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

2007 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 David E. Miller at the Impeachment Trial.
2. Representative Miller's address and phone number are: 1350 East Sibley Blvd., Suite 301 A & B, Dolton, Illinois 60419, (708) 201-8000.
3. Representative Miller will testify on the following subject matter: the Office of Executive Inspector General's Final Report No. 04-00034 received by the Special Investigative Committee of the Illinois House of Representatives.
4. This testimony is relevant and material because it addresses the Governor's violation of State and federal laws regarding hiring and firing of State employees as provided in paragraph 13 of the Article of Impeachment.
5. This testimony is not redundant. Representative Miller 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 Representative David E. Miller at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**



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