

**BLAGOJEVICH told  
Fundraiser A to tell  
Individual D if there is  
“tangible political support  
(campaign contributions)  
like you’ve said, start  
showing us now.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 115(b) (Conversation on December 4, 2008)*

**“some of this stuffs gotta  
start happening now . . .right  
now. . . and we gotta see it.  
You understand?”**

❖ *ROD BLAGOJEVICH told Fundraiser A to tell Individual D that ROD BLAGOJEVICH had a problem with Senate Candidate 5 just promising to help ROD BLAGOJEVICH because ROD BLAGOJEVICH had a prior bad experience with Senate Candidate 5 not keeping his word.*

**BLAGOJEVICH** said that “one thing I’d be interested in” is a 501(c)(4) organization.

**BLAGOJEVICH** explained the 501(c)(4) idea to **SEIU Official** and said that the 501(c)(4) could help “our new Senator [Senator Candidate 1].”

**SEIU Official** agreed to “put that flag up and see where it goes.”

*Approximately a week before this call, BLAGOJEVICH met with SEIU Official to discuss the vacant Senate seat, and BLAGOJEVICH understood that SEIU Official was an emissary to discuss Senate Candidate 1’s interest in the Senate seat.*

Source: Exhibit 3, Daniel Cain Affidavit, paragraph 109 (Conversations on November 12, 2008)

**“I said go back to [Senate Candidate 1], and, and say hey, look, if you still want to be a Senator don’t rule this out and then broach the idea of this 501(c)(4) with her.”**

*BLAGOJEVICH told Advisor B this is what he said to SEIU Official.*

Source: Exhibit 3, Daniel Cain Affidavit, paragraph 109-110 (Conversations on November 12, 2008)

**ROD BLAGOJEVICH** asked **Advisor A** to call **Individual A** and have **Individual A** pitch the idea of the 501(c)(4) to “[**President-elect Advisor**].”

*Advisor A* said that, “*while it’s not said this is a play to put in play other things.*”

**ROD BLAGOJEVICH** responded, “**correct.**”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 114 (Conversations on November 13, 2008)*

**ROD BLAGOJEVICH and Advisor A  
discussed who might be close to Senate  
Candidate 6 to talk with him about the  
issue, because BLAGOJEVICH**

**did not “want to be  
the one to ask  
something like that.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 105 (Conversations on November 11, 2008)*

**BLAGOJEVICH told HARRIS that he should do “homework” on private foundations “right away.”**

**BLAGOJEVICH told HARRIS to “look into all of those.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 94 (Conversations on November 5, 2008)*

**“I could have made a  
larger announcement but  
wanted to see how they  
perform by the end of the  
year. If they don’t  
perform, f--- ‘em.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 63*



**“I’m going to do \$8 million for them. I want to get [Hospital Executive 1] for 50.”**

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**ROD BLAGOJEVICH:** The pediatric doctors – the reimbursement. Has that gone out yet, or is that still on hold?”

*DEPUTY GOVERNOR A: The rate increase?*

**ROD BLAGOJEVICH:** Yeah.

*DEPUTY GOVERNOR A: It's January 1.*

**ROD BLAGOJEVICH:** And we have total discretion over it?

*DEPUTY GOVERNOR A: Yep.*

**ROD BLAGOJEVICH:** We could pull it back if we needed to – budgetary concerns – right?

*DEPUTY GOVERNOR A: We sure could. Yep.*

**ROD BLAGOJEVICH:** Ok. That's good to know.

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 68(b) (Conversation recorded November 12, 2008 at approx. 2:14p.m.)*

Lobbyist 1 had a private conversation with Contributor 1 about the contribution (“commitment”) Contributor 1 had not yet made and advised Contributor 1 “look, there is a concern that there is going to be some skittishness if your bill gets signed because of the timeliness of the commitment” and made clear that the contribution “got to be in now.” ROD BLAGOJEVICH commented to Lobbyist 1 “good” and “good job.”

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Lobbyist 1 suggested that it is better for ROD  
BLAGOJEVICH to make the call personally

“from a pressure point of view.”

