

RECEIVED

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

JAN 21 PM 4:35
SECRETARY
OF THE
SENATE

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

**HOUSE PROSECUTOR'S
MOTION FOR ADDITIONAL WITNESS TESTIMONY**

House Prosecutor David W. Ellis, pursuant to Senate Impeachment Rule 15(b)(1), moves for the admission of additional witness testimony and, in support thereof, states as follows:

1. The House Prosecutor seeks to admit the live testimony of Representative Chapin Rose at the Impeachment Trial.

2. Representative Rose's address and phone number are: 1113 Lincoln Avenue, Charleston, Illinois 61920, (217) 348-7673.

3. Representative Rose will testify as to the Governor's abuse of power on the following subject matters: (i) the plea agreement between the U.S. Attorney for the Northern District of Illinois and Ali Ata in *United States v. Ali Ata*; (ii) the testimony of Ali Ata in *United States v. Antoin Rezko*; (iii) the plea agreement between the U.S. Attorney for the Northern District of Illinois and Joseph Cari in *United States v. Joseph Cari*; (iv) the testimony of Joseph Cari in *United States v. Antoin Rezko*; and (v) the Governor's improper control and influence over the Health Facilities Planning Board. Among other things, Representative Rose will summarize material contained in the House impeachment record and will testify to the injury to the State of Illinois from the Governor's abuse of power described herein.

4. This testimony is relevant and material because it addresses the Governor's plot to trade official acts in exchange for campaign contributions as provided in paragraphs 6, 7 and 8 of the Article of Impeachment.

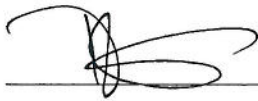
5. This testimony is not redundant. Representative Rose is the only live witness who will testify on these subjects.

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 testimony of Representative Chapin Rose at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**

A handwritten signature in black ink, appearing to be "D. W. Ellis", written over a horizontal line.

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