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

JAN 21 PM 4:34
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 Jim Durkin at the Impeachment Trial.
2. Representative Durkin's address and phone number are: 6404 W. Joliet Road, Suite 203, Countryside, IL, 60525, (708) 352-7700.
3. Representative Durkin will testify on the following subject matter: (i) the background of the federal government's authorization to intercept oral communications at the Governor's political campaign office and to intercept wire communications on his home telephone; and (ii) the Governor's plot to obtain a personal benefit in exchange for his appointment to fill the vacant seat in the United States Senate. Among other things, Representative Durkin will summarize material contained in the House impeachment record and will testify to the injury to the State of Illinois from the Governor's abuse of power described herein.
4. This testimony is relevant and material because it addresses the Governor's plot to obtain a personal benefit in exchange for his appointment to fill the vacant seat in the United States Senate, as provided in paragraph 1 of the Article of Impeachment, as well as the background of the underlying federal investigation that led to the Governor's arrest.


5. This testimony is not redundant. Representative Durkin 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 Jim Durkin at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**



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