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FOR THE NINETY-SIXTH GENERAL ASSEMBLY
SITTING AS AN IMPEACHMENT TRIBUNAL

2009 JAN 21 PM 4:36

SECRETARY
OF THE
SENATE

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

**HOUSE PROSECUTOR'S
MOTION FOR ADDITIONAL DOCUMENTS OR MATERIALS**

House Prosecutor David W. Ellis, pursuant to Senate Impeachment Rule 15(b)(2), moves for the admission of additional documents into evidence and, in support thereof, states as follows:

1. The House Prosecutor seeks to admit an excerpt of Exhibit 7, pages 41-42, at the Impeachment Trial.
2. A copy of this document is attached to this Motion.
3. This document will be introduced during the live testimony of Representative Chapin Rose as a demonstrative exhibit.
4. This document is relevant and material because it demonstrates the Governor's plot to trade official acts in exchange for campaign contributions as provided in paragraph 6 of the Article of Impeachment.
5. This document is not redundant because it does not exist in the proposed form and will be used for demonstrative purposes.
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 an excerpt of Committee Exhibit 7, pages 41-42, into evidence 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

ALI ATA'S TESTIMONY

Q: Did Mr. Blagojevich say anything to you about you working in his administration?

...

A: Mr. Rezko stated that I had expressed interest in serving in the administration. Mr. Blagojevich, again, stated that I had been a supporter and friend and asked Mr. Rezko if I had identified business – or job opportunities; and Mr. Rezko said yes.

Source: Testimony of Ali Ata in United States v. Antoin Rezko (Ex. 7 at 14-16)

A. Mr. Blagojevich thanked me for my continuing support. He indicated that he was aware of myself making another contribution, indicated -- and said that I -- he understood that I was considering a position with the new administration and said that it better be a job where I can make some money.

Q. Did you say anything in response?

A. I did not.

Q. After you had that conversation with Mr. -- or Governor Blagojevich, did you say anything to anybody about what he had said to you?

...

A. I mentioned to Mr. Rezko that the governor stated that it better be a job where I can make some money, and that I was surprised he would make such a statement; and Mr. Rezko said he wasn't surprised.

Source: Testimony of Ali Ata in United States v. Antoin Rezko (Ex. 7 at 41-42)