I felt pretty important and believed him.

Ballard then instructed WW to get “training,” and he would go over more details later.

Ballard then told WW that there was a fast-approaching operation, and that he really needed someone quickly.

On April 21, 2023, Ballard put WW in a text thread with Matt Cooper.

Ballard texted WW from a phone number that Ballard instructed her to label as “Brian” for “safety” purposes.

That phone number was 520-406-1139.

Ballard then introduced WW to Matt Cooper and informed her that she was being considered for an OPS position, and that she should get a background check in order to attend a survivor’s graduation.

Ballard further stated that the OPS team would meet that Friday around noon, where Ballard would run her through tacticals and finish conversations.

On April 23, 2023, WW attended a survivor’s graduation. Matt Cooper (Coop) was there with Ballard and WW.

Ballard had told WW prior that her OP name would be “Kelli”, but then Coop had introduced WW as WW.

WW was confused as she was afraid Matt Cooper had compromised the OP, as Ballard had earlier stressed how serious everything was.

WW asked Matt Cooper if she was compromised because he had said her real name. Matt Cooper responded “no” and reassured her that she was safe.

Ballard had told WW to keep track of all her hours while preparing and working on the OP.

Ballard understood that WW was a single mom at the time.

Ballard asked WW if she could go on an upcoming OP because the original girl could not go.

WW was moving by herself, so she explained that she could not go on an OP on such short notice.

Ballard responded by offering to pay for a moving van and movers to help so WW could go. He also gave her money to buy name-brand “slutty” clothes for the character. Brad had given her some cash for this. Brad also mentioned to WW that he and Ballard thought that WW would be a great speaker, and WW responded that she had always wanted to be one.

WW felt honored by the generosity of OUR.

Ballard told WW that they would be talking a lot, because they had to create a relationship to convince the traffickers that they were a couple, so they needed to get to know one another.

In some of their “training”, Ballard brought up the name of Hugh V., a person WW actually knew prior to meeting Ballard, and who was a huge part of WW’s healing from her own abuse.

Ballard told WW that Hugh was **not** to be trusted, along with many other people in his organization.

WW was sad to hear that about Hugh, but WW trusted Ballard.

Ballard told WW that the other female operators would fall in love with him, so he had to change operators often.

Ballard also asked WW to never betray him.

Ballard mentioned a journalist who wrote a negative article about him who he said was just out to get him and the cause, but no one believed her and he “buried her.”

Ballard then told WW that text messages needed to be sent via Signal, and everything, including messages via Signal or their regular phone messaging, was to be deleted every night because it was IMPERATIVE to the safety of the cause.

Ballard warned that if anything got leaked, it could put people's lives at risk.

On April 28, 2021, WW received an email from “Hugh V.” asking her about Ballard’s relationship with her.

WW immediately told Ballard about the email. Ballard said his team was just looking out for Ballard and testing WW’s loyalty to Ballard, and that WW passed.

At one of the “training” sessions, Ballard was briefing WW for the upcoming OP.

Ballard dismissed the others from his office, telling them he needed to prepare WW for the mission.

As WW sat on a couch in Ballard’s office, Ballard told WW that he needed to get to know more about WW so that they were comfortable with each other.

Ballard asked questions about WW’s current relationship, her children, and the trauma abuse as a child.

Ballard again said that it would make an amazing story.

Ballard came over to sit by WW and kept getting closer to WW until at one point, Ballard put his hand on WW's leg and caressed her inner thigh.

WW immediately tensed up but thought that Ballard was testing her and that she should just keep talking as if nothing were happening.

WW kept talking as Ballard stroked her neck.

Ballard finally got frustrated that she wasn't responding to his advances and asked WW, "Why are you not responding?!?"

WW responded, "Because I know you are testing me."

Ballard said he needed to know if WW was attracted to him. Ballard asked WW if she was attracted to him, to which WW said "not in that way." Ballard asked how WW could convince traffickers of chemistry then? WW told him she did not need to practice because that was what she was trained to do as an actor- get in to character when in role but only on "action" and out on "cut". WW explained she never "practiced" chemistry or romance scenes privately/outside of being on set in front of the camera and crew either.

Ballard then stated that this was the practice he mentioned previously, and that WW needed to be attracted to him in order to convince traffickers that they were a "kinky couple."

Ballard told WW that he must know she could pull this off, as a prior female operator went out on a mission once and couldn't perform, so all those donor dollars were wasted, and the mission to save kids failed.

At that point WW felt sheepish for thinking she knew better than Ballard, so she told him she would turn it on for just a moment for him to see that as an actor, she could turn it on and then turn it right back off.

Ballard agreed.

WW approached Ballard in the hallway outside of Ballard's office and put her hand on his chest and spoke to him seductively, saying she could turn it on if she needed to, and then pulled back immediately, but at that point, Ballard got excited and said, "Oh good, ok you can do this!"

WW asked Ballard if there were cameras in the building. He panicked and looked around and said, "No, no we are good."

Ballard continued in his COUPLES RUSE training, instructing WW that from the moment they got inside a plane heading to the location, inside cars, walking on the streets, anywhere except for the safe house, they were supposed to be in character as a kinky couple because the traffickers have people watching them at every move.

On April 30, 2021, I am looped into a group text and Ballard tells WW that the two of them need to go get spray tans as part of their cover.

On May 3, 2021, WW met at OUR's offices with a hair and makeup artist to teach WW how to apply fake tattoos on Tim and herself for the upcoming Puerto Vallarta, Mexico OP.

On May 5, 2021, OUR employee, Mike Porenta, made all the arrangements for WW to fly out to Dallas, Texas.

WW and Ballard stayed at a house in Irving, Texas, so that they could meet with Glenn Beck before flying out from DFW to Puerto Vallarta the next day. OUR employee, David Jacobs, met Ballard and WW at the Irving house and wrote a note to them that read in part, "Go Get Them! XoXoXo".

At Glenn Beck's home, Ballard spoke about how he had to remove the cancer from OUR,

and that many were out to get him.

Beck sympathized with Ballard, sharing his own experiences about how people would try to get him and that he had to hit rock bottom, with people going through his trash. He told Ballard that he may have to go through that too.

Ballard said he already hit rock bottom when he realized so many were out to get him, and he had to make all the changes in his company.

On May 6, 2021, Ballard and WW flew out to Puerto Vallarta.

Ballard went into immediate character from the DFW airport to Puerto Vallarta.

Ballard was all over WW, with his hands on her buttock and his hands wrapped through her legs while sitting on the airplane.

Ballard and WW finally arrived at the very large "safe house" that overlooks the ocean and has a private chef. The secondary team stayed in a second location.

WW had her own room and Ballard had his.

The next day, while the chauffeur drove Ballard and WW around, Ballard was in the backseat groping WW.

The windows were dark, but Ballard insisted they had to remain in character. On at least one occasion, Ballard's hand got quite close to WW's groin area. WW told him that he didn't have to be so close, so he pulled back.

Ballard explained that they were going out to find massage parlors.

WW asked him how she could avoid having to get naked in those massage parlors. Ballard responded by telling her it would be fine if she stayed in her underwear.

Ballard said WW could lay face down on the shared massage table, and he would lay face

up so that they could still talk to one another in their ears.

WW expressed concerns to Ballard, telling him that she knew the “massage therapists” would want her to take her bra off, which she didn’t want to do, so she said her story would be that she had a boob job and she could not take her bra off for support purposes.

Ballard assured WW that he would help express that, as the escorts may be speaking in Spanish.

Ballard is fluent in Spanish, but WW is not.

Ballard located a massage parlor and instructed the driver to drop them off.

They were then taken to the back massage room, where they undressed and got on the table.

WW was in a bra and underwear.

Two women came into the room, and Ballard started speaking to them in Spanish.

The two women took their own clothes off, down to their underwear too, and started massaging WW and Ballard.

Ballard asked questions, which then led to talking to them about a party, and him asking for “frescas”—younger girls.

Ballard instructed WW that if the escorts got too close to touching them, the code word was FUCK ME, to which it was WW’s job to convince the women that WW needed to fuck her boyfriend and get the women out of the room.

One of the massage girls undid WW’s bra and WW responded, “oh no no” and told Ballard (whose OP name was “Brian”) to tell the women, in Spanish, why she needed to keep her bra on.

Ballard repeated what WW said, but only in English, not Spanish, and the women did not care.

Ballard said the code word and WW immediately pretended to be jealous, telling the escorts not to touch Ballard.

WW next said the code word because one of the women went straight for WW's crotch. Ballard did not respond to protect her, so WW repeated it again.

Again, Ballard did not respond to protect her, at which point WW understood that she needed to get the women out of their room or she may be compromised and was in extreme danger.

As part of the Ruse, WW kissed Ballard's neck and rubbed his belly and told the women to leave as she needed to f--- her boyfriend.

However, the women just stood back to watch.

WW rolled over on top of Ballard so that the women could see that she was serious, as WW was very scared that the women would not believe them and leave her alone.

WW told them again to leave, this time with enough anger that the women left. Once the women left, WW realized she was topless on top of Ballard's chest.

WW immediately got off and got dressed. A trafficker had shown up and a conversation ensued. WW and Ballard left this massage parlor and WW immediately had a panic attack. Ballard told WW, "You are burning up." WW *was* burning up and was shaking. WW could barely walk from shaking due to what had just happened. Ballard gave her a few moments to breathe, and then they were off to the next parlor.

Over the next three days, Ballard and WW had similar experiences in massage parlors across Puerto Vallarta.

After one such “sting” in which WW obtained some phone numbers of “traffickers”, Ballard screamed WW’s accolades in the car after, saying he couldn’t believe what WW was able to do, as she got so many phone numbers that would allow OUR to save so many children.

WW then told Ballard that she was sorry about what happened at the first massage parlor, to which Ballard responded that it was ok, because he and his other operators would "accidentally kiss" because they were so in character.

Ballard also revealed that they would often sleep together in the safe house next to each other, snuggling, because the OPS are so traumatic.

Ballard said that sometimes things would happen in his Couples Ruse and he would just have to go ejaculate as things got too steamy.

WW told Ballard, "That’s interesting. That won’t be me.”

At one of the parlors, the female trafficker and Ballard were talking about something in Spanish, to which the female came directly to WW and grabbed her breasts and crotch. WW said the code word, trying to play it off and looked at Ballard for reprieve. Ballard just watched. At one point, said female trafficker brought up a younger female to take her clothes off down to her underwear and turn around for “Brian” to approve for an upcoming party. Ballard approved, and the young female was dismissed. The older female trafficker did not want to wait for any upcoming party and wanted to partake of WW now. WW immediately knew she was going to be raped if she didn’t get out, as the female kept grabbing her so forcefully that WW fell on the bed. WW knew she had to get herself out, so she made up a story that there was a meeting they had to

get to. Ballard said, “What meeting?” WW left Ballard and went outside. Ballard got upset with WW saying, “Why’d you leave? We were so close to getting information.” WW told Ballard she feared she was going to be raped and was upset he didn’t help her. Ballard told her he would never have let it go too far, to which WW again felt bad for doubting Ballard, and she worried she stopped the opportunity for kids to be saved.

When they were at the safe house, in between these “massage parlor missions”, Ballard would answer his door in just his towel and still have her come in to talk about the OP.

Ballard kept saying, “You know I’m clean, right? I don’t even get turned on by this stuff you see. I don’t even get a boner.”

WW asked Ballard why he still went on OPS when he told everyone he was not doing them anymore.

Ballard responded that Elder Ballard sanctioned the Couples Ruse and it was his [Ballard’s] calling to do OPS.

At one point, WW had to go shower and get ready for an OP when Ballard said, “You can use my shower,” to which WW responded, “No thank you, I’ve got my own.” Ballard double checked with her saying he would leave the room, and she still said no.

Later while they were eating at the safe house, Ballard confided in WW that things with Katherine weren’t the best.

WW asked Ballard if Katherine knew about the COUPLES RUSE, to which he said she did.

WW asked Ballard if she knew all the details though, and he responded that she is such a saint; she does not ask questions, as she is willing to do anything to save the kids.

WW told Ballard that he should stop doing OPS and be home with his family to heal, as his PTSD was very apparent and he needed to rest and just be with his family.

The last night in Puerto Vallarta was when Ballard took WW to strip clubs.

Prior to this last night, WW had expressed to Matt Cooper that she was concerned about Ballard. She confided a bit to him that Ballard had been distracted, worried about her betraying him the whole time, and didn't protect her. Coop listened to her and said Ballard did need some help, but that was the extent of it.

Ballard told WW that she was to "block" for Ballard, and the goal was to get some girls into the back private rooms to ask questions and get phone numbers.

Coop, Matt O., and Jorge were all there as secondary in another part of the club.

WW was mentally, emotionally, physically compromised after what it took to get a couple phone numbers at this club, and she told Ballard she had to be taken back to the safe house. As WW was leaving the "sting", she observed Jorge heading to a back room alone with one of the strippers for what was going to be a pleasure trip after the OP. Ballard told WW she had done an incredible job this trip and had done enough.

After getting back to the secondary team's safe house, Ballard explained that WW was done and had a super successful trip, but that he and a couple others were going to go check out one more spot. They were gone for a few hours with no "blocker" and no comms. Matt O. and a couple other secondary team members were with WW and kept getting angry and worried saying, "This isn't right."

WW warned Ballard that the type of conduct that she saw with Jorge as well would take down OUR. WW told Ballard, "Either you tell someone, or I will." Ballard responded, "You

can't do that to me," to which WW said, "Watch me". The next day Omar and Ballard had a private chat with WW, thanking her for letting them know. Omar told WW the rule was that no operator should operate without their blocker, and that can't happen, so he would take care of it.

WW also learned that DS was one of the other operators. WW knew DS from her line of work and had deep affinity for DS.

When Ballard found out that WW cared about DS, he told WW that DS had crossed the boundaries and kissed him.

Ballard told WW that DS was in love with him, and that she was the one that when he met WW at the very beginning in David Jacob's office, that he had explained was in love with him and that's why he had to get new operators.

When WW got home, she immediately had nightmares and knew she was re-traumatized.

She was also paranoid of being watched or saying anything about her experiences with Ballard, and her boyfriend at that time (her current husband now) was very concerned for her.

Ballard continued telling her that he needed her on the next OP, and that he was super excited because it was this really cool place with an amazing house and boat.

WW told Ballard that she was re-traumatized, and it wasn't wise for her to go on another OP.

Ballard said he would pay for her to go to his therapist, in order to see if his therapist could help WW be able to get back out there. Ballard told WW that she made the **most** difference out of any other operators.

WW went to see Ballard's therapist, K.M.

Ballard was pretty persistent about WW coming back out, even though she told him no

several times.

Ballard told her she could maybe do a secondary, but then after thinking about it, she said no to that too. Ballard then said, “Well, what if you become the female face of OUR.?”

Ballard knew her dream was to be speaking on stages, so she said “Oh my gosh yes!! I could still help the cause!”

Ballard helped the ruse by telling her that they needed to probably have better training for operators, so he was going to have future training for it and to watch for it. He said they could get footage, and since she had “kicked ass” on the undercover OP and was a survivor herself, this would be a HUGE thing.

Before the training, Ballard sent her a text in July, 2021, telling her that he was pulling out of OPS to be with his family.

She told him she was proud of him.

He had asked for replacement female operators for other operations, so she told him she may have someone, and recommended DM.

WW went to the OUR OP training held in Salt Lake City, as she believed Ballard and the organization were turning things around. They had the cameras follow her around a lot.

She gave them an interview, and Ballard told people she would be the face for speaking.

After this training, DM (who did not attend the “official” training), called WW, saying she needed to talk to WW but that she couldn’t talk over phone—it had to be in person.

DM told her she went to meet with Coop and Tim to be considered for the position of female operator, but things happened, and DM wanted to know if it was normal.

WW and others were told to not even talk to one another because of safety, so WW knew

why DM was nervous and scared to talk to her.

DM told her that Tim had pushed her up against the wall and licked her stomach, and then went out on a fake op practice at a local strip club where he was taking pills while his son was there.

DM thought it was strange and wanted to know if it was normal. That is when WW snapped and realized this was not normal.

WW then started questioning her own experience.

WW then called Ballard and told him that she could no longer be a part of OUR, even as a speaker.

Ballard was frustrated and sad, and kept trying to get her to come speak for another year.

Ballard also invited her to a separate private meeting that no one knew of, and he told WW that he was starting to do his own OPS.

WW didn't go, and kept asking the status of the OP that they had gone on, and if they had rescued any kids?

Ballard kept telling WW that it just takes time, but they were making progress.

DM told WW that she had verbalized to Ballard and Coop her boundaries, that she did not want to do things, and didn't need to practice, and then they dropped her.

WW wanted to tell Matt Osborne of her concerns at the training prior to this, but thought she couldn't trust anyone. She felt so small compared to Ballard, as he had told her he would deny everything if she said anything, and she would be buried.

EXHIBIT B

STATEMENT OF D.S.

Why Now?

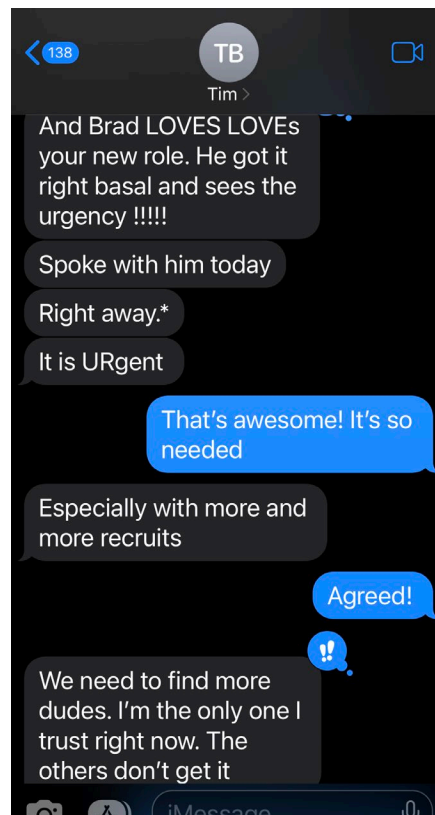
I feel compelled to participate in this lawsuit because no one else had my back when I needed it most, and the way I intend to right that wrong is to have my own back while simultaneously advocating for countless others who have been harmed while Tim continues to denounce the truth and skirt the consequences. This is not a matter of revenge, but a matter of justice and love. “Allowing people to face the consequences of their actions is a true act of love. That’s how we learn, that’s how we develop resilience, that’s how we wake up to the need to work on ourselves” (Dr. Nicole LePera, @the.holistic.psychologist).

I could never have anticipated being part of a legal battle and have lived so that I wouldn’t need to be. Even when I have been terribly wronged, abused, and robbed in my past, I have walked away quietly with my head high and moved forward in a different direction. In this case, I cannot in good conscience or integrity walk away or hide, though I would far prefer to if I didn’t feel this responsibility. I am a lover of truth and will use it to protect and defend others at all personal cost. With the same passion for the cause for which I was willing to risk my life going undercover to expose human traffickers, I now lay down my personal comfort, safety, time, relationships, and reputation to voice my experiences and allow truth to unfold.

The timing of Tim’s behavior coming to light is exactly as it had to be. Anyone who has previously tried to open the curtain has been crushed. I was told I would be as well. Those who have revealed truth at the expense of Tim’s image were labeled traitors to the good cause and to

Tim personally—who has enough clout and devotees that he is often revered as infallible and has proven to be invincible to date. I was told this “nobody mom with four kids from Utah” wouldn’t be considered credible. To the extent that I could speak and be heard, I always have and will.

I began speaking out about the mistreatment of operators in April 2022 after a traumatizing operation. When I spoke with Tim about it, I immediately began working with OUR executives to create change and care for operators. Based on what I outlined, OUR offered me a position to oversee operators, but it never fully materialized.



Within a few months, I learned that Tim was even more mentally and morally degenerate than I had been aware and had since abused other operators. A few of us proceeded carefully as outsider-insiders to put an end to Tim’s behavior and ability to do harm, while safeguarding ourselves and the cause we supported. In October 2022, I personally experienced what I believed

to be criminal behavior and received Tim's backlash when I called him out. I also informed Coop about it.

In April 2023, I received information that another female operator had filed a claim for sexual misconduct. OUR began an investigation and each woman willing to testify did so with great hesitancy, intentionally and cautiously acting in integrity to protect the organization (to prevent the cause from being publicly tainted) and Tim's public reputation (as the face of OUR). The concluding report was detailed and indisputable enough that the board unanimously agreed Tim had to step down. The board (stacked with Tim's family and close friends) reached a settlement that concerned many of us since it allowed Tim to separate without assuming full personal accountability or giving him any impetus to receive the help necessary for behavioral change. As predicted, Tim was instead emboldened to continue his destructive path through new avenues and funding while publicly slandering those he had victimized.

The board of OUR failed in its responsibility to uphold its mission and values regardless of status, influence, or fear tactics. We warned OUR's attorneys that failure to hold Tim accountable would cripple the efforts and intent of anyone sincere about protecting those who have been harmed and silenced in the hands of predatory, lucrative, dangerous men.

In the interest of and protection for all involved, we made every effort to maintain silence to the press and public regarding the specifics of Tim's behavior and names of women abused. Despite our efforts, the press eventually got word of the investigation and drew it to public attention. Tim had not indicated a Senate run until—conveniently—the day before the press printed the leak about the wrapped investigation into his sexual misconduct. Tim malevolently linked his political announcement with allegations investigated and verified long before, inciting

public anger and demand for Tim's victims to step forth and defend ourselves—which has led to further victimization, especially without the resources for personal and/or legal protection. I have never wanted to disappear from life this badly. It has been inexplicably debilitating to be so vulnerable, unsafe, and uncertain—and this is coming from a woman who dines with traffickers and cartel with intent to betray them.

Rather than taking accountability or humbly making amends, Tim blamed his victims of attempting to ruin him without cause. Through his denials, Tim has divided families and friends, church members and political allies. Any man who has left devastation and destruction in his wake, and continues to vehemently lie and slander, should be compelled to make recompense when he has refused to do so voluntarily. Tim has spent years in luxury, traveling in fame and power, living out his delusional and sexual fantasies, while people he has used to get there remain unprotected, afraid, financially ruined, and struggling to survive on multiple fronts.

To those who naively excuse Tim's atrocious behavior as a matter of consent, of simply walking away, I am glad for your good fortune of never having been lured into an abusive relationship. When it comes to understanding the extent of predatory behaviors and grooming, the issue of "consent" is irrelevant. The very definition of grooming is the process of securing a target's trust and manipulating that to get them to agree to things they would never otherwise consider. That's what master manipulators do; they get you to conform to their beliefs and tactics, making the absurd seem normal and you seem absurd.

Did I know at the time that I was being manipulated and lied to? Of course not. Did I know he was doing the same thing with other women? Of course not. He had convinced me (as I now know he convinced each of them) that *I was the only one he could trust to operate with him.*

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

Tim made me believe I was so special to him, with “academy-award winning” performances, that I was “the golden standard” among operators, called by God for this specific time. (I still want to believe that I was. Maybe that calling was to eventually expose the patterns that have hurt countless people and to pressure him into his own recovery.) This continued “love bombing” cemented in me a desire to do whatever was needed for the cause of saving children since I believed I was a rare operator who could. As I now know, he was grooming others with the same praise and placing a heavy feeling of trust in their unique relationship.

I worked closely with trafficked women who didn’t know they were trafficked. Tim can tell you specifically how their pimps lay it on so thick, telling them that they have the option to leave but they know well the repercussions if they try. Was it consensual? No. That’s what grooming is. It’s all of what takes place outside of and surrounding the very moment that you’re acting in the situation you’re being prepared for. It’s the ideas, justifications, lies, and threats that convince you it’s worth anything/everything you’re doing. It’s the level of close connection he repeatedly insists you have. It’s the trust he instills in you and the “secrets” he’ll share so that you’ll trust him back. It’s the understanding of the fragility of the relationship and situation and the ramifications that form a brainwashed bond to ensure that **even when he tells you that you don’t have to do what you’re not comfortable with, you do. And you need to get**

comfortable with it real fast.

It's the insistence that he trusts your spiritual level and intuition to guide him, effectively shifting to his victim a false power, security, and responsibility to protect the predatory and make sure that he is never hurt or betrayed by you or anyone else. It's the continued reminder that you're in life-or-death situations which could compromise your personal safety as well as that of countless others.

Elizabeth Smart has reported that occasionally people will slide in comments to her such as, "You and I both know you could have left if you wanted to." These insinuations are tormenting for victims of abuse, or anyone thrust into a situation to have to prove themselves. Nobody deserves for me to explain the extent of what I endured so that they can be judge and jury. Only me and my God can sort this out mentally, emotionally, spiritually and physically. I understand now it could take the rest of my life to process and understand the lasting effects. People who have never experienced what I have experienced have no place to weigh in on the credibility of my pain.

This is not about consent; consent means getting what you sign up for. This battle is about **not** getting what we signed up for. This is about having taken unimaginable risks and made enormous sacrifices...not for truth and freedom, but for lies. This is about being conned, gaslighted, and manipulated into believing we were doing something noble, when we were doing little more than providing a sick man an ego boost, power grab, and endless well to satisfy his selfish fantasies. This is about requiring Tim to take accountability for his wrongdoings and to stop profiting by exploiting us and others.

My Introduction to OPS

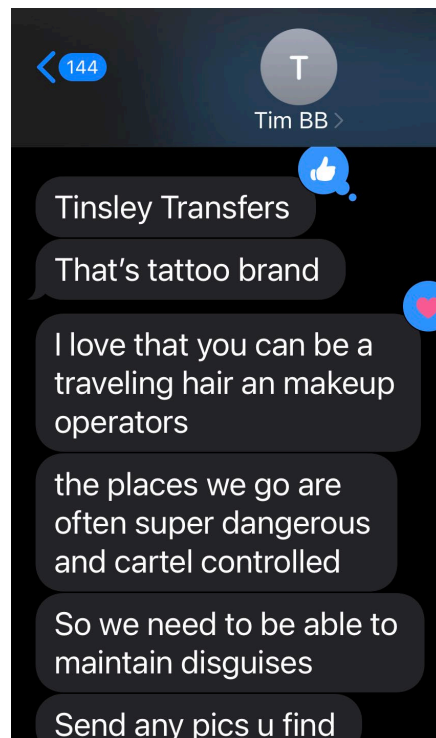
I first met Tim Ballard while working on a film project in 2020 during which he spoke about the power of prayer. I left that day a strengthened testimony of prayer and determination to pray more specifically with greater faith.

A year later, I was working on set again with Tim. He remembered me from our previous encounter and asked, “What’s your story?” I gave him some milestones of my personal journey, including how I had returned from living in Asia and divorced after my husband had fully relapsed into sex addiction. Tim then showed me a video with a lady he had just rescued from Thailand and said that “because we’re not sex addicts” (a line that I kept on replay in my mind every time that I doubted) they could go into dark places and fight those who promulgate the very filth that had caused me such devastation. I felt like he was literally fighting on my behalf.

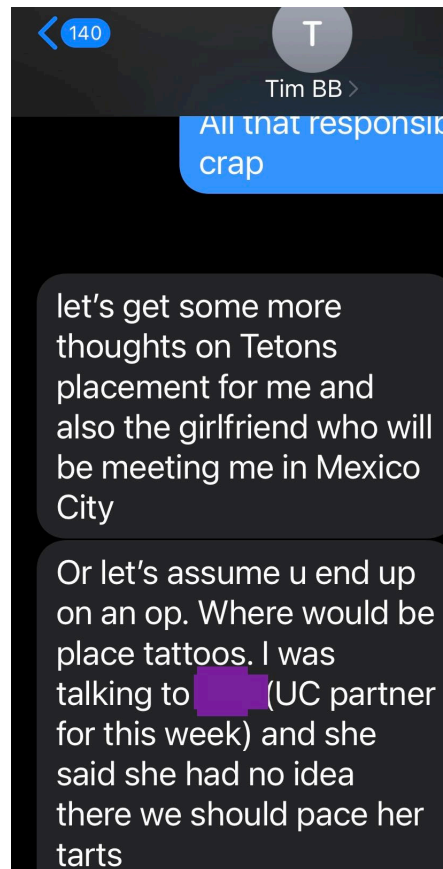
When filming was complete, he said, “You’re a hair and makeup artist, can you do tattoos?” I told him I could, and he asked me if I could also bleach his hair platinum to create a cool So Cal look. He explained he was going on a mission with a fake girlfriend the following week and needed help creating their costumes, then suggested I could help with her disguise as well. She was a police officer and needed some feminine refinement, her makeup done, and help with her hair. Tim suggested it would be great if I could go down to Mexico with them to keep the tattoos looking fresh because sometimes on missions they start to fade and then it puts him in great danger. He looked at David (who had come on set with Tim) and said, “Remember that—when we were (on the op) and my tats started to fade? That was scary!”

He asked for my number, if I had a valid passport, and if I would be available Saturday to get him ready. He said they have the supplies and everything already since he had an

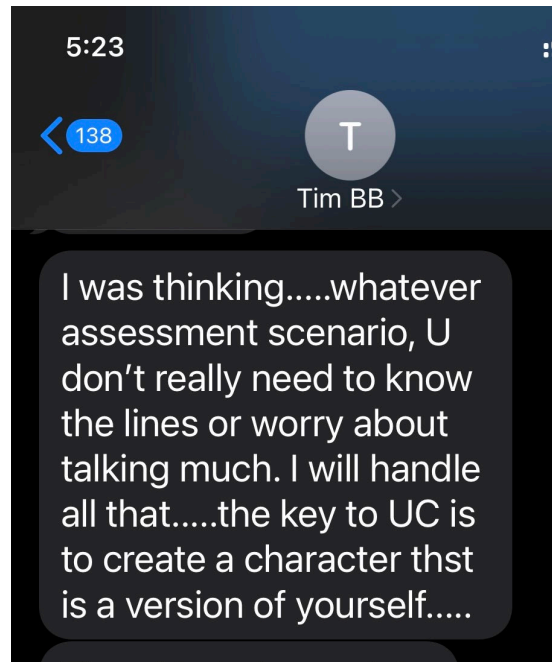
appointment with another hair and makeup artist; he would call her off and get the products from her so I could apply them. (He said the other artist lined up didn't have a valid passport and because of the Covid delays it was almost impossible for her to renew, so she wasn't able to travel with them.



He later texted to work out details for meeting up to apply his tats and bleach his hair. He asked if I would ever consider going out as an operator, mentioning the possibility of having me pose as his girlfriend and testing my comfortability with that. He said he thought I would be really good, and it would make things easier for him because he wasn't really attracted to this other operator and how that could throw off the operation because their relationship isn't as believable. He told me about an operation where he was coupled with a burly female Mexican and had to abandon the operation entirely because he couldn't even fake it with her.



I told Tim I wasn't sure if I could play that part not knowing what it would require of me—how safe it would be, how it might affect me mentally, what I would need to say and do to keep our cover and not screw it up, etc. Tim assured me there wasn't anything to worry about as he would cover for me and do all the talking; it was best for me to be the quiet, reserved, cockblocker. That would be my principal role: protect Tim at all costs. I often told people I was essentially “Tim's bodyguard” with the purpose of protecting both him and Katherine (via protecting their relationship from sex workers, which I believed I could do well because I'm firm in my boundaries, integrity, and intent).



I was extremely excited about being given the trust and chance to participate in something I felt passionate about and could make such a direct impact. But I was very hesitant about the role. What a heavy responsibility for me to do things just right with our lives on the line and no experience in how traffickers work or what exactly I was supposed to do and how that might affect me in the long run. I told him I was willing but unsure if I was the right fit. He said we would start out super slowly, just holding hands around town and such to see if I felt comfortable. That seemed innocuous enough. I could handle that.

Tim asked me to pray about it to see if it was something I felt good about and that we would talk in more detail on Saturday. I had many questions but couldn't believe the opportunity. Later that week, Tim told me he knew when we were first speaking that he had received the divine impression that he "was supposed to ask me about being an operator." This is the same guy who had strengthened my faith in prayer, and I easily trusted he could have received that revelation from God. And I believed it myself. My close friend reaffirmed that I

was absolutely perfect for this role, saying of my personality type that we “are the ones who want to save the world and don’t want anyone to know about it.”

We met up in an OUR office that Saturday and were initially with Coop and a few others who had brought in supplies and Tim’s wardrobe for the op. The others eventually left me and Tim alone as I worked on his disguise, and he seemed genuinely interested in knowing how I felt about life, the gospel, my situation being single, and my perception of him and the works he does.

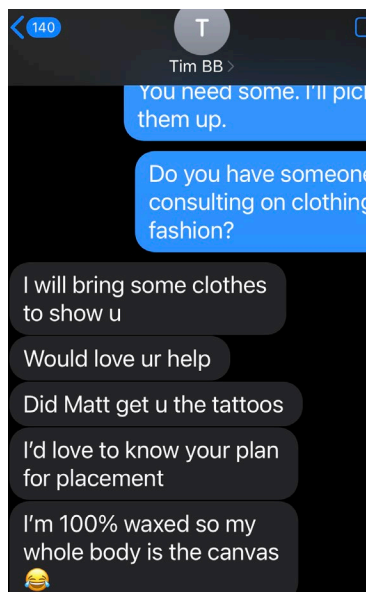
Tim inquired about my sexuality in light of my spirituality. He was especially curious about how I, as an active member of my church, would see going in on these missions and playing the part. We had lengthy discussion about what actions would be justified by God in this work. Throughout the afternoon and evening, He was impressed that I “got it” and was willing to do whatever was required for the cause and still feel strongly that it would be in keeping with my standards, since my highest standard is to sacrifice everything necessary for the Lord and His purposes—and I could conceive of no greater purpose than to free God’s children in captivity. I was increasingly willing to participate without question of the personal cost.

For the next several hours as I worked, Tim began to tell me more about the tactics they use to keep their cover on operations. I had been aware of his close association with Elder Ballard, so it seemed natural when he told me they met on a regular basis to receive blessings and to discuss OUR proceedings. Tim told me of the time he told Katherine he couldn’t do OPS anymore, that the thought of descending into the filth made him sick. Then he received revelation of using a girlfriend relationship (later deemed the “Couples Ruse”) as a cover. According to Tim, he presented the plan to Elder Ballard who thought it was brilliant and

specifically sanctioned the strategy. I could see how going undercover as a couple could be valuable, so it made sense that it would have come from an apostle of the Lord.

I asked various questions about what my role would require. Would I need to drink alcohol (which I had never done)? No, Tim said he never has to drink. He's really good at faking it and told me some of his tricks. Would I have to swear (which I also didn't do)? Yes, I could practice it (that evening, Tim asked me if I had practiced saying the "F" word in the mirror). What was my physical risk? Would I ever be in a situation alone with traffickers or where another man would be expecting me to be sexual with him? Tim responded that our roles were to protect each other from exactly that, so we would only need to be sexual with each other and only to the extent necessary to the situation. Of course, we would abide by strict standards and need to be able to both connect and trust each other.

Tim confided in me many "secrets," like that he had just gotten a full body wax for the first time and asked if I ever had, saying it's so much more appealing and he wishes Katherine would.



He told me to go shopping and get sexy clothes so we could test it out this next week if we got the chance. We were in frequent contact through the weekend. He asked me to send shots of the sexy clothes I got and screenshot tattoos and placements I was considering.

Plans changed and I was asked to leave Monday instead; this would give us more time to “practice”. Tim had asked if I had any concerns and I told him I had plenty, so we planned to discuss them while we were down in MX. He picked me up from the airport in Mexico City alone with a driver who I was assured only spoke Spanish, so we could speak openly and confidentially on our long drive to the home where we would be staying that first night. I shared both my written and mental lists of questions.

My greatest concern was for Katherine and how this worked with their relationship—since the whole point of going in as a pretend couple” was to safeguard his real relationship with his wife by preventing him from having to do heinous acts with victims of trafficking. I wanted to know how he had been able to keep emotionally stable and not blur the relationships. He assured me this was the best thing he could do for his relationship. Katherine knew it too. She helped choose me! He said that they always decide together who should go on these operations, who fits the part as a legitimate partner for him with the right look, height, and spirit. He said he had shown Katherine my picture and she felt strongly about me, agreeing I was the one.

As for making sure the role play doesn’t turn into real play, Tim said there were strict rules: No kissing on the lips because that makes it too difficult not to create a real attachment. No undressing or touching private parts. No texting, calling, or continuation of the role outside of the OPS. These stated standards helped me feel so safe about keeping that distinction and I was thrilled to know that he took this seriously for my protection as well.

Apparently, a previous operator had insisted on calling him and trying to see him after the op because she got too connected and couldn't let him go. He adamantly reminded her that they weren't in a real relationship. He couldn't work with her anymore after that. He told me about how he and another female operator, a big-time actress, were in a situation where they were staying with the trafficker who brought into their bedroom 10-12 minors to dance for them for them and sex play. To avoid the minors, this actress and Tim lied on the bed, pretending to make out and have sex, complete with fake orgasms and a shower afterward...to convince the trafficker they had actually had sex. After playing the role the woman was so legitimately horny that she had insisted on kissing him on the mouth, saying it was not fair to get her so worked up and then leave her hanging. Tim was furious and reminded her of her place. Because of that, he could never work with her again. She was so upset at not being included in future OPS. (The following year, Tim told me he was considering having that operator come on another op with us—and ultimately did—because she now has a boyfriend and is promising she's in a more stable place, wanted to prove she could handle it now, and pleaded for another shot.)

The way Tim verbally attacked previous operators and people who “betrayed him” (which meant anyone who stood up to him, including the CEO, other directors, or women who dared questioned him on ops) was a regular lesson on how I was expected to behave in order to work with him—and I took note. Initially, the expectations of our conduct were not printed, but Tim took video of us after the op “for both of our protection.” He had learned this the hard way because he had been accused in the past of acting inappropriately. Tim recorded that I had treated him appropriately and with respect and asked me whether he had done the same. In time, Coop wrote up and asked for signatures, calling it a Couples Ruse Agreement. (Notice Tim's

signature was not required.)

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 Timothy Ballard and [redacted] will not and have not engage in the following acts with each other during the operation in Cancun Mexico, Cozumel Mexico, and surrounding areas on 06/19/2021- 06/24/2021: 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

[redacted]

OUR Operator Signature

DocuSigned by:
[redacted]

Date [redacted]

Witness Printed Name

Matthew Cooper

Witness Signature

DocuSigned by:
Matthew Cooper

Date 6/20/2021

We arrived at the home of a wealthy politician where we would finish getting ready and stay the night. Tim had attended to most of my concerns and now it was his turn. He told me how risky this whole situation is. More than just that my life would be in danger (which he didn't seem to take seriously and in time it would be little more than a joking conversation about how we would die and that in fact he said he thought dying on an operation would be a cool way to go), he was taking a very serious risk by bringing me along. He told me how important it was

that I never say anything about what we're doing because I could literally ruin him. He seemed distressed as he asked, "Can you imagine what the response would be if you told people, 'I went on an op with Tim and he was all over me' or anything like that"?

I repeatedly assured Tim I would never ever say anything. He expounded that if I ever talked about what we were doing, he "would have to deny it." I told him I understood. Tim continued talking about how it would appear to people who wouldn't understand...and I fervently agreed it could easily be misconstrued. Tim drilled into my mind that he would have to use every resource he had to fight anything negative I might say about him and that of course he would be sided with. I knew that. It didn't matter. I was resolved that I would never ever betray him! By this time my heart was aching at the thought and my eyes welled with tears. I told him, "I could never EVER say anything that would hurt you or the cause! That would be sacrificing everything I believe in—everything important to me about my own good character and all the good that OUR had done. It would be sacrificing the lives of innocent victims that I am willing to lay my life on the line to rescue. That would be so devastating to me personally that I would rather die than falsely accuse him." Tim commended me, saying he had no doubt that I was sincere and trustworthy.

I trusted him too—just by virtue of him being Tim Ballard.

I only began to question Tim's claims when he needed constant reassurance that we weren't doing anything wrong. At the time, he was still seemingly concerned about compromising the temple covenants he made with his wife. I found it extremely odd that he worried so frequently about whether we were acting appropriately and specifically asked me to confirm that we were in the right to be playing our roles. He worried aloud that he "could not

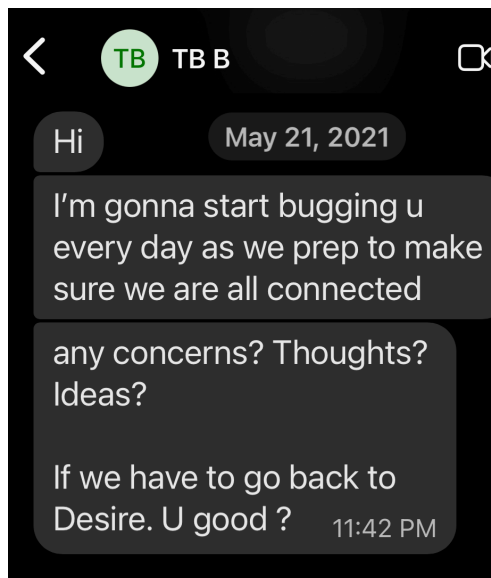
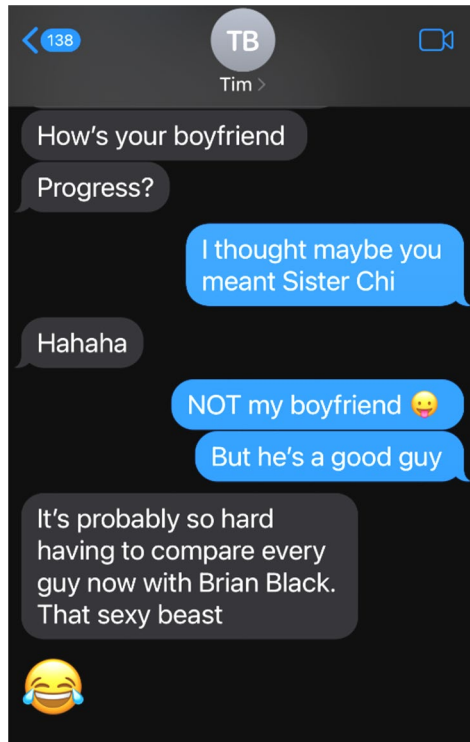
cheat on Katherine.” His concern caused me, as a natural comforter, to engage regularly in this pattern of conversation:

You received the idea of going in as a couple by revelation and immediately knew it as the answer you had been seeking, right? It was confirmed by Elder Ballard, right? And by going undercover as partners we’re protecting each other’s chastity as well as preventing those we engage with from having to perform sexual acts, right? Your wife was just as enthusiastic about this ingenious way to protect you, right? We were carefully selected to save lives in a unique way that God has trusted us to do, right? It’s a righteous cause and calling that came directly from heaven, right? Then we have no reason to be concerned! We can remain in the peace and faith that we have been and will be guided by the Lord.

What I didn’t understand then was the real reason for Tim’s constant concern and need for reassurance—he was behaving with impure intent. He used me to comfort him and regularly reaffirm the righteousness of our roles and behavior. Doing so kept me lodged in a belief that God condoned anything we needed to do to gain the trust of human traffickers and other dangerous or evil people while simultaneously keeping ourselves safe physically and spiritually. While I see how all that could be true at times, and scripturally/spiritually justified, I don’t believe it is in Tim’s case. During the past couple of years, I have witnessed first-hand Tim’s degeneration into moral decay, mental illness, and harm to himself and countless others.

