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IN THE HONORABLE SENATE OF THE STATE OF ILLINOIS
FOR THE NINETY-SIXTH GENERAL ASSEMBLY 4:34
SITTING AS AN IMPEACHMENT TRIBUNAL

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 Gary Hannig at the Impeachment Trial.
2. Representative Hannig's address and phone number are: 218 S. Macoupin St., P.O. Box 8, Gillespie, Illinois, 62033, (217) 839-2859.
3. Representative Hannig will testify on the following subject matter: The Governor's plot to condition the awarding of State financial assistance to the Tribune Company on the firing of members of the Chicago Tribune editorial board. Among other things, Representative Hannig 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 condition the awarding of State financial assistance to the Tribune Company as provided in paragraph 2 of the Article of Impeachment.
5. This testimony is not redundant. Representative Hannig is the only live witness who will testify on this subject.

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 Gary Hannig at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**

A handwritten signature in black ink, appearing to read 'David W. Ellis', is written above a horizontal line.

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