

Racketeering Act #1
(The Pension Obligation Bond Deal)
(Paragraph 7 Above)

Defendant ROD BLAGOJEVICH committed the following acts, any one of which alone constitutes the commission of Racketeering Act #1.

a. In or about 2003, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH

defendant herein, committed an act involving bribery, that is, conspired to commit bribery with Alonzo Monk, Christopher Kelly, and Antoin Rezko, in that ROD BLAGOJEVICH agreed to accept property, namely money, which he was not authorized by law to accept, knowing that the property was promised and tendered with the intent to cause ROD BLAGOJEVICH to influence the performance of acts related to his employment as Governor of the State of Illinois, namely, the awarding of lucrative state business relating to the refinancing of billions of dollars in State of Illinois Pension Obligation Bonds, in violation of 720 ILCS 5/33-1(d) and 720 ILCS 5/8-2.

b. In or about 2003, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH

defendant herein, committed an act involving bribery, that is, ROD

BLAGOJEVICH agreed to accept property, namely money, which he was not authorized by law to accept, knowing that the property was promised and tendered with the intent to cause ROD BLAGOJEVICH to influence the performance of acts related to his employment as Governor of the State of Illinois, namely, the awarding of lucrative state business relating to the refinancing of billions of dollars in State of Illinois Pension Obligation Bonds, in violation of 720 ILCS 5/33-1(d).

Racketeering Act #2
(Solicitation of United States Congressman A
(Paragraphs 21-24 Above)

Defendant ROD BLAGOJEVICH committed the following acts, any one of which alone constitutes the commission of Racketeering Act #2.

a. Beginning in or about 2005 and continuing through in or about 2006, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, did attempt to commit extortion, which extortion would obstruct, delay, and affect commerce, in that the defendant attempted to obtain property, in the form of political contributions for the benefit of ROD BLAGOJEVICH from United States Congressman A and United States Congressman A's brother, with the consent of United States Congressman A and United States Congressman A's brother, under color of official right, in violation of Title 18, United States Code, Sections 1951(a) and 2.

b. Beginning in or about 2005 and continuing through in or about 2006, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, committed an act involving bribery, that is, attempted to commit bribery, in that ROD BLAGOJEVICH attempted to solicit and agreed to accept property and personal advantage, namely political contributions,

pursuant to an understanding that defendant ROD BLAGOJEVICH would improperly influence the performance of an act related to his employment and function as Governor of the State of Illinois, namely, the provision of a \$2 million grant for the benefit of a publicly-supported school, in violation of 720 ILCS 5/33-1(e) and 720 ILCS 5/8-4.

Racketeering Act #3
(Solicitation of Children's Memorial Hospital)
(Paragraphs 25-28 Above)

Defendant ROD BLAGOJEVICH committed the following acts, any one of which alone constitutes the commission of Racketeering Act #3.

a. Beginning in or about October 2008 and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, and others did attempt to commit extortion, which extortion would obstruct, delay, and affect commerce, in that the defendant attempted to obtain property, in the form of political contributions for the benefit of ROD BLAGOJEVICH from the Chief Executive Officer of Children's Memorial Hospital, and Children's Memorial Hospital, with the consent of the Chief Executive Officer and Children's Memorial Hospital under color of official right, and induced by the wrongful use of actual and threatened fear of economic harm, in violation of Title 18, United States Code, Sections 1951(a) and 2.

b. Beginning in or about October 2008 and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH

defendant herein, committed an act involving bribery, that is, attempted to commit bribery, in that ROD BLAGOJEVICH attempted to solicit and agreed to accept property and personal advantage, namely political contributions, pursuant to an understanding that ROD BLAGOJEVICH would improperly influence the performance of an act related to his employment and function as Governor of the State of Illinois, namely, increasing reimbursement rates for specialty-care pediatric physicians, in violation of 720 ILCS 5/33-1(e) and 720 ILCS 5/8-4.

c. Paragraphs 2 through 42 of Count Three are realleged and incorporated as though fully set forth herein.

