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

2009 JAN 21 PM 4:36

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:

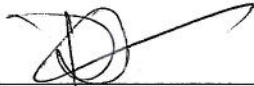
1. The House Prosecutor seeks to admit the live testimony of Representative Jack D. Franks at the Impeachment Trial.
2. Representative Franks' address and phone number are: 1193 S. Eastwood Dr., Woodstock, Illinois 60098, (815) 334-0063.
3. Representative Franks will testify on the following subject matter: Governor Rod R. Blagojevich's involvement, knowledge and participation in regards to the flu vaccine procurement, the I-SaveRx program and the Agency Efficiency Initiatives.
4. This testimony is relevant and material because Representative Franks will testify to Governor Blagojevich's involvement, knowledge and participation 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. Franks is the only live witness who will testify on the subject of the Governor's knowledge and involvement in regards to paragraphs 6, 7 and 8 of the Article of Impeachment.

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 Jack D. Franks 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