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

2019 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**

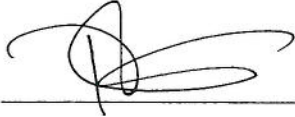
House Prosecutor David W. Ellis, pursuant to Senate Impeachment Rule 15(b)(1), moves for the admission of additional witness testimony and, in support thereof, states as follows:

1. The House Prosecutor seeks to admit the live testimony of Representative Constance A. Howard at the Impeachment Trial.
2. Representative Howard's address and phone number are: 8729 S. State Street, Chicago, Illinois 60619, (773) 783-8800.
3. Representative Howard will testify on the following subject matters: (i) the injury to the people of the State of Illinois that has occurred since the Governor's arrest and (ii) articles, statements and press releases relating to the Governor's current situation, as provided in Group Exhibit 37.
4. This testimony is relevant and material because it addresses the injury to the people of the State of Illinois.
5. This testimony is not redundant. Representative Howard is the only live witness who will testify on these subjects.
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 Representative Constance A. Howard at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a series of loops and a horizontal line extending to the right.

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