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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 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 Lou Lang at the Impeachment Trial.
2. Representative Lang's address and phone number are: 109 Capitol Building, Springfield, Illinois 62706, (217) 782-1252.
3. Representative Lang will testify to the following subject matters: (i) Governor Blagojevich's defiance of the Joint Committee on Administrative Rules, in violation of State law, and (ii) his refusal to provide the general public and lawmakers with information on the expansion of the FamilyCare program. Among other things, Representative Lang 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. Representative Lang is well-qualified to testify to these matters. Representative Lang has been a member of the General Assembly for 20 years. Representative Lang currently serves on the House Special Investigative Committee, which studied the expansion of the FamilyCare program, and the Joint Committee on Administrative Rules, which reviewed the rules concerning the expansion of the FamilyCare program.

5. This testimony is relevant and material because it addresses the Governor's utter disregard for the doctrine of separation of powers and refusal to recognize the authority of the Joint Committee on Administrative Rules as provided in paragraph 9 of the Article of Impeachment.

6. This testimony is not redundant. Representative Lang is the only live witness who will testify to the Governor's strategy, motives, directives, and public statements made in connection with these matters.

7. 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 Lou Lang at the Impeachment Trial.

Respectfully submitted,

DAVID W. ELLIS,
HOUSE PROSECUTOR



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