BLAGOJEVICH stated that he would call  
Contributor 1 and indicate that  
BLAGOJEVICH wanted to do an event  
(fundraiser) downstate

“so we can get together and start picking some  
dates to do a bill signing.”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 68(e)*

**ROD BLAGOJEVICH** stated that his decision about the open Senate seat will be based on three criteria in the following order of importance: “our legal situation, our personal situation, my political situation. This decision, like every other one, needs to be based upon on that.

**Legal. Personal. Political.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 111 (Conversation on November 12, 2008)*

**BLAGOJEVICH** said that the consultants are telling him that he has to “suck it up” for two years and do nothing and give this “motherf---er [the President-elect] his senator. F--- him. For nothing? F--- him.”

**BLAGOJEVICH** states that he will put “[Senate Candidate 4]” in the Senate “before I just give f---ing [Senate Candidate 1] a f---ing Senate seat and I don’t get anything.”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 101(c) (Conversation on November 10, 2008)*

**“the immediate challenge [is] how  
do we take some of the financial  
pressure off of our family.”**

**BLAGOJEVICH stated that absent  
getting something back, BLAGOJEVICH  
will not pick Senate Candidate 1.**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 101(c) (Conversation on November 10, 2008)*

# ROD BLAGOJEVICH

states that he will appoint  
“[Senate Candidate 1] . . . but  
if they feel like they can do this  
and not f---ing give me  
anything . . . then I’ll f---ing go  
[Senate Candidate 5].”



**BLAGOJEVICH said he knows  
that the President-elect wants  
Senate Candidate 1 for the  
Senate seat but “they’re not  
willing to give me anything  
except appreciation. F--- them.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 104 (Conversation on November 11, 2008)*

**“if . . . they’re not going to offer anything of any value, then I might just take it.”**

**“unless I get something real good for [Senate Candidate 1], s---, I’ll just send myself, you know what I’m saying.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 89-90 (Conversations on November 3, 2008)*

**“I’m going to keep this Senate option for me a real possibility, you know, and therefore I can drive a hard bargain. You hear what I’m saying. And if I don’t get what I want and I’m not satisfied with it, then I’ll just take the Senate seat myself.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 89-90 (Conversations on November 3, 2008)*

**The Senate seat**  
**“is a f--ing valuable**  
**thing, you just don’t**  
**give it away for**  
**nothing.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 90 (Conversation on November 3, 2008)*

**BLAGOJEVICH** stated that he will make a decision on the Senate seat “in good faith . . . but it is not coming for free. . . . It’s got to be good stuff for the people of Illinois and good for me.”



**BLAGOJEVICH** states “[President-elect], you want it? Fine. But, its got to be good or I could always take [the Senate seat].”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 92 (Conversation on November 4, 2008)*

**“I’ve got this thing and it’s  
f---ing golden, and, uh, uh, I’m  
just not giving it up for f---in’  
nothing. I’m not gonna do it.  
And, and I can always use it.  
I can parachute me there.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 96 (Conversation on November 5, 2008)*

**“some of this stuffs  
gotta start happening  
now . . . right now . . .  
and we gotta see it.  
You understand?”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 115(b) (Conversation on December 4, 2008)*

**“you gotta be careful  
how you express that  
and assume everybody’s  
listening, the whole  
world is listening. You  
hear me?”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 115(b) (Conversation on December 4, 2008)*



“I would do it in  
person. I would  
not do it on the  
phone.”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 115(b) (Conversation on December 4, 2008)*

**On the morning of December 5, 2008, the *Chicago Tribune* ran a front page news story stating that BLAGOJEVICH had recently been surreptitiously recorded in relation to an ongoing criminal investigation. BLAGOJEVICH and Fundraiser A discussed certain information contained in the story.**

**“undo your [Individual D] thing.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 115(c) (Conversation on December 5, 2008)*