On or about October 17, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire and radio communication in interstate commerce signals and sounds, namely a phone call between ROD BLAGOJEVICH in Chicago, Illinois, and the Children's CEO in Florida, in which ROD BLAGOJEVICH told the Children's CEO that ROD BLAGOJEVICH had approved an increase in the reimbursement rate for specialty-care pediatric physicians, in violation of Title 18, United States Code, Sections 1343 and 1346.

Racketeering Act #4
(Solicitation of Racetrack Executive)
(Paragraphs 29–33 Above)

Defendant ROD BLAGOJEVICH committed the following acts, any one of which alone constitutes the commission of Racketeering Act #4.

a. Beginning on or about December 3, 2008, and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, did conspire with Alonzo Monk and others to commit extortion, which extortion would obstruct, delay, and affect commerce, in that they agreed to obtain property, in the form of political contributions for the benefit of ROD BLAGOJEVICH from Racetrack Executive and two horse racing tracks with which Racetrack Executive was affiliated, with the consent of Racetrack Executive and the horse racing tracks under color of official right, and induced by the wrongful use of actual and threatened fear of economic harm, in violation of Title 18, United States Code, Sections 1951(a) and 2.

b. Beginning on or about December 3, 2008, and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH

defendant herein, along with Alonzo Monk, committed an act involving bribery, that is, conspired to commit bribery, in that ROD BLAGOJEVICH, with the assistance of Monk, solicited and agreed to accept property and personal advantage, namely political contributions, pursuant to an understanding that ROD BLAGOJEVICH would improperly influence the performance of an act related to his employment and function as Governor of the State of Illinois, namely, the signing of a bill that had passed the Illinois legislature and that would financially help the Illinois horse racing industry, in violation of 720 ILCS 5/33-1(e) and 720 ILCS 5/8-2.

c. Paragraphs 2 through 42 of Count Three are realleged and incorporated as though fully set forth herein.

On or about December 4, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire and radio communication in interstate commerce signals and sounds, namely a phone call between ROD BLAGOJEVICH in Chicago, Illinois, and Alonzo Monk in Miami, Florida, in which ROD BLAGOJEVICH agreed with Monk that, in order to obtain the campaign contribution sought from Racetrack Executive in exchange for a

prompt signing of the Racing Bill, it would be better “from a pressure point of view” for ROD BLAGOJEVICH himself to call Racetrack Executive to discuss the timing of signing the Racing Bill, in violation of Title 18, United States Code, Sections 1343 and 1346.

Racketeering Act #5
(Solicitation of Highway Contractor)
(Paragraphs 34–36 Above)

Defendant ROD BLAGOJEVICH committed the following acts, any one of which alone constitutes the commission of Racketeering Act #5.

a. Beginning in or about September 2008 and continuing through December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, and others did attempt to commit extortion, which extortion would obstruct, delay, and affect commerce, in that the defendant attempted to obtain property, in the form of political contributions for the benefit of ROD BLAGOJEVICH from Construction Executive (who was both an executive with a company that supplied materials for road construction, and a representative of a trade group involved with the construction of roads), and from the company that employed Construction Executive, with the consent of Construction Executive and his employer under color of official right, and induced by the wrongful use of actual and threatened fear of economic harm, in violation of Title 18, United States Code, Sections 1951(a) and 2.

b. Beginning in or about September 2008 and continuing through December 9, 2008, in the Northern District of Illinois, Eastern Division, and

elsewhere,

ROD BLAGOJEVICH

defendant herein, along with others, committed an act involving bribery, that is, attempted to commit bribery, in that ROD BLAGOJEVICH, solicited and agreed to accept property and personal advantage, namely political contributions, pursuant to an understanding that ROD BLAGOJEVICH would improperly influence the performance of an act related to his employment and function as Governor of the State of Illinois, namely, increasing funding for road building programs, in violation of 720 ILCS 5/33-1(e) and 720 ILCS 5/8-4.

