

RECEIVED

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

2007 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 Vicki Thomas at the Impeachment Trial.
2. Ms. Thomas's address and phone number are: 700 Stratton Building, Springfield, Illinois 62706, (217) 785-2254.
3. Ms. Thomas will testify to the following subject matter: the Joint Committee on Administrative Rules' objection to the Department of Healthcare and Family Services' FamilyCare Rules. Among other things, Ms. Thomas will summarize material contained in the House impeachment record.
4. Ms. Thomas is well-qualified to testify to this matter. Ms. Thomas is the Executive Director of the Joint Committee on Administrative Rules, an agency which oversees the adoption of all administrative rules in the State, and has served in that capacity for 18 years.
5. This testimony is relevant and material because it addresses the Governor's refusal to recognize the authority of the Joint Committee on Administrative Rules to suspend or prohibit rules and his violation of the Illinois Administrative Procedure Act by unilaterally expanding a state program, as provided in paragraph 9 of the Article of Impeachment.

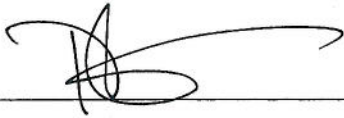
6. This testimony is not redundant. Ms. Thomas is the only live witness who will testify to the Joint Committee on Administrative Rules' history, powers, duties, operations, communications, and dealings.

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 Vicki Thomas 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