

Timothy Baldwin
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Attorney for Defendant

**IN THE DISTRICT COURT OF THE ELEVENTH JUDICIAL DISTRICT
OF THE STATE OF MONTANA AND FOR THE COUNTY OF FLATHEAD**

STATE OF MONTANA, Plaintiff, vs. Cory Robert Franklin, Defendant(s).	Case No: DC-13-465 & DC-14-128 AFFIDAVIT OF KRISTINA FRANKLIN IN SUPPORT OF MOTION TO COMPEL, FOR SANCTIONS AND TO RECUSE DEPUTY COUNTY ATTORNEY, KENNETH R. PARK
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I, Kristina Franklin, hereby swear or affirm that the following facts are accurate and true to the best of my personal knowledge.

My husband is the Defendant Cory Robert Franklin in cases DC-13-465 and DC-14-128, Flathead County, Montana. After my husband was arrested in DC-14-128, Agent McKeag Johns contacted me about my serving as a confidential informant. Agent McKeag told me that he would help me and my husband in his criminal cases, depending on what information I provided and what results it produced. I agreed to help Agent McKeag in reliance on his promise.

As a result of my help, State law enforcement agents arrested people regarding a significant drug distribution, and the federal government is now prosecuting that case. Agent McKeag told me that he would talk to Deputy County Attorney, Kenneth R. Park about helping me and my husband in DC-14-128. Agent McKeag and other law enforcement officers, and I believe Mr. Park, arranged a meeting where they interviewed my husband and co-defendant Jaimz Doran in DC-14-128 to see if their stories matched and what involvement my husband had in that case. The interviews were conducted separately, and law enforcement found that my husband and Mr. Doran's stories matched about my husband not having any involvement in any drug possession. Agent McKeag told me that he turned

this information over to Mr. Park, and I believe my husband's attorney, Tim Baldwin, has been provided this in discovery.

On or about April 24, 2014, I called Kenneth R. Park, Deputy County Attorney, Flathead County, Montana, at his office to discuss with him whether the State still intended to dismiss the charges in DC-14-128, as Agent McKeag promised would happen if I cooperated with law enforcement, given that Mr. Doran testified that my husband had no involvement in that case. Mr. Park told me that since Tim Baldwin is my husband's new attorney he would throw my husband to the federal government for criminal prosecution; that Mr. Park was not willing to work with Tim Baldwin regarding my husband's case; that it would be in my husband's best interest to get a new attorney because if he had a different attorney, Mr. Park would be willing to work with him or her; that he had a case where Tim Baldwin was the opposing attorney and that Tim Baldwin attacked Mr. Park's personal integrity for nine months for no reason; that he has no respect for Tim Baldwin as an attorney; that he cannot stand Tim Baldwin; and that Tim Baldwin has already sent him emails that Mr. Park refuses to respond to. Mr. Park then stated that my husband seems like a good guy but just has a drug problem, and that is why we need to get my husband a new attorney so Mr. Park can help my husband.

SO SAYETH THIS AFFIANT this 28th day of May, 2014.

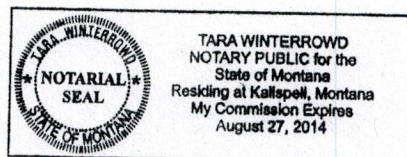
Kristina Franklin
Kristina Franklin

STATE OF MONTANA)
 :SS
County of Flathead)

On this 28th day of May, 2014, before me, a Notary Public for the State of Montana, personally appeared Kristina Franklin, personally known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same.

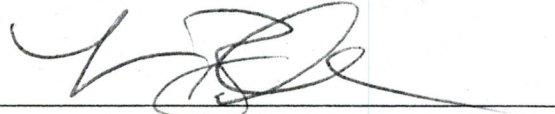
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Notarial Seal the day and year first above written.

Tara Winterrowd
Notary Public for the State of MT
Printed Name: Tara Winterrowd
Residing at Kalispell
My Commission Expires: 8-27-2014



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand deliver to the Flathead County Attorney, 920 S. Main St., 2nd Fl, Kalispell, MT 59901, on May 28th, 2014.

A handwritten signature in black ink, appearing to read 'Timothy Baldwin', is written over a horizontal line.

Timothy Baldwin