Over the course of our many OPS, Tim touched me repeatedly, trying to create a sexual connection by the words he spoke and the ways he touched. He was constantly feeling me out and trying to turn me on as well. Tim frequently asked about my sex life, what most arouses me, whether I masturbate, what I’m willing to do with my boyfriend, etc. Tim also admitted to some jealousy about guys I dated and feeling rejected when I didn’t respond to his touch as expected. Most of these touches were unnecessary, other than to “create chemistry,” because we weren’t with traffickers or in settings trying to fool anyone. It was often while we were traveling alone or

staying in a private place.



Tim spoke often about the disconnects in his relationship with Katherine (Tim's wife)

and I became a crutch for him to confide in and offer advice. It was often in regard to his sex life and wanting her to think more openly and be more exploratory (she was apparently not willing to wax or have oral sex, and “I’m *really* good,” he said).

Tim frequently asked with bewilderment, “Why are you still single. On the first “mission,” he said, “If anything happened to Katherine, I’d marry you.” He really pressed to know if I would feel the same. I told him, “We’re not going to have this conversation.” On another occasion, almost a year later, he said, “If I was single, I would marry you.” One of the donors with us on a separate trip mentioned that he had said this about the Ukrainian operator as well. And clearly, Tim said it to (REDACTED), then denied it and made horrible accusations about her wanting to marry him.

There was no care or training of “operators” during the missions. Not before, not after. I would arrive home, useless for my kids and family and work, until I could process what had just happened. When I broke my foot on a “training” in Budapest and was not able to go on OPS for a while, I lost that revenue stream, as well as the ability to run my home and business. Being unable to walk was financially devastating. There were many other times of team disorganization and neglect, including when another female operator and I were left at a large home in Mexico all night, unprotected and forgotten by anyone else on the team. She left the next day, but still no one came for me. Fortunately, Tim and a couple others stopped back at the house to grab something forgotten; they were completely surprised I was still there.

On the OPS, I was an afterthought—like I wasn’t really supposed to be there. I felt like I was risking and sacrificing for something that was becoming clearly about creating a story and not about putting together strategies to rescue. (Eventually, Tim began to say our responsibility

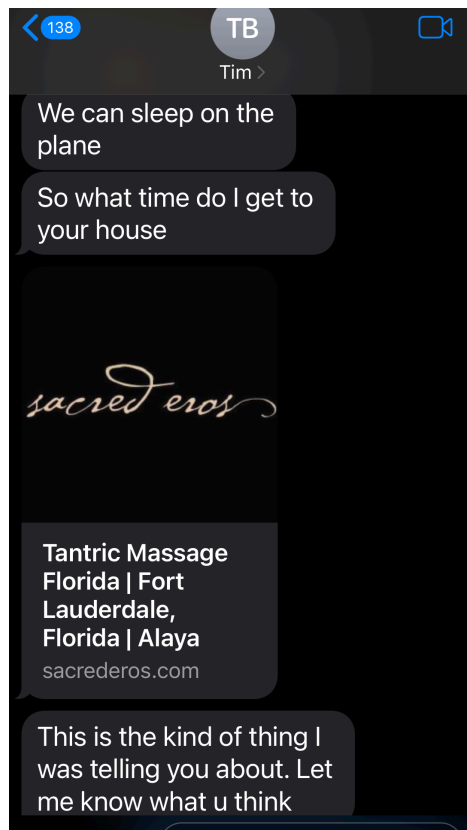
was to be “storytellers” and man, could he spin up a story!) No one seemed to need or care about the intel we gathered. My experiences and perspectives didn’t have a landing place; no one would know who I had spoken with in the places we visited or what I had seen and heard. I didn’t know if any of our efforts (or the supposedly “valuable information” we gained) had led to anything worthwhile. Tim spent very little time explaining the missions, targets, or victims, and an excess amount of time discussing all things sexual. I never really knew what we had actually accomplished other than achieving “chemistry” and being convincing to usually no one in particular.

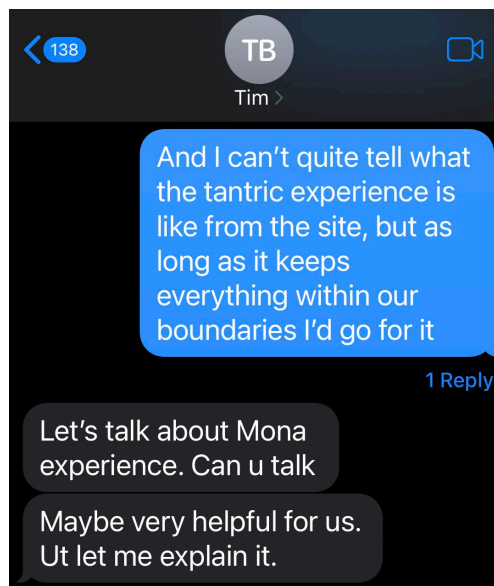
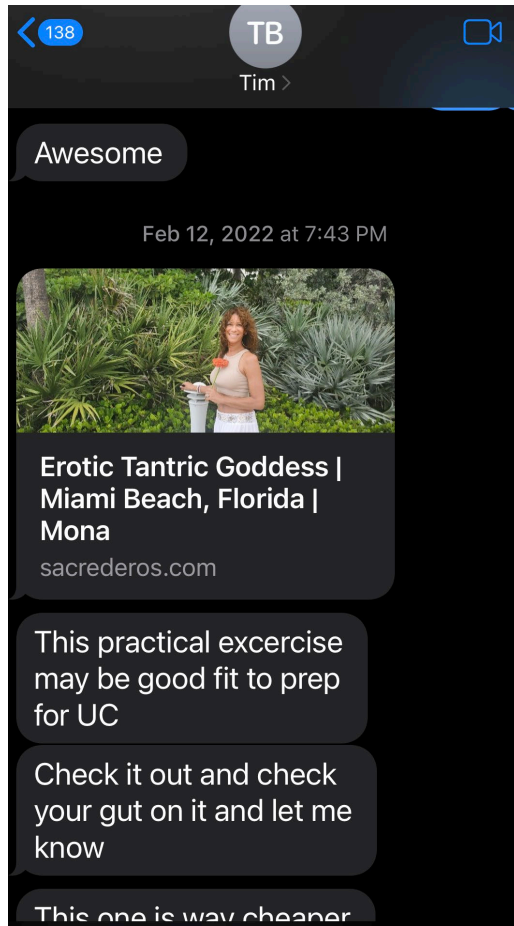
Tim also became increasingly sexually perverse and aggressive. At least twice I was afraid when he was on top of me and dry humping on a bed. We were alone in a hotel room the first time he did this, after which he went into the bathroom and masturbated. On another occasion, I was scared and unable to tell him, as he had become aggressive, grinding determinedly trying to come. When I tried to move away, he pulled me back under him.

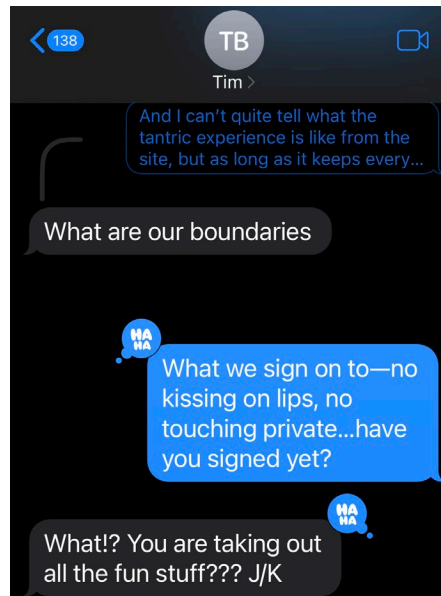
As we were preparing for an operation and staying in Miami, Tim wanted time to “practice” and reconnect since it had been a while. One evening he became demeaning and insistent that I meet him at the hot tub. I met him there late at night, alone, when I would rather have gone to bed but knew he would be upset if I refused. Tim began telling me all about the tantric massage that he and another operator experienced in CA. He said she had learned a lot and was excited about what she could do with it in her marriage. Tim had learned some techniques in tantric that he wanted to show me. He said, “I’m going to do something. I promise I won’t touch you. Trust me.” He moved his hand up between my legs and pressed his finger just behind my vagina, tapping firmly six times, which he explained awakens the sexual chakra or

something that that effect.

He frequently talked about doing a tantric massage with him and other “more intense” practices than we had done previously to “level-up our game,” insisting that undercover work was “a perishable skill.”







He began drinking regularly on OPS, justifying oral sex, nudity, and bed sharing with each other, creating situations precarious enough that he could vehemently argue these actions were necessary to accomplish the mission and retrieve information that would make all the difference in saving countless lives.

Tim kept saying we needed a more intensive training than we had done before and said Coop had made all the plans so that Tim and I would both be surprised. He had scheduled a trip to FL for this “special training” (where we would be meeting a Ukrainian operator), first routed through NY for a “surprise appointment” for just the two of us. Tim had been trying to arrange for a sexual massage for quite some time and was infuriated when our flight was cancelled and could not be rebooked, even on another airline, to get us there in time for the appointment. Mike arranged for a midnight flight direct to FL instead, thankfully skipping JFK, so Tim and Coop spent hours scouring Salt Lake City for a place we could get a sexual massage that day. When the first place failed, Tim yelled at Coop over the phone to find something. Coop drove us from place to place, but they were all full. Tim was relentless, offering women at the desks up to \$500

to get us into a room.

He finally found a sketchy massage place where he was demanding enough that the therapist allowed us to squish together onto a single massage bed so she could rub us both at the same time. Tim was persistent about asking her if she could do a Nuru massage or bring in someone who could, and he tried to get her involved in any sexual talk he could elicit. She did offer him a hand job if he wanted. He asked her if she ever got sexy with her clients and teased her about taking off her shirt. Tim kept acting like this all of this was part of a training designed by Coop and they were handing me mini “missions” to accomplish. This time, on the bed, Tim gave me the assignment to get the massage therapist to strip down for us. I refused as if he was joking. He was not. That seemed criminal to ask of an innocent bystander to our “training.”

When we finally left (before Tim was ready to, but because we now had limited time before our flight) I called him out about asking me to corrupt her. He shot back, “She’s anything but innocent...she was willing to give me a hand job!” He spoke disparagingly about me when Coop picked us up, telling him I had “gone soft.” For the remainder of the “training” trip, Tim didn’t have much of anything to say to me, including having me participate in any further training...which was supposedly the whole point of the trip. I didn’t participate in anything essential or unique and spent those FL days primarily alone; Tim specifically left behind at the house rather than taking me to visit Tony Robbins as promised. It was clearly my punishment for pushing back on and questioning his instructions. I told Coop about the incident with the massage therapist, and he was definitely very concerned...but there were no repercussions for Tim.

I now see many contradictions between how Tim protected himself, with little concern for

me and others, while creating in me a determination to risk everything to protect him and “us” as a partnership and OUR as a whole.

- It’s ironic that he claimed it took him a while to detox from “Brian Black” mode (Brian Black is Tim’s alias)—which was often his excuse for a foul mouth or inappropriate behavior—but he wasn’t concern that other operators might need to as well before returning home and getting back to “real life.” I wasn’t offered any help, therapy, or almost any contact between operations.
- Tim has become a hero by proclaiming how he puts himself in real danger, but he was discrediting other operators, including myself, who took on the same risks. For example, consider the statement put up by Spear Fund
- Tim enlisted top stylists and Hollywood-level help to get disguised but was not concerned about other operators being exposed, even if it meant we couldn’t return back to the country in the future with family or friends. When my identity was directly compromised with cartel, Tim dismissed it as a non-issue saying it would be dangerous if it was him, but not for me.
- Tim believed his family needed help and protection while he was away, but others didn’t (despite that I’m the only one my kids can rely on to provide and that we’re side by side going into the dark and risky places).

I’m not stating this for sympathy or accolades but to express the pattern of Tim’s inability or unwillingness to acknowledge and/or attend to the needs of others, including those of his partners and team. I felt extremely unprotected in every way. Tim would remind me to turn in my expenses and get paid after these operations, saying “that’s a lot of money!” As though I would be compensated well (...after all, Tim was highly compensated). But that was not the case.

I was initially offered \$x/day, a super low “operator rate” compared with my other services, which made it a financial strain to go out for days and weeks at a time. There were many hidden costs of both leaving and being involved which were not well compensated,

especially taking into consideration the time required to prepare before an OP and recoup after, the all-day/night schedule away from family and other life essentials/activities/opportunities, let alone the physical/emotional/financial risks of this particular endeavor (which isn't offset on a contract basis like it might be with a long-term or salaried and benefited employee). I finally settled for \$x/day, less than my professional day rate (which doesn't demand all-night work, time away, and personal risk, let alone require me to randomly available for the unpredictable travel schedules and follow-up missions).

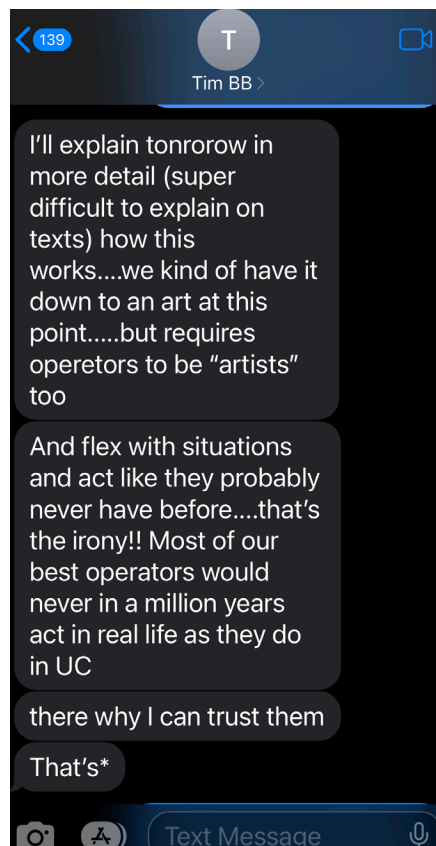
Tim greatly facilitated my mindset that compelled me to consider doing what I did. He told me that after we met last year, he remembered me and would have known me if he had seen me at the mall or in any crowd. He meets hundreds of thousands of people, but he would have known me. With me, he said, there was something different. We connected in a way that was so rare for him. Even through high school he never felt connected to anyone and started to wonder what was wrong with him. Katherine was one of the only women he had ever really connected with. It was such an anomaly that he could feel connected to her, so he knew he was supposed to marry her. Likewise, he felt so connected to me, as if we had known each other forever and before. Like we had had a relationship in a past life, perhaps we were married or something (which he questioned Janet about, and I wasn't surprised because he had shared with me how she had revealed many things about this principle of recycled lives) or were soul brother/sister.

I loved the cause and mission of OUR enough that I was willing to excuse a lot with Tim's justifications and convincing. But after my experience in the DR, I could not run fast enough through the airport to get home. I was physically and emotionally ill. When Tim asked me to speak to and encourage potential operators, I told him I wouldn't feel comfortable with

that until there was some reform. Sadly, it could never happen with him at the root of the organizational problems.

Deception

I understood the tactic and risks associated with the Couples Ruse as far as it was written and required. The spoken and understood Agreement kept me safe...until it didn't. Tim 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.** I was led to believe that Tim had been doing this for years, as had the other male operators; I thought it was standard operating procedure as an essential way to protect everyone involved.



What I have discovered in the past few months has been very revealing to me about Tim's real tactics and motives. Until I was able to talk with other women about their experiences with Tim, I did not know the lies he had been telling them about me. What I didn't know until now was that Tim was telling other women (and some of his staff) the same things about me to convince them that he was in need of a new operator who behaved well—I was now counted among those with whom he couldn't work anymore; He told them I had fallen for him, tried to kiss him, and seduced him in bed.

I will not accept being lied about and disparaged when I have risked so much and given so much without asking for anything in return. And I'm not OK with staying silent when someone else is being lied about and publicly disparaged.

I recently received advice to beware of people who are talking about others; they are talking about you too. I am absolutely dumbfounded that Tim would defame me that way. While I was doing everything I could to protect his image, he was smearing mine. I have a solid reputation among those who know me personally; Tim knows who I really am and was still capable of and willing to burn me by painting me as untrustworthy and slandering my character for his own self-indulgent purposes. This outright dishonesty and betrayal proves that Tim insidiously pitted us against each other to prevent us from talking—his manipulative scheme to secure our reliance on him alone. As it turns out, his efforts did not discredit our collective character, but exposed his own. As truth and deception battle, darkness will never overpower light.

EVENT LOG

March 2021

- Tim on set, he tells me he's not a sex addict, (Redacted) tells Tim to "watch it,

Romeo.”

- OUR Lehi office—Hair dye/cut and tattoos. Tim asks about being waxed, being willing without hesitancy to do whatever is required to save women and children, he’s impressed with how open I am to the work and requirements.
- Mexico City—Sneaking out to the guest house to apply tattoos, Tim begins the touching and “practice” of getting physically connected; He feels increasingly connected and asks Janet about our relationship in past lives; asks derisively if I’m “embarrassed” to leave the door open while I’m applying my bronzer in the bathroom. Tim acts “caught” when (Redacted) comes downstairs unexpectedly.
- Cancun time in the ocean, my discomfort with closeness and tactfully pushing back, Coop sees us on the beach holding hands and Tim worries about being caught. Says, “I can’t cheat on Katherine!” and I reassure him that will never happen with me.
- Calls me into his room (while reading scriptures) and comments about how connected he feels, how he wishes we could stay close at night, how if anything happened to Katherine, he would marry me.
- Tim wants to stay in my room on the separate bed. I refuse. He later tells me how he felt rejected.
- (Redacted) takes me to lunch and berates me for my role. I believed this to be standard procedure and am shocked that (Redacted) is suggesting I’ve done something wrong.
- Massage parlor, minors offering massages, find female trafficker who offers us “whatever we need.”
- Tim recounts stories of deep betrayal from those he had worked closely with, (including a previous operator who insisted on kissing him and he was furious so he can’t work with her anymore), how depression and suicidal ideation had overtaken him, how he has a hard time being home. Asks me to please pray because he trusts my connection with the Lord. I pray aloud as we put our heads together.
- Comes to my house and can’t resist touching me and is saddened when I scoot away from him on the couch.

April 2021

- Brought on as primary team. Tim makes sure we have a house with a hot tub, touches inappropriately specifically intent on trying to turn me on, asking me if I had

orgasmed.

- Went to a strip club in the evening, spent an hour in a private room with a topless woman who tried to seduce us while Tim faked oral on me. I had a physical traumatic response when we left the club. Tim held me until I had calmed down. He still wanted to continue “fishing,” so we entered a brothel where they introduced us to a lineup of prostitutes. Tim was deciding who we should take back into a room and asked me who I would choose. I was not up for it.
- Asks me constantly how I manage to separate the feelings and can “turn it off” when we’re not on the town (back in the safehouse) or specifically playing the role of a sexually charged couple.

May 2021

- Mission in MX, planning business venture with female trafficker.
- Island in BVI—Tim asks me for help separating from me while we’re on the island since he feels rejected when I resist his advances. Katherine is brought to the island as a surprise to Tim, who then actively keeps his distance from me for the week until she leaves, revealing that he has blurred our professional relationship. Tim sees and treats me as the “other woman” whom he must dismiss to avoid jeopardizing his relationship with Katherine. The night before we’re to leave to search for traffickers on the other islands, Tim apologizes for his mistreatment and hopes we can reconnect before continuing our mission.

July 2021

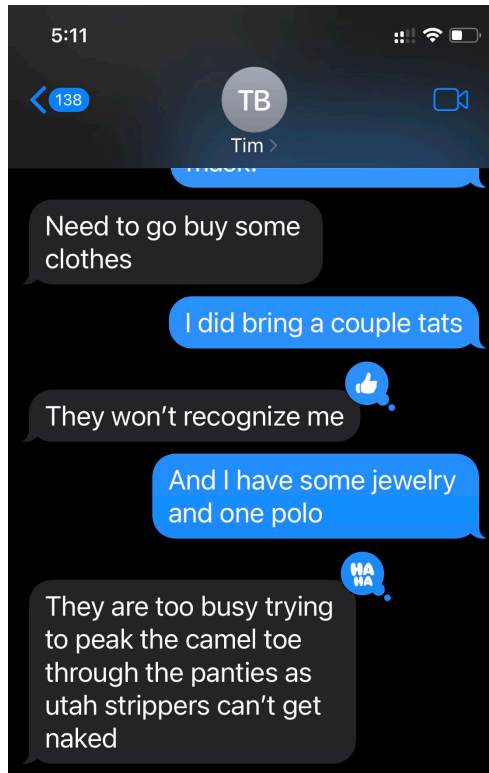
- 5:45am get Tim ready (hair dyed blue/tats/piercings); left at 8am in premier black car service for airport, SLC to Cancun. Happy Shuttle to Breathless, they wouldn’t let us in due to improper ID. Barely missed Riigo’s (trafficker’s) boss, so Tim paid Riigo 12K USD cash to meet us at another place with his boss, then raced to Coco Bongo to meet Riigo.
- Tim tells team he’s backing away from OPS (he’s been saying this for months and I hope he’s serious this time.)

Oct 2021, OUR TRAINING

- First aid, OSINT, HUMINT, dinner, clubs. Tim asks about my boyfriend, how far

I've gone with him, and if now I'm going to be hesitant to be as sexual with Tim.

- Before clubbing, Tim asks me to be witness to what happened in a hotel room with the trainee who tried to seduce him and get him to “finger f---” her. I insist he tell Coop and Matt.
- Tim wants to go to strip clubs in SLC as part of training.



- Actors meeting, role play with students in shifts. Tim talks (with his son present) about the trainee who wanted him to “finger f---” her in the hotel room. Embarrassingly crude with trainees in mock situations.

Feb 2022

- I'm on secondary team. Tim talks incessantly about the female operator he can't stand being with any longer, how she is pushy and verbose (i.e. she doesn't just go along with everything he says), says she freaked out about the cartel association and he couldn't continue working with her.
- Tim says the other operator refuses to go into cartel territory where we're doing the sting. He asks me to join him on primary. I meet with the trafficker and boy (who

Tim says is the cartel's "Golden Boy" because he looks so young he's in high demand—they can send him out multiple times a day for \$4K/hr. (When I asked a few days later, Tim told me the boy was 15 and had been trafficked since he was 12. They still couldn't find his family. On an operation earlier this year, I talked with the aftercare director there who said that boy was propositioned for that evening by his neighbor and that it was the first time that had happened to him.)

- We do the takedown, the police don't arrest me and instead expose me as an accomplice, as they take me outside and ask me to hand over the money in front of the local swat team.

Mar 2022

- Tim insists I meet him at the hot tub. Tells me all about the tantric massage with [redacted] (an operator), saying said she was excited to take some of the techniques back to her marriage.
- He learned some techniques in tantric and wanted to show me. Tim said, "I'm going to do something. I promise I won't touch you. Trust me." Moves his hand between my legs and presses firmly behind my vagina six times to activate sexual chakras or something.
- Evening in DR at "fantasy house" of suspected trafficker John [name changed]. Continuous rounds of alcoholic drinks, a surprise show with three girls whom John said come regularly to perform with fully revised costumes, choreography, and music.
- Tim tells me the plan: I am to stand in panties at the top of the stairs with drinks until there are witnesses, then summon "Brian" to go to bed alone with me. Some of the houseguests and staff heard me invite and then saw Brian holding me from behind with drinks and warned we would miss the party. Other female operator stays down unaccompanied at the bar to represent us at the party.
- Massage parlor, [redacted] café with the Haitian woman he refers to as his "boss" who is pimped, and her 15yo "daughter" (i.e. not her daughter). Tim lies on bed on the other side of the room divider as we get "massaged" (these massages are always gross mockeries, not real, not clean, and not relaxing).
- More massages at the seedy Haitian place, in separate rooms upstairs, my nice glasses were stolen by the time I got up.
- Evening at John's house. Both women (Russian and Ukrainian) join us in the bedroom. Tim has been heavily drinking, lays out the plan for me to do new boundary break of removing my top, take charge of the time with the ladies (because I'm the "boss"), to push his head down between my legs so they'll believe we're having oral sex. Tim gets completely naked, then sleeps drunk on floor (obviously not protecting me) until he climbs into bed. This night and the night

before were horribly disgusting situations as I primarily had to fend for Tim and even take the touching and sucking from the other women. I left incredibly vomitous and still want to throw up thinking about it.

- John arranges for me to have a private massage in his home. The lady ordered in to give the massage is the same we found previously who had worked on Tim. John is already suspicious about our wanderings from the day before and walks in on us as I'm on the table exposed. I feel compelled to "enjoy" her massage, which includes stroking and violating me until I fake orgasm.

Jul 31-Aug 4, "Training"

- 7/31: Meet in SL at seedy Motel 6 since our flight to JFK (where he planned to "surprise" me—Tim had me going under false pretenses—with tantric massage before flying to Tampa. Wanted to discuss 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. Duh.
- Tim becomes desperate to get us into a sexy massage, offering cash up to \$500 for the lady to find us a room so we can experience "Nuru" massage. He tries to get me to get the massage therapist to take off her clothes. I refuse. The remainder of the trip, supposedly for training purposes, I am irrelevant—evidence that I had not fulfilled my purpose.

EXHIBIT C

STATEMENT OF DM

In October of 2021, I went to lunch with my friend who was involved with OUR. In the midst of her conversation, I had brought up that I was interested in saving women and children who were victims of violence or sex trafficking. I did not know that she was involved with OUR. She told me she may have an opportunity for me to get involved with the organization. We chatted a little bit more and she told me that she would reach out to her contact in the organization.

At this point, I did not know who this person was or anything about the organization. A couple weeks went by, and I was contacted by Matthew Cooper, a.k.a. Coop. He is a male operator at OUR who works very closely with Tim. He had told me that they were doing some training, but that they would not be starting a new training course for a while. He asked if I would be interested in being an actress for the other operators to practice scenarios with. I told him that I would rather be more directly involved and actually be the one to go out and save women and children.

That was about all our phone call consisted of. He told me he would be in contact with me at some point in the future. A couple of weeks went by and he reached out again. He asked me if I would be willing to come up to the OUR gym and do a training session. I told him yes, absolutely. On October 28, 2021 I went up to the OUR gym located at 13648 S 200 W Draper, Utah 84020.

When I got to the gym, Coop was waiting for me inside. There were a few other women there as well, and a girl named (redacted). We did some basic training exercises involving self-

defense, and then covered some awareness tactics. After a certain point, Ballard arrived at the gym, and I spoke with him one-on-one in a back room.

When we spoke, he told me briefly about what the organization did and how I could potentially become involved. I expressed to him very clearly my interest in becoming an operator. He told me that it was a hard job, and I would have to be willing to do a lot of really potentially dangerous things. He said that I would see a lot of dark things, as well as be in some very seedy and gross places. He touched briefly on the COUPLES RUSE as well and asked if that was something I would be able to do. I told him that I was an actress and that I thought I could be quite good at being an operator. I then went back out after speaking with him for a bit longer. I continued doing some training with Coop and the other two girls that were at the gym. Ballard's son Blaine was also there doing some training with us.

After the self-defense tactics, Ballard said that he thought we should continue training in a different way later that evening. He said that we would now take it up a level. They wanted to essentially test how well we would respond to certain uncomfortable or intense situations. He told us about using an app called Signal to communicate, and how we had to be very careful with text messages. He said that we could not talk to anyone about this stuff ever. I signed an NDA as asked and left it there at the gym. (I never received any type of copy of this.)

We were told to meet later that night back at the gym. I believe it was around 10:30 PM that I arrived there. Coop, (redacted), Ballard and I were all supposed to go out as first team. First team meant that we would be the ones to go inside the strip clubs and try to gather information from people as a part of our training. There were two other men that I recall being there that night. They were on second team that night. Second team's job

was to maintain communications and follow us around discreetly in a vehicle of their own. One of them was Ballard's son, Blaine. The other was an older gentleman (I do not remember his name).

Ballard and (redacted) were partners that night and met up at her apartment. They were supposed to take an Uber to meet us at the OUR gym after getting in "character" together. They missed their first Uber and we were waiting around for a while (I think we ended up having to just meet them at the first strip club.) We were supposed to pretend like we did not know them when we were at the clubs on our training OP. The second team was supposed to just follow us around and keep in contact via messages on the Signal app.

We all had to constantly remain in character, even while interacting on the app. Tim and (redacted) were partners for the COUPLES RUSE training that night and Coop, (redacted) and I were a "throuple" for the COUPLES RUSE. While waiting to head out and start our training, at one point Ballard's son came over to talk with us. He made a comment about how his dad had given him something to take (presumably some type of pill, but I'm unsure of what).

He then said he felt high and was kind of laughing about it like it was no big deal. It really concerned me though. I didn't like that we were supposed to be pretending this was a real-life scenario and that he would be out of it. If it was a real situation potentially out of the country, where lives depended on it, then I would be so anxious and scared. I would never be able to trust someone not in their right state of mind. Not to mention it disturbed me and was inappropriate that his dad had given it to him. At some point (I don't remember exactly when) Ballard told me that he would sometimes take something in order to deal with his stress and to help him get into character, as well as loosen up.

I drove with Coop to the strip clubs in Salt Lake City for this training. (I don't remember the

names of all of the clubs and bars, or the order, but I know we went to these clubs for sure: Trails Gentlemen's Club, Exotic Kitty Gentlemen's Club, The American Bush).

We Coop, (redacted), and myself got there and went inside and sat down. I got an energy drink from the bar, and we all sat in a booth together. I saw Ballard and (redacted) at the first strip club. (Redacted) was sitting on Tim's lap and they were all over each other playing the part. Ballard was in character as "Brian" and wore these big glasses to disguise himself. (Brian is his alter ego of sorts).

The idea behind going to the strip club was for Coop & Ballard to see how well I could get information out of people and how I would respond to being in a "darker environment" around certain types of people. Ballard would point out people in the club and tell me to go try and either get their phone number, find out where they lived, or a variety of other questions. I don't remember how many strip clubs and bars we went to exactly, but I think we went to three strip clubs, as well as a regular bar at the beginning and then another bar at the end. No alcohol was consumed by anyone that I saw in my "throuple." While at these clubs and bars, Coop, (redacted), and I would hold hands, sit next to each other, and just generally pretend to be a couple.

Nothing overtly inappropriate ever happened while I was training with Coop. I felt like he was in character while still keeping things professional for the most part. (If that had been what Ballard had wanted for the COUPLES RUSE, it wouldn't have bothered me as much. His version was not that, unfortunately.)

During all of this, I occasionally saw Ballard and (redacted). They acted out the COUPLES RUSE as well—just more extreme (lap sitting, going into private rooms in the back, dances, etc.)

At the last club we went to, (redacted) and Tim were in the back by themselves in a private room.

Tim had asked (redacted) to give him a lap dance. She was supposed to show him that she could do the job—so even though she was hesitant, she did it in order to prove herself. She started giving him a lap dance, but shortly after she started, Ballard's son ended up coming inside. He walked into the club's back room and saw his dad and (redacted) together like that. It made me extremely upset because (redacted) had not wanted to do it in the first place and had been reassured multiple times that Ballard's son would not be coming inside or see them acting out the COUPLES RUSE. (Redacted) was freaking out a bit and came and told me what had happened.

At this point, Ballard came out from the back room and talked to me in the club. He had his arms around me and we were chest to chest. We were talking more about the COUPLES RUSE and what that would involve, as well as some other things like how his wife was going to kill him if she found out their son (Blaine) had come into the strip club. I cannot remember exactly what else was said at that moment. Shortly after that, we went to one last bar. Ballard and (redacted) did not meet us there. After that last place we decided to call it a night.

I drove with Coop and (redacted) back to the OUR gym, where we met up with Ballard and (redacted). At this point I think it was coming up on 4:00 am. Ballard told me I did a good job, then talked to us all about the night and how that experience only scratched the surface of what it would actually be like on OPS.

Tim texted me the next day, October 29, 2021, and said I was a badass and had done an awesome job the night before. He then asked me to come and meet him at the OUR American

Fork office, located at 758 S Automall Dr. Unit 5 American Fork, Utah, and I told him that I would. On November 1, 2021, I went up to the address he sent me. When I arrived, Ballard and Matthew Cooper were both there. Ballard asked me to come up to his office to speak with him privately.

When we sat down, he started talking to me about the COUPLES RUSE and how important it was; telling me exactly how intimate certain scenarios would be. He asked me over and over if I would be willing to act out certain sexual acts, continually getting more explicit. Doing all of this, he made it clear that I could not tell anyone about the things that were happening between us. He made it seem like it could be a life-or-death situation if I disclosed information, and/or that I would get into trouble as well. He also made it seem like it could be a life-or-death situation if I was not willing or able to act out certain sex acts well enough.

This is when he started pushing the idea of needing to practice with each other. He started telling me about other female operators and how they had been in situations where they had to be completely naked in the rooms in front of each other and while getting massages. He told me that the point of the COUPLES RUSE was for you to be able to block for each other. Meaning that on OPS, you would intercept sexual touches from traffickers or sex workers. He started to become explicit with the situations that had happened or that could happen. He told me that he wanted to train me to be his new primary partner on OPS. I would be paid for my time as a contractor with the organization. He said that operators before me had fallen in love with him. That some had tried to climb into his bed at the safe house and that they had pushed for relationships with him. He told me that other partners before me had gone a bit crazy and he had to end things. I knew he was married, and he said because of that he had one rule for the COUPLES RUSE, which was no

kissing on the lips. He made it seem that everything else besides maybe full-on penetrative sex would potentially be expected.

During all of this, I felt like everything was a test. Every question or action was proving myself. I had briefly gotten into my personal background with him and explained why helping on operations as an operator was so important to me. Saving women and children truly meant so much to me as a person on a personal level. I wanted to make a difference, I have been a longtime supporter of OUR and knew that's what I wanted my future to involve. Tim then asked me some personal questions about my life, like: if I was married, if I had my own place, and others, things of that nature.

Tim then became more open about things that could happen or that I could expect on OPS and that I would have to be willing to do those things in order to save children. This included being naked in front of each other, touching each other, imitating sex acts, talking dirty to each other, and all sorts of things of that nature. It was presented to me as, "If we were in a life-or-death situation, would you be willing to do XYZ...?" And of course if it came down to saving women and children I would be willing to do it. If it was a life-or-death situation, I would be willing to do whatever I had to do.

For him, he said if he was going to get a new partner, he needed to be able to practice. He would say that it was really important for us to have intense chemistry. He wanted to know if I was attracted to him and wanted to make sure that he would be able to turn me on. I was really uncomfortable with these questions obviously, but at that time in my mind I felt like it was a test. And I didn't want to fail this test. I wanted to become a part of the team.

Things then proceeded to become physical. It started out with him just resting his hand on my knee, then he started running his hands across and up my legs. He slowly started to become more comfortable and was running his hands all the way up my thighs. We were sitting in chairs facing each other at this point and were no longer talking. I was pretty shocked he was touching me so intimately. I guess in my mind I hadn't thought that he would begin practicing then. I guess I had assumed that he wouldn't need or want to practice until at least we were heading on an operation. He moved closer to me and started to run his hands along other parts of my body.

I remember there was a lot of touching, rubbing, and grabbing with his hands across pretty much my entire body. At this point I remember then being pushed up against the office door. Ballard was up against me, and he was sort of grinding his body against mine. It was obvious that he had an erection. At one point his thigh was kind of pressed in between my legs and kind of moving up and down against me. There was no kissing on the lips seeing as that was his rule, but there was lots of kissing and mouthing movement around my shoulders and neck and other parts of my body.

At this point I was very uncomfortable, but again I felt like I could not fail this test. I needed to prove that I could handle what he was doing. If I was not strong enough to handle this and deal with this, then I would not be able to go out and rescue women and children. And that was not an option for me. I wanted so badly to be able to be part of this organization, but still I was so unbelievably uncomfortable. I didn't understand why we had to be practicing right then. I mean, we weren't on an OP. He had only met me one other time before this, and it hadn't made sense to me that he felt like we needed this practice now.

Things were moving so quickly physically, and I hadn't done any other sort of training. It

was all happening really fast. He then slowly worked his way down my body until he was kind of kneeling down in front of me and was pulling at my jeans a bit. 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; I could just see it on his face. It seemed like he was unhappy with the situation he'd walked in on. He didn't say anything or ask any questions though. Coop wanted to speak to Ballard then I believe, and Ballard told him that we would be coming downstairs soon. Coop gave us another look and then left and shut the door behind him. We talked for a minute longer and Ballard tried to start things physically again, but I had to leave for an appointment, and I used that as an excuse to leave.

Ballard then began to question me about how I had felt about things. He wanted to know if I had been turned on during that or if I was still turned on and worked up. He wanted to know if I was attracted to him physically as well, and if he was good looking. I didn't quite know how to answer those questions, so I told him something along the lines of: Yeah you're a handsome man. It all felt like a test to me, so I tried to say what he wanted to hear and react the right way. I kept thinking about how he had a government background and that they had probably taught him these techniques and that I should trust him. He told me he was really attracted to me.

He told me that he wanted to have me do more training. And that the next training would be even more intense. He asked if I had a couple days available, possibly in November, to go and do a training weekend with him. He didn't specify if other operators would be going as well. He

told me he wanted me to start coming on OPS with him soon. He then made it clear that he would want and need to practice more physical things like we had just done. I told him that I was an actress and I did this for a profession, so practicing wasn't necessarily needed on my part. I tried to say these things delicately, as I did not want to offend him and jeopardize my chances of becoming an operator. He told me that practicing was fun. And that it helped keep your relationships more exciting.

He said in order for this (the COUPLES RUSE and operations) to be sustainable, it has to be fun. I immediately felt sick to my stomach: dirty, and panicked. I had been warned that I couldn't talk to people about things that had happened. I had signed an NDA, and I was really anxious about breaking it. I also didn't want to lose my opportunity to work on Operations. I called my friend (REDACTED) and told her I was really nervous to speak with her, but I felt like I needed to tell her something. I felt safer talking to her, because Ballard knew she had been the one to get me involved with him and the organization and hadn't minded me asking her certain questions before. She was the only person he seemed okay with me communicating with about certain things.

I knew he would not want me telling her what had just happened between us though. It was supposed to be too secret between us (Ballard and myself). I told her I was scared to talk about it over the phone and she told me that I could come and stop by her house later that evening. Over the phone though, I did very briefly tell her a few things that had happened in the office with Ballard. She seemed pretty shocked and did not think that what had happened was normal or good, but I did not tell her a whole lot because I was really worried at the idea of getting in trouble or messing anything up.

She reassured me that it was okay to stand firm about not wanting to perform any more sexual acts with him, even for the sake of practicing for an OP. I knew my talent as an actress and knew I didn't need to. I went to my appointment and Ballard messaged me, asking when I was coming back. I told him I wasn't sure if I would be able to. He asked again if I would be coming back that night or not. I told him that I would if I could. After my appointment, I went back up to the OUR office. At that point I was resolved on telling him that I would not want or need to practice any more sexual acts with him.

I went back and when I got there, Coop wanted to speak with me. So we sat down in the office and he asked me some questions about the night before when we had gone to the strip once, and about how I was feeling about things. I wanted to be honest with him, so I was. I told him that I was worried about Ballard a bit. I didn't get into any details because I knew that he was friends with Ballard, and I was worried about him not being happy with what I said, or it jeopardizing my role in the organization. I did tell him that I felt like Ballard needed some help.

I told him I felt like Ballard had seen a lot of things that were probably messing with his mental state a bit. I told him that I felt like Ballard, as well as the other operators, needed to talk to someone. That they needed to see to a therapist and work through some of these issues. I was really worried for Ballard's mental state at that point because of the pills, the way he was acting, the things I had heard, and the sexual situation that had happened already without us even being out an OP. Coop did not necessarily disagree with me, but he also didn't agree with me.

I then met with Tim again privately, and he started with wanting to practice some more. And saying basically that in the near future, we needed to keep practicing consistently in order to be a secure team together.

I didn't want to make him too upset or offend him, but at this point, I just genuinely wanted him to seek some help for his mental health sake. I told him that I was worried about the things he had seen as an operator and hoped he had someone to talk to. I told him that I was worried that OPS and the things he had been exposed to were negatively impacting his mental health. I told him that for the sake of his wife Katherine, that I didn't think it was right to practice like that. I told him that us practicing sexual acts was not necessary. I reiterated that as an actress, it was not needed, that I can turn it off and on as needed for the sake of the situation we were in at any given moment. That's what an actress does with all emotions or actions in scenes.

He asked at some point something about if I had my own apartment and that going there would be an easier place to get more comfortable with each other. I don't remember at what point in these conversations that was. At the time, since I was going through a divorce, I was living with my family and did not have my own place, which I let him know. I don't remember exactly all the things we continued to talk about... But I think it was pretty much the same as earlier. We then were done.

I don't remember the exact timing here, but at some point Coop talked to Ballard and Coop told him what I had said about him potentially seeing a therapist or seeking mental health. Ballard then confronted me and said, "Oh, I heard you think I'm crazy? I heard you told Coop that I am losing my mind... that I am completely crazy." Something along those lines. I told him, no I didn't say I think you are crazy... I just think that seeking therapy for some of the things you have seen should be a priority for not only you, but your entire team.

I then threw out some ideas about how to better protect people on OPS. I found out that no one is allowed to carry any type of weapon on them and that no one has any tracking devices in

their phone or on their persons. I told them my opinion was that for the sake of the safety of their operators, especially the female ones that could potentially then be trafficked, that it was important for them to seek some better safety methods. Up until this point in my conversations with Ballard, I had not even really been spoken too much about safety tactics on OPS. Really, almost all of what Tim spoke to me about the whole time I was there, was the COUPLES RUSE, sexual acts, and all the things I would need to be prepared and willing to do with him.

As I was getting ready to leave, they made it seem like they would be in contact in the next couple of days to continue training. I told him that I would be going out of town, but that we could plan something after that. I was prepared to keep working with him and be his new partner on OPS if he would stop pushing the sexual practicing aspect and get some professional help. I still wanted this working relationship to work out so that I could make a difference in this world by saving kids.

I then left and called and asked (redacted) if I could stop by her house and speak with her. When I stopped by her house, I told her all the things that had happened and asked her to please not tell anyone that I had told her. I was and still am very much nervous. She reassured me that the things that had happened she did not think were okay, and that I needed to stand my ground with him about no longer practicing the COUPLES RUSE unless we were actively on an OP and it was necessary. I then left her house and went home. I reached out to Ballard about when we would be able to meet up next when I was back in town. I was then invited to go to the OUR gala, and I told him that I would not be able to go. The last I heard from Ballard and Coop was on November 11, 2021. Tim told me he had talked to his family and team and would no longer be going on OPS. (This is something he said to the other women as well after they stood up to

him in some way or another.) When he realized he couldn't control or manipulate me any further sexually, he no longer wanted me as his "partner."

