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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 4:38
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 the December 5, 2008 front page of the *Chicago Tribune*.
2. A copy of this document is attached to this Motion.
3. This document will be introduced during the live testimony of Representative Jim Durkin.
4. This document is relevant and material because it demonstrates Governor Blagojevich's knowledge that the Federal Government was listening to his conversations regarding his 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. The article further corroborates the notion that he knew that his actions were wrong based on his subsequent efforts to reverse and conceal his actions regarding the Senate seat.
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 the December 5, 2008 front page of the *Chicago Tribune* into evidence at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,
HOUSE PROSECUTOR**



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