Racketeering Act #6
**(Efforts to Obtain Personal Financial Benefits for Rod Blagojevich
in Return for his Appointment of a United States Senator)**
(Paragraphs 38–43 Above)

Defendant ROD BLAGOJEVICH committed the following acts, any one of which alone constitutes the commission of Racketeering Act #6.

a. Beginning in or about October 2008 and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, did conspire with Robert Blagojevich, John Harris, and others to commit extortion in relation to the appointment of a United States Senator, which extortion would obstruct, delay, and affect commerce, in that they agreed to obtain property, for the benefit of ROD BLAGOJEVICH, from various individuals, with the consent of those individuals under color of official right, in violation of Title 18, United States Code, Sections 1951(a) and 2.

b. Beginning in or about October 2008 and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH,

defendant herein, and Robert Blagojevich, and others did attempt to commit

extortion in relation to the appointment of a United States Senator, which extortion would obstruct, delay, and affect commerce, in that the defendant attempted to obtain property, for the benefit of ROD BLAGOJEVICH, from various individuals, with the consent of those individuals under color of official right, in violation of Title 18, United States Code, Sections 1951(a) and 2.

c. Beginning in or about October 2008 and continuing through on or about December 9, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROD BLAGOJEVICH

defendant herein, along with Robert Blagojevich, John Harris, and others, committed an act involving bribery, that is, conspired to commit bribery, in that ROD BLAGOJEVICH, with the assistance of others, solicited and agreed to accept property and personal advantage, pursuant to an understanding that ROD BLAGOJEVICH would improperly influence the performance of an act related to his employment and function as Governor of the State of Illinois, namely, the appointment of a United States Senator, in violation of 720 ILCS 5/33-1(e) and 720 ILCS 5/8-2.

d. --- 1. Paragraphs 2 through 42 of Count Three are realleged and incorporated as though fully set forth herein.

On or about the following dates, defendant ROD BLAGOJEVICH, for the

purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire and radio communication in interstate commerce signals and sounds, namely phone calls, as further described below and in the corresponding indictment count, in violation of Title 18, United States Code, Sections 1343 and 1346:

Racketeering Act	Date	Description
6(d)	11/1/2008	Phone call between ROD BLAGOJEVICH in Illinois and Robert Blagojevich in Nashville, Tennessee, as such conversation relates to the Senate seat, and as more fully described in Count 4 of this indictment
6(e)	11/7/2008	Phone call between ROD BLAGOJEVICH and John Harris, in Chicago, Illinois, and Advisor A, in Washington, D.C., as more fully described in Count 5 of this indictment
6(f)	11/10/2008	Phone call between ROD BLAGOJEVICH, John Harris and others, in Chicago, Illinois, and various advisors in Washington, D.C., and New York City, as more fully described in Count 6 of this indictment
6(g)	11/12/2008	Phone call between ROD BLAGOJEVICH, in Chicago, Illinois, and Advisor A in Washington, D.C. (Sessions 533, 535, and 537), as more fully described in Count 7 of this indictment

6(h)	11/12/2008	Phone call between ROD BLAGOJEVICH in Chicago, Illinois, and a labor union official in Washington, D.C. (Session 541), as more fully described in Count 8 of this indictment
6(i)	11/12/2008	Phone call between ROD BLAGOJEVICH in Chicago, Illinois, and a labor union official in Washington, D.C. (Session 546), as more fully described in Count 9 of this indictment
6(j)	11/13/2008	Phone call between ROD BLAGOJEVICH in Chicago, Illinois, and Advisor B in Michigan (Session 624), as more fully described in Count 10 of this indictment
6(k)	11/13/2008	Phone call between ROD BLAGOJEVICH in Chicago, Illinois, and Advisor B in Michigan (Session 627), as more fully described in Count 11 of this indictment
6(l)	12/4/2008	Phone call between ROD BLAGOJEVICH and Deputy Governor A in Chicago, Illinois, and Advisor A in Washington, D.C., as more fully described in Count 13 of this indictment

All in violation of Title 18, United States Code, Section 1962(c).