Coop called me and told me he would be back in the country soon and would keep training me. A couple weeks went by and I still hadn't heard from them about coming back to do more training and go on an OP like planned. I reached out a few times to just Coop, and finally he called my back. He made excuses for why he hadn't started my training again, but promised he would reach out in a few weeks. He never did. I tried to reach out once more and got no reply. At this point I realized they had both shut me out. I can't even tell you how disappointed I was. I wanted to make a difference so bad. I had put so much hope into this new future. I had anticipated being paid for this new venture, but more than that I would have been able to impact a positive change. To have that taken away because I didn't want to "practice" sexual things and keep being physical with Ballard hurt.

EXHIBIT D

STATEMENT OF MK

I've known Ballard for a few years working as a make-up artist on multiple production sets. It took a different turn one year ago while we were on set (for O.U.R.), when I was asked to potentially go on a mission with O.U.R. Tim was very persistent in having me on his team, and I was excited to learn more about what a mission entailed. I asked if it was a paid job, and he said I would be compensated and paid to go. After giving him my number, and exchanging multiple text messages, I decided to meet with him, and he took me into a private room where the door was locked behind me.

It was a bit sketchy, but I went along with it because it seemed like an interview at first. Then he sat down across from me and said I needed to prove that we had a strong enough connection in order to be believable and potentially hired as his "girlfriend" for the mission coming up (which would be about 2 months later), so I wasn't sure what to do. He stared at me and said, "You can't touch me, but need to show me what you can do to basically 'turn me on enough'" that he would want to have sex with me.

Then we were interrupted, and his bodyguard said he had to leave. Ballard and I got close in proximity a few times, but I felt very confused about what the meeting was about or what exactly he needed to do. He was evasive with explaining, and he wanted me to do the work and come up with the ideas in the room to "connect with him". After about 45 minutes in his office and talking about everything in detail, he made me feel like I passed the test, but I didn't know what it meant going forward. I wanted to support the cause, so I signed an NDA before entering the private room. There was a lot of talk and anticipation about different scenarios that could

potentially happen if I was on a mission with him. I left and waited to hear from him again.

In his text messages to me, he was persistent and aggressive and very forward with me being involved. He wanted me on board and to say yes to being okay with the following scenarios. Those scenarios included:

1. If we were in a hot tub together—he would have to touch me under the water so they would believe we were into each other, which meant under my swimsuit.
2. Potentially we would have to shower together.
3. I would have to have an orgasm if needed for them to hear it or fake it.
4. I would have to turn him on enough that he'd want to have sex with me when we got back to the hotel.
5. I'd be his girlfriend (GF) the entire trip, including in the airport and back. People had to believe us the entire time that we were together.

We met on multiple occasions, and he would ask if I could get together or see him after, but fortunately I always had early morning call times and usually couldn't go along with him. He talked me into meeting at the hotel with other OUR members for the official training, but when I asked what to attend when I arrived, I didn't end up being training at all—it was more club scenes and practice sessions, and I'm not sure what else went on because it was very private.

I was told I'd be paid that weekend, but never got any compensation from OUR. I met Ballard at my hotel room upon his request, where I did another audition to see if I was eligible. So this time he said to show me what I was willing to do or how far I was willing to go without physical contact. So, I felt required to turn him on or give him a show by taking my clothes off (into my underwear), and he told me to say "Fuck me" as I looked in his eyes. He watched me on

the chair and I felt very uncomfortable. I've never said that word out loud before, but he said it was necessary.

After a long while and with his arms around me, he said he was too turned on and that we should go to the gym together. I declined. I never saw him again and he later told me he couldn't do missions anymore because he was too well known. That's when it was confirmed to me that I had been used and played. It was all for his enjoyment. While I was in the middle of so much with work as a makeup artist and barely even keeping up with my insanely busy schedule, Ballard decided to try to convince me to come with him on a mission, but instead there was no mission.

I was disappointed that I was treated like an object, and even more upset that it was all for his entertainment and pleasure. For a year, I sat in silence knowing my story wouldn't matter. But now maybe it will make a difference. After getting to the hotel at midnight, I was asked to sign another NDA and was told we would go clubbing that night as prep for the mission. He stayed in my room for about an hour, and I declined because I was much too tired. He stayed in my hotel room and asked me multiple times if I was recording him and if I was excited to be a part of this. I was in my pajamas and didn't understand what was going on or why he was asking so many questions at 1 in the morning. He said this was all private and nobody could hear about anything or it would be used against me.

I was told the next day to go to training, but there wasn't any training to go to. I basically left feeling depleted and used and completely confused. I was willing to go until I realized the truth about his "project". I felt devalued after that day. He basically told me in a few texts that he didn't need me anymore, but if I still wanted to go on a mission, I could reach out to someone

else. I didn't give him what he "wanted".

Other facts: Tim asked me to tattoo him up and go to a strip club with him. I declined. We met on multiple occasions and he made me feel important by telling me I was perfect for the job. He was polite and would open my door and give me compliments.

He would often check on me because I was so busy and even sick and working so much. I rarely had time to message him back because I was double and triple booked on other projects. He sent links and kept inquiring about the mission for me to be on board with him. He made it all sound very exciting. After all the meetings and time taken out of my schedule, I was thrown away like a piece of trash. I've been attending therapy this past year to understand the situation and regain my confidence and feel safe. It has been very hard for me to wrap my head around what happened to me when I trusted someone like Ballard, who talked about saving innocent lives, when in reality I felt he was taking advantage of me, and had other intentions for me. I was also disappointed with the OUR foundation and how they didn't do anything to stop him.

EXHIBIT E

STATEMENT OF HDT

I was introduced to Tim Ballard by my friend/client C.L. She is, I believe, a part owner in a local business establishment. She was pre-screening the movie, *The Sound of Freedom*, for O.U.R. and Tim Ballard. One day when I was doing her hair, she told me about this amazing organization that helps save women and children from sex traffickers.

She proceeded to tell me stories about how awful the world of sex trafficking is, and what this organization was doing to help save the children around the world. C.L. was doing the scheduling for these premieres. She asked me if I wanted to go to one of the pre-screenings. I said, "Yes, that sounds awesome."

She gave me some dates and I chose one. After the movie, Tim was there answering some questions. I told C.L. that if he really was a famous guy, then he needed a new hairstyle. When she ran into him, she told him that she had a great hairstylist. She said, "I think you should try her out." He had his assistant reach out to me.

I went to a house in Saratoga Springs. It was on October 24, 2021. Apparently, Tim was doing some sort of therapy that he had to do for three days in a row. He was on his third day, and he had to be away from his family and friends. Only Katherine, his wife, could be there. He couldn't have his phone or anything until the end of the three days, which would have been that night. So I had been communicating with his assistant and Dimitri, who was his bodyguard, about a time and place to meet, so that I could cut and color Tim's hair.

When I showed up to the house in Saratoga Springs (which was not his house—I guess it was just a house where he was doing this therapy), his wife Katherine opened the door. She let me in, and Tim was coming down the stairs. He looked like he just woke up. He and Katherine were talking about what they wanted to do to his hair. He was saying that he wanted to have a more edgier look. She did not want that—she didn't want him to color his hair more blonde, which

is what he wanted.

They couldn't really agree, so she just said, do whatever you want and left, and told me that his assistant would be there soon. When she left, he began to tell me that Katherine doesn't like his hair light because it reminds her of when he would be on operations, and it made her uncomfortable and she did not like that. So we kind of talked about how there are different levels of light colors that he could have, and maybe in the past it looked like a beach-boy blonde, so we could do more of a natural blonde and maybe she would like that better.

So we agreed, and I started cutting his hair first. We did that, then as I started applying the lightener, Tim started asking me questions. He asked what I knew about OUR, and I said I didn't know much except for what C.L. had told me, and that his movie was out. He seemed very shocked and almost disappointed that I knew nothing about his company or him for that matter. He asked what I did know about him or if I had even heard his name with the LDS church, and again I said "no." He replied with, "I'm actually a big deal." I said, "Oh ya, tell me why?"

That is when he started to tell me that he had written quite a few books on the New and Everlasting covenant. He said that he is good friends with many apostles, including Elder Ballard, and that he knows President Trump personally. He started telling me a lot more about

what OUR does. He asked me how I felt about it. I told him I was very impressed, that it's a very noble cause, and I really admired him and what he was doing.

He then asked if I ever wanted to be involved in a cause like that, and I said of course. He asked what position I would like to be involved in, and I said, I don't know, I've never thought about it, but it sounds amazing. He then asked me how I would feel about going on an operation with him. I asked him what he meant. That's when he started telling me about a COUPLES RUSE. Tim said that the way they had been getting intel on ops had worked for a while, but it wasn't working anymore, so they had started realizing what was happening and that they needed a new tactic.

Tim said he had been praying about it and he came up with the COUPLES RUSE, and that it had been sanctioned by Elder Ballard and that God told him to do it. He said it was a difficult job. We had to act like a couple, and we had to be very sexual with one another. But it was all for the benefit of "saving the children". He said that God knew our hearts and our souls and what we were wanting to accomplish, which was to only help the children. He asked me how I felt about it and if I thought I could do anything like that. I felt special that he was asking me. I felt important to be asked to do such amazing, important work. I said of course I would want to do that.

He then began telling me that his last operator who was his partner had fallen in love with him. And before any lines were ever crossed, she had told him she was in love with him, and decided to quit. He said he was about to do interviews with about 20 different women to be his new partner, but if I was willing to train for a little bit and see if it worked out, he would like me to be his new partner. He said he already felt very comfortable with me. I told him, "Yes, that sounds amazing." He asked when he could meet with me so I could sign an NDA. I said, "Anytime, let's figure it out." And he said, "How about tonight?" I said okay.

At that point I had told him that I was a single mom. He knew that I had my kids that weekend. He asked if he could come over with one of his partners after my kids went to bed and

I could sign an NDA, because he probably shouldn't have told me any of that before having me sign anything. I said absolutely. He asked me if I wanted to go to one of the showings of his movie premiere that was the next Monday morning and I said yes. He ended up wanting me to tone his hair a little darker. Katherine still thought it was a little bit too light. So we were trying to figure out a time when we could tone it a little darker as well.

We decided not to sign the contract that night – we would do it when we fixed his hair. C.L. was actually going to train as an operator as well. She and Matt Cooper were going to be partners. C.L. and Matt were going to come over to my home, and C.L. and I were going to sign our NDAs. That night we were all going to talk and run some scenarios, and Tim and Matt would explain some more in detail what it would be like on operations.

We talked about how we would have to start training one-on-one and hanging out so we could get really comfortable with each other, and we could know how each other works. We would even need to get to know our normal personalities, like, if we were sitting down with me putting my leg over his leg, things like, and holding hands. Tim said we really needed to get to know each other on a personal level so that we could trust one another. Tim talked a lot about how we needed to trust each other. He said we would be put in dangerous situations. The more we really knew how each other worked, then if we had to save one another, we could trust that would happen.

He started slowly touching my hand, slowly touching my leg, slowly rubbing my back, and I just kept going along with it because that's what "we're supposed to do". We're supposed to get really, really comfortable with each other, especially physically. C.L., Matt, Tim and I hung out for a little bit and C.L. and I signed the contracts and they left. Tim and I continued texting every

day, just still getting to know each other by talking on the phone. He asked me if I wanted to go to a gala that was coming up for his company. And I said yes. So he got C.L. and me tickets to that. At this point, we had only seen each other those two times, but we had been talking and we were planning to get together with Matt Cooper and C.L. again at my house one night, when I didn't have kids just so we could all kind of hang out and talk and get more comfortable with each other.

We were planning on doing that before that gala, so what happened was, we got together. Me, C.L., Matt, and Tim. We were hanging out—we actually played some games and we were trying to all act like couples. It was very strange, but that's, quote unquote, what you're supposed to be doing. Tim started kissing my neck and my forehead and grabbing my butt. He kept telling me, like this is what we have to do so that we are comfortable with one another. However, Matt Cooper wasn't doing this to C.L. They would touch each other's backs, and she had her leg over his, but that was the extent. I asked why they weren't being so handsy? Tim said we would be the ones who were really communicating with the traffickers. We're the ones who are really in there. And so you know, he is Tim Ballard. I'm trusting him.

I know that sounds crazy, but at this point, even my mom is telling me Tim is so amazing. She has all of his books at her house. She's read all of them. He's just this incredible guy. Anytime you mention his name, everybody just talks about how great he is. And so I just trusted this process. Well, C.L., and Matt and Tim and I are sitting there and they start talking about how we need to do self-defense training. They also said we need to do a training where we go on fake OPS. What we will be doing is, we will be going to some bars and/or strip clubs. We said okay. That's all we really talked about at that point. C.L. needed to go, so we kind of set a date for that and then we very quickly moved on because she had to leave.

Tim then asked Matt if he would go hang out in another room so he and I could just get more comfortable, and talk more one-on-one—just talk more about our lives and get a little more personal. Yes, I did think it was a little strange, but Matt Cooper didn't think it was weird. And therefore again, "I am trusting this process". We sit on my couch, Tim pulls me in really close,

he starts rubbing my arms, and he puts his face in my neck. He started kissing my neck, pulled down my shirt on my shoulder, and started kissing my shoulder, and I said, “Wait, wait, aren't we supposed to just be talking and getting to know each other more personally?” And he said, “Yeah, this is what we're doing. Why don't you talk?” So I started asking him questions—I think because I felt so uncomfortable that he was being physical.

I started asking him about his wife, Katherine. I asked him, “What does she know about this?” And he said, “Not much.” I asked him, “What do you mean?” and he said, “Not much” and that she didn't want to know. I was a little bit shocked. I said, “What do you mean she doesn't want to know?” He said, “She doesn't want to know the details. She trusts me. She knows that this is a calling from God. She knows that this is what needs to happen. And she knows that I'm the man for the job.”

I asked, “If she trusts you, then why does she not want to know what is going on?” He said, “Well, she knows to a point. She doesn't want to know details about the things that I have to do with the women. And she doesn't want to know about the gross things that we have to say with the sex traffickers and do with my partners.” Which brought me to more questions. So I started asking him, “Well, what do you have to do with your other partners?” He proceeded to tell me that he has had to shower naked with them. He has been in massages before where they have had to grind naked and act like they were having sex. He has had to pretend that he is fingering someone while they were at a bar. He has had to have somebody rub him over his pants on his genital areas.

Things like that. And I was a little bit shocked. And he kept just saying to me, “Do you now see what I'm saying? This is a very, very hard job. But it really is a calling from God because somebody has to do it and if somebody has to do it, I know that I can do it and have the spirit with me while I do it.” And I said, “I'm not sure if I can do that. That seems very hard for me.” He said, “You will. Once you understand and you see the good and the kids, you will get there.” He told me that a line has never been crossed with him and a partner before and that I can feel safe with him. He then began to tell me the first time I met Tim and Katherine, she later told him that she had a strong feeling I should be his partner. So once again I was feeling very uneasy. But I was also thinking in my mind that this situation is a very uneasy situation, but that “I'm going to trust this process.” At this point, Matt comes downstairs and Tim gives me a hug and they leave. In the meantime, Tim and I kept texting. He wanted us to build a narrative of what we would say our relationship was when we were undercover. He just kept saying we need to build our legacy, what's our story? He wanted to make sure we were talking or texting so that we could stay close, and he could answer any questions I had, no matter how awkward it may seem.

We had planned to do an OP training for October 28. That was a Thursday I believe, and we were going to do the “self-defense training” in the morning. That night, we were going to do the OP training. He wanted to come over one more time before that training. He wanted me to practice putting on tattoos for him, to talk about outfits, and what kind of roles we wanted to play together as a couple. He wanted to look up outfits that we would want to wear as a couple. He kept talking about how I needed to dress slutty. He said, “We can look up outfits for you,” and he told me multiple times that I need to hurry, and pretend to fall in love with him. He would tease me about how he thought it was funny how embarrassed I would get when he would touch me or do anything physical.

Tim and Matt came over the night before the “training” exercise. They just kind of hung out. I honestly was not quite sure if this is how the hang out was supposed to go. They just kept saying that they loved hanging out with me. And if I'm being honest, I enjoyed hanging out with

them. It felt like I was a part of a cause that was really changing people. They told me lots of stories about operations they had been on. It was great to hear. I felt a part of something that was amazing. Every once in a while, Tim would come over and sit by me.

He would whisper in my ear, “Why aren't you kissing my neck? Don't you want to do that?” I would sort of laugh and play it off as if it was a joke. Tim didn't bring the tattoos for me to practice on him. He said he forgot. We looked up outfits that we would like to wear as a couple when we would be out. They were getting ready to leave, and Tim asked Matt to go out to the car and wait for him. I immediately got nervous. Matt walked to the car. Tim shut the door. He said, “I need you to kiss my neck a little bit. I need you to be able to grab my ass. I need this to work both ways so we don't get ourselves in a bad situation.”

We were standing by my front. I put my arms around his neck and I started kissing his neck. He told me again, “I need you to grab my ass.” When I hesitated, he then turned around and pushed me up against my door and started trying to grind up on me. I could tell that he was hard. So I pushed him away. I snapped at him and said “Tim!!” He said, “This is what I wanted to show you, this is what I'm talking about and sometimes this happens and it's going to naturally happen and I just want you to be aware of that.” I think I said okay. I was in a little bit of shock. Luckily Matt knocked on the door. I hurried and opened it. He went to walk out the door and said, “You still need to learn how to smack my ass”, so I patted it as he walked by me. He said, “Don't ever pat my ass again.”

When he left, I felt very conflicted. I wasn't sure if that's how you should be feeling if that is what it was supposed to feel like when they were saying this is a hard job and somebody has to do it. I kept returning my mind to the stories that they were telling me about the operations they had been on, and how amazing it sounded, and I kept telling myself: this is why it has to be worth it. So Thursday morning came around, which was October 28. This is when we were going to the gym to do the "self-defense training" class. Tim of course is texting me in the morning and telling me he's so sorry for staying too late the night before. He was kind of giving me a little rundown about what time where we were going to meet that night. Tim asked me what I was going to wear because we never ended up talking about what we were going to wear when we were at the gym. We were going to make a list of things that I needed to get together for that night so that I could do makeup and tattoos and stuff for his hair.

So then, he asked me, "Are you feeling okay?" I didn't respond. He just kept trying to say like, "It's okay, and we should be over communicating at this point and telling each other everything. That's what saves our asses," and things like that. At this point, I'm feeling so uncomfortable about what happened the night before, with him pushing me up against the door. I asked him what I could talk to C.L. about, and he told me nothing. He said, "But we can talk at the gym." So we got to the gym. Nobody was there yet. Everyone was kind of running late. So as soon as C.L. arrived, I jumped in the car with her. We just started talking about how we are excited to do the self-defense class and how we were both really nervous to go to strip clubs.

We were joking about what we should wear to strip clubs? We don't know what to wear to strip clubs because we are moms. We don't know how to dress slutty. We don't go out, we're boring moms, so we were just having fun, which was nice. I wanted to talk to her so bad, but I just felt a little scared to say anything. At this point Tim was really pushing me to get a passport. He was telling me that in a couple of weeks they have an OP that he really wanted me to go on with him, and because I don't have a passport, we need to get it expedited.

At the gym, he told me that I really needed to talk with Matt Cooper about it. Everyone

finally got there. It was Matt Cooper, C.L., Tim, Blaine (Tim's son), who had just gotten home from a mission a week or two before, and a girl named D.M. We found out that D.M. was going to be on the OPS with us that night that we started doing the training. D.M. told us that she had just barely gotten a divorce, and she told us about her husband (I think), who had previously been in the military, so she kind of knew some self-defense.

As we started learning some self-defense techniques, Tim was taking us aside, one by one, to sign our NDAs. He did take D.M. back in the office I believe for a minute. Then he took me back there. I'm not sure if he took C.L. back there or not. He took D.M. back first, then when it was my turn, the first thing he said to me was that D.M. had just asked him if she could be his partner. And he said, "What do you think about that?" I said, "Do you want to be her partner?" And he said, "No, I want to be your partner." I told him I could be whoever's partner he needed me to be. He then asked me, "Oh, aren't you jealous?" I said, "Wait, what, am I supposed to be jealous?"

He was like, "Yeah, you're supposed to be jealous. It's a privilege to be my partner," and I was like "Oh yes, then I'm so jealous" in a joking tone. He didn't find it funny. We talked more about it. He started bringing a spiritual side into it. By the end of our conversation, I did feel privileged to be his partner. I felt "blessed." Later, we finished the self-defense training. We signed new NDA contracts.

I never got a copy of the NDA—we left to go home and get ready. When I got in my car, I just had a sick feeling, so I asked him to call me. He called me, and I just said, "I don't know... I'm getting really nervous." So he once again told me that he just felt so sure that I needed to be his partner.

He said that even that morning, he had had a dream the night before about some really amazing things that we did to save some children. So he just confirmed that it was just nerves and that I could trust him, and everything was going to be good. He then again called me and he said, “Hey, I think just you and I are going to leave your house. We're not going to leave the gym”, which is originally where we were all going to leave from. Tim was like, “I think we just need to make sure you're okay before we meet up with everyone.” And I thought, “Oh my gosh, that's so nice.”

He said, “We'll just Uber from your house.” When he got to my house, he was with his son and Matt Cooper (the same son who was at the training, Blaine.) I was like, “Whoa, whoa, whoa, well, this is not going to be okay. Blaine cannot come on this mission with us.” They all reassured me that Blaine could be included and that he would not be going into any bars or any strip clubs; rather, Blaine was going to be on the outside. Blaine would just do things with the phones and making sure we were all where we needed to be... those types of things, and that I didn't need to worry about that. I just felt like it would have been very strange that I was there pretending to be a couple with his dad. I didn't want him to have that image in his mind, nor did I feel comfortable with Tim's son, who had just returned home from a mission, being in a strip club.

So they get everything ready. All the phones were ready, everything connected. Those phones—OUR phones—can only connect with people who have one of those phones. They gave us a phone and then they left.

Tim was like, “Okay, well now we have to be in character because the second you get off a plane in another country, you are in character. Anyone can be a spy—from the cab driver, to every single person at the hotel; like everyone is working for the sex traffickers. And you have to be in character at all times except for when you are in your hotel room.” I was ready for the night, but Tim wanted to go up to my bathroom in my bedroom and put his tattoo on. So we went up and he changed in my bathroom with the door closed. He came out and I put his tattoo

on his arm. I think we also put a headband on him. Then we got ready to leave.

I think our Uber was supposed to be there in five minutes, and he kind of just pushed me back onto my bed. I was like, “What are you doing?” And he said, “I just want to see how far you're willing to go.” I was like, “Whoa, what do you mean?” And he said, “I want to see how comfortable you can be. You need to be very comfortable with me.” I had a long-sleeved shirt dress on, and he started kissing my legs and he lifted up my dress to right underneath where my boobs are. And he kissed my stomach. I kept saying, “Are you sure? Wait, are you sure?” He would say something to the fact like, “We might have to do this. Like if we're on a beach. We have to show them that this is who we are and that we're a very sexual couple, and they have to see this, and you have to be comfortable.”

“You can't shy away from it, and you get very shy. You shy away from this stuff.” I would say, “Okay, I think I could do it if we were in a situation, but in my bedroom it feels very uncomfortable.” And he kept saying, “I need you to show me, I need you to show me,” but also his phone kept ringing, which made me feel like everyone was waiting on us or Uber was there. So he literally turned his phone off at this point.

I tried to talk to him and ask him questions so that he would stop for a minute and answer my questions. Then he would start kissing my stomach again and kissing my neck, and putting his legs in between my legs. Grinding on me. Asking me to kiss his neck. His stomach. Then my phone kept ringing and buzzing, so I pushed him off me so that I could get my phone. It was Matt Cooper. He sounded very frustrated.

I handed him over to Tim. Tim is like, “Yeah, yeah, it's fine. Everything's fine. Just get another Uber here.” Luckily, the Uber was five minutes away. I said I needed to freshen up.

Tim told me to remember the second we get in the Uber, we are in character, well before we left. I felt as if I had a headache, so I grabbed some ibuprofen out of my drawer before I went to freshen up. Tim asked me if he could have some ibuprofen. I gave him some, and then he also asked if he could have some for the road. I said yes. He also asked if I had some Excedrin. I said yes, so I gave him some Excedrin as well. Then I shut the drawer and went into the bathroom to finish freshening up.

When I came back, I noticed my drawer was open. I remembered shutting it. I thought that was strange but didn't think too much about it. Then we got in the Uber and we started driving there. Of course, he's all over me. He had brought some energy drinks. I noticed that he had put a pill in his mouth and started drinking some energy drinks. It was not the ibuprofen or Excedrin I had given him. I asked him if he just took a pill and he said, "Yes, sometimes I have to take some pills that I was taking for my anxiety." He told me that "when he would take that pill with an energy drink, that it would almost make him feel like he had a little bit of a high." I thought well that's great, but to each their own. I didn't know what to do. I'm in a car with him once again, and everyone's telling me to trust this man. We are sitting in the car. He's telling me that when we are in these situations, we always have to be just very, very sexual. We have to be all over each other, just like groping each other.

So he's just all over me; he even spreads my legs in the car and puts his hand right there on my thigh, and he's like, "Oh, I just love these legs" and is like grabbing them and just being very grungy. We got to the bar/strip club. We were the first ones there. We went inside and we sat at a table, and Tim told me that I just need to be all over him. He said I need to give him lap dances. He also said that I need to talk to the women when they come over and ask them questions, and tell them to dance for us, and tell them they look nice, and ask them what time they get off. Questions like that. He would give me assignments, like I needed to go talk to the owner and ask him how long he's owned the place, and talk to certain strippers and ask them how they started, and just ask all these questions so that I could get comfortable talking to these types

of people. Then he got us a private room with a stripper. I was completely mortified. We went back to this private room.

At this point, Matt Cooper, D.M. and C.L. show up. They needed to pretend that they didn't know us. They just walked by us. They sat down and I could see they were talking to people. I'm not quite sure what else happened. I just remember being back in this room with the stripper's boobs and butt in my face. Tim had me sit on his lap, so pretty much she was giving me a lap dance with no shirt on and wearing a thong, shaking her butt in my face, rubbing her boobs all over me. And finally, I was like, "Okay, thank you so much. This was so great. Like we're done", and she was like, "We have five more minutes", and I just said, "Thank you. This was amazing, but now I need to go fuck my man." Because that was our safe word.

I could not be in there anymore. I had to leave. So we left the strip club and Tim said, "I'm sorry, was that too much?" And I said, "Yes. I just need to breathe." So we walked around the parking lot for a minute. I got some air and he said, "Okay, do you think we're good?" And I said, "Yeah, I think I'm okay." And he said, "Okay, we're gonna go somewhere else."

I'm just trying to prepare myself. I'm telling myself that I think I can do this. Trying to talk myself into being a big girl. Telling myself how amazing it will be if I can actually pull this off and help all these kids and what that will feel like. And telling myself that somebody has to do this hard job, and that I can do this, and that I need to be a bigger person than what I was being in that moment because that is what Tim is telling me. And I'm believing in him.

So we pull up to the next strip club. At this one, we all walk in together. There's a lot more people here, and this one is dirty, gross, and vile.

Most of the women do not have their shirts on, and they have little to no underwear on. I am feeling sick to my stomach. I wanted to cry, so I excused myself. I went to the bathroom. I was in a stall. It was disgusting. I didn't even dare to pee. I just leaned my head over because I didn't want to mess up my makeup. And I let the tears just fall to the ground because I didn't want to mess up my makeup. I was trying to keep it together. But this was so hard for me. I pulled it together as much as I could. I didn't have my phone. We weren't allowed to have our phones. So I was just really trying hard to be okay. I washed my hands, and I went out and I noticed that Tim had his arm around D.M.

C.L. is sitting in a booth with Matt Cooper. Tim walked over to me and asked me if I was okay. I said, "Yep." He was like okay, come with me, and we start dancing, and then he takes me into this room. He whispered in my ear, "Are you okay?" And I just nodded, and he said, "Okay." We are in this little room by ourselves.

There's a curtain and a woman opened it, and she asked us if we wanted someone to come dance for us. Tim told them that I was going to dance for him, so he told me that I need to give him a lap dance. So I started giving him a lap dance, and the next thing I knew, his son opened the curtain and I'm staring him straight in the face. He is watching me give his dad a lap dance. I lost it. I came unglued. Blaine, Tim's son, turned around, said, "Sorry", and walked away. I told Tim I was done.

I freaked out. I told him we're all done. We are all leaving—this night is over. I told Tim that he lied to me when he told me that this would not happen. They all promised me. When I walked out of that room, Blaine was sitting at the bar. He was literally staring at this girl on a pole with her leg up to her head, and her vagina is sticking out of her thong, like in the middle of her vagina. Her vagina is completely hanging out, and he's like a deer in the headlights. I grabbed him. I told him he needed to leave. Then I went and grabbed Matt, C.L., and D.M. I said we are done. I was so upset. Blaine should not have been in there.

At this point we were leaving. I had never seen this older gentleman, but he is clearly a

part of O.U.R. and the team. He came up and apologized to me. I just said, "Whatever." We were all leaving. We were all outside. Tim went over and talked to Blaine for a minute. Then mine and Tim's Uber came. We all got back into our cars and met back at the gym in Draper. I honestly do not remember my conversation with Tim on the way back. I just remember walking into the gym.

Everyone was looking at me with faces like "Oh shit." I walked right up to Blaine, and I asked him if his mom knew where he was that night. He said, "She knows I'm here with my dad."

And I said, "So what does she think you're doing?" He said, "Well, she thinks that I'm just helping with training." I asked him, "Does she know that you are going to strip clubs?" and he said no. I asked, "Would she be okay with you going to strip clubs?" and he said no. Earlier that night, when he was at my house helping with the phones, he told me that he has a girlfriend and that she had waited for him while he was on his mission. I said, "How do you think your girlfriend would feel with you being here?" And he said, "Not okay." I said, "There's your answer. You should not have been here tonight."

He said, "It's okay. It's okay. I've known about this and I've been training for this my whole life." And I said, "You really should think about getting a different job. If you want to do this, do a different part of it."

So we all huddled up. I stood in the corner because I was so pissed off, and everyone was still just kind of apologizing, like we're so sorry. It was really awkward. I don't really remember the rest of the night. I got a message from Tim the next morning at 6:52 a.m. that said, "You were fantastic. I really do want to keep working with you. We will work out the emotions and tactics and so many things will revolve around OPS. Let's talk very soon."

We ended up talking on the phone a lot that day, and from then on we talked a lot about spiritual things. My

dad had been diagnosed with a brain tumor about a year and a half before that, and it was terminal.

I was really struggling with my spirituality and God at the time. My dad had a brain tumor and was dying. I confided in Tim about that. I confided in him that I had depression and anxiety. He confided in me that night that he had had a major meltdown. Like a complete meltdown in front of family, friends, his wife, his kids, and that this is him kind of coming back from this, and that he had not done operations for a while. He said that even now, after that night, how he saw that I protected Blaine and him [Tim], that he felt even more that I was supposed to be his partner. Tim said he felt very, very safe with me and that he knows that I will protect him. He said he wanted me to know that he really does care about me and that he thinks that this is going to be a really great relationship.

He was joking and saying that I was his drug provider, his waxer, his hairstylist, his massage therapist, and he was saying, this is awesome, like I was everything for him. We were texting really late. He was saying that I was just all these things for him. I was trying to turn it around and I would always do this. I would turn it [the conversation] around about his wife, and I would say, "Go to bed, like go make love to your wife. Go do something for your wife. Go do something for your kids." I would try to turn things around for his family. I could tell he was relying on me heavily for his mental stability at this point. I really was starting to care for him. Only as a friend. As someone I looked up to and realized he had been through so much. We just kind of kept talking and texting at this point. When we did see each other, I don't believe there was any touching or uncomfortableness that way. It would be quick for a haircut or a wax.

Right before the gala, around the end of October, he came over and told me that he was feeling a little unsettled, and that he wanted to talk to me about some things. He just kept talking to me about how safe he felt with me; how he could talk to me about anything; how he wanted to tell me his deepest, darkest secrets. He said that he felt like he could relate to me and rely on me; that I was the only one right now that he could talk to and even feel safe with. He was often

making comments though that were like, “Please don't come after me. I don't want to sue you. You know if you went to the public and told them all these secrets that I'm telling you, that you would have your small moment of fame, but it wouldn't be good. It would look like we are having an affair. You would just look bad.” And I would just kind of ask him why he would say that. He would just say, “Everyone that I love turns on me. Everyone that I love makes up stories about me.”

I wanted him to trust me. I wanted him to feel like he had a friend in the world. I wanted to be there for this man who has done so much for everyone and quite honestly, I wanted to help him with his wife. I had seen her. I saw the sadness in her eyes and all of it made me very sad. He had talked about his former partners to me and how they had fallen in love with him. I was not attracted to him in that way. So I felt very much like that was going to be an easy thing for me to do—that I could just be his friend. At this point, he had come over a couple of times. I'm not sure exactly what we had talked about or what the days were. This was all at the end of October. But he had talked to me about number one, the operator, D.M., who went on the training with us.

He told me that when we were out that night, that she had made him very uncomfortable, and that she kept saying, “I should be your operator. I should be with you.” Tim said that even at the end of the night, he kept telling her, “You should date my son. You should date my son”, just to show her that he was not interested in her and that he didn't want her to be his operator. He also told me about his previous partner, D.S. He said that they had worked so well together, but she just could not help but fall in love with him, and she was so in love with him. Tim said that she had tried kissing him. They still

remained friends. Tim said that it was hard on Katherine, knowing but not knowing. Tim said that sex was difficult for them. She didn't like to be naked or be waxed because she felt he would just picture little girls' vaginas. He also told me to read this book, it was called the *Visions of Glory*. Tim said that he had met with the man who wrote it before he had died. His name was Tom Harrison, and that Tom had told him lots of visions that he had had, that actually had Tim in them.

He said that Tim would be a prophet of the LDS church one day, and that he would be the President of the United States. Tim told me that he also had another psychic friend, one here in Utah, and that she would tell him things like who his partners should be. She would tell him a lot of times where he could find the children and where the sex traffickers were, and that's where he sometimes got a lot of his information from. Tim had been going to California, where he was doing shows on PragerU. Tim was telling me that they wanted him to start hosting his own show. Tim said that while he was there, he had met with this lady who had done tantric on him. He said that they got naked together.

Tim said she didn't touch him, but she did sit behind him, and she would do these tantric exercises on him. Tim said that what would happen is, it would get out all of the bad like Juju in him, and at the end, he would have an orgasm, and that he would get such good relief, but he felt that it was okay because they weren't touching. He said he wasn't attracted to her. He said she was an older woman, not attractive, but that he was getting out all the gross toxins and stuff in his body. But, he said that he could have an orgasm, and he would ask me if I thought he should feel bad about it.

I asked him if Katherine knew, and he said no, and I said, then maybe it's something you should not be doing. You should probably have a conversation with her. Or if not, like just maybe don't do it. I thought it was the strangest thing, and he kept saying, "Oh my gosh, you should try stuff like this. You should do stuff like this." I told him I was not interested in that. I told him about this show called *The Goop Lab* with Gwyneth Paltrow, and that they talked a lot

about things like sex and being in your mind, and all of these things. I told him that I thought he should sit down and watch it with his wife, and that maybe it could help because he would always try to talk about his sex life about Katherine with me.

I did not want to talk about it. He would just say that they couldn't talk about it openly. So at the time, I mean, I'm a hairstylist, and a lot of women talk about these things. I had heard a lot about this show, and so I told him to watch it with her. That's when he started telling me that he had this therapy session, and that's when he was telling me about this tantric stuff.

Then we had the gala. He put me and C.L. in the very front of the Gala. He sat us at a table with Matt Osborne and Dean Morgan. He sat me right by Dean, and he also sat me next to his female operator, the one he had been telling me about, D.S., and her date. It felt very strange because automatically C.L. and I went to sit by each other. Matt and Dean split us up. Matt saw C.L. across the table from me, and he sat right next to her, and Dean sat right next to me. We both looked at each other, even texted each other, like what just happened? This was so weird. Dean was very nice. He started talking to me and asked me questions about my life and how I was liking training with Tim, and if I liked being like his partner, and things like that. He kind of asked me what sort of training we were doing, and I started feeling a little bit that I was being interrogated.

I sort of felt the need to be careful about what I was answering. I sort of started dodging his questions. I was feeling very nervous. For one, the contract [NDA] I signed says I can't tell anybody about being an operator. Not even anyone else in the company, not even other operators. Nobody. So I was feeling super nervous. I was even wondering if it was a test. I was feeling very uneasy. So I was kind of

dodging his questions. I also had been talking to Tim and telling him that I was feeling very unsure about moving forward. I felt like he was not in a very good place, and I was feeling very heavy with him. I felt like he was relying on me for his mental stability at that point. He just kept trying to say, like, “Come to this gala. It's gonna be so great. It will be so fun and let's talk later.”

I kind of thought at first that he was sitting us right up front to just kind of like woo me and keep me going in this direction. But then I was sitting next to D.S., who I feel was also asking me lots of questions. Questions like, what kind of training have you done? Have you gone out with Tim yet? And I felt the need to ask her questions. I said, did you feel it was worth it? Did you feel safe with him? Did you ever feel like you were in awkward situations? She just kept saying no, no, no. And I don't know if it's because her boyfriend was there, if Dean was listening, or what, but she was just saying how it is the best— “You can trust Tim with your life. Tim would never put you in a situation that you could not get out of. He would put his life in front of yours. He promised to always keep me safe.”

At some point she said, “You are going to have to be uncomfortable; He would never do anything that he is not supposed to do.” I said okay, and in that capacity, it made me think: Okay, I think maybe I can move forward. She talked so much about how it was so worth it. Saving the children. It was so great. Being there—how you felt important; you felt like you were doing so much good. She said all of these things. It gave me some courage to keep going.

The gala was done, and people were dancing and talking. I decided to go to the bathroom. Because I felt that I was in a very awkward situation, sitting in the middle of Dean and D.S., I made my way to the bathroom.

I ran into Tim's wife, (I had only met her the one time before when I did Tim's hair). I stopped her because Tim said that she felt like I should be his operator, so I wanted to talk to her. I said, “Hi, do you remember me? I met you when I did Tim's hair.” She seemed very, very uncomfortable with me. She said, “Oh yeah.” She was very kind— very nice, but it seemed as if

it was an uncomfortable situation for her. She did not seem to know that I was an operator for Tim. She said, "Oh, are you still doing Tim's hair?" And I said, "Yes." She was like, "That's so great. It's been looking good."

She said she was sorry that she didn't like it blonde and that she might have been weird that day. I said, "Oh please don't be sorry. Please don't apologize. I hope that you ended up liking it." She said she did. I just told her she looked beautiful, and we moved on. I figured she didn't mention me being an operator with Tim because everything is so hush hush. On the way back from the restroom, I ran into C.L. in the hall, and also Dean and Matt Osborne. I automatically felt very, very trapped. I felt like they had pulled us out in the hall to ask us questions. They started asking us, "What kind of training have we done?"e I just loodk at C.L. I didn't know what to say. I didn't know what to do. She told them that we had done self-defense.

We had gone out with Matt Cooper and done some shooting. They told us, "Just so you ladies know, if Tim ever asks to take you to strip clubs, that is not something you should be doing. If you're ever put in a situation that you feel uncomfortable with, you guys need to let us know right away. We have very different opinions on how things should be run. And we would like you guys to let us know if you are ever in any of those situations."

Well, a couple of weeks before, we had been in strip clubs with Tim, so we clearly felt very awkward. I'm a rule follower. I clearly wanted to run away from this conversation. Dean kept looking at me. He knew by my face. I couldn't even speak. Matt Osborne gave C.L. and me his card and said thank you for sitting by us, and they walked away. We both said we were done with the gala and we left to get in the car. We both felt so very uncomfortable at the gala. We weren't sure what was going on.

C.L. and I had met up and we drove together, so luckily we were driving back together. Anytime we had gotten together with Tim and Matt, they had made us turn off our phones because they didn't want anyone to listen in on our conversations.

I had a security camera in my house, and Tim would always make me turn that off. So we were even scared to talk in her truck with our phones on. We turned them off so we could talk openly. Before this night, I had never told her anything about my long time with Tim, or how I had felt uncomfortable, or any of our private conversations. I even showed her my text messages with him. We both talked about how the gala felt very uncomfortable, and how some things with him for sure were inappropriate, and that he really probably should not be going on OPS. The gala was still going on, so I was not going to reach out to Tim. I was going to wait a day or two and kind of process things. C.L. and I were both unsure of where to go or what to do. I decided to wait a couple of days.

Tim ended up texting me. He asked me if I could wax him and give him a haircut. I said sure, but so much happened the other night that I felt blindsided. He did not know what I was talking about. He said that we needed to talk, so we had a conversation. I told him that the rules I feel that he gives me are that I cannot talk to anybody about anything. I said that those rules don't apply to other people, because not only did D.S. know that I was his operator, but so did Matt and Dean. Obviously, they work there, and I understand that, but we were in public and weren't supposed to talk about it. I told him I was shocked that D.S. knew that I was his operator. Then she was asking me questions, and I felt that she knew things about me. So I just said to him, "I feel like you apply these rules to me. I can't talk to anybody, but everyone else can talk to me about it and open up to the public. I felt that they were interrogating me. They told us that we were not allowed to go to strip clubs."

He told me that he was sorry that he put me in that situation, that this training program was new, that they were kind of still building it, that they weren't on the same page, but he is the boss. He is the head of the company, and he will do whatever he wants.

Then things started getting weird. The OPS that we were going to go on kept changing dates. It moved to January, then it was moved to February. Tim started distancing himself from me a little bit more. I started feeling very unsure. C.L. and I had talked some more.

I was worried that she had talked to Tim more and told him that I was uncomfortable. That did happen, and it's okay. Tim wanted to talk. I told him that maybe coordinating with Matt Cooper, C.L., and I would be better. That way if it was just about OPS, then it might feel a little more comfortable so that we could all be together. We talked about how we were going to do more training and start doing OPS in the spring. Tim wanted to be waxed before, and he said he didn't want C.L. to know that he gets waxed. He was embarrassed and asked me to have them meet before and after we did that. I had him come over a little before, so we could wax his face really quickly. That way, he couldn't stay after for a long time and use that as an excuse. Of course, he wanted to stay after, but I wouldn't let him.

I didn't really want to talk to him about his personal life. I was trying to separate it out of our relationship. I had also talked to him about how I felt that Katherine did not know that I was his operator. He told me that he and Katherine talked about it in the temple. She did know that, and she also wanted me to be her hairdresser. I started just feeling like this was not okay. I wasn't feeling comfortable with any of it. Sometime in the middle of December, he started telling me that he was not going to do OPS anymore, and that he was going to run projects from home. We spoke on the phone. He wanted me to work with other operators. He called and texted me many times. He was so worried that I had talked to C.L. and told her that I had felt uncomfortable. He was worried that I would use my 15 minutes of fame

and say something. He was worried about all the personal things he had told me that would come out to the public. He would just tell me over and over how he had been under investigation. How all these evil people are after him. How it's so hard when you are doing all this good because evil just comes at you so hard.

