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IN THE HONORABLE SENATE OF THE STATE OF ILLINOIS 35  
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 Andrew Morriss at the Impeachment Trial.
2. Mr. Morriss' address and phone number are: 504 E. Pennsylvania Ave, Champaign, Illinois 61820, (217) 897-1234.
3. Mr. Morriss will testify on the following subject matters: (i) the administration's inability to make rules without a specific delegation of authority and (ii) the administration's duty to follow the letter of the law unless a court of competent jurisdiction deems it to be invalid.
4. 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, his utter disregard of the doctrine of separation of powers, and his violation of the Illinois Administrative Procedure Act as provided in paragraph 9 of the Article of Impeachment.
5. This testimony is not redundant. Mr. Morriss is the only live witness who will testify on the constitutionality of the Governor's action in violating the Illinois Administrative Procedure Act.

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 the testimony of Andrew Morriss at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,  
HOUSE PROSECUTOR**



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