

1 criminal charges?

2 A. It's -- it is possible that it can happen. The
3 rules provide that if our office receives I think
4 the word is "credible information" of an
5 attorney's possible criminal conduct, that we may
6 refer it to an appropriate criminal law
7 enforcement authority.

8 Q. All right. And you would agree, would you not,
9 that the known -- the elicitation of perjured
10 testimony would be a crime by a criminal defense
11 attorney?

12 A. I think that's true, yes.

13 Q. And so you would agree, would you not, that if
14 what I alleged in regards to Paul Humphrey and
15 Robert Krenz was substantiated, it could -- it
16 could have possibly led to Paul Humphrey being
17 criminally charged?

18 A. It is possible, yes.

19 Q. Okay. And would you agree, would you not, that if
20 Paul Humphrey was criminally charged, by
21 definition Robert Krenz could also possibly be
22 criminally charged?

23 A. No. Those are separate questions. I mean, in the
24 relationship of these facts it is possible, but
25 it's not necessary. Depends on an analysis of who

1 knew what when and it's -- it's not a conclusion
2 you can draw just simply because they were both
3 involved in the case.

4 Q. All right. And you would --

5 A. It depends on who knows what the true facts are
6 and who's reporting it. It may depend upon what
7 information they had shared between each other,
8 all of that. So, I mean, we're talking
9 hypothetically so I have to answer hypothetically.

10 Q. All right. But if it was substantiated that
11 Robert -- or that Paul Humphrey had knowingly
12 elicited false testimony from Robert Krenz --

13 A. Uh-huh.

14 Q. -- you would agree, would you not, that then
15 Robert Krenz would by definition be a possible
16 witness in the prosecution of Paul Humphrey?

17 A. Yes. It is possible, uh-huh.

18 Q. And you would agree then, would you not, by
19 definition whoever was charging Paul Humphrey
20 could then expand the prosecution to charge Robert
21 Krenz?

22 A. It is possible, yes.

23 Q. Okay. And so -- and you would agree, would you
24 not, that if Attorney Tibbetts set things in
25 motion that led to Robert Krenz being charged