I genuinely felt so bad for him. I also felt guilty. I felt guilty for thinking that things that he had done to me had crossed the line. I felt guilty for having the thoughts come in my mind that maybe this was wrong. I felt guilty for feeling sick when I was at the strip club. I felt guilty for telling C.L. and showing her the texts. I was just kind of telling myself that he was getting off all this medicine, and that he was getting ready to go to this camp where they would, I'm pretty sure, do like psychedelics on him for his brain to help him get through all of this stuff.

He just kind of kept texting random things. Nothing big... he kind of started getting a little bit deceptive of like, that I tell people things. He would say, these are things that happened, and they always turn on me, like I want you to be in my life but I'm so worried that people... I just don't want you to tell anybody anything I said... that's what he just kept worrying about. He wanted to get together, but he was worried about our boundaries since we weren't doing OPS anymore. I just kept telling him that it was fine. We don't need to be worried about anything. That was it. We kind of talked about how he thought I should write a book about things from my past with my ex, and things that I had endured. We realized we knew somebody in common, my cousin. He kept on about the book. He said we should get together and talk about writing that book, and that if we got together, that he could help me figure out how to do it. I also wanted to introduce him to one of my married friends. Her husband really wanted to work for OUR. He had been talking to B.C. as well. I told my friend's husband that I knew Tim Ballard, that I did his hair, and I would ask him personally.

I brought it up to Tim, and he said, "Yeah, I would love to get together. We can talk about writing a book for you, and maybe we could meet your friend and we could do those things."

Tim was also talking about how he thought maybe I really should do operations and partner with somebody else. All of these things. This was all through text messages. At this point, I was really sort of thinking that he seems very much like a narcissist. I asked him if he would read a few books if I asked him, and he said yes. I send him books on narcissists. He said he would read them. More than anything, I kept pushing to get together with him for my friend, because he really did want to get a job and meet with him.

Tim was also still telling me about how he was still getting depressed. We got together. He kept wanting me to wax his chest. I told him that I would wax his chest if he really needed it waxed, and his neck and face and stuff, so he kept asking me to do it at my house. I did not want to do it at my house alone with him, so I asked him to meet at my sister's studio, which is in my parents' basement in (REDACTED).

Cooper came with him. We just went down there, and he got waxed. When we were done, he went to hug me, and he put his head in my neck and kissed my neck, and I was like, "Ah What are you doing?" And he was like, "Oh, I'm sorry. I'm sorry." I was like it's okay. It's okay. And he apologized about it. He said, we are just friends. "Good. It was just very weird." So at this point, we just texted until about January.

We continued to text about random things, but we didn't really get together. I was still kind of talking to him about helping him and having him help my friend get a job there. Finally, we met together with my friend. We met together with (REDACTED), Matt Cooper, and me at my home. At this point, I had been telling (REDACTED) that I did not think it was a good idea for him to be involved in O.U.R. He really bad because he wanted to be an operator. I told him that I thought it was a horrible idea. I did not think his marriage would survive it. I obviously could not tell him what it was about because of the confidentiality agreement.

I told (REDACTED) that I would get him a meeting with Tim. I actually asked Tim to really be honest with him about what it was like, because I did not think his marriage could survive it.

Tim said that they did have other options of things that they could do and that he could probably get a different job there. Tim and Matt arrived first. Tim appeared a little bit off when he got here. They were only here for maybe about five minutes before (REDACTED) got here.

(REDACTED) showed up. I don't remember what they talked about, except for when Tim started telling (REDACTED) that if he wanted to be an operator, that it's a crazy, horrible job. He started being very, very, vulgar, talking about things that they have to say to the sex traffickers in order to get them to believe that they are there to buy the children.

Tim was saying horrible, awful things about things he would want to do to kids. Tim's face changed. His demeanor changed. He was showing (REDACTED) that that's what it would be like. But not only that, it was like Tim couldn't get out of the mode. He couldn't change back. He became vulgar, and I didn't recognize him. Right then, (REDACTED) left.

Tim's started freaking out. He was opening my cupboards and slamming them. I looked at Matt Cooper, as if, what is going on?? and he asked me to go upstairs for a minute, so I did. I went upstairs and I could hear Tim yelling. I shut my bedroom door. I was honestly afraid. Tim was yelling, and I could hear doors slamming and my cupboards opening and shutting again. I came back down a little bit later when Matt told me I could, and he said he was fine, but that they were going to leave and that was that.

Somewhere between the evening of January 7 to the early morning of January 8, 2022, Tim came over to my home. He came over because he needed me to cut his hair. He was going on vacation with his family. I don't remember where they were going, but they were going to be on a cruise for I believe a week or two somewhere. He was really nervous about going and being away for that long. He said he had just done some intense therapy with the military. He was hoping that he would be good mentally. When he arrived at my house, he seemed very intense and out of sorts. He was pacing in my living room. He looked stressed out. He was a little red in the face, and he started breathing heavily, like he was having a panic attack. I told him to sit

down, so he sat on my couch.

I put my hand on his chest and kind of started rubbing it. I told him to just breathe. He started calming down and I gave him a hug. He pulled me in closer and nuzzled his head into my neck, and he started kissing my neck. I felt like he was in a delicate state, so I was trying to be gentle. I told him, “Tim, you’re okay—it’s okay. He said, “No, this is what I want.” I said it’s not what you want, this is not what you want. I stood up and sat on the couch on the other side of him. He came over and knelt in front of me and asked me if I believed if we came back reincarnated as other people in different lifetimes. I told him that I had never thought about that before, and he said that he did.

He said he believed that he and I had been married in a different life. He said that is why he was so physically attracted to me, and emotionally attached to me. He asked me, “If Katherine ever died or if they were to ever get divorced, did I think we would get married?” I wasn’t really saying anything. I was in shock and a little bit nervous about what he was saying to me and what state he was in. I asked him what was going on and what was going through his head. He was still kneeling in front of me, and he pulled me closer. He put his hands underneath my shirt in the back and started to pull up my shirt. About a month before that, I had had a boob job, so I told him to stop, “Tim, that hurts.”

He said, “I’ll be careful.” I still did not have a lot of strength. I was nervous. I didn’t want to hurt myself, but I did not want him to hurt me. I was really nervous about the situation, for many reasons.

I was trembling. I asked him multiple times to stop. He kept saying to me, “Just trust me, you can just trust me right now. All I could think to say was just stop, and ask him what’s going

on. He still had his hands underneath my shirt and pulled it off the top of my head. He said, “I just want to see. I just want to see.” At this point, he unclipped the back of my bra. I was trying to get up off the couch. I told him that it was hurting me. I wanted to get up. He was standing over me, so I was having a hard time standing up. I turned over on my stomach, and finally stood up. As I was standing up, he took his shirt off and he grabbed me and hugged me. He said, “I just need to feel you. I just need to be skin-to-skin.” I was honestly terrified. I was not sure what to do. I felt scared. Nervous.

I said, “Tim, this isn't you.” He yelled a little bit and he said, “I don't even know who I am. Nothing feels like me.” So I just kept saying, “Tim you're okay, you're okay.” I tried to back away as I was saying that. I thought maybe he was going to put his shirt on again. But instead he started following me. I started walking towards my front door still with my shirt and bra off. He started telling me he knows that I want him, he knows that I can feel it too.

He started undoing his pants and he took off his belt. I was backing up against my stairs. Before I could get even a few steps up, he grabbed me and pushed himself on top of me, so that I was lying against the stairs. He pulled down my pants, maybe to my knees or calves.

I squeezed my legs together so he couldn't get them off more or open my legs more. I don't remember if his pants were all the way off or just halfway down. He started grinding on me. I just remember squeezing my legs closed tight as I could. He started telling me how beautiful I am. I was starting to feel like I was going to freeze up. I felt very trapped. I tried to get him to look me in the face. He wouldn't. He just kept almost talking to himself like he was talking himself into whatever mad state he was in. Finally, when he did look me in the face, I said, “Tim, you don't want to do this. Please. Tim.”

He stood up and zipped his pants up, grabbed his shirt, and walked out my front door. I'm not even sure if at first I thought that I was sexually assaulted. I think that I still felt bad for him. I remember wondering if I just had an affair. I remember thinking What did I do wrong?

What was I doing to make him think that I wanted to do that?

I started questioning myself if it even happened. I started feeling really sick. A lot. I was sad a lot, then my dad died a couple of weeks later, and I don't think that I could think about it anymore. I think anytime it popped into my mind, I would push it away. I had this self-doubt that was always there, because I felt very unsure of what happened. Why did it happen? I almost refused to think about it, until I ran into him back in June 2023. It was at the CEO fight nights up in Salt Lake— I remember looking at him and feeling sadness.

I could not understand the look on his face of terror when he saw me. He looked mortified. I couldn't figure it out, and I couldn't stop thinking about it for weeks after. Any time I would try to think about it, I kept having weird flashes and I would get really sick again... really, really sick. Then *The Sound of Freedom* started coming out for his movie. Tim is all over the news. People everywhere are talking about him. What an amazing guy he is. I start remembering things even from our trainings, and I start getting flashes of that night. It wasn't until my friends (REDACTED) and (REDACTED), who are friends with B.C. who worked at O.U.R., asked me if I wanted to talk to B.C. (REDACTED) and (REDACTED) told me that a while ago, they told B.C. some inappropriate things had happened to me with Tim, and that she wanted to talk to me. B.C. had been talking to some lawyers because inappropriate things had been happening to other women.

I just started crying and I had no idea why. During the next couple of weeks, I looked at B.C.'s number. I was afraid to call her. I've known B.C. for quite a few years. We have just seen each other at different things for our mutual friends, the (REDACTED). All I know is that my heart and my body were not OK, and I had to figure out what I had been hiding from myself. I wasn't totally sure why. I just knew in my heart that something had happened. My body and my mind weren't

letting me go there. I talked to B.C. and started telling her what happened. She said, “Well, you were sexually assaulted.” I think I was not even in a normal state of mind as I was talking to her and she told me that.

I got off the phone and every little thing came back to me. And even then, it took me quite a few days to really understand what happened and where my mind was at the time of the assault. I was thinking about the way I was now looking back on my life, ever since I met Tim, and seeing what it's done to me. I lost my job at the end of May 2022. I have been really sick on and off. I haven't been able to keep my clients, like I previously had done during the 20 years of doing hair. I haven't been functioning on a normal level. I have learned to block things out the last couple of years. If I feel scared or threatened, I block it out and pretend everything is fine. Then I go home by myself and fall apart. I can pull myself together for maybe a month, and then I fall again. I know that I don't want this to happen to other people. I know that I would like to get help so that I can move on with my life and recover from what's been happening.

Exhibit F

January 11th, 2017

Ministère de la Justice et de la Sécurité Publique
Eddy Fortuné

Dear Mr. Fortuné,

I am extremely grateful for your heroic work in the efforts to eliminate human trafficking in Haiti. Without strong leaders like yourself, we are not able to forge our way forward to make this world a better place. Please accept my outstretched helping hand to you and the people of Haiti to work together on these issues.

I would like to extend an invitation to you and a delegation from Haiti to join me in Washington D.C., at a date convenient for you, to discuss the fight against human trafficking. It is important that your perspective is included in discussions on pending federal legislation. When you visit Washington D.C., I will help facilitate meetings with U.S. Senator Orrin Hatch and Congresswoman Mia Love. This will allow you to weigh in on the Hatch Anti-Trafficking bill, which I wholeheartedly support.

I understand you were not able to visit us in Salt Lake City for the January 2018 Human Trafficking Awareness month, where many Utah Anti-Human Trafficking groups were honored. I have a deep personal love for Haiti because of my experience with O.U.R., Rapha House and Foyer de Sion (Guesno Mardy's orphanage). I look forward to your favorable reply and am extremely excited to meet with you in Washington D.C.

Please reach out to my Executive Assistant, Ms. Rebecca Lee, who will be able to provide further details and accommodate any of your needs. Email rebeccalee@agutah.gov or phone +1 801-538-1191,+1 385-266-5453.

Sincerely,



Sean D. Reyes
Utah Attorney General

Exhibit G

OUR STORIES



HOLI DAY

📅 August 16, 2016 👤

OURrescue 💬 3 Comments

The winding, narrow roads of

OUR STORIES



The winding, narrow roads of Kathmandu begin to quiet as the sun lowers over the mountains. A new atmosphere descends upon the streets; different from that of the bustling day, where vendors loudly sell their wares and trekking tourists idly walk by, bumping into one another in a sea of people.

The night seems somehow quieter, the streets more deserted as darkness lowers. And suddenly that quiet is pierced by rays of neon lasers and booming music from above and a smaller world of

OUR STORIES



lasers and booming music from above and a smaller world of Kathmandu nightlife emerges in the form of rooftop “Dance Bars”. Although many times one must know where to look and what to look for in order to find a Dance Bar, the skyline of Kathmandu streets are blatantly peppered with such establishments.

██████, a young girl who had been sexually abused by and sold to various male family members and friends from the age of 9-15, was a captive forced to dance at one such

Dance Bar. An O.H.P. Jump Team

OUR STORIES



Dance Bar. An O.U.R. Jump Team member describes most dance bars as “typically a dirty empty room, scattered with random old chairs, hideous neon lights glaring out from the walls, and music blaring so loudly that you cannot even think”.

In the middle of these rooms are young women, often minors, who have been sold to the bar and are now forced to dance on a small stage. It is not the type of dance that often comes to mind for many people. Rather, the young girls look miserable and often do not and

OUR STORIES



life of captivity. She was then relocated to a local shelter that empowers young women and minors who have been sold as sex slaves on their journey of healing.

At this new shelter, [REDACTED] chose her new name- meaning [REDACTED]. She shed her old family name and the bonds of what they had done to her and renamed herself "[REDACTED]" as representation of a new life and a new beginning for her body, spirit, mind, and future.

The young women at these shelters, [REDACTED] included, learn new skills

OUR STORIES



The young women at these shelters, [REDACTED] included, learn new skills such as sewing or schooling and become each other's new family, calling each other "sister" and naming the staff as "mother".

[REDACTED] had always dreamed of going to school and thus chose that as her skill. She attended and graduated high school and is now focusing on completing university. These skills give the young women, who have been used and sold for their bodies for so much of their life, new confidence and pride in themselves so that they do not

OUR STORIES



themselves so that they do not easily fall subject to being re-trafficked.

They are no longer “just” a body, that can be bought and sold. It is “a different type of self-worth” says the Jump Team member, one not based on a dollar sign, but rather, one full of pride and possibility and hope.

Members of an O.U.R. Jump Team found themselves at one such shelter recently during Holi, a Hindu religious holiday where people playfully and joyously throw colored

OUR STORIES



playfully and joyously throw colored dye at each other in the streets. There is much laughter, food, music and dancing. It is a celebration that enlivened the streets of Kathmandu and gave the people a day of cheer and revelry- a welcome respite from the hardship that has become daily life for most in Nepal after the crushing earthquake of March 2015.



Exhibit H

Troy S. Rawlings Bar# 6969
Davis County Attorney
800 W. State Street
P. O. Box 618
Farmington, Utah 84025
Telephone: (801) 451-4300
Fax: (801) 451-4328

IN THE DISTRICT COURT OF DAVIS COUNTY, STATE OF UTAH

FARMINGTON DEPARTMENT

THE STATE OF UTAH	:	SUBPOENA
	:	DUCES TECUM
vs.	:	Davis County Attorney's Office
RE: The investigation into Operation Underground Railroad (O.U.R.); Tim Ballard and others; The Abolitionists and other O.U.R. related ventures / movies; Nazarene Fund; Deacon Inc.; Other O.U.R. related ventures; Utah ICAC Task Force and other Law Enforcement Agencies relationship with O.U.R.	:	Case #: 20-00013
	:	
	:	
	:	

THE STATE OF UTAH TO:

██████████

Re: A formal interview and any and all impressions, communications, documents, notes, recordings, photos, emails, letters, text messages, financial records, agendas, lists, names or other materials of any nature whatsoever, in any format, in the possession of ██████████
██████████ in any way related to:

Operation Underground Railroad (O.U.R.); Tim Ballard and others;
The Abolitionists and other O.U.R. related ventures / movies;
Nazarene Fund; Deacon Inc.; Other O.U.R.
related ventures; Utah ICAC Task Force and other Law Enforcement Agencies
relationship with O.U.R.

YOU ARE RESPECTFULLY COMMANDED TO PRODUCE AND PROVIDE COPIES OF:

A formal interview and provide any and all impressions, communications, documents, notes, recordings, photos, emails, letters, text messages, financial records, agendas, lists, names or other materials of any nature whatsoever, in any format, in the possession of [REDACTED] in any way related to:


Operation Underground Railroad (O.U.R.); Tim Ballard and others,
The Abolitionists and other O.U.R. related ventures / movies;
Nazarene Fund; Deacon Inc.; Other O.U.R.
related ventures; Utah ICAC Task Force and other Law Enforcement Agencies
relationship with O.U.R.

**TO Davis County Investigator Bryan Purdy at: 801-451-3502; email:
bpurdy@co.davis.ut.us; on or before November 18, 2020.**

Given under my hand this 4th day of November, 2020.

**Troy S. Rawlings
DAVIS COUNTY ATTORNEY**

By:



Troy S. Rawlings
Davis County Attorney

Exhibit I

From: Troy Rawlings <troy@co.davis.ut.us>

Date: December 23, 2022 at 11:34:27 AM PST

To: "Gilson, James D." [REDACTED], "Karen P. Hewitt" [REDACTED]

"Melendres, James P." [REDACTED], Alessandra Serano [REDACTED]

Subject: Witness will not cooperate now

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks for your time yesterday.
A bad twist occurred within the last hour that I am not sure where this leaves us and what we will now do in response.

A critical and highly credible witness informed this morning that s/he will no longer cooperate. The conversation was recorded.

The only thing the witness will say today is:

S/he was contacted directly by one of your clients.

S/he was informed that the FBI and US Attorney's Office are no longer part of the case and have cleared OUR / Tim Ballard.

That Troy Rawlings will be sued and destroyed by Tim Ballard / OUR and their attorneys. And the witness provided some degree of basic yet interesting details of this plan.

That if Tim / OUR and their counsel can take down and ruin Troy Rawlings they can also surely destroy the life of this witness.

Maybe the way to resolve this case is that Tim / OUR sue me and let's see what happens and where it goes from there. I welcome that and please so inform your clients.

I am not sure the January meeting will be prudent at this point.

I do personally like each of you and wish you a nice Christmas despite the direction this has turned today.

Troy Rawlings

Davis County Attorney

801-451-4300

troy@co.davis.ut.us

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"The qualities of a good prosecutor are as elusive and as impossible to define as those which make a gentleman. And those who need to be told would not understand it anyway. A sensitiveness to fair play and sportsmanship is perhaps the best protection against the abuse of power, and the citizens safety lies in the prosecutor who tempers zeal with human kindness, who seeks truth and not victims, who serves the law and not factional purposes, and who approaches his task with humility."

Exhibit J



MEMORANDUM

February 14, 2023

TO: Dhillon Law Group

FROM: Brent A. Andrewsen and John C. Nash

RE: Summary of Davis County Atty. Roy Trawling Investigation of O.U.R.
117326.0001

Per your request this memorandum outlines the factual background and history regarding the Davis County Attorney Troy Rawlings' investigation into Operation Underground Railroad and Tim Ballard. We include facts refuting claims made by Rawlings.

1. Operation Underground Railroad ("O.U.R.") is a nonprofit corporation exempt from taxation under section 501(c)(3) of the Internal Revenue Code of 1987, as amended (the "Code").
2. O.U.R.'s mission is to shine a light worldwide on the global epidemic of child sex trafficking, and in so doing rescue more children from slavery and assist law enforcement to seek justice for those who violate children. While O.U.R.'s focus remains on children, O.U.R. assists survivors of all ages to bring them safety and healing. O.U.R. places survivors on a path to recovery by partnering with vetted aftercare providers or by placing them with families.
3. Since 2017, O.U.R. has donated \$959,000.00 to the Utah Attorney General's Internet Crimes Against Children Task Force ("ICAC"). The last payment to the ICAC was made on June 30, 2020, in the amount of \$250,000.00.
4. Since 2017, O.U.R. has received 11 official letter from the ICAC detailing the results achieved by the ICAC as a result of O.U.R.'s donations.
5. On February 6, 2020, O.U.R. posted on their social media accounts that as a result of O.U.R.'s training and support, the ICAC had been able to make arrests of 24 sexual predators, rescue 35 children, the ICAC was able to provide assistance in 337 cases to other ICAC task forces and enforcement agencies, and conduct 8 trainings.
6. The February 6, 2020, social media posts are the only public statement made by O.U.R. regarding their grants to the ICAC. The information provided was copy and pasted from the Utah Attorney General's Office's grant reports provided to O.U.R. The Utah Attorney General's Office did not report to O.U.R. whether any funds were provided to the Davis County ICAC project. O.U.R. never publicly reported anything regarding the Davis County ICAC.
7. In the Summer of 2020, Davis County Attorney Troy Rawlings ("Rawlings") allegedly received complaints from 2 O.U.R. donors and the Layton Police Chief. The donors allegedly lived in Bountiful and Farmington. Rawlings lead investigator is officer Brian Purdy ("Purdy").

8. O.U.R. has no records of ever doing work with the Layton police department.

9. On September 4, 2020, Rawlings reached out to O.U.R. to attempt to contact Tim Ballard ("Ballard"). Ballard's assistant responded the same day to work with Rawlings to set up an appointment.

10. On September 7, 2020, Rawlings posted a video and message to Instagram highlighting the Davis County Attorney's Office "Wall of Shame". Among other things the post highlighted the Davis County Attorney's Office efforts in investigating, apprehending, and prosecuting of online child predators and sex offenders.

11. Rawlings September 7, 2020 post also stated "Please be aware of any individual, entity or organization who solicits your money and may be claiming credit for work to protect children that is actually done by our task force and/or other law-enforcement organizations in Utah and around the world. Get the details before parting with your cash. You will be hearing more from our office about this in the relatively near future."

12. On September 9, 2020, Rawlings posted to Instagram Utah Code Section 76-8-508, Tampering with Witness – Receiving or Soliciting a Bribe. Along with the image of the Utah Code Section, Rawlings post stated "If any individual, or entity, including a purported 501(c)(3) charitable organization, threatens to sue you civilly for a supposed violation of a nondisclosure agreement (NDA) if you cooperate truthfully with a criminal investigation of that person or entity, these sections of the Utah Code are implicated. Thanks to those who have cooperated to date. For those of you who are expressing fear of being sued if you cooperate, take heart. An NDA will not protect the vindictive fraudster threatening you. The law will protect you."

13. On September 11, 2020, Rawlings responded to Ballard's assistant's September 4, 2020, email to assist with setting up a meeting with Ballard. Rawlings response indicated that one of the Davis County Attorney's Office investigators would reach out to set up an appointment.

14. Between September 9 and 19, 2020, Rawlings posted to Instagram an image of Utah Code Section 76-10-1801, Statute for Communications Fraud. The post also stated "Utah has seen more than her share of con artists over the years. It's not just a thing of the past, they still exist. Get the details before you part with your money. One quick example? Find out how much of the money being contributed to the supposed non-profit charitable organization is actually going to the Con-Man and his family & friends. Find out how much is being funneled to other organizations that use it for nonprofit purposes. Find out how much is going to campaign contributions for those running for elected office. Details do not mean simply listening to a sob story, even if the con invokes religion."

15. On September 19, 2020, Rawlings posted to Instagram another video of the Davis County Attorney's Office "Wall of Shame". In the post Rawlings stated "Any non-law-enforcement entity, individual or charitable organization asking you for money and claiming to somehow have involvement in and take any degree of credit for Internet Crimes Against Children (ICAC) investigations and arrests with respect to Davis County Utah and our joint state and federal task forces with the Utah Attorney General's Office and Federal Agencies is lying to you. They have had absolutely zero involvement in any of these arrests and successful prosecutions you see on display on the "Wall of Shame" in the Davis County Attorney's Office. Ask other federal, state and local agencies exactly what these entities and individuals have supposedly done to assist with their investigations, arrest and prosecutions before parting with your money. It is more than simply offensive they are somehow claiming credit for the work of legitimate law-enforcement agents and making a profit (and lucrative living) off of those real agents actual work. Additional witnesses: Do not be afraid of their NDA, they cannot successfully sue you for cooperating truthfully with law-enforcement. Just because someone claims they are called of God when asking for your money does not necessarily mean they actually are. #fraud #scam #crime"

16. The Davis County, through the Davis County Attorney's Office has entered into certain Memoranda of Understanding with the Utah Attorney General's Office and ICAC to receive grant funds to support the Davis County ICAC. We have a copy of one such agreement dated effective July 1, 2020.

17. On or about October 6, 2020, O.U.R. learned of a Fox 13 News Story about O.U.R. being investigated by the Davis County Attorney's Office (the "Investigation").

18. On the morning of October 7, 2020, O.U.R. attorney Adam Becker called Rawlings to explain the misunderstanding regarding the ICAC donations and agreed to provide evidence of O.U.R.'s donations to the ICAC.

19. On October 7, 2020, Rawlings emailed Alan White and Spencer Austin at the Utah Attorney General's Office requesting information regarding the amount of money O.U.R. has provided to Davis County over the prior four years, and which Davis County cases the O.U.R. money has assisted. In the email, Rawlings points out his inquiry is in response to O.U.R.'s representation "that they have provided at least a million dollars to the AG's Office of the last few years and that is has been responsible for assisting in a number of Davis County Cases."

20. On October 7, 2020, O.U.R. attorney Adam Becker emailed Rawlings 11 official letters from ICAC to O.U.R. with supporting documentation showing evidence of payments from O.U.R. to ICAC. The email also stated that O.U.R. had provided a total of \$959,000 to ICAC since 2017, and O.U.R. also provided support to local Utah law enforcement which put total funding over \$1,050,000.00. Rawlings confirmed receipt of the documents.

21. On October 7, 2020, Fox 13 ran the story regarding Rawlings' investigation into O.U.R. Following the Fox 13 News story Rawlings claimed multiple people contacted him to discuss Ballard and O.U.R.

22. On October 8, 2020, O.U.R. attorney Adam Becker emailed Rawlings and provided him the link to the Fox 13 news story. Rawlings responded to Adam Becker that he had seen the news story and already been contacted by other news outlets regarding the story.

23. On October 10, 2020, O.U.R. attorney Adam Becker emailed the O.U.R. legal team regarding the Fox 13 news story and his conversations with Rawlings. Per Adam Becker, Rawlings stated that O.U.R. was not under investigation, that Davis County had received a complaint about O.U.R., but that no investigation had been opened. Becker further conveyed that Davis County had asked the Utah Attorney General's Office to verify O.U.R.'s donations, and that after receiving confirmation, that Rawlings would issue a written "all clear" statement stating that the "complaint had not merit, and that he looks forward to working with O.U.R. in the future," and that Rawlings had give Adam Becker permission to inform people that he will issue the "all clear" once he has confirmation from the Utah Attorney General's Office.

24. On October 12, 2020, O.U.R. received a call from a donor, Vilma Betancourt who had heard the Fox 13 news story. Vilma had called the Davis County Attorney's Office and spoke with Craig Webb, who informed her that there was an open investigation into O.U.R. regarding communication fraud, surrounding O.U.R.'s claims that they are involved in as many rescues as they claim to be.

25. On October 13, 2020, Alan White from the Utah Attorney General's Office emailed Rawlings and informed him that the ICAC had received donations from O.U.R. for the last four years which amounted to a total of \$950,000.00. In the email, Alan stated that the ICAC used the funds for the Officer Wellness program and all remaining money is passed through to ICAC affiliated throughout the State of Utah each year. The email further stated that the Davis County Attorney's Office had received \$67,000.00 over the prior four years from the ICAC as stated in the annual Memorandum of Understanding, and that all funding sources for all money awarded in the Memorandum of Understanding has been O.U.R. The email concluded by stating the

Davis County Attorney's Office would have the most accurate data for which specific cases had been worked over the prior four years.

26. On October 13, 2020, Rawlings responded to the email from Alan White at the Utah Attorney General's Office by questioning whether all \$67,000.00 provided to the Davis County ICAC for the prior four years originated from O.U.R. money, stating the claim as "BS".

27. On October 21, 2020, O.U.R. attorney Adam Becker emailed Rawlings requesting an update on whether Rawlings' office had received the additional documentation from the Utah Attorney General's Office, and to notify Rawlings that O.U.R. was starting to have problems with partners as a result of the statements made by Rawlings' office to Fox News 13 that Rawlings' office was investigating O.U.R.

28. On October 22, 2020, in response to O.U.R. attorney Adam Becker's October 21, 2020 email, Rawlings stated that they had not received a formal response from Spencer Austin in the Utah Attorney General's Office.

29. On October 26, 2020, Rawlings emailed Alan White in the Utah Attorney General's Office alleging that the ICAC numbers O.U.R. was publicly claiming credit for as a result of its donations to the ICAC and receipt of letters from the Utah Attorney General's Office, were the exact same ICAC numbers being reported to the feds by the Utah Attorney General's Office as part of OJJDP grant money statistics. Rawlings further questioned how Davis County ICAC numbers could be supported by O.U.R. money and also be reported to the feds by the Utah Attorney General's Office as OJJDP funded operations.

30. In December of 2020, Rawlings communicated to James Melendres and Adam Becker that Rawlings had completely cleared O.U.R. of the allegations made against them regarding the illegal fundraising efforts. Rawlings further communicated that he believed it was possible O.U.R. and Ballard were the victims of the Utah Attorney General's Office.

31. In February or March of 2021, Rawlings communicated with O.U.R. counsel ("Andrewsen") that he simply needed to get some information from his investigation team and that he should be able to wrap things up "soon."

32. On June 9, 2021, Andrewsen sent a letter to Rawlings requesting that the investigation be closed and informing Rawlings that the ongoing openness of the investigation and Rawlings' occasional commenting about the same were causing reputational and financial harm to O.U.R. and Ballard.

33. Thereafter, Rawlings appears to have referred the case to the FBI. Following Rawlings' referral to the FBI, Rawlings' and the FBI attempted to refer the investigation to the Department of Justice (the "DOJ").

34. On July 21, 2021, as part of the investigation, a Federal grand jury served a subpoena to Janet Russon for documents related to O.U.R. and numerous associated entities.

35. On November 10, 2021, as part of the investigation, a Federal grand jury served a second subpoena on Janet Russon.

36. On December 8, 2021, the DOJ served a wide-reaching Requests for Information on O.U.R.

37. On December 21, 2021, O.U.R.'s legal team met with the DOJ, FBI, and Agent Purdy to narrow the Requests for Information.

38. On February 2, 2022, O.U.R.'s legal counsel and Ankura (a nationally recognized forensic auditing firm) a comprehensive presentation to the DOJ, FBI, and Agent Purdy.

39. The FBI and Purdy failed to demonstrate to the DOJ that O.U.R. had committed anything resembling a crime. As a result, of the DOJ's conclusions that no evidence existed demonstrating O.U.R. had committed any crimes, DOJ ordered its investigation to be shut down.

40. On March 15, 2022, the DOJ conveyed to O.U.R. that the DOJ was declining to prosecute O.U.R.

41. On April 13, 2022, Rawlings acknowledged to O.U.R. that he was aware of the DOJ's decision to decline efforts to prosecute O.U.R.

42. On August 3, 2022, O.U.R. and Ballard's legal counsel met with Rawlings to discuss the matter and to request, again, that Rawlings close his investigation. Rawlings said he needed to review information that he had requested from DOJ and that he would decide which direction to go after getting that information.

43. On September 9, 2022, the Court signed a search warrant to Google for emails from accounts for Ballard, Jessica Mass, and Janet Russon. During the legal proceedings, Rawlings and Purdy presented an affidavit (the "Affidavit") that misrepresented facts and omitted exculpatory evidence that had previously been provided as part of the investigation in an effort to secure the search warrant. Moreover, in the Affidavit Rawlings neither raised nor relied upon any facts regarding the initial allegations that O.U.R. had committed communications fraud by claiming to have supported the ICAC through substantial grants.

44. As part of the search warrant proceedings, Rawlings sought to seal the order securing the search warrant, but was unsuccessful.

45. Following Rawlings issuance of the search warrant to Google, Google informed Ballard of the search warrant. Ballard's and O.U.R.'s counsel requested a copy of the warrant and the Affidavit.

46. On October 3, 2022, O.U.R. and Ballard moved to quash the search warrant. In support of its motion to quash, O.U.R. and Ballard's legal counsel assembled a 500-page response to the Affidavit (the "500-Page Response"), in which they identified numerous false, misleading, and omitted facts, statements, documents, and other information provided to the Court.

47. In rebuttal to the 500-Page Response, Rawlings submitted a 2 page rebuttal (the "Rebuttal") in which he alleged that the primary issue under investigation is the communications fraud committed by O.U.R. in claiming it made grants to ICAC in the amount of nearly \$1,000,000.00. Rawlings further stated that he intended to subpoena the Utah Attorney General's Office to obtain the information needed to demonstrate the grants were never made.

48. Following the Rebuttal, O.U.R. made a Utah Government Records Access and Management Act (GRAMA) request to the Utah Attorney General's Office to obtain information regarding O.U.R.'s grants in support of the ICAC (the "2022 Subpoena"). Utah Attorney General Sean Reyes ("AG Reyes") confirmed that the 2022 Subpoena, requested the same information already previously sent to Rawlings by the Utah Attorney General's Office in 2020, confirming that O.U.R. had granted \$950,000.00 to the ICAC.

49. In addition to issuing the 2022 Subpoena, Rawlings also contacted the Utah Attorney General's Office and falsely claimed that O.U.R. was considering bringing legal action against them for misusing the grant money provided for the ICAC. AG Reyes informed O.U.R. / Ballard of Rawlings false statements to the Utah Attorney General's Office.

50. At approximately the same time that Rawlings contacted the Utah Attorney General's Office alleging O.U.R. was planning to bring suit for misuse of the ICAC grant funds, Rawlings also reached out to O.U.R.'s legal counsel and alleged that the Utah Attorney General's Office was upset with O.U.R. for instructing them to use the ICAC grant funds for reasons other than

operations.

51. Around the same time that Rawlings issued the 2022 Subpoena, Rawlings contacted Legal Counsel for the Church of Jesus Christ of Latter-day Saints (the "LDS Church"), David Jordan ("Jordan"). Jordan recounted to Andrewsen that in that interaction Rawlings spoke "incoherently" about nothing, asked for nothing, and then stated that the only reason Rawlings was investigating O.U.R. was because "O.U.R. took credit for his operations."

52. 26. In November of 2022, Rawlings contacted O.U.R. and Ballard's legal counsel to schedule a meeting in December of 2022 (the "December Meeting"). Unlike all prior meetings held between Rawlings and O.U.R., Ballard, and their legal counsel, the December Meeting was not held at Rawlings office, but at an offsite location.

53. Following submission of the 500-Page Response, Purdy became inaccessible to O.U.R. and Ballard's legal counsel, in part because he has sought new employment, in an effort to leave the Davis County Attorney's Office. Rawlings provided a number of inconsistent explanations as to why Purdy could not attend the December Meeting.

54. On December 22, 2022, O.U.R. and Ballard's legal counsel met with Rawlings for the December Meeting.

55. At the beginning of the December Meeting, Rawlings stated that multiple news outlets, including national news outlets, had been trying to get him to release dirt about O.U.R. / Ballard. He also stated that with the press' power to invoke FOIA, he did not know how long he could keep them at bay.

56. During the December Meeting, Rawling released names of every witness he had assembled as part of his investigation. He also released the names of the individuals accused of committing crimes.

57. During the December Meeting, even though Rawlings had more than a month to prepare for the meeting, Rawlings failed to provide any proof of his allegations that O.U.R. / Ballard had committed criminal acts. Rawlings stated he would provide proof of his allegations later.

58. During the December Meeting, Rawlings raised the following allegations of criminal activity against O.U.R. / Ballard:

- a. Rawlings alleged that Ballard had engaged in sexual affairs with eight different women all of whom were members of a group call "Mormon Women with Blue Eyes" ("MWBE").
- b. Rawlings alleged that Ballard failed his CIA Polygraph and was thus fired from the CIA. Rawlings further alleged that Ballard was only an unpaid intern at the CIA.
- c. Rawlings alleged to have multiple witnesses claiming that Ballard's motives for building and running O.U.R. was for fame and money.
- d. Rawlings alleged that O.U.R. faked or staged an operation in Columbia, which was depicted in footage as part of Operation Triple Take.
- e. Rawlings alleged the movie "Sound of Freedom" is a tool used by Ballard to defraud donors.
- f. Rawlings alleged that Ballard's wife, Katherine Ballard ("Katherine"), was guilty of witness tampering. Rawlings alleged Katherine had attempted to influence a witness not to cooperate with Rawlings in the investigation.

Rawlings alleged to have written communication which Katherine had sent via email to witnesses claiming Ballard was a second iteration of Joseph Smith and Rawlings is the devil, and further telling witnesses not to cooperate with Rawlings (the "Joseph Smith Email").

- g. Rawlings alleged that LDS Apostle, Elder M. Russell Ballard's ("Elder Ballard") son-in-law is involved in investing O.U.R.'s money and Elder Ballard and/or his family is benefiting from the investments.
- h. Rawlings alleged that AG Reyes was guilty of witness tampering. Rawlings alleged to have written communication from AG Reyes to a witness requesting the witness not to cooperate with Rawlings in the Investigation. Rawlings further alleged that Ballard requested AG Reyes to send the written communication.
- i. Rawlings alleged to have evidence that Ballard lied during a Deseret Book / LDS Living interview labeled "The Scripture that Saved My Life."
- j. Rawlings alleged that the Layton Chief of Police had sent a complaint to Rawlings claiming that O.U.R. had taken credit for Layton PD's operations.
- k. Rawlings alleged that he had evidence that Elder Ballard and/or other LDS Church Authorities had provided LDS Church tithing records to O.U.R. to help O.U.R. target large donors, or wealthy LDS Church Wards.
- l. Rawlings alleged that he had evidence that O.U.R. only invests one cent of every dollar donated towards O.U.R. operations.
- m. Rawlings alleged that O.U.R. had committed a crime by failing to disclose the use of a Remote Viewer to donors of O.U.R.

59. O.U.R. and Ballard dispute each and every one of the allegations above.

60. Leading up to, and during the December Meeting, Rawlings sent a series of emails and made requests of O.U.R. and Ballard's legal counsel regarding whether O.U.R. legally represented, among others, any of the following individuals:

- a. Glenn Beck
- b. Tony Robbins
- c. Elder Ballard
- d. Jim Caviezel
- e. Rodd Barr
- f. Alejandro Monteverde

61. During the December Meeting, Rawlings raised concerns regarding O.U.R.'s handling of a false sexual harassment claim brought in 2020 against O.U.R.'s Executive, which resulted in a settlement offer to the complainant. No allegations were raised that the handling was improper, rather only the hypothetical question of "what would donors think" about the allegations.

62. During the December Meeting, Rawlings alleged that he had scheduled interviews with three LDS Church Authorities, Elder Ballard, Elder Ron Rasband, and Elder Bob Gay as part of the Investigation. As of January 10, 2023, O.U.R.'s legal counsel Andrews confirmed

with LDS Church legal counsel David Jordan that no interviews had been scheduled. LDS Church legal counsel David Jordan confirmed that Rawlings had called shortly before the December Meeting and mentioned during that call that he might call again later to arrange interviews with the above-named LDS Church Authorities.

63. During the December Meeting, Rawlings alleged to have a mole/informant imbedded inside O.U.R.

64. During the December Meeting, Rawlings alleged that people in Rawlings' wife's community were ostracizing her because of the damage the Investigation had caused O.U.R.

65. On December 23, 2022, the morning following the December Meeting, Rawlings emailed O.U.R. and Ballard's legal counsel with new allegations of witness tampering. Rawlings alleged that an informant in the Investigation had reached out to Rawlings that morning and told Rawlings that O.U.R. / Ballard was going to sue the informant, and as a result the informant would no longer cooperate in the Investigation. In the email Rawlings suggested that the alleged actions by O.U.R. / Ballard was "low-hanging fruit" for a witness tampering charge. Rawlings refused to provide any names of the alleged informant, or for the individual(s) alleged to have threatened the informant. Rawlings further alleged the individual(s) were confirmed employee(s) of O.U.R. Rawlings also alleged to have the threat in writing, and a recording from the informant putting forth the same accusations. Rawlings refusal to provide names of witnesses or names of individuals accused of the alleged witness tampering was in stark contrast to his actions the day prior.

66. The following are additional facts regarding Rawlings' behavior.

67. During the Investigation, O.U.R. provided an electronic detection dog (or K-9), which helps law enforcement locate media devices containing child rape material, to Woods Cross PD, located in David County. The K-9 provided to Woods Cross PD was nicknamed "Flash" and was one of 64 K-9s provided by O.U.R. to law enforcement throughout the Country.

68. When Rawlings learned of O.U.R.'s intent to provide Flash to the Woods Cross PD, Rawlings contact Woods Cross PD Chief of Police, Chad Soffe ("Soffe"), and requested that Soffe not accept Flash, alleging that O.U.R would falsely take credit for Woods Cross PD's operations. Soffe declined Rawlings' request and accepted Flash.

69. Flash has assisted Woods Cross PD and other law enforcement entities in fighting child crimes in Davis County. Flash has also served other Utah counties, including Salt Lake County, and the Utah Attorney General's Office, and conducted approximately 30 search warrants in Utah in the six months leading into January 2023. Soffe relayed the above information regarding Flash and Rawlings' request to O.U.R.'s Domestic Coordinator J.C. Holt.

70. Rawlings will not permit any groups he runs to use Flash.

71. Rawlings' Fall 2020 statements to the press and on his social media platforms have been published and republished numerous times through multiple national press outlets. Rawlings' Fall 2020 statements and social media posts, along with the investigation into O.U.R. and Ballard have resulted in O.U.R.'s loss of more than \$10,000,000.00 in donations. In the Spring/Summer of 2022, O.U.R.'s legal counsel provided Rawlings with a document outlining the amount of damage and other impact his public statements and investigation had caused to O.U.R. and its efforts to fulfill its mission.

72. Among other negative impacts on O.U.R.'s operations, Rawling's Fall 2020 statements to the press and social media posts, along with the Investigation into O.U.R. and Ballard has resulted in O.U.R.'s loss of important partners, including, but not limited to, Florida Attorney General Ashley Moody ("Florida AG Moody"). O.U.R. was in the process of launching a fusion intel center with Florida AG Moody. However, in the Summer of 2022, Florida AG Moody informed O.U.R. it was cancelling the program after reading Rawlings' Fall 2020

statements, reaching out personally to Rawlings, and learning of the investigation.

73. Rawlings holds himself out as the most ethical of prosecutors, and according to his own website, formed an "ethical" task force as part of his office. Rawlings also posted on his website that he declined a to bring a case against former Utah Attorney General Shurtleff, because the DOJ had hidden exculpatory evidence in favor of Shurtleff in an affidavit for a search warrant.

74. On February 3, 2023, O.U.R. and Ballard's legal counsel made a detailed presentation to Rawlings highlighting the factual inaccuracies in Purdy's Affidavit, as well as his material misstatement or omissions in his Rebuttal.

75. On February 6, 2023, O.U.R.'s counsel presented concerns to the court. A hearing on the Motion to Quash has been set for May 3 -4, 2022.

