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IN THE HONORABLE SENATE OF THE STATE OF ILLINOIS  
FOR THE NINETY-SIXTH GENERAL ASSEMBLY  
SITTING AS AN IMPEACHMENT TRIBUNAL

2009 JUN 21 PM 4:36  
SECRETARY  
OF THE  
SENATE

In re )  
Impeachment of )  
Governor ROD R. BLAGOJEVICH )

**HOUSE PROSECUTOR'S  
MOTION FOR ADDITIONAL DOCUMENTS OR MATERIALS**

House Prosecutor David W. Ellis, pursuant to Senate Impeachment Rule 15(b)(2), moves for the admission of additional documents into evidence and, in support thereof, states as follows:

1. The House Prosecutor seeks to admit a document similar to a document included in Exhibit 6 on pages 50-51, namely the timeline detailing the events that transpired before and after the Governor launched the I-SaveRx Program, at the Impeachment Trial.

2. A copy of this document is attached to this Motion.

3. This document will be introduced during the live testimony of William Holland as a demonstrative exhibit.

4. This document is relevant and material because it demonstrates the Governor's action with regard to, and responsibility for, the I-SaveRx Program as provided in paragraph 11 of the Article of Impeachment.

5. This document is not redundant because it does not exist in the proposed form and will be used for demonstrative purposes.

6. Moreover, although some evidence related to this issue is contained in the House impeachment record, under Senate Impeachment Rule 15(g), the evidence is not deemed redundant simply because it relates to material already in the record.

WHEREFORE, the House Prosecutor respectfully moves for the admission of the timeline detailing the events that transpired before and after the Governor launched the I-SaveRx Program at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,  
HOUSE PROSECUTOR**



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David W. Ellis  
House Prosecutor  
Illinois House of Representatives  
412 State House  
Springfield, IL 62706

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Exhibit 3-1  
I-SAVERX PROGRAM TIMELINE  
(continued)

SECRETARY OF THE SENATE

10/4/03 CanaRx contract executed by Gov.'s Office.

2/05 FDA seizes medications in New York filled under I-SaveRx program.

2/17/05 Pharmacy inspections in New Zealand and Australia.

10/28/04 MO and IL execute Memorandum of Understanding for MO to participate in I-SaveRx.

4/17/05 VT and IL execute Memorandum of Understanding for VT to participate in I-SaveRx.

11/18/04 Governor sends letter to IL physicians explaining I-Save Rx.

11/30/04 KS and IL execute Memorandum of Understanding for KS to participate in I-SaveRx.

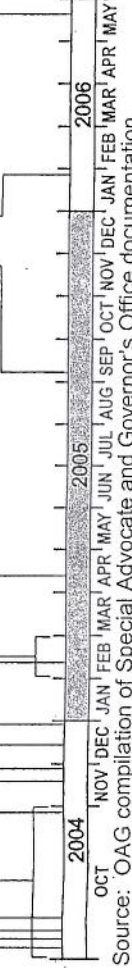
9/20/05 CanaRx requests opportunity to present to the Governor the combination of two other government clients into I-SaveRx.

12/15/04 Effective date of interagency agreements to provide program "outreach" marketing services.

12/30/04 Spec. Advocate notifies CanaRx they are in breach of contract with respect to maintenance of insurance.

1/25/06 CanaRx informs Spec. Advocate that only 3 pharmacies were filling I-SaveRx orders (2 of the 3 were not listed on "Approved" pharmacy list provided by Governor's Office).

5/18/06 State announces replacement for CanaRx effective July 1, 2006.



Source: OAG compilation of Special Advocate and Governor's Office documentation.

Exhibit 3-1  
I-SAVERX PROGRAM TIMELINE

10/04 State personnel inspect pharmacies in Canada and Europe.

10/14/04 WI and IL execute Memorandum of Understanding for WI to participate in I-SaveRx Program.

10/14/04 Gov.'s legal counsel approves exemption from Procurement Code to contract with D.C. law firm to review IL's drug program and represent the State with any enforcement action.

10/14/04 Legal Firm contract signed by firm.

10/14/04 CanaRx contract signed by CanaRx.

5/24/03 Exec. branch staff develop memo on whether to issue cease & desist order against Canadian pharmacies exporting drugs to IL primarily over the internet.

10/27/03 Spec. Advocate releases Canadian report concluding employees and retirees can safely purchase drugs from Canada.

1/16/04 FDA responds to IL report and states, "We are also concerned that your plan, if implemented, would be in direct conflict with Federal and state law."

1/20/04 Governor directs the Spec. Advocate to determine whether IL residents could safely and cost-effectively obtain drugs from Europe.

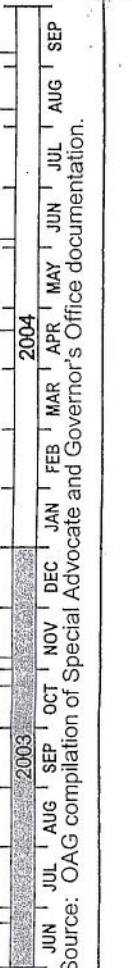
5/04 State personnel inspect pharmacies in Europe.

5/04 State personnel inspect pharmacies in Canada.

5/20/04 FDA reports that waiver to allow pilot program for importation of drugs could not be granted under current law.

8/04 State personnel inspect pharmacies in Canada and Europe.

9/27/04 CanaRx identified as Sole Source on IL Procurement Bulletin.



Source: OAG compilation of Special Advocate and Governor's Office documentation.