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

JUN 21 11 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 Susana Mendoza at the Impeachment Trial.

2. Representative Mendoza's address and phone number are: 2500 South Millard, Chicago, Illinois, 60623, (773) 277-7711.

3. Representative Mendoza will testify on the following subject matter: The Governor's plot to trade official acts for campaign contributions, namely the signing of the horse racing impact fee legislation; the awarding of a state tollway project and possible expansion of that project; and the release of pediatric care reimbursements to Illinois doctors and hospitals. Among other things, Representative Mendoza 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.

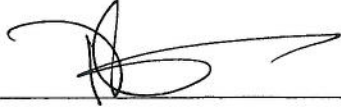
4. This testimony is relevant and material because it addresses the Governor's plot to trade official acts for campaign contributions, as provided in paragraphs 3, 4, and 5 of the Article of Impeachment.

5. This testimony is not redundant. Representative Mendoza is the only live witness who will testify on this subject. 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 Susana Mendoza at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**



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