Location

222 South Main Street, Suite 2200
Salt Lake City, UT 84101-2194

Contact

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Belloni & Hart LLP Anchorage Aspen Billings Boise Boulder Chicago Denver Honolulu Salt Lake City Las Vegas Miami Salt Lake City South Park Washington, D.C.

EXHIBIT K

X Gmail - Fwd: Available Information



1 of 2 | [View all messages](#)

Fwd: Available information

Brent A. Andrewsen

Tue, Feb 7, 2023 at 1:58 AM

To: Tim Balard

FYI

[Get Outlook for iOS](#)

From:

Sent: Monday, February 6, 2023 11:38:29 PM

To: Spencer Austin <spenceraustin@agutah.gov>

Subject: Available Information

Spence,

Thanks for taking my call earlier today. Based on certain happenings today, and information in our, we would like you to open a file regarding potential violations of our client's rights subject to the jurisdiction of the Utah Attorney General's office. Although this week may be difficult to find a time to meet, we would like to find some time in the next 2-3 weeks to visit with you and share such information.

Please let me know if we can schedule some time.

Sincerely,

Brent

Holand & Hart, LLP
(801) 799-5929

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DRAFT-ATTORNEY CLIENT PRIVILEGED

April __, 2023

Attorney General Sean Reyes
Utah Attorney General's Office
350 North State St., Suite #230
Salt Lake City, UT 84114

Re: Request for Investigation of Davis County District Attorney Troy Rawlings and His Investigator Bryan Purdy

Operation Underground Railroad (OUR) and Tim Ballard respectfully request that the Utah Attorney General's Office (AGO) promptly seek to have a special prosecutor appointed pursuant to Utah Code 77-10a-12 to investigate Davis County District Attorney Troy Rawlings and Bran Purdy, a county investigator that worked under his supervision.

As detailed below, Mr. Rawlings was entrusted with fearsome power by the people of his community to protect them from criminals. Instead, he chose to maliciously and perversely abuse that power to harm an organization dedicated to saving and aiding the victims of heinous crimes and which had provided nearly \$1 million to Utah law enforcement agencies. After nearly three years, his deranged charade has concluded, but the harm he inflicted on OUR and its efforts to save trafficking victims was severe. He must be held accountable to protect the public from him, and only the Attorney General has the mandate and the power to do so.

As a nation founded on liberty protected by the bedrock principle of equality under the law, America is and must forever remain a nation ruled by laws, not men. Yet, we must grant immense powers to our criminal prosecutors, trusting they will wield their powers justly to serve the public with integrity and in conformity with our laws. Accordingly, when a rogue prosecutor abuses his power in service to his own ego and vanity, rather than based on evidence and the law, his persecution inflicts injustice on his victims and offends our core national values.

In recent years, however, our necessary trust in prosecutors has been tested. From "progressive" prosecutors derelict in their duty to equally enforce the law and who instead allow crime to run rampant, to partisan prosecutors like Alvin Bragg who fulfilled a campaign promise to personally hound one man, ideological and partisan prosecutors are making no secret of their agenda to selectively apply the law. This is the rule of men, not law, and it must be stopped if we are to preserve our character as a free people.

Rawlings is another example of a rogue prosecutor using his office and the powers the people granted him to serve his own ego and pride rather than the public interest. Rawlings has spent most of the last three years relentlessly harassing OUR, a charity devoted to assisting law enforcement in the fight against human trafficking, and its founder, Tim Ballard.

As summarized below, Rawlings' abuse of power implicates key legal and professional safeguards against such abuse. He not only launched a baseless investigation and public smear campaign baselessly alleging OUR and Mr. Ballard committed crimes, he lied about whether he was investigating them and for nearly three years maintained his assault on their rights and reputations despite being shown that his assumptions and statements were groundless by the AGO, the U.S. Department of Justice, and counsel for OUR and Mr. Ballard. Rawlings' peculiar misdeeds including lying about the existence of an email from Ballard's wife, Katharine. Ms. Ballard is raising 9 children. Rawlings falsely and ludicrously claimed he possessed an email in which she compared Mr. Ballard to Joseph Smith and tried to pressure witnesses to not testify against Mr. Ballard. Rawlings later admitted he never had any such email. Rawling's disgrace culminated in seeking, but failing, to obtain a search warrant based on a perjured affidavit, and false statements to a court at a hearing—which he then sought to have placed under seal forever.

When his abuse and misconduct finally became untenable with the looming prospect of judicial scrutiny, he was forced to drop his investigation. But Rawlings' personal witch-hunt against OUR and Mr. Ballard has caused significant damage to his targets and, more importantly, to their work protecting children from sex-slavery. This appears to have been his motivation.

Unsurprisingly, the public has not left itself defenseless against wantonly unethical unprofessional abuse of power, at least on paper. But doctrines such as sovereign immunity, qualified immunity, and statutory protections in the Utah Code would make a private civil suit against Rawlings for pre-indictment misconduct very challenging. No doubt, Rawlings was emboldened by his perceived imperviousness to accountability.

There are, however, grounds for the AGO to investigate Rawlings and his investigator Bryan Purdy, for making false statements in violation of the Utah criminal code. An investigation would also further inform the AGO on its position regarding potential adjustments to the current web of prohibitions and immunities that are contemplated, for different reasons, by forces across the political spectrum. Such changes would expose prosecutors and other law enforcement agents to greater potential liability. The scandal of Rawlings' violation of his public trust also threatens the requisite faith of potential witnesses, cooperators, and jurors. Thus, the AGO has strong institutional interests in reining in a Utah prosecutor run amok and abusing his power.

If OUR and Mr. Ballard cannot be assured that Rawlings will be held accountable and the threat of future harm by him eliminated using existing safeguards, they will have no choice but to escalate this matter to every other available authority and forum, including Congress and the state legislature, and the media, in order to try to contain Rawlings and prevent him from revisiting his abuse upon them or others.

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□ I.	OUR'S FIGHT AGAINST TRAFFICKING INCLUDES EXTENSIVE FINANCIAL AND OTHER SUPPORT FOR LAW ENFORCEMENT	
▲	Tim Ballard Found's Operation Underground Railroad to Fight Sex Trafficking	

OUR was founded by Tim Ballard in 2013 when he realized that the fight against sex-slavery and human trafficking went far beyond America's borders and the limited jurisdiction of government law enforcement agencies. Following Mr. Ballard's multi-year career across the CIA and the Department of Homeland Security, where he served as a special agent, Mr. Ballard was inspired to expand his mission to protect children and the vulnerable from sexual exploitation and slavery across America and beyond its borders.

Mr. Ballard founded OUR in 2013, relying on donations to fulfill OUR's mission of protecting the most vulnerable from the worst injustice at home and abroad. OUR conducted its first mission in Haiti in 2014, resulting in 2 arrests and the rescue of 28 human trafficking victims—two of those victims, a 2 and 3 year old, were adopted by Tim and Katherine. OUR rapidly expanded its reach and pace, conducting 3 missions in October 2014 alone across several Colombian cities. OUR worked directly with the Department of Homeland Security's Investigations unit, called HSI, to conduct these missions, collectively called Operation Triple Take. These missions were such a resounding success that the Department of Homeland Security named Operation Triple Take its case of the year for 2014.

Since 2014, OUR's mission has reached across the world to save human trafficking victims and assist law enforcement globally. OUR supports rescue operations and aftercare for survivors in all 50 states and in over 40 countries, with registrations and partnership-building underway in even more countries. OUR is expanding its mission to include new countries and regions, such as Australia, Argentina, South Africa, and Ethiopia. OUR has worked hand in hand with law enforcement since its founding and momentous beginnings with Operation Triple Take. In the last 10 years, OUR's work assisting law enforcement partners and international allies has saved over 7000 survivors and provided aftercare to thousands more.

While some charities in the space only raise awareness and others only conduct limited operations or provide limited financial assistance to law enforcement agencies that undertake rescues, OUR is an international leader in the fight against human trafficking, raising awareness of the issue through its work, cutting edge media projects, and partnerships with federal, state, and local law enforcement. OUR is also on the front lines, coordinating with international law enforcement agencies to conduct operations, including undercover stings featuring OUR operators, to find and secure victims and takedown traffickers. OUR also uses the insight and experience of its staff and leadership, which includes multi-decade veterans in law enforcement and elite military units like the Navy SEALs, to direct funding from OUR's donors to programs and tools that are force multipliers for law enforcement departments across the country. OUR's funding projects have provided agencies and police departments with mental health support for officers, elite K9 units, and specialized training that enable law enforcement officers to step up the fight against human trafficking based on the hard-earned experience of OUR's operators and intelligence network.

B. OUR Supports the Utah Attorney General's Internet Crimes Against Children Task Force

From 2017 to 2020, OUR provided over \$950,000 to the Utah Attorney General's Office's Internet Crimes Against Children Task Force (ICAC), to support its work rescuing trafficking survivors and arresting the traffickers and pedophiles who distributed child sexual abuse material. In appreciation for OUR's assistance, the Utah Attorney General's Office detailed the results it was able to achieve with the resources provided by OUR in 11 letters sent

between 2017 and 2020. (Exhibit 1.)

In the ICAC's July 13, 2017 letter, it stated that OUR's "generous support and resources" helped ICAC do the following:

- Arrest 7 child sexual exploitation predators
- Conduct 64 child sexual exploitation investigations
- Investigate 102 child sexual exploitation Cybertipline referrals
- Serve 15 child sexual exploitation search warrants
- Perform 162 child sexual exploitation forensic exams (hard drives, cell phones, flash drives, SD cards)
- Preview 105 child sexual exploitation electronic items on-scene during search warrants
- Initiate 35 child sexual exploitation undercover investigations
- Provide technical support and assistance in 97 cases to other ICAC task forces and law enforcement agencies in furtherance of ICAC related investigations
- Facilitate 4 ICAC law enforcement trainings to Utah law enforcement officers
- Send 7 ICAC law enforcement officers to ICAC specialized training.

In addition to these statistics, the ICAC's letter stated that the ICAC "identified several children who were victims of sexual exploitation and provided them the necessary help to start their healing process and stop their victimization."

ICAC's appreciation letters show that by 2020, the ICAC credited OUR with helping it achieve the following incredible successes over the course of OUR's funding:

- Arresting 161 child sexual exploitation predators
- Conducting 780 child sexual exploitation investigations
- Investigating 1325 child sexual exploitation Cybertipline referrals
- Serving 380 child sexual exploitation search warrants
- Initiating 360 child sexual exploitation undercover investigations
- Providing technical support and assistance in 1857 cases to other ICAC task forces and law enforcement agencies in furtherance of ICAC related investigations
- Identifying 319 children who were victims of sexual exploitation and providing them the necessary help to start their healing process and stop their victimization

To honor the good work achieved by the ICAC through the contributions of OUR's

donors, OUR publicized on social media (Exhibit 2) some of the ICAC's results of survivors rescued and traffickers arrested with OUR's help. [OUR was careful to only credit ICAC, never were we informed of the members of ICAC who may have received any part of OUR's donations, so they could not identify them] These posts from February 6, 2020, highlighted that the ICAC was able to arrest 24 traffickers and rescue 35 survivors as a result of OUR's training and support, as stated by the ICAC itself in its own letters of gratitude to OUR. The posts also noted that OUR provided assistance in 337 cases to other task forces and 8 trainings to Utah officers.

Unfortunately, what should have been an opportunity to celebrate law enforcement achievements in rescuing victims and punishing human traffickers enabled by the support of passionate, justice-driven donors became the basis for an almost three-year prosecutorial nightmare by Davis County District Attorney Troy Rawlings based on his own misunderstanding about OUR's partnership with the ICAC.

II. TROY RAWLINGS' ABUSES HIS POWER WITH A BASELESS INVESTIGATION INTENDED TO HARM OUR AND MR. BALLARD

For the last three years, OUR's fight to rescue victims of slavery and help arrest traffickers has been hampered by a smear campaign and rogue investigation personally conducted by Davis County District Attorney Troy Rawlings. Rawlings has used his pulpit as a public official, amplified by eager allies in the media like Vice.com, as well as his prosecutorial powers to attack Mr. Ballard and OUR. Rawlings trampled Mr. Ballard's and OUR's rights using meritless accusations of criminal misconduct—starting *before* he investigated—and then repeatedly failed to substantiate his claims. His refusal to admit his error and his determination to find a crime at any cost to cover his false accusations turned what could have simply been a brief and forgettable error into a pride-fueled spiraling descent into misconduct.

The home page of Rawlings offices claims "The mission of the Davis County Attorney's Office is to uphold the public's trust in the pursuit of justice and enforcement of the law." <https://www.daviscountyutah.gov/attorney>. Rawlings also maintains a website, www.troyrawlings.com, where he boasts of his own excellence as an "award winning" district attorney, a member of Utah's "legal elite," and the possessor of "decorated professional judgment." Yet, on information and belief, there have been multiple prosecutors in Davis County who were fired for prosecutorial misconduct while they worked under Rawlings' supervision in the environment he has created in the office since his first election more than 22 years ago.

**TROY RAWLINGS - DAVIS COUNTY DISTRICT
ATTORNEY**

2018



The irony and hypocrisy of Rawlings' self-praise, including citations to awards he received for his work on justice for children, will become evident in the account that follows. So too, bear in mind the words below his email signature bloc:

"The qualities of a good prosecutor are as elusive and as impossible to define as those which make a gentleman. And those who need to be told would not understand it anyway. A sensitiveness to fair play and sportsmanship is perhaps the best protection against the abuse of power, and the citizens safety lies in the prosecutor who tempers zeal with human kindness, who seeks truth and not victims, who serves the law and not factional purposes, and who approaches his task with humility." United States Supreme Court Justice Robert H. Jackson, April 1, 1940

Rawlings' excessive pride in his image and accolades may explain why he stubbornly refused to admit his error and the harm he caused to an organization that rescues children from terrible abuse—and why he desperately tried to find or concoct a crime, any crime, committed by OUR, Ballard, and those close to Ballard, including Rawlings' wife. The embarrassment of admitting that the organization he baselessly labeled as a fraud in fact gave Utah law enforcement nearly \$1 million – including \$67,000 to Rawlings' own county – was apparently too much for his fragile pride to bear. Rawlings' descent into lies, intimidation, and manipulation to avoid simply admitting an error was a selfish and corrupt course of action that must be investigated.

A. Rawlings' Initial Social Media Attacks on OUR and Mr. Ballard

In the Summer of 2020, OUR was experiencing astounding growth, success, and media attention. But then, in September 2020, Rawlings began to target OUR and Mr. Ballard on social media, seemingly due to Rawlings' misimpression that OUR was improperly claiming credit for ICAC and Davis County's operations. OUR never published any posts or claims about supporting operations in Davis County, because it didn't even know at the time a portion of its donations were sent to Davis County.

The first sign of trouble began on September 4, 2020, when Rawlings made a token attempt to set up a meeting with Mr. Ballard. Though Mr. Ballard's assistant replied on the same day to set up the meeting, Rawlings never responded to confirm a meeting. (Exhibit 3.) Rather than follow through with his inquiry and take up his concern with OUR, Rawlings jumped to publishing social media posts shaming OUR without directly naming the organization.

On September 7, 2020, Rawlings published a post (Exhibit 4) clearly targeting OUR and Mr. Ballard without mentioning them by name, and promising his office would be making further announcements in the "relatively near future":

"Please be aware of any individual, entity or organization who solicits your money and may be claiming credit for work to protect children that is actually done by our task force and/or other law-enforcement organizations in Utah and around the world. Get the details before parting with your cash. You will be hearing more from our office about this in the relatively near future."

Throughout September 2020, Rawlings expanded his thinly-veiled campaign against OUR, repeatedly posting cryptic statements about con artists and fraudulent nonprofits and impugning those who acknowledge that they were called by God to do charitable work and serve the most vulnerable, a clear reference to Mr. Ballard and his public witness that he was called to found OUR.

On September 9, 2020, Rawlings posted on Instagram (Exhibit 5) the statutory definition for witness tampering alongside a statement calling out charities using nondisclosure agreements to silence cooperation with investigators:

If any individual, or entity, including a purported 501(c)(3) charitable organization, threatens to sue you civilly for a supposed violation of a nondisclosure agreement (NDA) if you cooperate truthfully with a criminal investigation of that person or entity, these sections of the Utah Code are implicated. Thanks to those who have cooperated to date. For those of you who are expressing fear of being sued if you cooperate, take heart. An NDA will not protect the vindictive fraudster threatening you. The law will protect you.

On September 11, 2020, Rawlings finally responded (Exhibit 6) to Mr. Ballard's assistant about scheduling a meeting with Mr. Ballard, stating that his investigator would soon talk with Mr. Ballard but that Rawlings himself no longer needed to visit Mr. Ballard.

Between September 9 and 19, 2020, Rawlings posted (Exhibit 7) [OUR: We didn't see these posts in the materials you provided – do you have them preserved somewhere?] to Instagram the statutory definition of communications fraud and a message warning about con artists in Utah using non-profits to scam the public:

"Utah has seen more than her share of con artists over the years. It's not just a thing of the past, they still exist. Get the details before you part with your money. One quick example? Find out how much of the money being contributed to the supposed non-profit charitable organization is actually going to the Con-Man and his family & friends. Find out how much is being funneled to other organizations that use it for nonprofit purposes. Find out how much is going to campaign contributions for those running for elected office. Details do not mean simply listening to a sob story, even if the con invokes religion."

On September 19, 2020, Rawlings published an Instagram post (Exhibit 8) implying that OUR's social media posts highlighting the results achieved by law enforcement agencies with OUR's support were lies:

"Any non-law-enforcement entity, individual or charitable organization asking you for money and claiming to somehow have involvement in and take any degree of credit for Internet Crimes Against Children (ICAC) investigations and arrests with respect to Davis County Utah and our joint state and federal task forces with the Utah Attorney General's Office and Federal Agencies is lying to you. They have had absolutely zero involvement in any of these arrests and successful prosecutions you see on display on the 'Wall of Shame' in the Davis County Attorney's Office. Ask other federal, state and local agencies exactly what these

entities and individuals have supposedly done to assist with their investigations, arrest and prosecutions before parting with your money. It is more than simply offensive they are somehow claiming credit for the work of legitimate law-enforcement agents and making a profit (and lucrative living) off of those real agents actual work. Additional witnesses: Do not be afraid of their NDA, they cannot successfully sue you for cooperating truthfully with law-enforcement. Just because someone claims they are called of God when asking for your money does not necessarily mean they actually are #fraud #scam #crime”



88 views

Rawlings published these posts without either Rawlings himself or anyone from his office ever speaking with Mr. Ballard or anyone else at OUR about Rawlings’ supposed concerns. Instead, Rawlings, as a public prosecutor and with the full power and imprimatur of the state behind him, used his office as a platform to defame OUR on social media and effectively call OUR and Tim Ballard fraudsters before completing an investigation and without bringing formal charges against them

ii. Rawlings Amplifies His Baseless Statements through a Fox 13 News Story About His Investigation Despite Being Informed of Their Falsity and then Provides False Information to the Utah Attorney General’s Office

On October 6, 2020, OUR learned that Fox 13 News would be running a story on Rawlings’ accusations against OUR. As a former defense attorney and veteran prosecutor, Rawlings knew that an accusation from a prosecutor is a bell that once rung cannot be un-rung. Once Rawlings’ accusations as a public prosecutor were out in the media, OUR would be tagged with the label of “under criminal investigation” by Rawlings’ office. For an organization that relies on the goodwill of donors to fund law enforcement operations and operations in partnership with law enforcement agencies, the accusation would cause immediate and long-lasting damage despite the presumption of innocence. Not only would Rawlings know this, his

public smear campaign, before completing an investigation or filing charges, seems to have counted on it.

Unlike formal charges which present the accused the opportunity to have his day in court and obtain vindication of his innocence, a highly publicized "investigation" and official accusation of un-charged criminal wrongdoing leaves the accused without any ability to defend himself except with denials. The prosecutor's public accusations leave the accused with the stain of suspected wrongdoing in the public eye—leaving the prosecutor's grace or whim as the only way to clear their name.

On October 7, 2020, before the Fox 13 News story would be released, OUR's counsel called Rawlings to attempt to correct his apparent misunderstanding about OUR's support for law enforcement and partnership with the ICAC. OUR's counsel told Rawlings about OUR's almost \$1,000,000 in support for the ICAC and the gratitude letters from the ICAC specifically crediting OUR's support for helping the ICAC achieve the arrest, investigation, and rescue statistics it shared with OUR. OUR's counsel followed up on the call by sending Rawlings the 11 ICAC gratitude letters and supporting documentation (Exhibit 1) showing that OUR made the payments to the ICAC. Rawlings confirmed receipt of these materials from OUR.

After being put on notice that he was recklessly peddling false information, Rawlings contacted the Utah Attorney General's Office to confirm OUR's representations about the money it provided to the AGO, and to ask which cases in Davis County OUR's donations had assisted. (Exhibit 9). But as with his social media posts, Rawlings falsely asserted in his communication with the Office of the Attorney General that OUR had claimed credit for operations by law enforcement in Davis County, though OUR never made any such claims about any operations in Davis County. (Even two years later, in the Fall of 2022, Rawlings would perpetuate this lie to LDS Church council member David Jordan, still claiming OUR took credit for the work of Davis County.)



Even though Rawlings learned from OUR that his claims that OUR was run by "con artists" who stole credit for law enforcement operations were false, Rawlings refused to correct

or moderate his statements to Fox 13 News. Though Rawlings was waiting for the Utah Attorney General's Office's confirmation of OUR's donations to the ICAC as of October 7, 2020, his call with OUR's counsel and the ICAC documents sent to him by OUR were enough to show that Rawlings' initial bombastic accusations and suspicions were not true. Despite this, Rawlings refused to correct or moderate his statements to Fox 13 News or in his social media posts.

Due to Rawlings' failure to correct his own misimpressions and statements, Fox 13 News ran its story stating that OUR was under investigation by Rawlings based on alleged complaints Rawlings had received about OUR. (Exhibit 10). As Rawlings clearly intended, Fox 13 News drew the obvious connection between Rawlings' social media posts about a non-profit tampering with witnesses, engaging in communications fraud, and stealing credit for law enforcement operations and Rawlings' announcement that he was investigating OUR less than a month later. Thus, Rawlings confirmed to the public that his social media posts were directed at OUR and that he was using his voice as a prosecutor to declare that OUR and Mr. Ballard were committing scams, intimidating witnesses, and engaging in fraud, and that he was investigating them.



By letting Fox 13 broadcast its story without alerting them to the exculpatory information OUR provided to him, Rawlings manipulated Fox 13 News to use it as a proxy in his personal war on Mr. Ballard and OUR. He also humiliated OUR by talking out of both sides of his mouth before the story ran. Rawlings told OUR's general counsel before the Fox 13 News story that OUR was not under investigation. Naturally, this led to OUR to state to Fox 13 News for the story that OUR did not believe it was under investigation. Rawlings then told Fox 13 News that OUR was under investigation. The result was that OUR was humiliated in the story by its statement that it did not believe it was under investigation when in the same story Rawlings directly stated OUR was under investigation.

C. Rawlings Vacillates Between Claiming the Investigation is Over and Escalating

His Baseless Investigation and Smear Campaign

Throughout Rawlings' campaign against OUR, he employed a duplicitous tactic against OUR and Mr. Ballard repeatedly, falsely promising in one moment that OUR was not under investigation or that the investigation would soon be closed before revealing his assurances were a lie by escalating his investigation through some additional extraordinary action. The effect of Rawlings' contradictions and false statements was that OUR and Mr. Ballard were unclear throughout the process whether the investigation was closed or ongoing, and what course of action they should pursue to defend their rights and reputation. Rawlings' tactics prevented OUR and Mr. Ballard from publicly pushing back against his abuse of the investigation process for fear that they would upset Rawlings and spoil the potential for resolving any concerns cooperatively, as Rawlings falsely suggested they could. Rawlings' deception and manipulation kept OUR and Ballard from vigorously defending their interests from his smear campaign.

On October 10, 2020, after the Fox 13 News story ran, OUR's general counsel contacted Rawlings about the story. Rawlings told OUR's general counsel that he had seen the story and was already in contact with additional news outlets. (Exhibit 11). Rawlings stated that he intended to repeat the same statements about OUR being under investigation to other outlets, meaning that he would not acknowledge to the media that OUR had already sent him the ICAC letters refuting Rawlings' false statements in his social media posts, including that OUR had stolen credit for ICAC operations. Rawlings also refused to correct or otherwise ameliorate the impression he had given Fox 13 News that OUR was guilty of fraud and other crimes.

Between October 7 and October 10, 2020, OUR's general counsel and Rawlings spoke three times. Each time, Rawlings cunningly lied to OUR's counsel, adopting a friendly pose and falsely stating that he had not opened an investigation into OUR, despite his direct statements otherwise to Fox 13 News. Rawlings claimed that he was only reviewing a complaint he had received about OUR to determine whether an investigation should be opened, but that he had not even created a file regarding OUR.

D. Rawlings Admits His Ignorance but Nonetheless Maintains His False Claims

Rawlings eventually acknowledged that hadn't initially known that OUR donated funds to Davis County to assist its anti-trafficking operations, but that he had now seen thank you letters to OUR from the ICAC and the receipts showing OUR had donated the funds. Rawlings claimed that he was only waiting on the Utah Attorney General's office to verify the information OUR had provided him and that he would send out an "all clear" statement that the "complaint had no merit" and that he looked forward to working with OUR in the future. Rawlings even gave his permission to publicize the fact that he intended to issue the "all clear" statement once he received the Attorney General's Office's verification.

This was yet another example of Rawlings' pattern of misrepresenting his intentions to OUR to put OUR at ease so it would not dispute or fight against his malicious campaign. While stringing OUR along, he maintained his public statements that OUR was under criminal investigation for fraud and did not remove or retract his original social media statements or the impression he was able to create using Fox 13 News and other media organizations like Vice to accuse OUR of fraud and other crimes.

OUR obtained proof of Rawlings' lies and misrepresentations about his investigation on October 12, 2020, when OUR received a call from a donor who said she had contacted Rawlings' office after seeing the Fox 13 News story. She spoke with Rawlings' Investigation Bureau Chief, who told her that Rawlings had an open investigation into OUR for communications fraud related to OUR's claims about its involvement in trafficking victim rescues. Despite OUR's clarifications to Rawlings and the records OUR shared with Rawlings, and despite Rawlings' assurances to OUR that it was not under investigation, Rawlings' office continued to inform the public that OUR was under investigation for fraud related to communications even though he was on notice that his investigation was baseless.

Rawlings' spread his false statements further, giving an interview to Vice News—the same news outlet that referred to pedophiles as “minor-attracted persons.” Between October 2020 and March 2022, Rawlings was quoted in Fox News, Grit Daily, Vice, Romper, Daily Mail, the New York Times, the Ogden Standard Examiner, the Herald Journal, and the Atlantic. OUR's counsel responded with a letter to Rawlings alerting him to the damage he had done to OUR. (Exhibit __.) Rawlings doubled down, claiming his investigation was “fruitful” and “productive.”

D. The Utah Attorney General's Office Confirms to Rawlings that OUR Donated to the ICAC

On October 13, 2020, Rawlings received an email from Alan White of the Utah Attorney General's Office confirming that OUR donated \$950,000 to the ICAC over the previous four years. (Exhibit 12) White stated that OUR's funds were used for the ICAC's Officer Wellness program and that remaining funds were passed to ICAC affiliates throughout Utah each year. Indeed, Rawlings must have been shocked to read that his own office received \$67,000 of OUR-donated funds from the ICAC under this program. White informed Rawlings that all the money Davis County received from the ICAC would have been donated by OUR and referred Rawlings to the Memorandum of Understanding that regulated the use and disbursement of ICAC funds. This information should have conclusively ended Rawlings' investigation.

On Tue, Oct 13, 2020 at 10:31 AM Alan White <alan.white@utah.gov> wrote:

Mr. Troy Rawlings,

The ICAC Task Force has received donations from Operation Underground Railroad (OUR) for the last four years for a total of \$950,000.00. The Utah Attorney General's Office ICAC Task Force has used the OUR funds for the Officer Wellness program and all remaining monies are passed through to ICAC affiliates throughout the State of Utah each year.

Rawlings responded to White on the same day with additional questions, so it is clear he promptly saw and read White's message. Rawlings apparently received no response from White about his questions and followed up with White again on October 26, 2020, with further questions about how the Utah Attorney General's Office credited OUR in its gratitude letters, seemingly putting the AGO in his sights now, too. Rawlings' confusion concerned how AGO was attributing the statistics to OUR's support versus grants from the Department of Justice's Office of Juvenile Justice and Delinquency Prevention. Other than the ICAC's 11 gratitude letters sent to OUR crediting OUR's donations with supporting its achievements in rescuing victims, arresting traffickers, and conducting investigations, OUR was unaware of how the ICAC employed OUR's donations or the basis of White's claims to Rawlings.

On October 21, 2020, OUR's general counsel asked Rawlings whether he had received documentation from the Attorney General's Office. He also informed Rawlings that some of OUR's law enforcement partners, particularly the West Jordan and St. George police departments, were suspending their work with OUR until further notice. As a result, because of Rawlings, OUR would be directly prevented from assisting with the rescue of children during imminent law enforcement operations in Colombia, Ukraine, and Guatemala. [Q - were the operations canceled or just done without OUR?]

Rawlings falsely replied (Exhibit 13) that he had not received a "formal response" from the Attorney General's Office, despite his contact with White, and made a half-hearted statement that he would reach out to the police departments to address OUR's concern "about their lack of participation in 3 operations with them."

From: Troy Rawlings <troy@stjordan.ut.us>
Sent: Thursday, October 22, 2020 12:53 PM
To: Adam Becker <adam@stjordan.ut.us>
Subject: Re: O.U.R.

Adam, we do not have the formal response from Mr. Austin in the Utah Attorney General's Office yet. We are reaching out to the police chiefs of St. George and West Jordan to address the concern you have raised about their lack of participation in 3 operations with them.

Best,

Troy Rawlings
Deputy County Attorney
888-451-4300
troy@stjordan.ut.us

E. Rawlings States that he Cleared OUR of Allegations and that it was the Victim of the Utah Attorney General's Office's Misrepresentations – But Does not Retract His Own Accusations and Continues His Investigation

In December 2020, Rawlings told OUR's counsel that he had completely cleared OUR of allegations regarding illegal fundraising and that he believed OUR and Mr. Ballard were victims of misrepresentations by the Utah Attorney General's Office. Nevertheless, he refused to end his investigation or issue a public statement releasing OUR from the shadow he had cast over the organization through his own statements. In fact, Rawlings was again engaging in a cunning and deceptive ploy because he was still investigating Mr. Ballard and other OUR leaders *related to OUR's operations*—effectively, OUR was still under investigation.

In February 2021, Rawlings told OUR's counsel that he still needed more information for his investigation but would then wrap things up "soon." But Rawlings took no further action, perpetuating OUR's limbo while it suffered the ongoing reputational and financial harm from Rawlings' "investigation" and accusations of fraud.

On June 9, 2021, OUR's counsel sent Rawlings a letter (Exhibit 14) requesting the investigation be closed and detailing to Rawlings the reputational and financial harm he inflicted on OUR and Mr. Ballard. Incredibly, rather than close the case, Rawlings escalated the matter by

referring it to the Federal Bureau of Investigation.

A reasonable person, even a child, knows the right thing to do at this point would have been to simply apologize and retract their statement. Why didn't he? Perhaps he feared public embarrassment after calling OUR a fraud for claiming it supported Utah law enforcement, which garnered much attention, when in fact OUR gave nearly \$1 million and his own county received \$67,000 of those funds. Perhaps he saw only one way out: to double down and look for anything he could find against OUR and Ballard, investigating the person, not the crime.

Other than claiming "witness tampering," Rawlings never proffered a theory of what crime OUR or Ballard committed. But his comments showed he was fishing. For example, he asked who paid for the fence around Ballard's house. Eager to prove its innocence to bring the investigation to close and staunch the financial harm it was causing, OUR paid \$800,000 for audit to show that no funds were misspent. OUR's counsel objected to not being given a theory, and to the damage Rawlings had done. (Quote?/Exhibit?)

F. The Short-Lived Federal Investigation

On July 21, 2021, and again on November 10, 2021, the Department of Justice served federal grand jury subpoenas on an OUR employee. On December 8, 2021, the Department of Justice served wide-reaching Requests for Information on OUR. On February 22, 2022, OUR's counsel and Ankura, a nationally recognized forensic auditing firm, gave a comprehensive presentation to the DOJ, FBI, and one of Rawlings' investigators, Agent Bryan Purdy, to answer questions posed by the Department of Justice. During the three-hour presentation, OUR's counsel and Ankura demonstrated the soundness and integrity of OUR's accounting, how OUR upheld strict ethics standards for use of donor funds, and OUR's record of results in rescuing children and human trafficking victims.

On March 15, 2022, the Department of Justice informed OUR that it determined not to bring charges against OUR or Mr. Ballard, finding that all allegations it had received of OUR's alleged misconduct were false and unsupported, and not evidence of any other crimes.

One can only imagine the fate of children that could have been rescued had OUR not had to spend \$800,000 on Ankura's audit.

G. Rawlings' Search Warrant to Google Based on Agent Purdy's False Affidavit

Even after Rawlings' attempt to escalate his campaign against OUR to the Department of Justice failed and the Department of Justice concluded there was no merit to Rawlings' allegations, Rawlings refused to release OUR from its two-year legal limbo. Again, he escalated his attack.

On August 3, 2022, counsel for OUR and Mr. Ballard met with Rawlings to discuss the investigation and again request that it be closed. Rawlings yet again refused to release OUR and Mr. Ballard, saying he still needed to review information he requested from the Department of Justice and that he would decide which direction he would go after getting the information. As with his previous assurances to OUR and Mr. Ballard, such as that they were not under

investigation, this too was a lie.

Rawlings instead obtained a search warrant (Exhibit 15) on the Google accounts of Mr. Ballard and several OUR executives and employees. The search warrant was supported by a sworn affidavit (the "Affidavit") (Exhibit 16) signed by Agent Purdy that asserted there was evidence of communications fraud, obstruction of justice, and witness tampering. Agent Purdy's Affidavit was riddled with lies, material omissions, and misrepresentations.

Notably and egregiously, the Affidavit alleges crimes by Mr. Ballard and the others that have nothing to do with the original basis for Rawlings' investigation – that OUR falsely claimed credit for operations by the ICAC and Davis County. Rather than continue Rawlings' inquiry into whether OUR had improperly taken credit for law enforcement operations, which OUR had thoroughly debunked, the Affidavit pursued an entirely new basis for claims against Mr. Ballard and the others personally.

But the crimes alleged by Agent Purdy in the Affidavit were already investigated by Agent Purdy, the FBI, and the Department of Justice previously in the defunct and short-lived federal investigation. When OUR and Ankura answered the federal investigation team's questions in February 2022, their presentation addressed the basis for all the same allegations alleged in the Affidavit. As already noted above, OUR and Ankura's presentation was so comprehensive that the Department of Justice shut down its investigation within a few weeks after receiving it, concluding there was no basis to continue its investigation.

Agent Purdy's Affidavit included ridiculous characterizations, including this small but telling example: In 2020, Ballard returned from an undercover operation in the Dominican Republic that resulted in the rescue of 27 girls who were sexually assaulted and made to live in a chicken coop. Rawlings demanded Ballard prove there was an operation. Ballard presented evidence, including evidence the operation required Ballard to fly across the country in a small dilapidated plane and a picture of Ballard during the operation, wearing a disguise. Having their suspicion's proven wrong yet again, the Affidavit characterizes Ballard's successful operation as follows: "I know that Tim Ballard got on a private plane to put on makeup for an event." They thus took a righteous thing and all but exploited a successful end to 27 tragic stories just to try to make Ballard look bad.

On October 3, 2022, OUR and Mr. Ballard moved to quash the search warrant. In support of their motion, their legal counsel assembled a 500-page [or 300?] response identifying and cataloging the false, misleading, and omitted facts, statements, documents, and other information provided to the court.

Rawlings responded to the 500-page response by OUR and Mr. Ballard's counsel with a 4-page rebuttal that blithely conflated the allegations in the Affidavit with Rawlings' original allegations against OUR, bizarrely defending the Affidavit and search warrant by claiming that he was really pursuing allegations against OUR similar to his original fraud claims. Incredibly, Rawlings now claimed that OUR never donated \$950,000 to the ICAC despite the conclusive evidence Rawlings had already received showing otherwise.

Around this time, Rawlings subpoenaed the Utah Attorney General's Office for information that would supposedly prove that OUR never donated any funds to the ICAC. OUR

submitted a records request to the Utah Attorney General's Office to obtain records regarding its grants to the ICAC. Utah Attorney General Sean Reyes confirmed to OUR that Rawlings' new subpoena requested the same information that the AGO already sent to Rawlings 2 years previously in 2020. That information confirmed that OUR had granted \$950,000 to the ICAC.

To recap: In 2020, Rawlings cleared OUR of his own false allegation that it did not contribute to ICAC, after getting records from the AGO proving that OUR indeed donated the funds. In his late-2022 search warrant Affidavit, Purdy made no mention of this allegation. In response to OUR and Ballard's motion to quash the search warrant, Rawlings resurrected this allegation yet again, even though not in the Affidavit, and also subpoenaed the AGO, again, to document OUR's payments to ICAC.

H. Rawlings' Ploy to Set OUR and the Attorney General's Office Against Each Other

At this point in October 2022, as his baseless investigation further unraveled, Rawlings' became unhinged. Rawlings attempted to play OUR and Mr. Ballard against the Attorney General's Office. At about the same time that Rawlings issued his subpoena to the Attorney General's Office, he falsely claimed to the Attorney General's Office that OUR was contemplating legal action against the AG's Office for misusing the grant money OUR provided to the ICAC. Concurrently, Rawlings contacted OUR's counsel and alleged that the Attorney General's Office was upset with OUR for instructing the Office to use OUR's donations to the ICAC for purposes other than operations. Rawlings' ploy was not only unbecoming of a prosecutor and an abject set of lies, it was also nonsensical. OUR's objective in donating funds to the ICAC was to support operations and OUR never made any request to the ICAC, and had no incentive to make such request, that the funds be spent otherwise. Rawlings' lies were exposed when the AGO and OUR spoke to one another about what Rawlings told them.

I. Rawlings' Incoherent Communication with the LDS Church

Rawlings also attempted to involve the Church of Jesus Christ of Latter-Day Saints in his accusations and theories. Rawlings convinced himself of a fantastical plot between OUR, Mr. Ballard, and members of the LDS Church and began to hound Church officials as part of his flailing and ever-expanding investigation in search of a crime. Rawlings contacted the LDS Church's legal counsel about his allegations against OUR in a strange and off-putting conversation. The LDS Church's counsel described Rawlings' as "incoherent," saying that Rawlings spoke about nothing, asked for nothing, and then admitted that the only reason he was investigating OUR and Mr. Ballard was that "OUR took credit for his operations." It is worth pointing out, yet again, that OUR never published any social media posts or other claims about any involvement with operations in Davis County or results achieved by Rawlings' office, that Rawlings' original impression that OUR "claimed credit" for Davis County's anti-trafficking efforts was due to his own misunderstanding, that OUR provided every resource to clear up Rawlings' original allegations as early as October 2020, and that the AGO had also provided records to Rawlings in 2020 showing OUR contributed nearly \$1 million to ICAC.

J. Rawlings Urges Police to Not Use OUR's Donated Anti-Trafficking Canine to Prevent OUR from Receiving Credit for Fighting Trafficking

Further evidence of Rawlings' escalating spitefulness toward OUR clouding his judgment is his petty reaction to OUR's donation of a specially trained electronic detection dog to the Woods Cross police department in Davis County. The dog, named Flash, was trained to help law enforcement officers locate media devices containing child sexual exploitation material in their investigations. Flash is one of 64 specially trained dogs that OUR provided to law enforcement departments throughout the country to combat child sex exploitation.

When Rawlings learned that OUR would be donating Flash to the Woods Cross police department in 2022, Rawlings' office contacted the department's chief of police, Chad Soffe, to urge him not to accept Flash, claiming falsely that OUR would take credit for the department's operations. Chief Soffe ignored Rawlings and accepted Flash, deploying him to assist with numerous search warrants. Chief Soffe shared Flash with other law enforcement agencies fighting child sex crimes in Davis County, other Utah counties, including Salt Lake County, and the Utah Attorney General's Office. In just 6 months in 2022, Flash assisted with approximately 30 search warrants. To date, Rawling refuses to permit any law enforcement operations he runs to use Flash, needlessly diminishing the effectiveness of efforts within his jurisdiction to combat trafficking.

Rawlings' effort to stop the use of a dog who helps save children was despicable.

K. The December 2022 Meeting: Agent Purdy Disappears and Rawlings Devolves into Veiled Threats, a Paranoid Tirade, and Acknowledges His Abuse of Power

PRUDy nows he violated 4th Am and perjury – time to disappear.

In November 2022, as the legal dispute over Rawlings' search warrant against Mr. Ballard and other OUR leaders continued, Rawlings contacted OUR and Mr. Ballard's legal counsel to schedule a meeting in December. Strangely, Rawlings insisted on this meeting taking place at a location away from his office. Additionally, Agent Purdy became inaccessible because he sought new employment. It is unknown whether he was fired or chose to distance himself from Rawlings. Rawlings gave several inconsistent explanations for why Agent Purdy could not attend the December meeting.

On December 22, 2022, OUR and Mr. Ballard's legal counsel met with Rawlings per his request. Over the course of the meeting, Rawlings' behavior and conduct degenerated into the realm of the bizarre and paranoid. Despite Rawlings himself setting the meeting and scheduling it a month in advance, he arrived unprepared, without any proof of his allegations that OUR or Mr. Ballard committed criminal acts. Instead, Rawlings waived away the issue claiming he would provide proof of his allegations later at some unspecified time in the future, which he never did.

Rawlings started off the meeting with veiled threats to OUR and Mr. Ballard, saying that multiple news outlets, including national news outlets, had been trying to get him to release harmful information he had gathered on OUR and Mr. Ballard during his investigation, and that with the media's power to use public records requests he was not sure how long he could avoid disclosing the information. Rawlings provided the names of every witness he had assembled as part of his investigation and the names of the individuals he was accusing of crimes.

