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FOR THE NINETY-SIXTH GENERAL ASSEMBLY
SITTING AS AN IMPEACHMENT TRIBUNAL

JAN 21 PM 4:36

SECRETARY
OF THE
SENATE

In re)
Impeachment of)
Governor ROD R. BLAGOJEVICH)

**HOUSE PROSECUTOR'S
MOTION FOR ADDITIONAL DOCUMENTS OR MATERIALS**

House Prosecutor David W. Ellis, pursuant to Senate Impeachment Rule 15(b)(2), moves for the admission of additional documents into evidence and, in support thereof, states as follows:

1. The House Prosecutor seeks to admit an excerpt of Exhibit 8, namely pages 30-31, at the Impeachment Trial.
2. A copy of this document is attached to this Motion.
3. This document will be introduced during the live testimony of Representative Chapin Rose as a demonstrative exhibit.
4. This document is relevant and material because it addresses the Governor's plot to trade official acts in exchange for campaign contributions, namely the awarding of State contracts, as provided in paragraph 7 of the Article of Impeachment.
5. This document is not redundant because it does not exist in the proposed form and will be used for demonstrative purposes.
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 an excerpt of Exhibit 8, namely pages 30-31, into evidence at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right, positioned above a solid horizontal line.

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

JOSEPH CARI'S TESTIMONY

Q. Mr. Cari, what did you and Governor Blagojevich discuss during that time period on the airplane?

...

A. We got into a discussion about President Clinton and his view of why Clinton was successful and my view of why Clinton was successful, coming into this as a sitting governor. And Governor Blagojevich was very attuned that Governor Clinton at the time was able to raise a lot of money because, as a sitting governor, he thought -- and history does show that it's easier to raise money as a sitting governor than as a senator sometimes when you're running for the presidency.

Q. Did he explain why he thought it was easier to raise money as a governor?

A. **Yes, because the governor has the ability, unlike a U.S. senator, to give contracts, legal work, advisory work, investment banking work to a variety of individuals and companies.**

Q. Did he -- what, if anything, did he say about how that related to fund-raising?

A. **That because a governor had the ability to award contracts, that it was much easier to solicit people for contributions.**

...

Q. And what, if anything, did he say in relation to how they might help his friends?

A. **That there were contracts, that there was legal work, that there was investment banking work, consulting work to give to people who helped them.**

Q. And when you say "them," who are you referring to?

A. I took that to mean -- them, meaning Governor Blagojevich and the people around him.