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

JAN 21 PM 4:42

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 a document detailing the purpose and function of an organization known as "Change to Win" 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 Jim Durkin as an exhibit.
4. This document is relevant and material because it demonstrates the Governor's plot to obtain a personal benefit in exchange for his appointment to fill the vacant seat in the United States Senate, as provided in paragraph 1 of the Article of Impeachment.
5. This document is not redundant because it does not exist in the record.
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 a document detailing the purpose and function of an organization known as "Change to Win" at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**

A handwritten signature in black ink, consisting of a stylized 'D' and 'E' with a horizontal line extending to the right, positioned above a solid horizontal line.

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

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Who We Are

Leadership Council

Anna Burger
Chair
Change to Win
International Secretary-Treasurer
Service Employees
International Union (SEIU)

Edgar Romney
Secretary-Treasurer
Change to Win
Executive Vice President
UNITE HERE

Joseph Hansen
International President
United Food and
Commercial Workers
International Union (UFCW)

James P. Hoffa
General President
International Brotherhood
of Teamsters (IBT)

Geralyn Luty
International Vice President
United Food and
Commercial Workers
International Union (UFCW)

Douglas J. McCarron
General President
United Brotherhood
of Carpenters
and Joiners
of America (UBC)

Terence M. O'Sullivan
General President
Laborers' International Union
of North America (LIUNA)

Bruce Raynor
General President
UNITE HERE

Arturo S. Rodriguez
President
United Farm Workers
of America (UFW)

Andrew L. Stern
International President
Service Employees
International Union (SEIU)

Change to Win was founded in September 2005 by seven unions and six million workers devoted to building a movement of working people with the power to provide workers a paycheck that supports a family, universal, affordable health care, a secure retirement and dignity on the job.

Change to Win's primary focus is to unite the 50 million workers in Change to Win affiliate industries whose jobs cannot be outsourced and who are vital to the global economy — but who are not given a chance to reach the middle class. We are uniting workers in industries such as hospitality, construction, retail, food processing, healthcare, trucking and transportation among others.

The seven affiliated unions are: *International Brotherhood of Teamsters, Laborers' International Union of North America, Service Employees International Union, UNITE HERE, United Brotherhood of Carpenters and Joiners of America, United Farm Workers of America, and United Food and Commercial Workers International Union.*

Restoring The American Dream

The six million members of the Change to Win labor federation have united to renew hope, opportunity and prosperity for American workers and their families. By uniting millions more workers in a strong and innovative union movement, we can ensure that work is valued and rewarded in America and create hope for a better future for our children and grandchildren. We are building a movement with the power to provide workers:

Universal Health Care

Universal health care is the central jobs and economic security issue of our era. Winning access to affordable, quality care for everyone in America will have the biggest positive impact on the economic security of the American people of any campaign in generations and places the labor movement at the forefront of progressive change. Change to Win unions have taken the lead in a campaign to unify the broadest number of working people, capture the imagination of the nation and build a broad coalition to win affordable, quality health care for all.

Retirement Security

Change to Win is devoted to building a nationwide campaign to win real retirement security for American workers. We are simultaneously focused on defending defined benefit pension plans that guarantee retirees a monthly pension as we also develop new ideas and strategies that will enable us to extend genuine retirement security to the millions of Americans who don't have defined benefit plans. We believe that we need to build a system that is adapted to a world of rapid change.

Immigrant Rights

Change to Win continues to play a leading role in the movement to defend the rights of immigrant workers to join a union and be protected on the job. The fight for fair treatment and legal protection for immigrant workers in this country is inextricably linked to the fight for better wages, benefits and working conditions for all workers. We will not allow workers to be pitted one against the other because of their national origin. Everything labor has ever won came by building a grassroots movement and strong community alliances. Our unions have been organizing and fighting for the rights of immigrant workers, and we will continue to do so.

■ It's Time To *Make Work Pay!*

For too many people, 40 hours of hard work does not provide the basics of the American Dream. CEO pay is skyrocketing and corporate profits go up and up. But most workers are being left behind — the gap between the rich and everyone else is gaping and growing. The only way to preserve the middle class and the American way of life — the only way working people in America will obtain a decent standard of living — is to help millions unite in the union movement.

Change to Win unions are sharing resources, supporting each other's organizing drives, and exerting pressure on corporations to not interfere with their workers' democratic right to join a union. We are partnering with other unions, community groups, elected public officials, responsible employers, and other allies around the world.

■ Innovative Strategies

The Strategic Organizing Center

- Coordinates the work of affiliates in organizing campaigns
- Provides a hub for Change to Win unions to come together to integrate their organizing programs and launch large-scale organizing campaigns
- Assists in joint campaigns by two or more unions
- Works with affiliates to develop and implement plans to generate large-scale growth
- Leverages the collective resources of the affiliates for growth
- Provides cutting edge research for campaign strategies
- Develops and leverages global alliances for growth

The Sector Coordinating Committees

Our goals can only be accomplished through increased cooperation and coordination of our organizing and collective bargaining activities. The SCC will coordinate the organizing and bargaining activities of affiliated unions, develop strategic organizing plans and set bargaining goals and contract standards in major industries. The SCC will:

- Raise pay and benefit standards in each industry
- Stop employers from playing off one against another
- Avoid duplication and waste of resources

Global Initiatives

Change to Win is uniting with unions and allies in other countries to negotiate with global corporations to raise living standards and win respect for workers' rights everywhere. Workers around the world are working for the same employers and in the same industries — and being treated very differently. Corporations move jobs from one country to another to put workers into competition to drive down wages and benefits. We are uniting workers to take on these multi-national corporations. Workers' power comes from being able to join forces when they have a common employer or work in a common industry.