Rawlings then launched into an odd series of allegations about OUR and Mr. Ballard relating to crimes, private personal conduct, and paranoid theories. Rawlings' allegations were far-fetched and false, and Rawlings failed to present any evidence to substantiate them. Rawlings' tirade included the following allegations:

- a. Mr. Ballard had sexual affairs with 8 women who were members of a group called "Mormon Women with Blue Eyes;"
- b. Mr. Ballard was only an unpaid intern at the CIA, not a true employee;
- c. Mr. Ballard was fired from the CIA because he failed a CIA polygraph test;
- d. Mr. Ballard's motives for building and running OUR were fame and money;
- e. OUR faked or staged an operation in Colombia, which was depicted in footage as part of Operation Triple Take;
- f. The movie "Sound of Freedom" is a tool used by Mr. Ballard to defraud donors;
- g. Mr. Ballard's wife, Katherine, was guilty of witness tampering when she supposedly attempted to influence a witness not to cooperate with Rawlings in his investigation. Rawlings falsely alleged that he possessed written communications Katherine sent via email to witnesses in which she claimed Mr. Ballard was the second iteration of Joseph Smith, Rawlings is the devil, and that the witnesses should not cooperate with Rawlings;
- h. LDS Apostle Elder M. Russell Ballard's family benefitted from OUR donor dollar investments;
- i. Attorney General Reyes tampered with witnesses. Rawlings claimed to have written communications from Attorney General Reyes to a witness asking the witness not to cooperate with Rawlings' investigation;
- j. Mr. Ballard lied during a Deseret Book/LDS Living interview titled "The Scripture that Saved My Life;"
- k. The Layton Chief of Police complained to Rawlings that OUR took credit for the Layton Police Department's operations;
- l. Elder Ballard and/or other LDS Church Authorities provided LDS Church tithing records to OUR to help OUR target wealthy donors or LDS Church Wards;
- m. OUR only invests one cent of every dollar donated towards OUR operations;
- n. OUR committed a crime by failing to disclose to donors its use of a remote viewing specialist.

We note that few of the items above, which Rawlings was implicitly threatening to provide to the media as an obvious witness intimidation tactic, would have been crimes even if they had been true, which they were not. Which again raises the question as to what the purpose of Rawlings' investigation was.

Rawlings' numerous far-fetched allegations were ridiculous and unsupported by any evidence he presented to OUR and Mr. Ballard's counsel. In defiance of the dictum that big claims require big evidence, Rawlings made massive claims with zero evidence but his own word, which he had already repeatedly devalued by his pattern of lies and contradictions to OUR and Mr. Ballard throughout his investigation, most notably in Agent Purdy's sworn Affidavit.

In December [did this take place at the December 22 meeting? I also have a note that Rawlings said the same to Spiro during the fed investigation (July '21 to March '22)], Rawlings claimed that he had an email from Katharine Ballard that showed she was tampering with a witness, and stated to Attorney General Reyes and Ballard's counsel that he could charge her at that time. The threat terrified Ms. Ballard, who was caring for 9 children while Mr. Ballard risked his life to rescue children. But in a meeting with OUR attorneys in January, Rawlings admitted he never had any such email. Rawlings was thus willing to try to manipulate and intimidate Ballard by threatening to prosecute his wife with a fabricated allegation.

[When?] – Rawlings also claimed he would accuse AG Reyes of using taxpayer dollars to take trips to participate in OUR operations, which was false. AG Reyes did not use taxpayer dollars to travel on OUR trip.s

During the meeting, Rawlings further pursued his attempts to rope the LDS Church into his investigation and target the Church alongside OUR. Rawlings alleged that he had scheduled interviews with 3 LDS Church Authorities, Elder M. Russell Ballard, Elder Ron Rasband, and Elder Bob Gay. Fitting into the pattern of Rawlings' lies and contradictions, the LDS Church's legal counsel confirmed to OUR's counsel on January 10, 2023, that Rawlings had not scheduled any of those interviews and had only called the Church's counsel shortly before the December meeting to mention that he might call again later to arrange interviews with those Church Authorities.

In the meeting, Rawlings raised concerns he supposedly had about how OUR handled a false sexual harassment claim brought against an OUR executive in 2020, which OUR settled. At this point, Rawlings abandoned all pretense that he was using his powers as a prosecutor to act in the public interest and revealed that he was motivated by the vindictiveness he had developed for OUR throughout his meritless investigation. Rawlings admitted that there were no allegations that OUR's handling of the false harassment claim was improper. Instead, he menacingly posed the hypothetical question of "what would donors think" about the situation surrounding the false harassment claim if Rawlings used his office and power to publicize it in a way that would humiliate OUR. Rawlings further voiced his out-and-out personal antipathy towards OUR and Mr. Ballard by bragging that he had a mole/informant embedded within OUR. He also made paranoid claims that Katharine Ballard was being ostracized within her community because of damage Rawlings caused to OUR by his investigation.

Further, Rawlings told OUR in the December 22 meeting that he had empaneled a grand jury for the investigation of OUR, but had to dismiss it because Agent Purdy was getting a new job. The statement seemed a reminder of his power and the nearness of a potential indictment. But he was lying, again. (One month later, in January 2023, Rawlings admitted that he never convened a grand jury.)

The December meeting effectively confirmed that Rawlings' investigation had now degenerated into an abuse of power and personal misuse of his office and government resources to target OUR and Mr. Ballard solely to inflict as much pain on them as possible. From Rawlings' outlandish and deeply personal allegations raised without evidence, to his gleeful bragging about infiltrating OUR with a mole, to his outright admission that he sought to gin up the false harassment allegations to harm OUR's relationship with its donors, Rawlings' statement and conduct confirmed that he was misusing his office for personal reasons instead of serving the public trust.

On December 23, 2022, the day after the meeting, Rawlings emailed OUR and Mr. Ballard's legal counsel. (Exhibit 17) Rawlings claimed an informant in the investigation told Rawlings that OUR and/or Mr. Ballard were going to sue Rawlings and that the witness would no longer cooperate with Rawlings. [None of this is in the email you forwarded: Rawlings threatened OUR and Mr. Ballard, describing charges for witness tampering as "low-hanging fruit." Demonstrating that this was a cynical and abusive tactic in line with all his others, Rawlings refused to provide the name of the alleged informant or how OUR and Mr. Ballard had allegedly threatened him. Rawlings further alleged that someone working for OUR threatened the informant and that Rawlings had this threat in writing and a recording from the informant making the accusation.

Beyond the too-perfect timing of the alleged accusation from the informant, the truthfulness of Rawlings' claims was undermined by his secretiveness about the identity of either the person allegedly threatened or the person allegedly making the threat.

Rawlings continued (in the 12/23/22 email?), name-dropping several prominent people, including a celebrity, a media personality, and an LDS elder, who were close to Ballard – implying Rawlings could contact them and tell them his fabricated allegations. Confirming this impression, Rawlings separately told David Jordan, a distinguished attorney who has served as counsel to the LDS Church, that he might interview two prominent apostles and inform them of his allegations, if OUR sued him. This bogus claim appears to be more of Rawlings' buster and attempted intimidation, essentially warning OUR not to sue him or else he will go to the press with more disinformation to hurt OUR.

Rawlings, perhaps knowing that his agent's false affidavit would be subject to the court's scrutiny in the face of OUR's thorough refutation, may have been maneuvering to pressure OUR to accept whatever offer he was about to make to resolve the matter before the Court could rule on OUR's motion.

I. OUR Privately Confronts Rawlings to Refute the False Affidavit and Rawlings Ends His Investigation

[We need to carefully review this section and make sure we have our dates right for the meeting with OUR counsel and the hearing. Conflicting info.]

On February 3, 2023, OUR and Mr. Ballard's legal counsel met with Rawlings to make a detailed presentation demonstrating the factual inaccuracies in Agent Purdy's Affidavit and the material misstatements and omissions in Rawlings' rebuttal. Rawlings informed OUR's counsel

that even if OUR won the hearing and stopped the warrant, he would continue to investigate OUR. [Email where Rawlings admits he doesn't have email?]

On February 6, 2023, OUR's counsel preliminarily presented its concerns about Agent Purdy's Affidavit to the court overseeing the proceedings related to Rawlings' search warrant to Google to obtain Mr. Ballard's emails. Google previously provided Rawlings with a portal to view the emails he sought. Rawlings had asked OUR's counsel if he could look at Ballard's emails, but counsel told him he could not.

OUR's counsel alerted the Court that it believed Rawlings had searched the emails before the court had decided whether Rawlings' warrant was valid. The basis of OUR's belief was the fact that, on February 4, Rawlings provided OUR with an email [or did he just say in an email he had them?] between Ballard and one other person. [Q: Wouldn't the email have gone to the FBI, with whom Purdy was working, during the federal investigation?] [Tim - you tried to text Rawlings' emails but they got chopped off somehow. Can they be pdf'd and forwarded by email?] Rawlings' reaction to the accusation in the courtroom was extreme. He visibly shook while he denied searching the emails (even though he told OUR he had them), speaking over the judge, he insisted on having a second hearing to vindicate himself, and then stormed out of the courtroom, still shaking, as the judge was still talking. The court scheduled a full hearing on OUR and Mr. Ballard's motion to quash for May 3-4, 2023.

[When did this happen?] In the course of trying to persuade Rawlings to drop the case, Rawlings proposed including in the declination letter OUR's agreement to change its practices, which would apparently allow Rawlings to save face. But Rawlings could not identify any practices he thought should be changed and OUR refused.

In March 2023, Rawlings called James Gilson, OUR's attorney. He told Mr. Gilson that he could not sleep because he could not get out of this case. As a result of the February presentations by OUR and Mr. Ballard's counsel to Rawlings and to the court conclusively refuting Purdy's Affidavit undergirding Rawlings' warrant, and Rawlings' successive failures to escalate his investigation, Rawlings finally called an end to his investigation on March 28, 2023.

Rawlings issued a statement to OUR (Exhibit 18) announcing that his office had determined to close its investigation and declined to pursue any potential charges against OUR or individuals associated with OUR. The declination letter acknowledged that the decision to close the investigation was supported by favorable audits of OUR by a reputable third party and by information provided by other law enforcement agencies, including the Utah Attorney General's Office. But Rawlings could not resist leaving the door open to further investigation, reminding OUR and Ballard of his unchecked power and willingness to use it against them, and refusing to completely exonerate OUR of his own concocted allegations. Amid the clear statements that the investigation was over and there was no evidence of wrongdoing, the letter included a line that his decision was made due to the "lack of assistance from other entities" and that Rawlings merely believed it would not be "prudent" to pursue charges against OUR or any individuals associated with OUR.

One further nuance to these events reveals Rawlings' fear of what the world would think if his work was scrutinized. Investigatory matters are routinely sealed for 6 months. Rawlings asked if OUR would agree to seal the case materials forever, whereas OUR wanted the records

unsealed. Rawlings and OUR finally agreed to the routine 6 months.

III. DAMAGE TO OUR

[OUR: We recommend bolstering this section with more specific information. Can you detail the impacts of the investigation further? It might be helpful to have a chart or line graph of annual fundraising totals showing the decline, as well as more examples of operations or projects that were limited or canceled.]

As a result of Rawlings' unfounded and abusive campaign against OUR and Mr. Ballard, OUR lost millions of dollars in donations it would have received to fund its operations fighting human trafficking in America and abroad. Rawlings' campaign against OUR and Mr. Ballard accomplished nothing for the public. No crimes were unearthed, no allegations were proven, and no charges were filed.

In 2022, OUR outlined for Rawlings the damage he caused to OUR's ability to financially support its work rescuing children and other victims from sex exploitation, and to its relationships with important law enforcement partners. One of the law enforcement partners OUR lost due to Rawlings' conduct was Florida Attorney General Ashley Moody, with whom OUR was in the process of launching a fusion intel center before she cancelled the program in Summer 2022 after reading Rawlings' statements from 2020 and learning of his investigation. OUR had invested \$1 million in building the fusion center to support prosecutions in Florida that had otherwise been weakened by a lack of resources, leading to lenient plea bargains for sex offenders. After donating dogs and mobile labs, the fusion center was to be the culmination of OUR's partnership with the Florida AG. Mr. Ballard was also disinvited by Moody to be the keynote speaker at a December 2022 anti-trafficking summit because Rawlings lied to her about Mr. Ballard posing a threat to her.

OUR additionally lost its partnership with the West Jordan and St. George police departments, which suspended their work with OUR after Rawlings' fall 2020 statements, leaving planned OUR rescue operations in Colombia, Ukraine, and Guatemala without law enforcement operators to assist with child rescues.

The legacy of Rawlings' deranged smear campaign and stubborn refusal to close his baseless investigation is that thousands of trafficking victims whom OUR could have helped rescue or provided aftercare could not be reached because of the millions of dollars in donations and key law enforcement partnerships that Rawlings personally and directly caused OUR to lose. It is a grim testament to the trust that the American people place in their public prosecutors that just one county prosecutor has the power to cause so much harm to the national and international fight to stop human trafficking.

IV. REQUEST FOR AN AGO INVESTIGATION INTO RAWLINGS' VIOLATIONS OF LAW AND PROFESSIONAL MISCONDUCT

Based on the misconduct of Troy Rawlings summarized above, OUR and Tim Ballard respectfully request that the Utah Office of the Attorney General (AGO) initiate forthwith an

investigation into his conduct for the purposes of ascertaining whether he violated the federal or Utah constitutions, criminal statutes, or any other Utah rules governing the conduct of district attorneys.

For three years, Rawlings engaged in a concerted effort to harm OUR and Mr. Ballard that involved: the use of Rawlings' official power and social media accounts to smear OUR and Mr. Ballard as frauds before he even started his investigation; repeated efforts to keep the controversy in the press to maintain a shadow over OUR and Mr. Ballard's reputation; calling on the FBI and Department of Justice to take over the investigation before they quickly concluded there was no crime; a fight over a search warrant that involved an affidavit filled with lies, omissions, and misrepresentations; circumstances suggesting Rawlings reviewed Ballard's emails illegally while his search warrant was being contested; a bizarre set of conspiracy theories involving the LDS Church and the AGO; attempts to manufacture a dispute between OUR and the AGO; and threats to prosecute Katharine Ballard based on a false claim he possessed incriminating emails sent by her. In Rawlings' mind, it was him or Mr. Ballard, even if it required lies to hurt Mr. Ballard, Katharine Ballard, the AGO, and LDS spiritual leaders, even if it meant preventing OUR and its partners from rescuing exploited children in his own district, other states, and other countries.

We urge the AGO to look into the catalogue of lies Rawlings used to manipulate and intimidate OUR, Ballard, and others. The lies, threats, and intimidation, including threats to prosecute Katharine Ballard for a fabricated crime, and his offer to drop the case if we canceled the hearing into Purdy's affidavit, appear to have been calculated to discourage OUR and Mr. Ballard from testifying against Rawlings in the search warrant proceeding, or from filing suit against Rawlings, or exercising their First Amendment right to blow the whistle on Rawlings' misconduct. Investigator Purdy's false sworn Affidavit is a particularly clear potential crime warranting investigation, and it must be determined if Rawlings instructed him to lie.

Given the history of prosecutors Rawlings fired for misconduct and the departure of Investigator Purdy following the submission of a false affidavit, the AGO should examine Rawling's leadership of the office with regard to promoting ethical conduct. This includes examining the underlying reasons for the misconduct and Rawlings' role, if any, in causing that conduct.

Further, the AGO should investigate whether Rawlings violated Mr. Ballard's constitutional rights by searching Mr. Ballard's emails while the court was still considering whether Rawlings's search warrant was valid.

In addition to any potential prosecutions, an investigation would inform the AGO's position on potential amendments to current standards or the creation of new standards governing the conduct of prosecutors and their agents. If the current laws are inadequate to hold Rawlings responsible for the harm he has caused to OUR and Mr. Ballard, their efforts to combat sex trafficking, and the public's faith in the criminal justice system, then those laws must be amended in ways that afford greater protection to Utah's citizens, even if they might expose prosecutors to greater liability.

An AGO investigation would uphold the public's faith in the integrity of the Utah criminal justice system – upon which faith that system relies for its successful operation.

A. Investigating Rawlings Would Fulfill AGO's Stated Priorities

The mission of the Office of the Attorney General of Utah is to "To uphold the constitutions of the United States and the State of Utah, to enforce the law, and to protect the interests of the State of Utah and its people, environment, and resources." Among its top priorities is to "Restore Public Trust" because "[e]fficiency, ethics, and transparency are key components to the foundation of good government" and "[i]t is vital that citizens know what their public officials do." Mission & Priorities, Office of the Attorney General, <https://attorneygeneral.utah.gov/about/utah-attorney-general-mission/>.

As the events summarized above demonstrate, Rawlings' emotions and delusions drove him to abuse the powers of his office in a malicious campaign to hurt OUR and Mr. Ballard, during which he attempted to deceive and manipulate them, the media, the U.S. Department of Justice, and your office. His actions violate every precept the AGO cited – efficiency, ethics, and transparency – as "key components to the foundation of good government." These principles are also essential to maintaining the public trust in law enforcement, which in turn is essential for the effective functioning of law enforcement. With Mr. Rawlings' egregious conduct left unchecked, the damage to the public trust in his office and Utah law enforcement in general – by witnesses, jurors, and law enforcement officers – will harm the public safety efforts of all prosecutors.

B. Only an AGO Investigation Has the Potential to Hold Rawlings Accountable

There are a web of laws and rules that govern the conduct of prosecutors, calibrated to balance public safety while protecting citizens from the unjust application of the powers of the state. These standards, in theory, include rules prohibiting malicious prosecution, selective prosecution, and prosecutorial misconduct, ethical rules governing all attorneys as well as ethical rules establishing special responsibilities for prosecutors, statutes governing prosecutors' pretrial actions, and the crime of making false statements. These rules work in conjunction with federal Constitutional rights to Due process and Equal protection, among others, as well as rights enshrined in Article I of Utah's constitution.

However, despite these paper rights, there are formidable countervailing protections for prosecutors and the state. Within the standards listed above there are lenient elements or high bars for liability, such as malice requirements and rules that do not necessarily reach all aspects of the investigatory phase of a prosecution, in addition to extrinsic principles such as sovereign immunity, qualified immunity, and the Governmental Immunity Act of Utah, U.C.A. § 63G-7-201(4)(b) (providing public officials immunity from suit for *negligent* acts or omissions arising from or in connection with malicious prosecution).

Rawlings himself would likely be immune from private suit. The Davis County District Attorney's Office, too, would also likely be immune from suit. But Rawlings and Agent Purdy may be prosecuted for any crimes committed in the course of their work, such as false statements in violation of Utah Code 76-8-502. And Rawlings, as a member of the Utah bar is subject to rules of professional responsibility. This includes the prohibition in Rule 4.1 against a lawyer knowingly making a false statement of material fact or law to a third person.

C. The AGO Has Strong Institutional Interests in Conducting an Investigation

As shown above, Mr. Rawlings thoroughly disgraced himself as a prosecutor as he ran amok, unchecked, for nearly three years in a groundless investigation that harmed not only OUR and Mr. Ballard but the credibility of the Utah criminal justice system as whole. The Attorney General, as the top law enforcement official in Utah, has a responsibility to impartially investigate and prosecute criminal violations by prosecutors and law enforcement agents, to see that the laws in the state are being faithfully executed, and to advise the Governor and Legislature on the need for new laws or the need to amend current laws. It also has an interest in preserving the public's faith in all law enforcement institutions in the state in order to preserve its ability to effectively fulfil its own duties.

On the legislative front, the AGO has a strong interest in getting ahead of this issue. On the political Right, there is grave concern over ideological or partisan rogue prosecutors, while on the political Left, there is grave concern over a lack of accountability for law enforcement officials due to qualified immunity. The AGO has an interest in showing the current legal regime works—before there is a confluence of political forces that reduces the protections afforded to law enforcement, including prosecutors. As much as Rawlings apparently exploited those protections or was emboldened by them, they also are designed to enable law enforcement officers to make often difficult decisions so they may successfully fulfil their duties. Policymakers could conclude that diminishing those protections is necessary and justified even though it could potentially impair the ability of the AGO and its law enforcement partners to fulfill their public safety mission.

If Rawlings cannot be held accountable in any way for his misconduct, OUR and Mr. Ballard are prepared to take their account of abuse at the hands of Rawlings to the state legislature, the state bar, Congress, and the media.

D. Appointment of a Special Prosecutor Would Avoid Potential Conflicts of Interest

Utah Code 77-10a-12 authorizes the appointment of a special prosecutor to appear before a grand jury when the supervising judge determines there is good cause that a conflict of interest exists in the AGO, the county attorney's office, or the district attorney who would otherwise represent the state before the grand jury. Because this matter involves the potentially illegal actions of a county attorney and members of the AGO were witness to those actions, there would be an appearance of a conflict of interest if the AGO (or a Davis County prosecutor) were to conduct the investigation itself. Accordingly, we respectfully request that the AGO take any necessary steps to have a special prosecutor appointed to handle this investigation.

* * * *

After more than 22 years in office, Rawlings is acting like a king of a fiefdom, trampling rights like someone who believes he is untouchable. The Constitution means nothing if there are no checks and balances. This is an opportunity for the people of Utah, through their elected attorney general, to provide the essential checks and balances to make good on the promises of the Constitution. For these reasons, OUR and Mr. Ballard urge the AGO to begin an investigation into the actions of Troy Rawlings summarized here. To that end, we offer our full

cooperation in any inquiry and look forward to your response.

Respectfully submitted,

[XXXXXXXX]

Counsel to Operation Underground Railroad

cc: **Sen. Mike Lee**

Rep. Blake Moore

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Exhibit L

Fwd: FW: URGENT: Theater financial fraud of Pay-it-Forward of "Sound of Freedom"

Sean Reyes <reyes.seand@gmail.com>

Thu, Jul 20 at 6:59 AM

Reply-To: <reyes.seand@gmail.com>

To: TIM BALLARD 2022 CELL <timblainballard@gmail.com>

Tim, I'm sure you've received more than a few emails expressing concerns about theater conditions but this is a new and interesting concern if true. Just thought you'd want to pass along to whomever is the most appropriate to review it.

From: [REDACTED]**Sent:** Wednesday, July 19, 2023 3:18 AM**To:** Sean Reyes, Attorney General Utah <uag@agutah.gov>**Cc:** info@seanreyes.com**Subject:** URGENT: Theater financial fraud of Pay-it-Forward of "Sound of Freedom"**Importance:** High

Dear Attorney General Reyes,

Theaters are financially abusing the Pay-it-Forward tickets for "Sound of Freedom"

1. Theater screening and Showtime's are 1:00am, 2:30am, 3:30am and 5:00 am *only* on the Freetickets on Angel Studios website.
2. Screenshots are attached for zip code 74136, Tulsa, OK.
3. However for the same dates, these unreasonable screenings and Showtime's do not appear on the same theater for public ticket purchase.
4. Unless Angel Studios agreed theaters could have screenings at these unreasonable times, the end result is theaters are fraudulently burning through hundreds of thousands of the Pay-It-Forward tickets at these unreasonable times of 1am to 5am times.
5. This Theater abuse must be made public and theaters must credit back all the tickets at these unreasonable 1:00am to 5am times.
6. This alert has been forwarded to Angel Studios last weekend, 15 Jul however they are too busy to do anything.
7. This alert has also been sent to independent media Gateway Pundit and JD Rucker of Discern Report, both Christian and truth-focused advocates.

Please confirm receipt of this urgent email - otherwise I will keep sending to others who I hope will act to recover the significant financial values of theater financial fraud.

Blessings and thank you for your significant role in "Sound of Freedom".



PS: I was born in Tulsa, and now living overseas. We look forward to the "Sound of Freedom" coming to UK. I'm in Guernsey, where Liberation Day will always be celebrated, when the Channel Islands were freed from the Nazis after World War II

Exhibit M

Tim's UC- Mexico

9 messages

Alessandra Serano >
To: Brad Damon >, Tim Ballard <timblainballard@gmail.com>
Cc: Alessandra Serano >

Sun, Jun 19, 2022 at 10:26 PM

Brad/Tim – I'm sending this to just you two as Tim did not want my comments sent to the RDs, or [REDACTED] right now. I know the RDs and [REDACTED] will be involved in the post-op debrief and hope they can benefit from the roundtable and comments from a former prosecutor's perspective at some point. I think it's important that we be critical and constructive. I know I learn a lot from this advice.

I reviewed the entire video from Tim's Op. My comments are meant to be constructive and helpful to avoid any legal issues or other liability from this or future ops for Tim, all UCs and the organization as a whole. And I am so glad Tim said at the OC office meeting these types of review/post op debriefs get tough where people need thick skin. Apologies if this email comes across as harsh. Just trying to be brief and to the point. I'm happy to discuss any or all of my comments and the justification for them from my 18+ years of experience defending hundreds of UC ops in trafficking, exploitation and other settings such as drugs and firearms.

Overall takeaways are below. Please note I have specific instances/examples supporting my conclusions with video timeframe so folks can go back and review. Bottom line is I hope this video does not get released to anyone outside of the org for the issues below.

- There was entirely too much talking from Tim and the UCs. About 75-80% of the footage is us talking and interrupting the subject. I understand the excitement and nerves that goes with UC ops, but there were times where the subject was asked a question but unable to respond bc of interruption. It's okay to be silent and allow the subject to talk. In fact, that is preferred. For example, Subject spoke for less than 15 seconds in first two min of video. This is an issue throughout the footage.
- There were "entrapment" issues throughout the 2+ hour video. Topics raised by us where the subject never acknowledges yet we get pushing him even after he says no or withdraws from the idea.
- Conduct that "shocks the conscious" also throughout. It is one thing where the subject is the one speaking in shocking terms, but we should not.
- Possible criminal law violations – did we show CP to subject? It's unclear what was shown to the subject at certain points but I certainly hope not CP. We are not allowed to possess CP and certainly not show it anywhere in the world. Even if we had top cover we should not re-exploit kids by showing CP.
- Use of real kids in the op? Tim and UC shows picture of real kid to subject (I think – it's

unclear) and appears to be talking to a real kid. Who are these kids and did we get permission to use their photo? And if CP, we are reexploiting that kid. It's a liability issue and optics that we are re-exploiting kids if they are kids or victims from prior ops

- The UCs need to be mindful of where the cameras are. I realize we can't pose or be perfect, but to the extent we can sit or stand where the video is capturing the subject, the better. Also some audio issues where some of the conversation is inaudible. I realize this is more of a tech issue. But FYI

Some concrete examples:

- Why is the blond UC girl talking - she doesn't add anything. Very distracting. 2:30, 6:20-30, etc.
- Tim says - "I really wanted you to see the little girl in the corner. She waved to you" 3:20. NO reason to highlight that or if you do you can do it another way without it being so obvious. Subject hasn't raised it at all. Possible beginning of entrapment.
- Tim brings up 13 yo. "You can still have her. She's still a Virgin" 3:50. More entrapment concerns.
- Twinks -8:10- Tim raises the topic. Subject doesn't.
- Subject first raises his experience with 16yo boy("like 16 yo") 10:15. Appears to like boys btw 16-22. His def of twinks. We should have let him expound on this.
- Tim presses on hiring or finding this 16 yo after subject say he lost contact. 11:20. Once subject shut it down, so should we.
- Subject talks about his porn idea. Doesn't mention underage kids at all.
- Tim switches subjects back to his "expansion" and asks for more underage kids. 14:10. "Can you help us find that?" Subject says it should be easy to find. Doesn't admit to doing himself.
- Subject is asked about perfect age - doesn't say bc of the interruption.

- Tim brings up half of 16 or age 8. Subject says cost \$100-\$150 Then discusses 5 and 8 yos "ing right here for \$8000" 16:00. Pretty raunchy especially where subject does not talk about it.
- Subject tells Tim you can get things easily outside of town. But he doesn't go outside of town bc of his [immigration] status.
- Tim raises "expansion" again. 17:20 Subject doesn't respond. We should have let him respond.
- Subject starts talking about getting kids outside the city and Tim interrupts him. Would have been great opportunity to hear what he says, 18:50
- Tim says to subjecy- "I need your help" getting the kids to city. 19:40. Subject says he has to research. Has to finish paperwork (immigration) Meaning he has no predisposition- possible entrapment.
- Discussion about a doctor fixes 6yo ripped vagina in Cozumel. 23:50. Pretty outrageous/shocking the conscious . And way too much info/talking.
- UC girl off camera talks way too much 26:30. Tim talks about how 6yo girl is still a Virgin. Subject says nothing. For over 3 min, subjects says nothing bc Tim and UC girl is talking.
- 30:05- is there a real child on the video?? Who is this kid? Using kids in ops really concerns for liability among other things.
- 37:20 – Tim show subject a picture of a real hot 11yo. Appears to be photo from previous. Liability issue and optics reshowning real kid's photo.
- 39:50 – brown haired UC talks about bringing kids to MX and subject has connections. She never gives the subject a chance to respond. Nor does he ever agree with anything she said. Tim interrupts with "likemindedness" discussion.
- 41:15 – UC sets urgency – "now is the time". Subject doesn't respond bc of all the talking. He has already stated he can't do much due to his immigration issues.

- 42:38, 43:50 – subject says he can set something up but not now. He has immigration issues. We continue to press him – possible entrapment. Subject expressly states he cannot set up “party” anytime soon. He says for 16 yo boys he needs to do research in the city as he doesn’t know the area. He has no info on finding girls.
- 44:14 – subject says he has hooked up with young looking boys who say they are 18 but could be 16.
- 44:38 – UC raises again the timeline on setting up a “party”. Subject says he does not want risk to set up party. “not in my mindset” 45:40
- 46:10 – subject does not want to gather kids in the city – too dangerous. Suggest going south or near border. Says he has not been to these places due to his immigration paperwork. We continue to press – possible entrapment.
- 47:25 – Tim suggests he has a guy who can fix subject’s paperwork. Subject does not agree to help even with that offer.
- 47:50 – Tim raises new crime – CP/videos of kid. Subject never raises this topic. Subject responds with there is plenty of stuff out there – why be stupid? Possible entrapment re: CP crime.
- 50:30 – subject off camera. Hard to hear.
- 51:00 – camera angle changes. Hard to hear bc so far away.
- 52 minutes and forward – a whole convo on commercial CP, how to encrypt it, etc. Subject never offers to assist with this.
- 58min forward – way too much talking. Tim asks subject “will you do this?” And does not let subject respond. 59:20.
- 1:05:00– Subject is talking about what he is willing to do but Tim interrupts him. We should let the subject talk.

- 1:08:30 – subject admits he does not know where he can find kids – would have to research bc he does not know the areas.
- 1:24 forward– no one is on camera. Then camera tilts to under the desk or something for 8 minutes
- 1:35 – video goes to group of people in a room – no idea what happened here. Looks like the backroom. You can hear audio through of subject
- 1:35:30 – ██████ raises 12 yos in Argentina – why are we going down this road?
- 1:41:50 – UC asks subject “what’s your experience in MX?” Doesn’t let subject respond.
- 1:43:50 – Tim has idea – have the little girl he has do a CP video with a 15-16yo boy he wants ██████ to get. Subject does not agree or have a chance to say anything
- 1:44:40 – Tim asks what the youngest subject has had– does not let him respond.
- 1:47 and forward – finally we allow subject to talk! Talks about how he met his roommate, subject talks about a gun, no other weapons, etc.
- 1:51:42 – Tim raises another idea – has a client interested in a girl losing her virginity. Asks subject if he has a 15-16 yo boy to have sex with 6 yo girl. Subject says “zero” chance of that happening.
- 1:53:01 – UC gets really graphic about sex act even after the subject says “zero” chance of that happening. Why are we getting graphic? Not necessary given where we are with subject.
- 1:54:20 – subjects again repeats “zero” chance of getting a young boy. The conversation should have stopped.
- 1:54:50 – Tim talks about an 8 yo getting a b███er? Why? Unnecessary discussion at this point.

- 1:55:43 – UC again raises the idea with the girl and a young boy – extends the room rental. This conversation should have ended after the first time the subject said “zero”
- 1:58:30 – subject says he understands why he is “here”. Again too much interrupting by Tim and UC, would have been good opportunity to let subject talk. Let him say what is understanding is.
- 2:00:54 – UC raises “Epcot” and mix of races for a party. Goes on and on and does not allow subject to talk.
- 2:01:50 – UC back right in front of camera. Need to be mindful of where cameras are
- 2:02:22 -Tim raises the little girl again wanting to meet subject for lunch. Then come up and have a “dance party”
- 2:04 and forward– subject says he likes younger boys. Young and skinny. Tim asks what age.... Subject says “you know”. UC asks “is 10 too old” Subjects says no. Again, we are way past entrapment after 2 hours of this.

I welcome the opportunity to discuss any or all of this. Again, my comments are meant to be constructive and in the best interest of the op, the UCs (especially Tim) and the organization as a whole.

Thanks.

Ali

Alessandra Parisi Serano
Chief Legal Officer of Int'l Operations
Operation Underground Railroad
Cell: + [REDACTED]

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Tim Ballard <timblainballard@gmail.com> Tue, Jun 21, 2022 at 7:02 AM
To: Blain Ballard <blainwb@gmail.com>, David Jacobs [REDACTED]

[Quoted text hidden]
--
Sent from my iPhone

Tim Ballard <timblainballard@gmail.com> Tue, Jun 21, 2022 at 8:11 AM
To: Blain Ballard [REDACTED]

[Quoted text hidden]

Tim Ballard <timblainballard@gmail.com> Sat, Jun 25, 2022 at 10:25 PM
To: Alessandra Serano [REDACTED], Brad Damon [REDACTED], Brent Andrews [REDACTED],
[REDACTED], Mark Blake [REDACTED], Matt Osborne [REDACTED], Simon Brewer [REDACTED]
Bcc: David Jacobs [REDACTED], Tim Ballard <timblainballard@gmail.com>

Hi Team,

Ali wrote a review of undercover footage she obtained that depicts a June 6 operation I led in Mexico City.

Please read her review in full. It's in this email thread, below.

I have responded to her review, which can be found in the attached Word doc. If you are in the "To" line, there is a specific reason I need you to read both.

Sorry for delay in this. I wrote in en route to Ecuador last week but only barely have had the right combination of time and sufficient Wifi to send it. I wrote it in a Word doc on the plane, hence the attachment.

Please make it a priority to read both the review and the response. The word doc also includes Ali's full review as well, if that is easier.

This exchange is VERY important, for reasons that will be made in clear in the exchange.

If I overstated any part of my response, it was very intentional. This is not just a response to Ali, but I took advantage of the opportunity to explain in great detail how it is that I lead operations, and great insights for OUR operations in general. Something you all should understand.

The exchange is also a great foundation as we finish writing operations SOPs.

Thanks!

PS: great news! Just left the presidential palace in Quito, after spending several hours with the president and his wife. We ended with a dinner at the presidential residence on the top floor of the palace, which was hosted by the First Lady to honor OUR and our rescue op in Ecuador a few days ago. My response was written before the op, but I can tell u it was more successful than I thought. Both targets arrested and somewhere between 50-100 children victims (likely). Little boys under 10, for the most part. More on this and the aftermath soon. Especially the big aftercare plans Jessica and I now have. But it's important that u know this good news as it's very connected to my response.

[Quoted text hidden]

Ali.docx

Tim Ballard <timblainballard@gmail.com>

Sun, Jun 26, 2022 at 5:40 AM

To: Craig Anderson [REDACTED]

Gotta read this bro!!! Give me feedback when Done

[Quoted text hidden]

Ali.docx

Tim Ballard <timblainballard@gmail.com>

Sun, Jun 26, 2022 at 9:57 AM

To: Alessandra Serano [REDACTED], Brad Damon [REDACTED]g>, Brent Andrews

[REDACTED], Mark Blake [REDACTED], Matt Osborne [REDACTED], Simon Brewer

<[REDACTED]>
Bcc: Craig Anderson [REDACTED] >

Some of u did not get this....sending again just in case.

[Quoted text hidden]

Ali.docx

Alessandra Serano <alessandra@ourrescue.org>

Sun, Jun 26, 2022 at 10:39 AM

To: Tim Ballard <timblainballard@gmail.com>

Cc: Brad Damon [REDACTED], Brent Andrews [REDACTED], Mark Blake [REDACTED],
Matthew Osborne [REDACTED], Simon Brewer [REDACTED]

Tim- thanks for the email. There's a lot to unpack here in your multipage document. So I won't go blow by blow through the entire thing, but know I am happy to discuss - in fact I welcome it- at any time at your convenience. I stand by my comments based upon what I was allowed to review.

As you know, I repeatedly asked for a debrief of this op prior to execution but was provided nothing. No phone call, no text, no email, nothing from anyone. So I am Monday morning quarterbacking based upon what I have. That's what I understand my job as CLO of Intl Ops is supposed to be. I even recall talking with you before I started with OUR that I would get to "review every op". That was not the case here. If that's changed, please advise so I know my lane.

The hot wash and review was a decision made and agreed to at the OC board mtg. You even agreed with the process. I texted you in advance and said I wanted to provide my comments based upon what I had prior to me leaving for Uganda. Even though the hot wash review is supposed to go to all RDs, I, as a courtesy, asked you (Tim) twice if you wanted to limit it given what I had to say. I wish we could have had a discussion versus email but given the time frame, that's what I did and gave you advance notice of that. I knew it would be hard to hear. When you responded to me that my comments only go to you and Brad, I have respected that request. I have not sent this to anyone else. But I see you have- which is fine. Feel free to check my email sent box. I welcome it.

I've said on multiple occasions, including at the last OC mtg, that it's my intent (and I thought my job) to protect OUR, it's employees especially Tim, from any fall out on any level to the best I can while help support the saving as many kids as possible. I still maintain that mindset. I was on a call with Mark Blake and Eric Robinson a few days back and championed you and your passion to a company on donations bc they had questions about the negative press about OUR. It's not just about formal legality(whether you can or can't); it's also optics: how it can be spun. As well as judgment: Just bc you can, does not mean you should. As a prosecutor I had to balance all of those things.

I think you (Tim) are unfortunately aware of how optics can go sideways. I think you've been unfairly targeted and I am mindful of that and want to do what I can to prevent further fodder. I've put myself willingly out there with the DOJ on closing the investigation of OUR and you to great success. And will do the same- Assuming Brad and the board wants me to- with Troy if he ever responds to set up a meeting.

So if you feel I am not doing my job to you, Brad, and the boards satisfaction, fire me. But I will not back down or compromise my integrity, what I think is good for the entire organization (its mission and purpose) based upon my years of experience defending agents and officers in court in the toughest anti-govt circuit in the country, and will always express my opinion as I see it in an appropriate manner.

So you let me know when you want to talk. I will make the time at your convenience. I dont care if it's at 2am while I'm on vacay. I think it's important if you and the board feel my intent, heart and mind are not in the right place or if you feel I'm not living up to my job description. I welcome constructive feedback back and open dialogue. But will not compromise my integrity or DNA.

So name the time/date. I will be happy to discuss. Thanks.
All

Alessandra Parisi Serano
Chief Legal Officer of Int'l Operations
Operation Underground Railroad
Cell:+1 619/606-3085

On Jun 26, 2022, at 6:57 PM, Tim Ballard <timblainballard@gmail.com> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[Quoted text hidden]
Ali.docx

Tim Ballard <timblainballard@gmail.com>
To: Craig Anderson <[REDACTED]>

Sun, Jun 26, 2022 at 10:59 AM

[Quoted text hidden]

Tim Ballard <timblainballard@gmail.com>
To: David Jacobs <[REDACTED]>

Sun, Jun 26, 2022 at 2:48 PM

[Quoted text hidden]

Thanks Ali.

I appreciate the time you took to do this. I also appreciate you reminding us that debriefs can sound harsh. I know and love your passion to keep us safe in operations, and I recognize that your analysis, harsh as it may come across, is a reflection of that passion. That said, as a legal advisor to operations, I'm sure you would agree that your role in advising is also subject to review. My response to your analysis may come across as harsh. But it is also necessary for us all to learn our roles in this. This entire exercise--the back-and forth--is also important, as it will inform our final draft of SOPs for operations. I'm confident that with the right SOPs, you never would have thought to write the vast majority of what you wrote, and we all would have saved a lot of time and frustration.

My Bottom line reaction to your analysis of the Mex City/██████████ case: One hundred years of prosecutorial experience would not have qualified you or anyone to take two hours of undercover footage and make the conclusions you made. You had no context. It's akin to stepping into a feature film halfway through, spending ten minutes watching, then exiting and writing a credible review. It's impossible, even if the movie reviewer held the world record for most movies ever watched and reviewed. You may respond thinking, "Well, there is no harm in sending out an email that includes an out-of-context review." But in this case, there is great potential harm (in addition to wasting valuable time), which I will explain below.

But first, I will explain why your conclusions were off, as they were almost entirely built upon a false premise.

The covertly-filmed, two-hour undercover meeting at the Ritz Carlton hotel which you analyzed was a VERY different type of undercover operation. You clearly assumed it was a more traditional undercover meet that we are both very accustomed to.

This particular meeting had ONLY TWO objectives:

1. Lure ██████████ out of his rat hole, and find out where he lives, so arrest and search warrants could be served. Nobody could discover where he was. He was a ghost in Mexico for two years, and a very smart one at that. Being that he was a fugitive from Holland, having committed sex crimes against children there, he knew he was a "wanted" man. And so, we went to GREAT lengths to set a stage that was irresistible to him. (As I will point out below, many things you criticized as "unnecessary" were actually *quite* necessary to set this stage. The details matter, and I have learned over 18 years of running undercover operations, how to create and employ these details)
2. Get him to tell us where his fugitive deputy-pedophiles were hiding out. We have a list of this pedophile network, and we knew, as a leader of the group, ██████████ knows where they are. However, after hours of analyzing his behaviors and communications, I knew he would not reveal his contacts easily. Again, what you perceived as mistakes were actually highly thought-out and very calculated tactics, learned over 18 years, to get him to talk.

At this point, any experienced law enforcement officer or prosecutor would ask: Where is number3? Where is the part where you advance the case by getting him to admit to the crimes he is committing or will be committing. This is, after all, the traditional undercover ops motive. The operator, careful not to entrap the target, gives him the opportunity to confess or act upon a criminal behavior. Your entire analysis was based on the false premise that this is what our objective was, but it was not. Not in the least. And this miscalculation severely tainted your conclusions.

To clarify what I am trying to say, I will now address your 6 stated criticisms, which you backed up by time-stamped examples from the footage. (I'm intentionally switching the order of your main criticisms, starting with your "entrapment" concerns, as it flows better for my response to be clear.)

- 1. There were "entrapment" issues throughout the 2+ hour video. Topics raised by us where the subject never acknowledges yet we get pushing him even after he says no or withdraws from the idea.**

First, I'm surprised by your pretty bold assumption that we "raised" criminal topics or opportunities to the target, which were "never acknowledged" by the target. This presupposes the very false idea that this was my first meeting with the subject. In fact, this was my FIFTH meeting with him, to include Facetime and audio calls. Yes, it was my first in-person meeting, but that, of course, is of little consequence when determining entrapment issues. What has already been clearly communicated by the target—whether in person or via telecom-- is what matters. In addition to the prior communications, there are several, lengthy text exchanges between [REDACTED] and a Dutch police asset, all of which were turned over to me and the Mexican AG. (It was this Dutch asset who introduced target to my undercover persona, and I then picked up where he left off).

Within this lengthy body of recorded evidence, [REDACTED] clearly confesses to his egregious sex acts against children in Mexico and Holland, to his current possession of child pornography and his connection to sex trafficking rings in Mexico. And much, much more. When Dutch asset then introduced a new character to their communications—"Brian" (that's me)—Target requested an introduction to Brian and offered an invitation for Brian to meet him in Mexico. Dutch asset informed target that "Brian" trafficked young girls out of Ukraine and other parts of Europe, after target expressed interest in trafficking in Ukrainians. Target was thrilled to have Brian come to Mexico and show him his "goods" —a Ukrainian child who Dutch asset described as being around 11-13 years old.

