

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 08 CR 888-6
)	
ROBERT BLAGOJEVICH,)	The Honorable
)	James B. Zagel,
Defendant.)	Judge Presiding.

DEFENDANT ROBERT BLAGOJEVICH’S MOTION FOR REIMBURSEMENT OF FEES AND COSTS FROM THE FOB CAMPAIGN FUND

NOW COMES the defendant, ROBERT BLAGOJEVICH, by and through his attorneys, MICHAEL D. ETTINGER and CHERYL A. SCHROEDER, and moves this Honorable Court to enter an order setting aside sufficient funds from the Friends of Blagojevich (“FOB”) campaign fund to reimburse Robert Blagojevich for attorneys fees and costs in the event Robert Blagojevich is acquitted of the charges in this cause of action. In support thereof, the defendant states as follows:

1. This Court gave Rod Blagojevich and Robert Blagojevich two options to choose from regarding funding. The defendants decided to upon Option 2, namely receiving funds from the FOB campaign fund pursuant to the rules of the Criminal Justice Act of 1964, as adopted by the United States District Court for the Northern District of Illinois.

2. Robert Blagojevich initially did not ask to be funded through the FOB campaign fund.

3. On April 2, 2009, this Court entered a restraining order. On June 1, 2009, the restraining order was amended. On June 20, 2009, this Court entered a supplemental amended restraining order concerning the distribution of funds from the FOB campaign fund.

4. Robert Blagojevich asks this Court to reserve or set aside \$350,000.00 from the FOB

campaign fund to help pay his attorneys fees and costs related to his defense in this case, in accordance with the requirements and specifications of the Criminal Justice Act of 1964. 18 U.S.C. § 3006A, and the Plan of the United States District Court for the Northern District of Illinois.

WHEREFORE, the defendant prays that this Honorable Court will enter an order reserving \$350,000.00 from the FOB campaign fund to help pay his attorneys fees and costs related to his defense in this case in the event Robert Blagojevich is acquitted of the charges in this cause of action.

Respectfully submitted,

/s/ Cheryl A. Schroeder

Cheryl A. Schroeder

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