**“We were approached ‘pay to play.’ That, you know, he’d raise me 500 grand. An emissary came. Then the other guy would raise a million, if I made him (Senate Candidate 5) a Senator.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 115(a) (Conversation on October 31, 2008)*

**BLAGOJEVICH** stated that the “trick . . . is how do you conduct indirectly . . . a negotiation” for the Senate seat.



**BLAGOJEVICH** analogized his situation to that of a sports agent shopping a potential free agent to various teams, stating “how much are you offering, [President-elect]? What are you offering, [Senate Candidate 2]? . . . Can always go to . . . [Senate Candidate 3].”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 92 (Conversations on November 4, 2008)*

**With respect to the Senate seat, Deputy Governor A suggested putting together a list of things that BLAGOJEVICH would accept in exchange for the Senate seat.**

**BLAGOJEVICH responded that the list “can’t be in writing.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 91 (Conversation on November 4, 2008)*

**ROD BLAGOJEVICH indicated that if he was appointed as Secretary of Health and Human Services by the President-elect, then BLAGOJEVICH would appoint Senate Candidate 1 to the open Senate seat.**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 99 (Conversation on November 7, 2008)*

HARRIS stated “we wanted our ask to be reasonable and rather than. . .make it look like some sort of selfish grab for a quid pro quo.”

HARRIS suggested a “three-way deal,” and explained that a three-way deal like the one discussed would give the President-elect a “buffer so there is no obvious quid pro quo for [Senate Candidate 1].”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 99 (Conversation on November 7, 2008)*



Advisor B stated that he likes the idea, but liked the Change to Win option better because, according to Advisor B, from the President-elect's perspective, there would be fewer "fingerprints" on the President-elect's involvement with Change to Win because Change to Win already has an existing stream of revenue and, therefore,

**“you won’t have stories  
in four years that they  
bought you off.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 107 (Conversation on November 12, 2008)*

*Governor General Counsel asked,*

**“can [the President-elect] help  
in the private sector. . . where  
it wouldn’t be tied to him? . . .**

**I mean, so it wouldn’t  
necessarily look like one for  
the other.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 101(b) (Conversation on November 10, 2008)*

**BLAGOJEVICH said that he thinks that they should put this all together and then have HARRIS or somebody go talk to the Tribune owners and say, ‘Look, we’ve got decisions to make now... moving this stuff forward (believed to be a reference to the IFA helping with the Cubs sale) . . . someone’s gotta go to [Tribune Owner], we want to see him. . it’s a political f---in’ operation in there.’**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 73 (Conversation on November 3, 2008)*

**BLAGOJEVICH** stated that because of the impeachment articles, “we don’t know if we can take a chance and do this IFA deal now. I don’t want to give them a grounds to impeach me.”

**BLAGOJEVICH** stated that “our recommendation is fire all those f---ing people, get ‘em the f--- out of there and get us some editorial support.”

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 76*

**BLAGOJEVICH instructed HARRIS to call someone at the Tribune and “lay a foundation with them.”**

**BLAGOJEVICH told HARRIS to tell Tribune Financial Advisor that “everything is lined up, but before we go to the next level we need to have a discussion about what you guys are going to do about that newspaper.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 77*

**HARRIS said he told Tribune Financial Advisor that things “look like they could move ahead fine but, you know, there is a risk that all of this is going to get derailed by your own editorial page.”**

**HARRIS said that he told Tribune Financial Advisor that they need to have a discussion on how they might tone things down and change the focus of “that page.”**

*Source: Exhibit 3, Daniel Cain Affidavit, paragraph 78*

**ROD BLAGOJEVICH** stated that **HARRIS's** suggestion will be to “get rid of these people” and that “the other point you want to make is in fact, we, we sure would like to get some editorial support from your paper. Okay?”

❖ **BLAGOJEVICH** stated that “the Tribune thing is important, if we can get that.”

❖ **HARRIS** replied, “delicate, very delicate.”

❖ **BLAGOJEVICH** said, “I know, I know. Use your judgment, don’t push too hard. But you know what you got to do, right.”

❖ **HARRIS** responded, “Alright, sir.”



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