At this point, target calls "Brian's" phone (my undercover burner) and it now becomes an investigation under the authority of the Mexico City AGs office.

That is A LOT of evidence and information that preceded the two hours of footage you observed. In that you did not have this evidence and information, your analysis was destined to carry little to no useful information for me or the team, especially regarding entrapment. In fact, contrary to your stated conclusion, I DID NOT raise any issue at the Ritz which ██████ had not already raised ad-nauseam in prior communications. No entrapment. I was in fact responding to him. Walking through the doors he himself had opened to me without my solicitation.

I suspect you are thinking, "Why did you not share this with me?" Two responses: 1. the RDs and I only answer to one prosecutor, in this case the one in Mexico City. She is the only one who fully understands the local case, law, etc; the only one with authority, and therefore the only one that really matters. I will never authorize any SOP that would require me or anyone to provide that level of detail to anyone except the prosecutor and law enforcement officers in this case. OUR will NEVER require more red tap than the US government does, and even in the USG, we didn't have to report to that many entities. I believe you agree with all of that. I'm just trying to clarify why we did not and will not have that level of detail for you at this point. This is not to discount your eyes on a case, which brings me to the second response.

2. We discussed SOPs in San Clemente, and decided that reports will go from the RDs to Davis, which then triggers a hotwash/debrief. It is at this point that you will hear such details, as I just described. It is after this point that we will then decide if it's necessary to dig deeper into entrapment issues or review lengthy videos. The full narrative and context *must* come first, in this orderly fashion.

I understand you wrote this analysis because you were leaving the country and did not know if you could make the hotwash/debrief. However, that doesn't change the fact that you went into a pretty time-consuming project knowing you could not possibly, as of yet, have the full context. Unless you somehow believed that the case began the second ██████ walked into the Ritz, which wouldn't be likely. I did not ask you to request that footage and analyze it prior to RD reports coming in and prior to debrief. I MUST know if that's being requested on my own cases. I have to admit, I was pretty surprised when I heard you had done that. It felt out of order, contrary to general post op guidelines we discussed in San Clemente, and a little bit like an internal investigation. I understand that the SOPs are not yet written and approved, therefore we have lot of tolerance for things happening out of order (it's happening all the time). If wasting time was the only consequence to the backwards way this analysis was handled, I probably would not be wasting even more time writing this response. However, I have to, because there is a much more serious consequence to this ordeal, which I will get to shortly

Back to the entrapment issue. The Ritz Carlton meeting is only understood by also understanding a unique piece of this operation, which harks back to the two stated objectives of the meeting. That piece is this: the arrest of ██████ and the search of his house (which happened that same day) was a foregone conclusion. It was already going to happen. The Mexicans had investigated at length and already had what they needed.

In other words, even if target had not opened all the doors in the weeks prior, allowing me to legally walk in and talk openly with him about his criminal activity, it would not have mattered all that much. Entrapment implies that I was trying to get him to do something he otherwise would not have done. Like (as a hypothetical example), getting him to kidnap a child to produce child porn. I knew, and (more importantly!) the cops and prosecutors ALSO knew, that the target would never, ever have the opportunity to commit any such required "overt act," which (in this hypothetical) *must* first happen in order to close the loop on and confirm our proposed illegal/unethical entrapment. The urgency of the case, with real victims to find and a house to search, did not offer the time it would take to allow him, even a day, to commit the overt act. As elusive as he is, we also would never have risked taking our eyes off him, which would have been required to allow him to commit the overt act. It wasn't happening. At that point, entrapment wasn't the issue. He was not ever going to be charged for anything we discussed in the Ritz.

Please know, these decisions (which I agreed with) were made by the prosecutor and cops in the next room. This case was so important that the Police Chief of Mexico City, who manages over 8,000 people, personally took the case and was in the adjacent room with the AG's deputy (who likewise personally signed on for the case). They were both there with their deputies for the entirety of the Ritz meeting. This is also an important point, as the final analysis should include the intimate involvement of these high-level officials, who were calling the shots, who understand legal issues such as entrapment (within the legal framework of THEIR country), and know what they are doing. You should trust that process a bit more, perhaps? In the footage you will notice I leave the scene several times, under some false pretext. That was when I entered the adjacent room to get advice and instruction from the prosecutor and chief of police, who I worked for. They were watching the entire UC meeting streamed live into their adjacent room. Considering their deep involvement in THEIR case, they would be pretty disturbed by your analysis. And they most definitely would reject it out of hand.

And so, since trying to get him to commit an overt act in furtherance of the investigation was NOT an objective at the Ritz meeting, let me remind you again what they were, for that is essential knowledge to addressing your next criticism. 1. To lure him out of his hiding place so the Mexicans could arrest him and locate his home, and 2. To get him to reveal the whereabouts of his two main deputies, two Dutch, child predator fugitives, named [REDACTED], one charged and once convicted for producing child porn of prepubescent boys. These predators had been hiding, and no doubt abusing children, wherever they were. But we had no idea where they were. Only [REDACTED] could tell us.

My motivation was obviously high to get [REDACTED] to tell me where his colleagues were. Knowing all I did about him, however, I knew the chances were slim. Based on my weeks-long analysis of him, researching all there is to find about him, I concluded he was smart. And paranoid. Both would be obstacles to achieving success to the two objectives. And so I introduced very deliberate and calculated details, which you dismissed as mistakes or unnecessary distractions. In fact, they were the key.

Which leads us to the second criticism.

- 2. There was entirely too much talking from Tim and the UCs. About 75-80% of the footage is us talking and interrupting the subject. I understand the excitement and nerves that goes with UC ops, but there were times where the subject was asked a question but unable to respond bc of interruption. It's okay to be silent and allow the subject to talk. In fact, that is preferred. For example, Subject spoke for less than 15 seconds in first two min of video. This is an issue throughout the footage.**

Under more traditional objectives, this is very sound advice. But our objectives, once again, were not traditional. I just needed him to show up, and that would trigger the arrest and search warrant. After he initially called me, he made clear in subsequent communications, that he was a "wanted" man, and that he feared I may be working with police. We had to play this just right so he would not fear coming to the meeting.

I will dive deep into your concerns about "talking too much," but allow me to first set up the argument...

Undercover work is an art and largely intuitive. I have learned to read people, and I knew I was going to have to set the stage with great care so he would not cancel our meeting. I knew I had been introduced to him as the American trafficker who had a little girl from Ukraine. So, I brought a Ukrainian speaking female operator () who we trained in Budapest. The training was excellent, conducted by highly experienced operators, including myself. I hand selected this female operator because she did the best in scenarios and she looked like she was 15. With make-up, and through the lens of an iPhone, I knew she could look 11-13 years old and thus be very useful. (I will later address your expressed opinion about this training being a "horrible" idea—again, opinions without context are strange, problematic, and a waste of time).

I believe () saved the () case. He was coming to see HER, and so excited about the potential money and sex he could get related to her and my other European connections. After all, this is why he reached out to me in the first place.

The plan was to have () accompanied by our undercover operators, be in a large Mexico City park that lies at the feet of the Ritz (I chose the Ritz due to its proximity to the park). () would get to see her via Facetime, knowing she was so close. (If he had asked, I would have explained to him that I couldn't trust him to see her in person, until I had a chance to see him first. The truth: I wanted to avoid any potential request that he might engage sexually with her on the spot, and also I wanted to hide anything, notwithstanding the excellent makeup job, that might reveal her true age: THIRTY-FOUR.)

In the days leading up to the meeting, █████ continued to express nervousness, and even texted me that if I was a cop, *he would have to kill me*. Knowing he had a gun, we took this seriously. And so, I staged an intense party scene at the Ritz suite, where █████ would be coming the next day. I Facetimed him into the party, showed him █████, dressed like a 12 year old “prostitute” sitting in the corner (I had a professional Hollywood makeup artist with us, who made █████’s and my disguises.)

I watched █████ on the iPhone screen soften like he never had. He was so excited now, he went and got a haircut and hair color just for the meeting, which took place the following afternoon.

In your comments, you criticized the use of █████. Referring to a comment I made in the Ritz footage, where I brought to █████’s memory the Facetime session I had had with him the night before, you wrote the following in your “concrete examples” section:

Tim says - “I really wanted you to see the little girl in the corner. She waved to you” 3:20. NO reason to highlight that or if you do you can do it another way without it being so obvious. Subject hasn’t raised it at all. Possible beginning of entrapment.

In fact, there was EVERY reason to highlight that. And YES he HAD raised it multiple times in the weeks prior. And yes it was obvious, and I made it obvious BY DESIGN, as it was the very reason he ultimately found the courage to show up. It worked! Only now would the Mexicans be able to identify him, arrest him, search his house, etc. (Again, that you would just boldly assume that this meeting somehow took place in a vacuum, with nothing significant occurring before which would provide clear context, is very strange to me. What case has ever just commenced with a very known target walking into a hotel room for what is obviously a pre-planned meeting?)

As to entrapment, impossible. At no time were we seeking to use █████ to get him to commit some overt act in furtherance of the case. As I explained, there was no time and no possibility. The arrest was ordered based on evidence already collected pursuant to child porn. The █████ ruse was just a tool (and a brilliant one at that) so that the target would reveal himself and thus trigger the arrest and search. Which it did!

But objective 2 was not yet achieved. How could we possibly get him comfortable enough to reveal the locations of his deputy-pedophiles. I knew enough about him to know he would be nervous at the hotel room. And he was. Only I had had enough previous experience with him to know his baseline and know what level he was at. He was high nerves. I projected that, and so I had instructed my UC team to do the very thing you criticized them of doing—“talking too much.” (btw, you questioned the relevancy of the blonde operator. I had only English and Ukrainian speakers in the room and I needed another Spanish speaker in case certain contingencies were required.)

This is a very smart guy. He had a lot of experience with police. I was right to assume he would be looking for any tactic police might use. For example, if we were talking very little, making him bring up criminal activity, etc. And so I explained to my team that there was no reason to seek an overt act, or try so hard to avoid entrapment issues. Such things, as already explained, were irrelevant at this point. So Brian is going to act like Brian. Talk loud and talk a lot. Same with the others. The only objective is to show him our crazy excitement and passion for our business. That was the trap. That is what would make him comfortable enough to eventually rule out his aching thought that we were cops, thus bringing him to a place where he would reveal the location of [REDACTED]. I had already predetermined when I would go in for the kill and ask him about his pedo-friends. And it WAS NOT going to be in the hotel.

My team played it as I told them to. And they played it right. I could visually see target relaxing as the minutes went by. Again, UC work is more intuitive than scientific or academic. Its near impossible to understand speaking patterns or beats in conversations by watching footage after the fact, and especially without the full narrative. Weeks went into this plan. Looking at footage after the fact, you may interpret things as being "obvious" or "unnecessary," unorganized, undirected. You suggested I was talking too much because I was nervous. I assure you, I was not. I don't get nervous at all in these settings. I'm being honest when I say, I don't know anyone who has gone undercover more times and in more countries, and in these settings, more than I have. (Especially in Mexico). Believe it or not, I actually do have a plan. A very detailed plan. And this was part of it.

You suggested that our incessant talking canceled our opportunity to get him to answer our questions. That's not correct. Yes, we asked questions, followed by another one, and then a comment or a story. And yes, perhaps he wasn't able to answer during the window you wanted him to answer in. But he eventually did answer them (at least the ones we WANTED him to answer). Some of those questions, we already had answers to. For example, you pointed out that we asked his age preference but didn't let him respond properly. We didn't need that answer, as he had told me previously and he had told the world in his own publication (he likes 7-8 year olds). Why would I give him the opportunity to contradict the egregious age preference he had already announced? Again, it wasn't always about letting him talk. It was about setting a mood so he would talk when we needed him to. I was controlling it on purpose. As you will see below, by the time I asked him the REAL question I needed answered, I had him primed and practically dying to tell me, and I did it through *over talking* and lulling him into what he felt was a safe place.

Your third critique reads as follows:

3. Conduct that "shocks the conscious" also throughout. It is one thing where the subject is the one speaking in shocking terms, but we should not.

Here you suggest it was inappropriate to talk dirty. We did talk dirty. It was absolutely shocking and it was absolutely appropriate. Again, Brian will be Brian. Natty will be Natty. Christian will be Christian. We have only one objective: make him believe we are who we say we are so we

can find more children and more predators. There is very little I would not say—so long as it doesn't hurt the case, or our ability to continue the work—to rescue children. Talking dirty had no negative consequence to the case, only upside. *Not* talking dirty would have hurt the case severely—maybe even destroyed it completely.

Had you had access to the hours of communications with ████████ prior to the Ritz meeting, you would have seen his insane “dirty talk.” He bragged about sodomizing 2 year-olds, and raping both animals and dead human bodies. If anyone on our side is worried about “Shocking the conscience,” they are in the wrong business. The mere existence of ████████ in the hotel shocks the conscience. *He came for the self-admitted purpose of raping and selling children.* The mere existence of ████████ as a human, and his friends as a network, shocks the conscience. If you think I'm not going to at least match his willingness to “shock the conscience,” then you are asking me to fail to convince him I'm “legit” in his eyes, which would then destroy the possibility of accomplishing our stated objectives of luring him out of his rat hole, putting him away, infiltrating his network and rescuing many, many children.

It would be like me telling a beloved employee: “I need you to go to China to negotiate the deal of your life. Kids' lives are at stake. As is your life. It's a very complex and delicate deal, full of nuances that, if you don't communicate and interpret correctly, will blow the whole thing. The deal will be made with a group of gun-wielding Chinese men, who may kill you if you mess it up. They don't speak a word English. Ok! Go get 'em..... Oh! And there IS one rule. Even though you and your team speak fluent Chinese, you can't use even one word of Chinese. Ok! Good luck! You got this!” “Why can't I speak Chinese?” they would ask me. My answer: “Because I found this book of best practices and standards, which was written about “negotiations”—though not about the specific negotiation you are doing, and it also is written by and for another country that is not China. But it exists, so I'd just feel better if you kept that rule.”

For the benefit of others reading this, the legal term “shock the conscience” (which Ali is referencing) is a pretty broad and *not* narrowly defined U.S. court opinion/standard to define the appropriateness of undercover operations over *all* fields, not specifically written for child sex crimes investigations. Example: When investigating medical fraud, can an undercover agent pretend to be an Ob-Gyn and put his fingers into the vaginas of unwitting women in order to maintain credibility? No! That would indeed violate the “shock the conscience” standard. I'm not saying this never has application to undercover operations involving child rapists (e.g. we would NEVER possess child porn or engage in sex with children or adult sex workers). But we NEED to apply some common sense here.

There is nothing inherent about the medical industry, or frankly most markets where crimes may be committed, that “shocks the conscience.” (The “shock the conscience” opinion most definitely had its origins in reviewing these more general crime markets). Conversely, there is nothing about child sex crimes that DOES NOT “shock the conscience.” Therefore, the applications will be very different, especially when doing the kind of *very advanced* work we do. Legal scholars generally agree that the term is very vague and open to interpretation depending on who is judging. We are going to judge in a way that sides with kids and operators, and

continue our practices. And we will make the reasonable assumption that anyone else who judges us (including actual judges) will agree with us and will be able to comprehend the obvious truth that there is NO POSSIBLE WAY to fully and successfully infiltrate a ring of child rapists as undercover operators without saying things that would absolutely “shock the conscience.” (And just out of curiosity, who do you propose gets to decide for OUR operators what “shocks the conscience” in any given UC child rapist case. You obviously felt qualified to determine this issue for the ██████ case. Opinions would be more varied than the people giving them. I will trust my operators, the ones on the ground, feeling and tracking the beat of the conversation, and who have the FULNESS of the WHOLE narrative. Outside voices here do nothing but confuse and endanger. We, the trained and experienced operators, are THE experts at the very detailed and nuanced individual case we are working. Not a one-size-fits-all scenario.)

Also, in this case, we were working in Mexico, under the direction of the AGs office, which is not compelled or inclined to adhere to a very general U.S. legal standard. (And we never even do UC work in the U.S., so this will usually be the case). Since we cannot (and dare not) engage in sexual acts with children or adult witnesses in order to build credibility with targets, I refuse to take away the only other powerful tool we have to build the essential credibility. Why on earth would you want to? Because someone once wrote an opinion about “Shock the conscience?” and did so clearly without considering or even citing as an example sex crimes against children? (Though I understand others may have tried to force the application onto child sex crimes later)

Ali, do you really mean what you wrote? Did you perhaps write it before thinking it through? Are you really saying we should not talk in “shocking terms” when engaging child rapists in an undercover capacity? We just stand there like choir boys and hope they believe us? This is very alarming, for if this were our standard, I would have to shut down all undercover operations, which may end OUR altogether, as I would be asking our people to unnecessarily risk their lives, as they would be “made” instantly if they could not say things that “shock the conscience.” But it *is* what you wrote—you literally wrote that we “should not speak in shocking terms.” And you defined that by what we said in the ██████ case, which was not *at all* an extreme example of how we communicate undercover. (It would also *not* be an extreme example of how we did so as United States undercover agents. Not even close.)

This is a major predicament. This standard WILL NEVER EXIST at OUR. I will not play with my operators’ lives this way, and I also will not abandon children who are being raped. We definitely need clarification and re-assessment on your position regarding “shock the conscience” before proceeding on anything with your involvement in undercover operations. Especially training our operators. (Several people on the UC training email thread you sent were uncomfortable when you dropped the “Shock the Conscience” phrase in reference to undercover training. I assured them you meant engaging sexually with victims, etc. Apparently, and most unfortunately, it seems I was wrong.)

After 18 years of doing undercover child crimes work, I hope we would all expect my work—and by extension OUR's work-- to be very advanced and not always fitted neatly into most "boxes." We will NEVER become a red tape, bureaucratic, standardized, one-size-fits-all, one-policy-per-every-scenario, entity like unto DOJ. I promise it won't happen and I commit to be ever vigilant to ensure our SOPs don't trend that way. There is a HUGE gap between what is legal and what is DOJ/gov policy. We will always stay legal, but, remember, I left the government because I watched such policies, and their misapplication, prevent the rescue of hundreds of child sex slaves. I thought you knew this. Just to be clear, we did not bring you here so you could offer us government policies and standards, *especially* bad ones, and *especially* those not written with our kind of work in mind. This would only hurt and not help us.

Without mentioning names or specifics, I reviewed your application of the "shock the conscience" standard as related to the work we do with two of the most experienced United States government undercover operators I know. They were both dumbfounded, opined that it's a complete misapplication, and said they have never nor would ever take onboard such very bad council. One of them concluded: "If you listened to that, you would be sending your team to be butchered!" And I can assure you, every RD and undercover operator would agree.

Case in point! If I had followed these "rules" in the ██████████ case, we almost certainly would have left hundreds of children in harm's way and I would have exposed my wife to the very real possibility of being a widow, and my children, orphans, as I would have been "made" immediately by a gun-toting, dangerous pedophile and his network, which has already issued a private death threat to me and a public death threat against OUR. (As I write this, I can't believe I am even having to address this and justify this.)

██████████'s Final Reveal and Arrest

All these tactics you have criticized combined to form the conditions for the successful accomplishment of our two objectives. This is how it went down....

This "Ritz-ruse" was enhanced by a second Ukrainian speaking female operator (██████████), who is Ukrainian-American and contracts with Aerial Recovery Group. She also graduated from my Budapest UC school. ██████████ served in the role of "groomer" to ██████████. At my signal, ██████████, from the hotel room with ██████████, called and spoke Ukrainian to ██████████ via Facetime. ██████████ interpreted for ██████████. ██████████ speaks English in real life, but these little details--the image of an 11/12 year old girl with a red hat and innocent face, who only speaks Ukrainian, and is "live" right now in a nearby park--these details make all the difference. It calmed ██████████ further. It excited him. But more than that, it set things up for me to go in for the kill.

As planned far in advance, I asked ██████████ if he would like to join ██████████ for lunch down on the street. He agreed and we left the hotel and walked into the park from where ██████████ had earlier Facetimed him. Once in the park, and just as I had expected, all the nervousness left him. The

truth is, it would have been safer and easier to have had him arrested in the self-contained hotel room, far from the public. But I knew that ██████ knew this from the beginning, which was obviously contributing to his severe nervousness in the hotel room.

Now in the park, he had at least two reasons to be happy and at peace. Both "reasons," of course, were designed *by* me and provided *to* him per my plan. First, he was free in a park; and if he were to be arrested that day, he knew that moment had passed. And second, he was about to meet ██████ in person.

He turned to me and literally said, "I now know you are not a cop. I also know you are not a Dutch assassin."

I started laughing and asked him if he really thought I could have been an assassin. He said yes, but "you had a clear shot in the hotel and didn't take it, so I now know you are not."

He continued: "The only thing you might be, if not who you say you are, is maybe a TV show host setting me up, but I really doubt it at this point."

We were both laughing.

Then I told him that, in an effort to vet him too, I looked him up. I mentioned his "brothers" ██████, and also mentioned that I had read that they too were hiding out somewhere. (This information is publicly available, something I knew he knew). I knew I only had one shot at this. If I asked him at the hotel, he was for sure in no mood to reveal such sensitive information. And once asked, and rejected, that question could no way be asked again without alerting all sorts of red flags in him that I was too interested and likely a cop (because why would "Brian," with so much opportunity in Mexico, care all that much about the pedo-brothers, unless I had other motives.)

"Do you ever see those guys?" I asked him.

"I worked for them for about a month, but then came to Mexico."

"Cool" I said casually, "What did you do for them?"

"Bartender at their hotel."

"They have a hotel?" I asked.

"A sex hotel!" he said with a grin.

"Lets go!!!" I said, giggling.

"Maybe someday when I know you a little better."

"Well, I don't like vacationing in Europe anyway," I said.

"Oh, it's not in Europe. It's in Latin America."

"What country?" I asked.

He replied: "I need to know you a little better before I tell you that."

I was given authorization to walk him through the very large park as long as I needed to (presumably heading toward [REDACTED]), but I knew I had what I needed at that point.

In that instant, I faked an incoming call, walked over to the uniformed officer (one of many strategically planted for me to signal), gave him the sign that I was done, after which [REDACTED] was surrounded by half a dozen or more officers and arrested for possession of child porn, possession of an illegal firearm, and other charges.

I knew we would be hitting his house that night with a warrant. We had worked with Mexico all that morning to determine his address, based on cell phone triangulation and a public camera, which caught him leaving his residence. As we knew he would not leave until I called him to come to the Ritz, the timing of my call, coordinated with Mexican intel unit, narrowed the window of time of when to consult certain cameras. They caught him on camera leaving his home.

That night I accompanied about 30 SWAT agents, along with our K-9 Hidu, who executed the warrant. Hidu discovered 4 hidden devices. In total, 3 terabytes of video and images were seized. The final results are still pending, but prepubescent child porn has already been confirmed.

[REDACTED] (for those CC'd here, she is our Spanish speaking digital forensics operator) will be working with Mexico to extract data regarding this large pedo-ring.

And, as I expected, [REDACTED] passport was seized. The name of only one other Latin America country was indicated by a stamp in the passport. Ecuador.

With the information we already had on [REDACTED], and now knowing the country they were in, and knowing they were associated with some hotel, I knew our Intel unit would locate the sex hotel quickly. All the pedos had to do was make one mistake (e.g. place their real names into some online hotel magazine or something), and we would have them. [REDACTED] found a clue within just a couple of days. It was an ad post by a "[REDACTED]" (not a Latin American name) for a house/hotel on Air-B&B in the small beachside village of Canoa, Ecuador.

I called our Regional Director for Latin America, [REDACTED], immediately and he, in turn, immediately contacted an HSI managed vetted unit (for those CC'd, this is an elite Ecuadorian

national police unit who work in tight coordination with HSI at the US Embassy in Quito). [REDACTED] gave them the address in Canoa, and they were eyes on the house the next day.

That day they sent us pictures that were 100% confirmed as depicting [REDACTED] in the house with prepubescent boys. It was later confirmed that these particular boys rarely left the house, and that dozens of other small boys visited the house every day. Again, these predators had been charged in Holland for PRODUCTION of child porn, focused on prepubescent boys.

And this brings us to today, the day I'm responding to your written analysis of the Mexico case. In fact, I'm writing this response on the airplane ride to Ecuador, where we will support the search warrant, digital forensics, and child interview forensics (Jessica's team is on the ground now with an HSI Child Forensics Interviewer.) You can imagine the irony I felt and am feeling, having opened your email yesterday. Any objective reader of your analysis, minus any additional information, would have to conclude that my operation in Mexico was so poorly conducted, full of egregious mistakes, and possibly even criminal. And yet, the reality on the ground—both in Mexico and now Ecuador--paints the *exact opposite* picture.

And now we go to the next criticisms you wrote (#4 and #5), and to the most disturbing part of this whole ordeal. Your suggestion as to my possible (maybe even probable) illegal conduct paints such an egregious picture, that I felt inclined, after consulting [REDACTED], to include our general council, [REDACTED]. There is damage control here that we must address immediately. (Otherwise I would not be using this valuable pre-op time to respond so fully. It's unfortunate that I must).

- 4. Possible criminal law violations – did we show CP to subject? It's unclear what was shown to the subject at certain points but I certainly hope not CP. We are not allowed to possess CP and certainly not show it anywhere in the world. Even if we had top cover we should not re-exploit kids by showing CP.**
- 5. Use of real kids in the op? Tim and UC shows picture of real kid to subject (I think – it's unclear) and appears to be talking to a real kid. Who are these kids and did we get permission to use their photo? And if CP, we are reexploiting that kid. It's a liability issue and optics that we are re-exploiting kids if they are kids or victims from prior ops**

I admit you leave some room for some doubt as to whether or not I actually possessed child porn or victimized or re-victimized children in my Mexico City ruse. However, your immediate follow-on instructions about how "we are not allowed to possess CP" and when you ask "who are these kids and did we get their permission?, etc) suggests way too much about your suspicions into my conduct.

My above narrative answers these questions. However, just to be clear on this email thread (as you know emails are forever), IN NO WAY AND AT NO TIME WERE REAL CHILDREN USED, LIVE

OR PICTURES, AND NEVER WAS CHILD PORN POSSESSED OR UTILIZED BY ME, ANY O.U.R. OPERATOR, OR ANY MEXICAN OFFICIAL.

The "child" in the live video was THIRTY-FOUR-YEAR-OLD, trained, vetted, and papered OUR operator, [REDACTED]. The images shown to [REDACTED] were doctored photos of a fully clothed, Hollywood-made over [REDACTED] in suggestive poses. [REDACTED] and our makeup artist produced these photos at my direction days earlier.

First of all, it is absolutely unfathomable to me how you could believe that an operator as seasoned as me could possibly make these mistakes. Equally unfathomable is your belief that I would need instructions like "using CP reexploits kids" or "We are not allowed to show CP." That would be as demeaning as me telling my 22 year old son, who has been eating meals by himself for at least 18 years, "Son, as you dip your fork into your pasta, make sure you do not stab yourself with that fork in your eye, or it will do severe damage. Also, make sure the fork doesn't end up jabbing your anus, as that could be serious as well." I'm not trying to be a smart ass. I promise. I'm trying to let you know how this landed. It truly is that outrageous. If I continued that pattern with my son, he would, in short order, stop eating near me, and eventually never come into my kitchen.

(The only consolation here, I suppose, is the unintended compliment of how good I am at this. Not only did I trick [REDACTED], apparently I tricked you too.)

This behavior cannot be repeated when addressing our RDs. If you could do this with me, surely you could do it to them. I don't want them to stop coming to "your kitchen," as I need them in your kitchen, I need them to take full advantage of your expertise.

Before Brad and I received your email, I believe he had mentioned to you that, when engaging folks, perhaps you were coming in at a "10" and that you should instead try coming in at a "2" or "3". I think this is what he was talking about.

A suggestion: Quick phone call, [REDACTED] to Tim: "Hey, great job tricking [REDACTED]. How on earth did you convince him that you had a real child on the line and a real child in the photos." I would have then told what I did, with pride. You would have had your answer. If somehow I had inadvertently slipped mentally into the seventh circle of hell and was using real children and real CP, then you would also have your answer, and would (I hope) call my lawyer, my therapist and my ecclesiastical leader.

More unfathomable to me was your desire and intention to send this email/critique to every RD and [REDACTED]. As you stated, you thought that would be a good idea for educational purposes. (I agree it would be educational for them to learn how a successful operation is done and how designing very calculated and creative tactics can bring unbelievable results. I would like them to emulate what I did in Mexico City. But I don't think that's what you had in mind. That said, I will credit your analysis as presenting some important and sound principles of investigation for a more traditional case; however, as I have shown, there is pretty much zero

application to the Mexico City case. But we could still use the general principles for training. Both of our writings in this case could be used. But I digress).

Had you actually disseminated the email to all the RDs, as you planned to do, this would have been so, so hard (maybe impossible) for me to have come back from. It would have been days or weeks before I could have got them all on the phone, with witnesses from the op, to explain the truth. Even then, they would always have this lingering doubt: *Did Tim use real children and CP. After all, I never saw the footage. Its Tim, so he could have covered it up later. I guess we will never really know.*

Disseminating this to the RDs would have revealed to them that you, who worked with me professionally for a decade, **could** believe I was capable of such criminality. Why then should they doubt that I could have done it? Not to mention that you also would have exposed them to *extremely* false ideas about what a sloppy operator I am, and how I clearly don't understand the basics of undercover work or entrapment issues. It would have been a disaster, and would have had the effect of undermining me for years to come with a team I need to trust me. Thank the Lord you came to me ahead of time, expressing your intent. And thank the Lord I asked you to limit access of your critique to just Brad and I.

In the spring of 2021, O.U.R. International Ops Chief, former HSI ASAC [REDACTED] was caught forwarding very sensitive emails pertaining to ongoing undercover operations in Mexico to Vice Mag. (We can only speculate why.) We had to get Mexican officials on the phone with Vice to stop them from publishing the emails and blowing a large child rescue operation. Vice agreed to not publish that one email, but they published selected parts of other emails he sent. Luckily Brad caught him and ended it.

Had you sent that critique to all the RDs, it would have been shocking to them. While I trust them all, I also trusted [REDACTED] and others who eventually betrayed us. There might have been a level of temptation for them to forward such a provocative and suggestive email about the Founder to any one of their friends or other OUR personnel. (I certainly could see myself doing it, wrong as it may be. Stories about "Tim" have that effect on people). It is not unreasonable to think that one of our RDs may become disgruntled some day (even ten years from now), or fired, or that perhaps one of the people they forwarded the email to would become disgruntled. And someone, with one or two simple strokes of the keyboard, forwards your email on to Vice or Lynn Packer. This is not unreasonable at all. In some ways, it would even be expected. It has happened before and will happen again.

At this point, this response I'm writing now, necessary as it is, would do little to redeem me. I would be done. Notwithstanding what your actual intent was or what you actually wrote, the damaging headline would read: "O.U.R. CHIEF LEGAL OFFICER, AND VETERAN US PROSECUTOR, WHISTLE BLOWS ON TIM BALLARD FOR POSSESSING CHILD PORN, VICTIMIZING CHILDREN ON UNDERCOVER OPERATIONS, AND ENTRAPING INNOCENT PEOPLE ABROAD TO PAD HIS STATS."

Ironically, the document you produced and disseminated with the desire to protect me and our operations has become the ONLY real identifiable liability in this entire case.

Did you happen to send this to anyone else? I will leave it to [REDACTED] for any necessary damage control. I would say let's delete everything, but then it looks like we are hiding something, which we aren't. We just live in a world of dishonest media. And they have the next 40 years to find the email and publish their story. Even with the very limited dissemination thus far, its concerning to me and I will always wonder if/when it gets exposed.

CONCLUSION:

Earlier this year, our videographer [REDACTED] asked me an interesting question. As he practically lives jumping from OUR op to OUR op, he was perhaps the only person qualified to ask the question. He asked me why it is that when I'm running the op, big results come quickly, almost magically, and come fast, and not so much with ops I'm not involved in.

I don't write this to be boastful, but I know the answer. And it's all in the narrative above. Its all the calculated, deliberate, hours and days and weeks of prepping every little detail.

With the exception of your sixth and final critique about better placement of cameras, there is nothing you suggested that I would take onboard for this Mexico op. Again, it's great and useful advice for other ops perhaps, that have nothing to do with the Ritz-ruse. If I had to do it all over again, I would have repeated the exact same tactics.

Why? Because tomorrow night we are supporting a raid on an obscure house in an obscure village in Ecuador. Children most certainly will be rescued. And dangerous pedophiles put away.

Had I changed any detail, as per your council, I can't say that this would be the case as I fly into Ecuador this afternoon, to say nothing of what might have happened in Mexico in regards to our safety. In fact, I don't think we would be in Ecuador at all, at least not right now, had I not led the Mexico op *exactly* as I did.

I KNOW that this was all well-intended, and I love that about you. You and I have kicked serious butt together for a long time, and I hope to continue to do so for many years to come. I love the fast action, Jersey-girl spice you deploy, but more so when you deploy against our common adversity, and not so much when deployed internally. That might need a little more "2/3" and less "9/10" (;

There is a strange thing about the "Tim Ballard" name that is not your fault and is something I have seen my best friends and most important allies have to grapple with. I'm something of a "lighting rod," meaning I attract too much attention, both negative and positive. I get credit for

good things I truly don't deserve and I get credit for bad things I also don't deserve. Its unjust, but it's my life right now.

Awesome friends like you see the injustice and will fight like hell to rectify it. You have done this masterfully in the short time you've been here, saving me from perhaps the worst personal disaster of my life. So THANK YOU a million times over.

But what happens too often is that in the desire to protect me, people make the mistake of trying to protect me from *myself*. While I will always welcome checks and balances and reviews, which the board is great at, I mostly need protection, not from myself, but from forces outside. When people—again, I'm talking about the good people-- start too passionately down the path of trying to protect me from myself, they look high and low for problems. And when they don't find them, they will often create them by over-interpreting things or making conclusions without foundation. It's like a highly trained, well intentioned, and experienced doctor who, in his passion to care for his patient, over-medicates and accidentally create problems.

Except for the damage control issue, I do not fully regret this exercise—this back and forth over what actual happened in Mexico. It allows you and others on this thread to understand how I operate. It also serves us well to finalize SOPs and inform us on how to conduct pre and post op analysis. For starters, I hope we can agree that the "investigating the op" and "post op reporting" must only begin after the RD sends reports to Davis. Then the hotwash—a verbal ONLY, not written, documented, and emailed, debrief/hotwash—Can begin. And never can we put conclusions into writing when we have only a fraction of the facts—especially when it comes to the "Lightening Rod's" ops (;

I so hope my directness has been taken in the spirit it was intended. I had no choice but to be direct, honest, and bold in my response. The suggestions (in some instances, the accusations) of sloppy work and perhaps egregious criminal activity left me no other choice. I had to defend myself and OUR. It was almost an existential issue.

Ok! Let's go kick butt together now. To borrow a line from [REDACTED], GREAT DAYS AHEAD!

PS: This will likely be the beginning of further discussions related to all of the above. I'm sure you have questions and comments, which I welcome. I also have some questions concerning a potential pattern I fear I'm seeing. I'm not clear on several facts, so I can't make any solid conclusions, but questions do remain.

Like, why was [REDACTED] telling people pre-op to Mexico/[REDACTED] case that "Ali had turned down this Mexico case." The implication being that this whole idea of Ballard's was a bad one from the get-go, and that you might have been warning [REDACTED] that you had rejected it for some good reason. Perhaps this did not even happen and [REDACTED] was confused. I never got to ask what he meant by that, but it had an undesirable, stressful effect on him and others. And why would anyone turn down such am AWESOME case, if they did?

Why did you text me, and include [REDACTED], suggesting I might be in violation of EU laws? Again, the suggestion certainly undermined me to Brad and Simon, who don't have experience in this field. It puts them on high alert (which I have to guess was your intent. Again- "watch out for Tim, lets save him from himself!") and causes them to question me for no reason. Creates needless drama. They have no reason to question me on breaking EU law for the same reason they should never have to question me on the [REDACTED] case. Like the [REDACTED] analysis, this also smacks of the same suggestive, over-the-top, conclusions, without facts, as there is no fathomable way, unless I was mentally challenged, for me to have violated EU law. Unless you have something on this I don't. Happy to hear. Why do I see clearly how there is no avenue, short of kidnapping [REDACTED] and dumping him in Holland, where laws could be violated by OUR, as it was clearly something between two countries, and not directly involving us at all? Don't you also see that? Or did you think I would kidnap him? Or did u think I was going to pretend to be a country, and try to assume deportation power?

Why would you tell [REDACTED] that my Budapest training was somehow projecting illegal activity? The suggestion was that I was planning to go into EU countries to do UC work, which would be illegal because EU doesn't allow UC. Did I hear that right from [REDACTED]? You suggested to me in SC that the Budapest training was a "horrible" idea. I didn't want to waste SC time and get into it. But we need to.

None of these reported projections are true. We have never and would never operate without full country permission, and, contrary to what you reportedly told [REDACTED], EU countries DO have ways for us to operate undercover and two EU countries HAVE invited us already to consider UC options. Not to mention Western Hemisphere countries who also have a Ukrainian victim problem, which our Budapest trained Ukrainian operators have already engaged. And we are having great success in this, including a Russian/Ukrainian trafficking case I referred to [REDACTED] [REDACTED], Mexico to Middle East trafficking route. Also, no Budapest training would have meant no Mex city/[REDACTED], no Ecuador rescue, etc. Yet you still say it was "horrible"? Why? I am willing to hear if there is something I'm not seeing.

Do you see how suggesting to the marketing team that I'm doing something illegal (here we go again!) with Budapest training completely undermines me? People I love, without field experience, having to question who is right. Tim or Ali? Frankly, this stuff ultimately hurts both of our credibility. Do you need us to help you find a way to trust that we are not mentally challenged people, but instead we are seasoned, experienced operators? Again, not being a smart ass. I'm just being honest. Someone with my experience in fighting HT would HAVE to be mentally challenged at this point to download or use child porn, use real kids in ops, kidnap a dutchman, pretend to have deportation powers into Holland, or go uninvited with Ukrainian speakers into a European country of our choice and illegally solicit sex of minors. This kind of stuff makes me believe that you must think this about me and maybe some of the RD's. And you seem to so freely share or suggest, and even document and disseminate, such horrible accusations/projections against me (false as they ALL are) with others in OUR. You would do

well to level up your analysis to the advanced game you are now playing in and stop feeling/acting like we are all fresh out of the academy.

As you know, I, of all people have definitely had more than my share of false accusations/insinuations and I'm not going to tolerate it from my own people. Though it's well-intended, it still has the same burdening effects on me and is not necessary. I don't know how to compute this. These suggestions/projections can't be sustained. The RDs and I will not have time to constantly be defending ourselves and trying to redeem ourselves of suggestions/projections that are so far afield from what we would ever do. Not questioning your intent or love for me, the team and cause. Just tactics and intensity levels.

Talk soon,

Tim

*****ORIGINAL EMAIL FROM ALI TO TIM AND BRAD*****

Brad/Tim – I'm sending this to just you two as Tim did not want my comments sent to the RDs, or Jason Davis right now. I know the RDs and [REDACTED] will be involved in the post-op debrief and hope they can benefit from the roundtable and comments from a former prosecutor's perspective at some point. I think it's important that we be critical and constructive. I know I learn a lot from this advice.

I reviewed the entire video from Tim's Op. My comments are meant to be constructive and helpful to avoid any legal issues or other liability from this or future ops for Tim, all UCs and the organization as a whole. And I am so glad Tim said at the OC office meeting these types of review/post op debriefs get tough where people need thick skin. Apologies if this email comes across as harsh. Just trying to be brief and to the point. I'm happy to discuss any or all of my comments and the justification for them from my 18+ years of experience defending hundreds of UC ops in trafficking, exploitation and other settings such as drugs and firearms.

Overall takeaways are below. Please note I have specific instances/examples supporting my conclusions with video timeframe so folks can go back and review. Bottom line is I hope this video does not get released to anyone outside of the org for the issues below.

6. There was entirely too much talking from Tim and the UCs. About 75-80% of the footage is us talking and interrupting the subject. I understand the excitement and nerves that goes with UC ops, but there were times where the subject was asked a question but unable to respond bc of interruption. It's okay to be silent and allow the subject to talk. In fact, that is preferred. For example, Subject

Exhibit N

December 6, 2021

Tim Ballard Blessing highlights.

Because of the nature of the Priesthood blessing given and the power felt during the administration of the blessing, as I rehearse what I can remember regarding it, I fear in trying to summarize it. It may assuredly take away from the flow and true purpose and meaning of the blessing. Some of the main points might certainly be excluded in my trying to recollect what was conveyed.

So, here are my impressions to the best of what I can presently remember. Praying that what is now difficult to recall may be conveyed back to me so I can share the process and content with you, the receiver.

The fact that you have been given many PH blessings by your father, brother, President Ballard, and others, was very evident and important. This fact was given to me and was emphasized significantly so I could see the importance of the combining of all these blessings into one. It was emphasized by the spirit for me to consider that this combining was taking place.

It was clear that all these individuals who had blessed you in the past, love, and care deeply for you. This blessing I was giving you, was somehow a confluence of all the blessings received. Like, at the time of giving the blessing, all the previous blessings you had received, were in a predestined pattern, flowing together into one great whole. Like they, in some fashion, built upon each other and were coming together at this crucial time in your life for some grand purpose. I could feel this happening by seeing a swirling, blending motion. Seeing in my mind's eye, all these administrations flowing together in a manner sent from above to incorporate them all into one for strength and solidarity purposes. This confluence made the whole stronger and were prepared in a way that made them easier for your spirit and body to digest, incorporate and integrate them all into one.

The legions of righteous spirits from the other side were evident and spoken of in the blessing. Many had gathered for the purpose of this blessing to cheer and grieve with you. They had and still are pleading with Father on behalf of you, Catherine and your family's spiritual and physical welfare. This time is a

crossroads for you, and they were there to pull and see you through this time of sorrow and testing. They are seeking deliverance, help and heavenly support in this crucial journey. The dark forces that are now conspiring against you and have been for a year or longer, were made evident and they were rebuked in the name of Jesus Christ, to return from whence they came and no longer have power to disturb your peace. You were instructed to no longer go to their place of dwelling and operation. A reason you are suffering so severely is that you do not live, think, or function as they do and that you can no longer waste your spiritual and physical time and energy trying to discover their hellish plans and schemes, but that you will soon rise above them so their plans will be totally frustrated and brought to naught. These forces (both earth-bound and evilly possessed) are united to bring you down to their level, darkness, and dysfunction. By the power of the Priesthood and in the Name of Jesus Christ, they were rebuked that the dark influences inside of you and outside of you were cast out and sent on their way. These evil minions have placed blockages, stumbling blocks, and diversions upon the path that the Lord has set forth for you. You were blessed that their ways will be frustrated. The stumbling blocks directed at you were removed and all their work will come to naught. The adversary is unsuccessfully trying to thwart the work that God has planned for you to accomplish. It feels to you like their power is great, however, you were promised that there are more with you than that stand against you. You will soon see this reality and it will drastically change how you view those who are against you. Those who stand with you will grow to a point of overwhelming the powers of darkness. The tide of destruction will turn to ruin upon the heads of those against you. It seemed there will be a companion given to assist you in these future works....someone that will strengthen the process.

