

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

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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 Auditor General William Holland at the Impeachment Trial.
2. Mr. Holland's address and phone number are: 740 East Ash Street, Springfield, IL 62703, (217) 782-6046.
3. Mr. Holland will testify on the following subject matters: (i) management audit of the flu vaccine procurement and the I-SaveRx Program directed by House Resolution 394; and (ii) a summary report on agency efficiency initiative payments released in June 2005.
4. This testimony is relevant and material because it addresses the findings of the Auditor General with regard to the procurement of flu vaccines, the I-SaveRx Program, and the agency efficiency initiatives, as provided in paragraphs 6, 7 and 8 of the Article of Impeachment.
5. This testimony is not redundant. Mr. Holland is the only live witness who will testify on this subject.
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 Auditor General William Holland 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