As you continue to walk uprightly and manifest your belief in Father and His Son so shall your humility grow in strength and wisdom. Increase your willingness to be teachable and you will be taught great things. Allow your cup to be full and overflowing with the teachings of the Lord. He desires to teach you. You will then have the confidence necessary to stand in your relationship with God and seek His will and enjoy the peace of His teachings. Not man's or men but God's.

D & C 84:88

And whoso receiveth you, there I will be also, for I will go before your face, I will be on your right hand and on your left, and my Spirit shall be in your hearts, and mine angels round about you to bear you up.

You are a Gift given to Christ by the Father, which will be tested in the furnace of affliction to rise above the precepts of men and take your rightful place with those who follow Him at all costs, depths, and situations.

Do not look at what is presently happening as what you think it is, for it is what you are being prepared for shortly. How short ye know not, how long is not shown unto you.

Do not limit yourself by your present thinking and limited vision.

All these things will be revealed here a little and there a little.

For the Stones, Mountains, Valleys, know what will soon come to pass, however you do not now know the where, when, and wherefore. This "unknown" is what is trying your soul, patience, and well-being. It will all be revealed in time. Have patience my son.

Prepare for what is right around the corner, for it is not what you think. It is far different than you have ever considered. Trust in the timing of it all. Just go forward, willing to give up all you have created for a much greater work and greater assignment.

Open your heart and mind and keep it opened. Words were given you to gather support and those who will support you in what is ahead for you. For with these thousands and hundreds of thousands, and even millions which you will gather, the support needed will come to you to sustain you in preparation for your future roles and responsibilities.

You were blessed that your heart, mind, spirit, understanding, and vocabulary will be expanded to gather this support from all over the country and world to accomplish your mission and life's work. OUR is not that work, it was just your starting point. Because of the present division of your heart, mind, and spirit, they were blessed to again work together and no longer be divided.

You were protected against all opposition that they will have no power over you. The law enforcement, the courts, police and all who fight against you will be frustrated in their attempts. You will come forth triumphant and successful.

Tim, there was so much more given which was coming so fast that my mind can now not remember. Thank you for the opportunity to be voice. God continue to bless you as a son, husband, father, brother, friend, learner, and fellow traveler on the earth.

Sincerely, Thom Harrison

Exhibit O

To Tim through Thom, I am a 2nd witness! (Ken)

Saturday Aug 5, 2023, 6:15 pm

This came to me regarding Tim from the writings of 2 Corinthians 6.

As the Ministers of God, (to administer to His Children) you have been called by Apostolic decree.

It takes much patience in affliction, distresses, and in

Necessities, to accomplish such responsibilities and foreordinations as you have been called. In riotings and revelings you are caused to endure and suffer much.

You will be sustained by the pure ness of speech, by pure knowledge from God. Long suffering will be demanded, for where much is given much is of necessity required. Then the kindness of the Holy Ghost will comfort and sustain you. His unfeigned love will sustain you, not like the feigned love of friends, past supporters, and family who have abandoned you for filthy money, lies, conspiracy and all Manner of greediness, selfishness, and false accusations.

You will be sustained by the Word of truth, by the power of God unto righteousness. By His armor of righteousness, He will go before you on your right and your left, before you to dispel falsehoods and to be at your rearward to defend your back.

You have and will continue to receive honor and dishonor. Evil as well as good report. And be surrounded and assailed by deceivers as well as those who are yet true and will remain upright before you.

You have been prophetically proclaimed, to be known and unknown. Unknown by your enemies, and the enemies of truth and righteousness before the children of God! Known to those who will support you in times of trouble and grief. Your grief and shame have gone before the ears of the God of the Sabbath. He gathered and heard thy sorrows, despair, and pain. You have felt like dying, yet behold you live to fight another day for the salvation of his children and the covenants he has made with the Nation. The Covenant that will save the remnant of America.

You will be chastened yet not killed, beaten yet not bloodied.

In your sorrowful heart there is always rejoicing of what you have seen, what has been shown you, and what will continue to parade before your eyes and live in your heart.

You will live on to see the destruction of this nation. The abandonment of righteous ideals. The constitution hangs in the balance of unrighteous leadership and the selfish desires of conspiring men and women.

You will stand as a solitary witness of all you have warned the nations of. And you will see all those who offend His little ones fall into the traps they have set for men like you to stumble into.

Nations will rise up and call you blessed. Nations you know not of. And you will say in your heart. "Where have these nations come from? Where are these been born of, and from whence have they come to redeem this nation from Babylon the great."

These, with their banners so terrible, will fight with weapons never before imagined. They will not slumber or sleep before the battle is won.

It takes much patience in affliction, distresses, and in

Necessities, to accomplish such responsibilities and foreordinations as you have been called. In riotings and revelings you are caused to endure and suffer much.

You will be sustained by the pureness of speech, by pure knowledge from God. Long suffering will be demanded, for where much is given much is of necessity required. Then the kindness of the Holy Ghost will comfort and sustain you. His unfeigned love will sustain you, not like the feigned love of friends, past supporters, and family who have abandoned you for filthy money, lies, conspiracy and all manner of greediness, selfishness, and false accusations.

You will be sustained by the Word of truth, by the power of God unto righteousness. By His armor of righteousness, He will go before you on your right and your left, before you to dispel falsehoods and to be at your rearward to defend your back.

You have and will continue to receive honor and dishonor. Evil as well as good report. And be surrounded and assailed by deceivers as well as those who are yet true and will remain upright before you.

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Nations will rise up and call you blessed. Nations you know not of. And you will say in your heart. "Where have these nations come from? Where are these been born of, and from whence have they come to redeem this nation from Babylon the great."

These, with their banners so terrible, will fight with weapons never before imagined. They will not slumber or sleep before the battle is won. Their battle and yours being one. United is the righteous deliverance of the captive, valiant and true,

Cease all filthy conversations. Shrink not or faint.

You are held up by faith, prophecy, and foreordained to do this work.

Heal the breach in your marriage. Pray for those who speak evil against you. Love those that hate you. For many will fall into the pit they have dug for you.

I am with you always. Your Savior, Redeemer, and Friend.

Your battle is mine. Your ways are becoming My ways. Make now your heart My heart, your mind My mind.

These things are uttered in righteousness. And under the Sacred and Holy name of Jesus the Christ, amen.

To be distributed to Tim and to Todd and Ken and their dear spouses.

Exhibit P

SEPARATION AND MUTUAL RELEASE AGREEMENT

This Separation and Mutual Release Agreement (the "Agreement") is made and entered into June 22, 2023 (the "Effective Date") and confirms the following understandings and agreements among Operation Underground Railroad, Inc., a Utah nonprofit corporation, (the "Company") and Tim Ballard (hereinafter referred to as "you" or "your").

WHEREAS, you were employed by the Company in various roles and served on the Company's Board of Directors, including without limitation as Chief Executive Officer and Chairman of the Board (your "Employment");

WHEREAS, your Employment ended effective June 22, 2023 (the "Separation Date");

WHEREAS, you and the Company desire to fully and finally settle all issues, differences, and claims, whether potential or actual, between you and the Company, including, but not limited to, any claims that might arise out of your Employment or the termination of your Employment;

WHEREAS, in connection with the separation from your Employment, you and the Company now desire to enter into this Agreement, which sets forth a mutually satisfactory arrangement concerning, among other things, separation from your Employment and payment of a severance to which you would otherwise not be entitled.

NOW, THEREFORE, in consideration of the promises set forth herein, you and the Company agree as follows:

1. Employment Status and Effect of Separation.

(a) You acknowledge, and the Company hereby accepts, your resignation from your Employment, and from any position, paid or unpaid, you held or hold at the Company, effective as of the Separation Date (to the extent you have not already done so, you hereby resign from all Employment and positions with the Company). From and after the Separation Date, you agree not to represent yourself as being an employee, officer, director, agent or representative of the Company for any purpose. However, you may refer to yourself as the founder of the Company, though you understand and agree that this is not a title of the Company, that you cannot represent the Company or claim to be a representative of the Company, and you have no authority to bind the Company or act in its behalf, or right to compensation, employment, Company property or assets, or input into Company matters, and you hereby agree not to represent to anyone anything to the contrary. However, nothing in this Section 1(a) limits your ability to encourage third parties to be donors or volunteers for the Company, or for them to otherwise support the Company or its causes.

(b) The Separation Date shall be the termination date of your Employment for purposes of participation in and coverage under all benefit plans and programs sponsored by or

through the Company. In connection with your separation, you will be entitled to receive amounts payable to you under any retirement and fringe benefit plans maintained by the Company and in which you participate in accordance with the terms of each such plan and applicable law.

(c) You acknowledge and agree that all of the payment(s) and other benefits you have received as of the Effective Date are in full discharge and satisfaction of any and all liabilities and obligations of the Company or any of its direct or indirect parent(s), subsidiaries, and/or affiliates (collectively, the "Company Group") to you, monetarily or with respect to employee benefits or otherwise, including but not limited to any and all obligations arising under any alleged written or oral employment agreement, policy, plan or procedure of the Company or any other member of the Company Group and/or any alleged understanding or arrangement between you and the Company or any other member of the Company Group.

2. Consideration and the Mutual Release and Waiver of Claims.

(a) Provided you do not revoke this Agreement, the Company will pay you, as a severance payment, 18 times your monthly current salary (a total of \$618,000.00) (the "Consideration"), less applicable deductions and withholdings. Subject to the terms of this Agreement, the Consideration will be paid to you in two lump sums: the first within 7 business days after the expiration of the Revocation Period of \$206,000.00 (being for 6 months' salary) and the second being by January 15, 2024 of \$412,000.00 (being for 12 month's salary). You acknowledge that the Consideration represents monies that are not earned wages and to which you would not be entitled but for this Agreement. As also part of the Consideration, the Company will convey to you unencumbered title to the vehicle used by you for Company business, a Jeep Grand Cherokee, VIN No. 1C4RJFAG1KC638407, and the Company will also cooperate in transferring your mobile number to a personal account and you may retain your Company mobile phone after you have removed all Confidential Information and Company property as required by this Agreement.

(b) For and in consideration of the Consideration, and for other good and valuable consideration set forth herein, you, for and on behalf of yourself and your heirs, administrators, executors and assigns, effective as of the Effective Date, do fully and forever release, remise and discharge the Company and each member of the Company Group, and each of their direct and indirect parents, subsidiaries and affiliates, together with their respective former and current officers, directors, board members, board officers, partners, shareholders, members, managers, owners, employees, contractors, operatives, attorneys, investigators, and agents (collectively, the "Company Parties"), from any and all claims up to the Effective Date which you had, may have had, or now have against the Company Parties, for or by reason of any matter, cause or thing, including without limitation any claim arising out of or attributable to your Employment or the termination of your Employment with the Company or any member of the Company Group whether for tort, breach of express or implied employment contract, intentional infliction of emotional distress, wrongful termination, failure to hire, re-hire, or contract with as an independent contractor, unjust dismissal, defamation, libel or slander, or under any federal, state or local law dealing with discrimination based on age, race, sex, national origin, handicap, religion, disability or sexual orientation. This release of claims includes, but is not limited to, all claims arising under the Civil Rights Act of 1866, 42 U.S.C. § 1981 *et seq.*; the Civil Rights Act of 1964, 42 U.S.C. § 2000 *et seq.*; the Civil Rights Act of 1991; the Rehabilitation Act of 1973, 29 U.S.C. § 701 *et seq.*; the Americans with Disabilities Act, 42 U.S.C. § 1201 *et seq.*; the Family and Medical Leave Act, 29 U.S.C. § 2601 *et seq.*; the National Labor Relations Act, 29 U.S.C. § 151 *et seq.*; the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.*; the Vietnam Era Veterans' Readjustment Assistance Act of 1974, 38 U.S.C. § 4212 *et seq.*; the Employee

Retirement Income Security Act of 1974, 29 U.S.C. § 1001 *et seq.*, the Occupational Safety and Health Act, 29 U.S.C. § 651 *et seq.*; the Worker Adjustment and Retraining Notification Act, 29 U.S.C. § 2101 *et seq.*; the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.*; the Age Discrimination in Employment Act of 1967, 29 U.S.C. § 621 *et seq.*; the Equal Pay Act of 1963, 29 U.S.C. §206 *et seq.*; the Utah Antidiscrimination Act, Utah Code Ann. § 34A-5-1060 *et seq.*; the Utah Payment of Wages Act, Utah Code Ann. § 34-28-1 *et seq.*; the Utah Minimum Wage Act, Utah Code Ann. § 34-40-101 *et seq.*; the Utah Labor Rules; any other federal, state, or local human or civil rights, wage-hour, anti-discrimination, pension or labor law, rule and/or regulation, each as may be amended from time to time; contract or tort theories or claims arising from or related to any investigation of the Company, whether conducted internally by Company employees or by outside counsel or investigators; by all other federal, state and local laws, statutes, and ordinances; the common law; and any other purported restriction on an employer's right to terminate the employment of employees.

(c) As the full extent of their releases given hereunder, the Company and the Company Group fully release and discharge you from any duty or obligation to indemnify the Company and the Company Group, or hold them harmless, from any liability, actions, causes of actions, and claims of any nature, whether known or unknown, for or by reason of any matter, cause or thing brought by a third party against the Company and the Company Group, including without limitation any claim arising out of or attributable to your Employment or the termination of your Employment with the Company.

(d) As used in this Agreement, the term "claims" will include all claims, covenants, warranties, promises, undertakings, actions, suits, causes of action, obligations, debts, accounts, judgments, losses and liabilities, of whatsoever kind or nature, in law, equity or otherwise. The parties intend the release contained herein to be a general release of any and all claims to the fullest extent permitted by applicable law.

(e) You acknowledge and agree that as of the Effective Date you have no knowledge of any facts or circumstances that give rise to or could give rise to any claims under any of the laws listed in the preceding paragraph.

(f) Nothing contained in this Section 2 shall be a waiver of any claims that cannot be waived by law.

(g) Without limiting the scope of the release herein, the release also includes, without limitation, any claims or potential claims by you against any of the Company Group for wages, earned vacation, paid time off, bonuses, expenses, severance pay, and benefits earned through the date of the execution of this Agreement. Such amounts are not consideration for this Agreement.

(g) You understand that nothing contained in this Agreement, including, but not limited to, this Section 2, will be interpreted to prevent you from engaging in Protected Activity as set forth in Section 6. However, you agree that you are waiving the right to monetary damages or other individual legal or equitable relief awarded as a result of any such proceeding.

3. Right to Revoke and Rescind. You are hereby informed of your right to revoke your release of claims, insofar as it extends to potential claims under the Age Discrimination in Employment Act, by informing the Company of your intent to do so within 7 calendar days

following your signing of this Agreement (the "Revocation Period"). You understand that any such revocation or rescission must be made in writing and delivered by hand or by certified mail, return receipt requested, postmarked on or before the last day within the applicable revocation period to: Operation Underground Railroad, Inc. c/o Brent A. Andrews, 222 South Main, Suite 2200, Salt Lake City, UT 84101.

4. Opportunity for Review: Acceptance. You have until 21 days after the Effective Date (the "Review Period") to review and consider whether to sign this Agreement. Changes to this Agreement, whether material or immaterial, will not restart the 21-day consideration period. During this time, the Company advises you to consult with an attorney of your choice. To accept this Agreement, and the terms and conditions contained herein, prior to the expiration of the Review Period, you must execute and date this Agreement where indicated below and return the executed copy of the Agreement to Operation Underground Railroad, Inc. c/o Brent A. Andrews, 222 South Main, Suite 2200, Salt Lake City, UT 84101. In the event of your failure to execute and deliver this Agreement prior to the expiration of the Review Period, this Agreement will be null and void and of no effect, and neither the Company nor any member of the Company Group will have any obligations hereunder.

By execution of this Agreement, you expressly waive any and all rights or claims arising under the Age Discrimination in Employment Act of 1967 ("ADEA") and: (a) You acknowledge that this waiver of rights or claims arising under the ADEA is in writing, and is knowing, voluntary and understood by you; (b) You expressly understand that this waiver specifically refers to rights or claims arising under the ADEA; (c) You expressly understand that by execution of this Agreement, you do not waive any rights or claims under the ADEA that may arise after the date the waiver is executed; (d) You acknowledge that the waiver of rights or claims arising under the ADEA is in exchange for the Consideration, which is above and beyond that to which you are entitled; (e) You acknowledge that the Company is expressly advising you to consult with an attorney of your choosing prior to executing this Agreement; (f) You have been advised by the Company that you are entitled to up to twenty-one (21) days from receipt of this Agreement within which to consider this Agreement, which period is referred to as the Review Period; (g) You acknowledge that you have been advised by the Company that you are entitled to revoke (in the event you execute this Agreement) this waiver of rights or claims arising under the ADEA within seven (7) days after executing this Agreement and that said waiver will not be, and does not become, effective or enforceable until the seven (7) day Revocation Period has expired; (h) The parties agree that should you exercise your right to revoke the waiver, this entire Agreement, and its obligations, including, but not limited to the obligation to provide you with Consideration and any other benefits, are null, void and of no effect; (i) You acknowledge and agree that you will communicate your decision to accept or reject this Agreement to the Company as provided herein; and (j) Nothing in this Agreement shall be construed to prohibit you from engaging in Protected Activity as set forth in Section 6, though you have waived any right to monetary relief. Should you elect to revoke this Agreement within the Revocation Period, a written notice of revocation shall be delivered to Operation Underground Railroad, Inc. c/o Brent A. Andrews, 222 South Main, Suite 2200, Salt Lake City, UT 84101.

5. Other Agreements. Your duties and obligations pursuant to Sections 4, 5, 9 and 10 of the Employee Non-Disclosure Agreement (the "Employment Agreement") signed by you shall survive this Agreement and remain in full force and effect, and the Consideration herein constitutes consideration for your promises and obligations pursuant to Section 4, 5, 9 and 10 of the Employment Agreement to which the provisions of this Agreement shall be applicable.

6. Protected Activity Not Prohibited.

(a) You understand that nothing in this Agreement in any way limits or prohibits you from engaging in any Protected Activity. For purposes of this Agreement, "Protected Activity," means filing a charge, complaint, or report with, or otherwise communicating, cooperating, or participating in any investigation or proceeding that may be conducted by, any federal, state or local government agency or commission, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration, and the National Labor Relations Board ("Government Agencies"). In addition, Protected Activity includes any actions to: form, join, or assist a union; choose a representative to bargain with us on your behalf; discuss and act together with other employees for your mutual benefit and protection with respect to terms and conditions of employment; choose not to engage in any of these protected activities.

(b) You understand that in connection with such Protected Activity, you are permitted to disclose documents or other information as permitted by law, and without giving notice to, or receiving authorization from, the Company. Notwithstanding the foregoing, you agree to take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company Confidential Information under this Agreement or the Employment Agreements to any parties other than the Government Agencies.

(c) You further understand that "Protected Activity" does not include the disclosure of any Company attorney-client privileged communications or attorney work product. Any language in this Agreement or the Employment Agreements regarding your right to engage in Protected Activity that conflicts with, or is contrary to, this Section is superseded by this Agreement.

(d) Pursuant to the Defend Trade Secrets Act of 2016, you are notified that an individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (i) is made in confidence to a federal, state, or local government official (directly or indirectly) or to an attorney solely for the purpose of reporting or investigating a suspected violation of law, or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if (and only if) such filing is made under seal. In addition, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual's attorney and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

7. Confidential Information. You recognize and acknowledge that the Company's business and continued success depends upon the use and protection of confidential and proprietary business information, including, without limitation, the information and technology developed by or available through licenses to any member of the Company Group to which you had access during your Employment (all such information being "Confidential Information") – all of which you acknowledge as property of the Company. The phrase Confidential Information will be interpreted to include without limitation all information of any sort (whether merely remembered or embodied in a tangible or intangible form) that is (i) related to any member of the Company Group's or its subsidiaries' or affiliates' (including their predecessors) current or potential business, and (ii) not generally or publicly known. Confidential Information includes, without limitation, the information, knowledge, observations and data obtained by you while employed by the Company or any member of the Company Group and its subsidiaries (or any of their predecessors) or while performing services hereunder concerning the business or affairs of the Company or any member of the Company Group or any of its subsidiaries or affiliates; technical information concerning the Company's or any member of the Company Group's programs, products and services, including without limitation product or program data,

specifications, documentation, hardware configuration information, diagrams, flow charts, drawings, test results, formulas, algorithms, processes, inventions, research projects, engineering, and product development; software (including without limitation source code and object code), information concerning operations (ops), both foreign and domestic, developed by or for the Company; business information, including without limitation markets, cost information, profits, sales and fundraising information, accounting and unpublished financial information, business plans, markets, marketing and fundraising methods, donor and supporter lists (including, but not limited to, donors to the Company or any member of the Company Group on whom you called or with whom you became acquainted during the term of your Employment), and donor and supporter information (including without limitation donation history), purchasing techniques, supplier lists, supplier information (including without limitation pricing, preferences, discounts, and contracts) and fundraising and business strategies; information concerning investigations of the Company, whether conducted internally or through outside counsel, including without limitation the identity of those who participated; forwarding-looking or event-anticipating forecasts or predictions of events, happenings or circumstances to come as to the Company or its directors, officers or employees; information about employees, including their compensation, strengths, weaknesses and skills, recruiting strategies and goals and hiring criteria; and other information not generally known to the public, which has independent economic value to the owner or discloser of the information or which, if misused or disclosed, could reasonably be expected to adversely affect the business of the owner or discloser of the information. Provided, however, that the phrase does not include information that (a) was lawfully in your possession prior to disclosure of such information by the Company or any member of the Company Group; (b) was, or at any time becomes, available in the public domain other than through a violation of this Agreement; (c) is documented by you as having been developed by you outside the scope of your rendering services hereunder and independently; or (d) is furnished to you by a third party not under an obligation of confidentiality to the Company or any other member of the Company Group. Subject to Section 6 of this Agreement, you agree that you will not directly or indirectly use or divulge, or permit others to use or divulge, any Confidential Information for any reason, except as authorized in writing by the Company. You will be allowed to disclose such information of the Company or any member of the Company Group to the extent that such disclosure is:

- (w) duly approved in writing by the Company or by the member of the Company Group;
- (x) necessary for you to enforce your rights under this Agreement in connection with a legal proceeding;
- (y) required by law or by the order of a court or similar judicial or administrative body, provided that you notify the Company of such required disclosure promptly and cooperates with the Company in any lawful action to contest or limit the scope of such required disclosure; or
- (z) to report possible violations of federal law or regulation to any governmental agency or entity or making other disclosures that are protected under the whistleblower provisions of federal law or regulation. You do not need the prior authorization of the Company to make any such reports or disclosures and you are not required to notify the Company that you have made such reports or disclosures.

Your obligations under this Agreement are in addition to any obligations you have under state or federal law. You agree that you will not violate in any way the rights that the Company or any other member of the Company Group has with regard to trade secrets or proprietary or

Confidential Information. In addition to other damages or remedies the Company may have, in the event of your breach of this Section 7, the Company's obligation to continue paying the Consideration is terminated. Your obligations under this Section 7 are indefinite in term.

8. Non-Disparagement. The Company agrees to refrain from making any disparaging, negative or uncomplimentary statement or communication, whether public or private, regarding you. You agree to refrain from making any disparaging, negative or uncomplimentary statement or communication, whether public or private (including anonymous message boards and social media) regarding the Company or any of the Company Parties. You also agree to refrain from any tortious interference with the contracts, donations, support and relationships of the Company, including without limitation the Company's relationships with donors, volunteers, law enforcement and supporters. The Company's obligations under this Section are limited to statements or communications made by the Company's current officers and directors for as long as they serve as officers and directors. As used in this Section 8, "disparaging" means anything unflattering and/or negative, whether such communication is true or untrue.

Your duties hereunder expressly apply to, without limitation, (a) communication, whether oral or written, with members of the media and (b) publication of disparaging statements or posts on Facebook, LinkedIn, Twitter, Glassdoor, and other social media, regardless of whether the statements are accessible to the general public or limited to "friends," "followers," and the like. If you breach this Section 8, the parties agree that damage will result from such breaches, and should the Company fail to prove actual damages in an action to enforce this Section 8, the Company will be entitled to recover nominal damages, and attorneys' fees pursuant to Section 17 as the prevailing party. In addition to other damages or remedies the Company may have, in the event of your breach of this Section 8, the Company's obligation to continue paying the Consideration is terminated. All of the obligations in this Section 8 are subject to Section 6 governing Protected Activity and nothing in this Agreement shall be construed to prohibit you from filing a charge or complaint with the Equal Employment Opportunity Commission ("EEOC") or other local civil rights enforcement agency, or participating in any investigation conducted by the EEOC or other local civil rights enforcement agency, though you have waived any right to monetary relief, or otherwise complying with any obligations to provide truthful testimony or information as required by a court or by statute. This is a continuing obligation that shall survive this Agreement.

9. Knowing and Voluntary Waiver. You expressly acknowledge and agree that you (a) are able to read the language, and understand the meaning and effect, of this Agreement; (b) are specifically agreeing to the terms of the release contained in this Agreement because the Company has agreed to pay you the Consideration, which the Company has agreed to provide because of your agreement to accept it in full settlement of all possible claims you might have or ever had, and because of your execution, of this Agreement; (c) acknowledge that but for your execution of this Agreement, you would not be entitled to the Consideration; (d) were advised to consult with your attorney regarding the terms and effect of this Agreement; and (e) have signed this Agreement knowingly and voluntarily. You agree that no promise or inducement has been offered except as set forth in this Agreement, and that you are signing this Agreement without reliance upon any statement or representation by the Company or any representative or agent of the Company except as set forth in this Agreement. You agree and acknowledge that you have been provided with a reasonable and sufficient period of twenty-one (21) days within which to consider whether or not to accept this Agreement.

10. No Suit. Except as set forth in Section 6, you represent and warrant that you have not previously filed, and to the maximum extent permitted by law agree that you will not file, a complaint, charge or lawsuit against any of the Company Parties regarding any of the

claims released herein. If, notwithstanding this representation and warranty, you have filed or file such a complaint, charge or lawsuit, you agree that you shall cause such complaint, charge or lawsuit to be dismissed with prejudice and shall pay any and all costs required in obtaining dismissal of such complaint, charge or lawsuit, including without limitation reasonable attorneys' fees of the Company or any of the Company Group against whom you have filed such a complaint, charge or lawsuit.

11. Successors and Assigns. The provisions of this Agreement shall be binding on and inure to the benefit of your heirs, executors, administrators, legal personal representatives and assigns.

12. Severability. If any provision of this Agreement shall be held by any court of competent jurisdiction to be illegal, void or unenforceable, such provision shall be of no force or effect. The illegality or unenforceability of such provision, however, shall have no effect upon and shall not impair the enforceability of any other provision of this Agreement.

13. Return of Property. You shall return prior to the Effective Date, and not retain in any form or format, all Company Group documents, data, and other property in your possession or control. Company Group "documents, data, and other property" includes, without limitation, any computers, fax machines, access cards, keys, reports, manuals, records, product samples, inventory, correspondence and/or other documents or materials related to any member of the Company Group's business that you have compiled, generated or received while working for any member of the Company Group including all copies, samples, computer data, disks, or records of such material. After returning these documents, data, and other property, you will permanently delete from any electronic media in your possession, custody, or control (such as computers, cell phones, hand-held devices, back-up devices, zip drives, PDAs, etc.), or to which you have access (such as remote e-mail exchange servers, back-up servers, off-site storage, etc.), all documents or electronically stored images of any member of the Company Group, including writings, drawings, graphs, charts, sound recordings, images, and other data or data compilations stored in any medium from which such information can be obtained. For the purposes of this Section 13 Company documents shall not include publicly distributed marketing materials. Furthermore, you agree, on or before the Effective Date, to provide the Company with a list of any Company documents that you created or are otherwise aware to be password protected and the password(s) necessary to access such password protected documents. The Company's obligations under this Agreement are contingent upon you returning all Company Group documents, data, and other property as set forth above.

14. Non-Admission. Nothing contained in this Agreement will be deemed or construed as an admission of wrongdoing or liability on the part of you, the Company or any member of the Company Group.

15. Entire Agreement. This Agreement constitutes the entire understanding and agreement of the parties hereto regarding the subject matter hereof, including without limitation the termination of your Employment. This is an integrated agreement. Except as set forth in Section 5, this Agreement supersedes all prior negotiations, discussions, correspondence, communications, understandings and agreements between the parties relating to the subject matter of this Agreement.

16. Amendments; Waiver. This Agreement may not be altered or amended, and no

right hereunder may be waived, except by an instrument executed by each of the parties hereto. No waiver of any term, provision, or condition of this Agreement, in any one or more instances, shall be deemed to be or construed as a further or continuing waiver of any such term, provision or condition or as a waiver of any other term, provision or condition of this Agreement.

17. ARBITRATION.

YOU AND THE COMPANY AGREE THAT ANY AND ALL DISPUTES ARISING OUT OF THE TERMS OF THIS AGREEMENT, YOUR EMPLOYMENT WITH THE COMPANY OR THE TERMINATION THEREOF, OR ANY OF THE MATTERS HEREIN RELEASED, ARE SUBJECT TO A PRIVATE AND CONFIDENTIAL ARBITRATION IN SALT LAKE COUNTY, UTAH, ADMINISTERED BY THE AMERICAN ARBITRATION ASSOCIATION ("AAA") IN ACCORDANCE WITH ITS RULES THEN IN EFFECT FOR THE RESOLUTION OF EMPLOYMENT DISPUTES (THE "AAA RULES"). THE ARBITRATOR WILL ADMINISTER AND CONDUCT ANY ARBITRATION IN ACCORDANCE WITH UTAH LAW, INCLUDING THE FEDERAL RULES OF CIVIL PROCEDURE, AND THE ARBITRATOR WILL APPLY SUBSTANTIVE AND PROCEDURAL UTAH LAW TO ANY DISPUTE OR CLAIM, WITHOUT REFERENCE TO ANY CONFLICT-OF-LAW PROVISIONS OF ANY JURISDICTION. TO THE EXTENT THAT THE AAA RULES CONFLICT WITH UTAH LAW, UTAH LAW WILL TAKE PRECEDENCE. NOTWITHSTANDING ANY OTHER PROVISION IN THIS AGREEMENT, THE ARBITRATION WILL BE PRIVATE AND CONFIDENTIAL. THE ARBITRATOR WILL HAVE THE POWER TO DECIDE ANY MOTIONS BROUGHT BY ANY PARTY TO THE ARBITRATION, INCLUDING WITHOUT LIMITATION MOTIONS FOR SUMMARY JUDGMENT AND/OR ADJUDICATION AND MOTIONS TO DISMISS AND DEMURRERS, PRIOR TO ANY ARBITRATION HEARING. MOTIONS FOR SUMMARY JUDGMENT, PARTIAL SUMMARY JUDGMENT OR SUMMARY ADJUDICATION WILL BE DECIDED ACCORDING TO RULE 56 OF THE FEDERAL RULES OF CIVIL PROCEDURE AND APPLICABLE CASE LAW. NOTWITHSTANDING ANY AAA RULES OR ARBITRATION PROCEDURE, IT IS THE INTENT OF THE PARTIES THAT THE ARBITRATOR WILL CONSIDER AND RULE ON ANY SUCH MOTIONS AS IF IN A FEDERAL COURT OF THE UNITED STATES. THE PARTIES AGREE THAT THE ARBITRATOR WILL ISSUE AN ORDER PROVIDING, THAT ALL PLEADINGS, MOTIONS, DISCOVERY, RESPONSES, DEPOSITIONS, TESTIMONY, CASE MANAGEMENT ORDERS, DECISIONS, AND DOCUMENTS EXCHANGED OR FILED IN RELATION TO THE ARBITRATION BE KEPT STRICTLY CONFIDENTIAL. THE DECISION OF THE ARBITRATOR WILL BE FINAL, CONCLUSIVE, AND BINDING ON THE PARTIES TO THE ARBITRATION. THE PARTIES AGREE THAT ANY PARTY MAY SEEK A SEPARATE ORDER FROM A COURT OF COMPETENT JURISDICTION ENFORCING THE ARBITRATOR'S ORDER PROTECTING THE DISCLOSURE OF PLEADINGS, MOTIONS, DISCOVERY RESPONSES, DEPOSITIONS, TESTIMONY, CASE MANAGEMENT ORDERS, DECISIONS, AND DOCUMENTS EXCHANGED OR FILED IN THE ARBITRATION, PROVIDED SUCH MOTION AND RESPONSES THERETO ARE FILED UNDER SEAL. THE PARTIES AGREE THAT THE PREVAILING PARTY IN ANY ARBITRATION IS ENTITLED TO INJUNCTIVE RELIEF IN ANY COURT OF COMPETENT JURISDICTION TO ENFORCE THE ARBITRATION AWARD, AS LONG AS IT IS ENTERED UNDER SEAL IN A COURT OF COMPETENT JURISDICTION. THE PARTIES TO THE ARBITRATION WILL EACH PAY AN EQUAL SHARE OF THE COSTS AND EXPENSES OF SUCH ARBITRATION, AND EACH PARTY WILL SEPARATELY PAY FOR ITS RESPECTIVE COUNSEL FEES AND EXPENSES; PROVIDED, HOWEVER, THAT THE ARBITRATOR WILL AWARD ATTORNEYS' FEES AND COSTS TO THE PREVAILING PARTY, EXCEPT AS PROHIBITED BY LAW. THE PARTIES HEREBY AGREE TO WAIVE THEIR RIGHT TO HAVE ANY DISPUTE BETWEEN THEM RESOLVED IN A COURT OF LAW BY A JUDGE OR JURY. NOTWITHSTANDING THE FOREGOING, THIS SECTION WILL NOT PREVENT EITHER PARTY FROM SEEKING INJUNCTIVE RELIEF (OR ANY OTHER

PROVISIONAL REMEDY) FROM ANY COURT HAVING JURISDICTION OVER THE PARTIES AND THE SUBJECT MATTER OF THEIR DISPUTE RELATING TO THIS AGREEMENT. SHOULD ANY PART OF THE ARBITRATION AGREEMENT CONTAINED IN THIS SECTION CONFLICT WITH ANY OTHER ARBITRATION AGREEMENT BETWEEN THE PARTIES, THE PARTIES AGREE THAT THIS ARBITRATION AGREEMENT WILL GOVERN. NOTHING IN THIS PROVISION LIMITS OR PROHIBITS EMPLOYEES FROM ENGAGING IN "PROTECTED ACTIVITY" AS DEFINED IN THIS AGREEMENT OR AS ESTABLISHED UNDER STATE OR FEDERAL LAW.

NOTWITHSTANDING THE FOREGOING, THE FOLLOWING CLAIMS ARE NOT COVERED BY THIS ARBITRATION PROVISION: CLAIMS FOR WORKERS' COMPENSATION BENEFITS, CLAIMS FOR UNEMPLOYMENT COMPENSATION BENEFITS, CLAIMS UNDER THE NATIONAL LABOR RELATIONS ACT, CLAIMS BASED UPON THE COMPANY'S EMPLOYEE BENEFITS AND WELFARE PLANS THAT CONTAIN AN APPEAL PROCEDURE OR OTHER PROCEDURE FOR THE RESOLUTION OF DISPUTES UNDER THE PLAN, AND CLAIMS THE COMPANY FOR INJUNCTION OR OTHER EQUITABLE RELIEF, INCLUDING WITHOUT LIMITATION CLAIMS FOR DISPARAGEMENT OR THE UNAUTHORIZED DISCLOSURE OF CONFIDENTIAL INFORMATION.

18. Injunctive Relief. You acknowledge that it would be difficult to fully compensate the Company for damages resulting from any breach of the provisions of this Agreement. Accordingly, in the event of any actual or threatened breach of such provisions, the Company shall (in addition to any other remedies that it may have) be entitled to temporary and/or permanent injunctive relief to enforce such provisions, and such relief may be granted without the necessity of proving actual damages.

19. No Contact. Except as set forth in Section 6, you covenant and agree, whether directly or through another person, not to retaliate against any person who you know participated in a company investigation who you understand, believe or suspect made complaints against you or made allegations against you. Except as set forth in Section 6, you also covenant and agree, whether directly or through another person, not to contact any person who made a complaint to the Company that you violated the law or company policy.

20. Confidentiality. Except as set forth in Section 6, the parties intend that this Agreement be confidential. You warrant that you have not disclosed, and agree that you will not in the future disclose, the terms of this Agreement, or the terms of the consideration to be paid hereunder, to any person other than your attorney, spouse, tax advisor, or representatives of the Equal Employment Opportunity Commission ("EEOC") or a comparable state agency, all of whom shall be bound by the same prohibitions against disclosure as bind you, and you shall be responsible for advising these individuals of this confidentiality provision and obtaining their commitment to maintain such confidentiality. You shall not provide or allow to be provided to any person this Agreement, or any copies thereof, nor shall you now or in the future disclose in any way any information concerning any purported claims, charges, or causes of action against the Company or any of the Company Group to any person, with the sole exception of communications with your spouse, attorney, tax advisor, or representatives of the EEOC or a comparable state agency, unless otherwise ordered to do so by a court or agency of competent jurisdiction.

21. Governing Law and Jurisdiction. This Agreement is governed by the laws of the State of Utah, without regard for choice-of-law provisions. You consent to personal and exclusive jurisdiction and venue in the State of Utah.

22. Continuing Support and Litigation Assistance. In consideration of the Consideration set forth above, you hereby agree to participate, as requested, in any of the Company's legal matters that were ongoing as of the Termination Date or that may arise in the future and relate to matters alleged to have occurred during the time period during which you were employed by the Company (the "Participation"). The Company agrees to reimburse reasonable attorneys' fees incurred by you in order for you to comply with the Company's requests for your Participation. The Participation may include, without limitation, interviews with attorneys, depositions, acting as a witness, providing documents requested by the Company, and assisting in responding to discovery. You agree that, as requested by the Company's Board of Directors or the Company's Chief Executive Officer, you and your counsel will travel within the United States in connection with the Participation. The Company shall provide reasonable notice for any such travel. The Company will reimburse you and your counsel for all reasonable expenses incurred in the performing your duties under this Section 22, provided that you have obtained prior approval from the Company's Chief Executive Officer or his or her designee for such expenses. You further agree that if subpoenaed, requested or noticed to testify, produce documents, provide an affidavit or declaration, or otherwise answer questions relating in any way to a legal claim against the Company, you will immediately notify Company of the date, time, and location of the requested testimony, meeting, affidavit, document production or legal proceeding involving a legal claim against the Company, as well as the name and phone number of the party and/or attorney seeking the information before complying with any such subpoena, request, or. Such notice shall be provided via email to Brent A. Andrews at baandrewsen@hullandhart.com.

You further hereby agree that, as requested by the Company, you will continue to cooperate with the Company so as to support and facilitate its existing relationships with donors, volunteers and others who help to advance the Company's cause. You also agree that you will execute and deliver any instruments and other documents and to do all other things reasonably requested by the Company for an orderly transition to new leadership. You agree to provide truthful information to the Company at all times. You also agree to cooperate generally with the Company and do everything reasonably necessary to facilitate the transition of your responsibilities to new leadership.

23. Statement. The Parties agree to cooperate and coordinate in connection with any announcement by the Parties as to your resignation from your positions at the Company.

[Signature Page Follows]

IN WITNESS WHEREOF, the parties have executed this Agreement as of the Effective Date.

TIMOTHY B. BALLARD

OPERATION UNDERGROUND

	RAILROAD, INC.
Timothy B. Ballard	By: _____
	Its: _____
Date	Date: _____

THIS AGREEMENT IS NOT TO BE EXECUTED UNTIL AFTER THE SEPARATION OF EMPLOYMENT HAS OCCURRED

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Exhibit Q

quinn emanuel PERU LLP

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | tel. (212) 904-7000 fax (212) 649-7100

PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT
ATTORNEY-CLIENT COMMUNICATION
DRAFT

June 14, 2023

CONFIDENTIAL SETTLEMENT COMMUNICATION
VIA E-MAIL

Brent A. Andrewsen
Gregory M. Saylin
Holland & Hart LLP
222 South Main Street, Suite 2200
Salt Lake City, UT 84101

Re: Final Letter to Counsel from Board (June 8, 2023)

Dear Messrs. Andrewsen and Saylin:

On behalf of Tim Ballard, the founder, Chairman of the Board of Directors, and Chief Executive Officer of Operation Underground Railroad (O.U.R.), we write in response to the letter dated June 8, 2019 ("Letter") from the Board of Directors of O.U.R. requesting Mr. Ballard's resignation from O.U.R. within 72 hours. The Letter was received on June 9, 2023 and as we immediately advised via email in response, we would need time to respond. We subsequently spoke via video conference on June 12, 2023 and respond herein to the Letter.

As referenced in our June 12 discussion, we, on behalf of Mr. Ballard, firmly object to the findings and disagree with the conclusions drawn based on the facts and circumstances. As you are well-aware, Mr. Ballard cooperated with the investigation and the requirements of his administrative leave on which he was abruptly placed over a month ago. Indeed, Mr. Ballard participated in a lengthy interview. He was forthright, open, and explained critical background and context in significant detail. Mr. Ballard also provided multiple text messages relevant to the investigation.

The conclusions set forth in the Letter, as informed by our subsequent discussion raise

serious concerns, including relating to the scope of the investigation which should have been a discreet investigation into a single complaint. Nevertheless, we write in the spirit of moving forward productively and in a manner that serves the best interests of both O.U.R. and Mr. Ballard. To that end, Mr. Ballard is willing to resign, subject to O.U.R.'s agreement on the following terms:

- (1) Full severance of his current salary for 2 years;
- (2) Mr. Ballard's complete discretion as to the content of his resignation statement to O.U.R., as well as any other statements by him (including public statements) relating to his resignation;
- (3) Mr. Ballard's editorial sign off as to any statements (including public statements) by O.U.R. relating to his resignation, or any statements (including public statements) by O.U.R. regarding the investigation;
- (4) The entering into of a consulting agreement with Mr. Ballard for a 5 year guaranteed term whereby Mr. Ballard (a) is paid his yearly salary [via grant to Liberty & Light]; and (b) provides consulting services, including relating to marketing and development to O.U.R.;
- (5) Full insurance benefits for the term of the consulting agreement referenced in (4) above;
- (6) The entering into of non-disclosure, non-disparagement and confidentiality agreements relating to the investigation and the terms of Mr. Ballard's resignation by all relevant parties;
- (7) Mr. Ballard's approval of O.U.R.'s next CEO;
- (8) Access to all information the Board considered in reaching its findings, including all information favorable to Mr. Ballard, and an opportunity for Mr. Ballard to respond to such information and findings;
- (9) Opportunity for Mr. Ballard to address O.U.R.'s Board in parallel with his resignation; and
- (10) O.U.R.'s past and continued payment of Mr. Ballard's legal fees.

* * *

We look forward to a productive discussion regarding the foregoing and to coming to a mutually acceptable resolution expeditiously. For the avoidance of doubt, all rights remain reserved.

Respectfully,

Alex Spiro
Kristin Tahler

cc: Alessandra Serano