

BEFORE THE FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

MAY 13 3 10 PM '99

BRENT M. CHRISTENSEN,

Complainant,

vs.

SUBURBAN O'HARE COMMISSION,  
an unincorporated association of Illinois  
municipal corporations; VILLAGE OF  
BENSENVILLE, ILLINOIS; JOHN GEILS,  
individually and in his capacity as President of  
Village of Bensenville, Illinois; CITY OF PARK  
RIDGE, ILLINOIS; RONALD WIETECH, A,  
individually and in his capacity as Mayor of City  
of Park Ridge, Illinois; CITY OF ELMHURST,  
ILLINOIS; THOMAS MARCUCCI, individually  
and in his capacity as Mayor of City of Elmhurst,  
Illinois; VILLAGE OF ELK GROVE, ILLINOIS;  
CRAIG JOHNSON, individually and in his  
capacity as President of Village of Elk Grove,  
Illinois; VILLAGE OF ITASCA, ILLINOIS;  
GIGI GRUBER, individually and in her capacity  
as President of Village of Itasca, Illinois;  
VILLAGE OF ROSELLE, ILLINOIS; GAYLE  
SMOLINSKI, individually and in his capacity as  
Mayor of Village of Roselle, Illinois; CITY OF  
DES PLAINES, ILLINOIS; PAUL JUNG,  
individually and in his capacity as Mayor of City  
of Des Plaines, Illinois; VILLAGE OF LISLE,  
ILLINOIS; RONALD GHILARDI, individually  
and in his capacity as Mayor of Village of Lisle,  
Illinois; CITY OF WOOD DALE, ILLINOIS;  
KENNETH JOHNSON, individually and in  
his capacity as Mayor of City of Wood Dale,  
Illinois; VILLAGE OF ADDISON, ILLINOIS;  
LARRY HARTWIG, individually and in his  
capacity as Mayor of Village of Addison, Illinois;  
DUPAGE COUNTY, ILLINOIS; and  
ROBERT SCHILLERSTROM, individually and in  
his capacity as Chairman of DuPage County,  
Illinois Board,

Respondents.

MUR 4896

AMENDED COMPLAINT

Now comes, Brent M. Christensen and complaining of the above-named respondents and each of them alleges as follows:

1. The "Suburban O'Hare Commission" (hereinafter "SOC") is upon information and belief, a self-described consortium of municipalities located near O'Hare International Airport in Chicago, Illinois.

2. Upon information and belief SOC receives all or a portion of its funding from its member municipalities. Accordingly, SOC is publicly funded.

3. Upon information and belief SOC is not chartered by the State of Illinois as a corporation, partnership, or other business entity; nor is SOC registered with the Illinois State Board of Elections as a political committee; nor is SOC registered with the FEC as a political committee.

4. The municipalities listed in the caption of this complaint are Bodies Corporate and Politic under the laws of the State of Illinois and are, upon information and belief, member organizations of SOC. Because SOC is not a legally cognizable entity, its member municipalities are proper respondents herein. An address list of all named respondents is attached hereto.

5. On or about April 23, 1999 a full-page advertisement appeared in several Chicago-area newspapers. A copy of that advertisement is attached hereto.

6. The advertisement contains numerous statements of express advocacy for Henry John Hyde, a Republican candidate in Illinois' 6<sup>th</sup> Congressional District including: "One Man Standing For Principle — Henry Hyde," "there is obvious animus against Mr. Hyde for his principled stance that lying under oath is a serious offense to the rule of law," "And to Henry Hyde we say: God Bless You. Hang Tough Henry!"

7. The advertisement also contains some statements that could be reasonably construed as express advocacy opposing Presidential Candidate John McCain, including: "Representative Schuster Senator McCain do not live in Illinois. But they should know (especially Senator McCain who will be seeking support in Illinois for his presidential campaign) that Republicans in Illinois have consistently asked for and received voter majorities in our communities."

8. The advertisement suggests that the individually named Respondents were sponsors of the advertisement along with SOC both personally and in their capacities as executives in SOC's member municipalities..

9. Upon information and belief the advertisement was paid for by SOC. As indicated above, upon information and belief, SOC's funding is derived from public sources. Accordingly, the express advocacy for and against federal candidates in the advertisement is particularly offensive insofar as the advertisement was paid for with public funds.

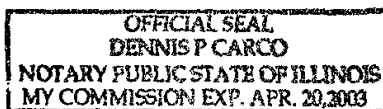
WHEREFORE, the Complainant respectfully requests that the FEC conduct an investigation into this complaint and take any and all further action deemed necessary, equitable and just.

Brent M. Christensen

Brent M. Christensen  
Two Mid America Plaza  
Suite 800  
Oakbrook Terrace, IL 60181

CERTIFICATION

SIGNED AND SWORN TO BEFORE ME THIS 11<sup>TH</sup> DAY MAY, 1999



Dennis P. Carco

or  
Notary Public

Larry Hartwig  
Village of Addison  
131 W. Lake St.  
Addison, IL 60101-2786

Robert Schillerstrom  
DuPage County Board  
421 N. County Farm Rd.  
Wheaton, IL 60187

Ronald Wietecha  
City of Park Ridge  
505 Butler Place  
Park Ridge, IL 60068-4173

Gigi Gruber  
Village of Itasca  
100 N. Walnut St.  
Itasca, IL 60147-1795

Gayle Smolinski  
Village of Roselle  
31 S. Prospect  
Roselle, IL 60172

Craig Johnson  
Village of Elk Grove  
901 Wellington Ave.  
Elk Grove, IL 60007

Kenneth Johnson  
City of Wood Dale  
404 N. Wood Dale Rd.  
Wood Dale, IL 60191

Thomas Marcucci  
City of Elmhurst  
209 N. York Rd.  
Elmhurst, IL 60126

John Geils  
Village of Bensenville  
700 W. Irving Park Rd.  
Bensenville, IL 60106

20040306 177

Ronald Ghilardi  
Village of Lisle  
1040 Burlington Ave.  
Lisle, IL 60532

Paul Jung  
City of Des Plaines  
1420 Miner St.  
Des Plaines, IL 60016

Suburban O'Hare Commission  
117 E. Green St.  
 Bensenville, IL 60106

20 "04" 396 "4779



SUBURBAN O'HARE COMMISSION

## THE FIGHT OVER INCREASED FLIGHTS AT O'HARE A CALL FOR REPUBLICAN LEADERSHIP

**Out-of-State Republicans Propose Vast O'Hare Flight Expansion.** Republican leaders in Congress — Representative Schuster (R-Pa.) in the House and Senator John McCain (R-Az.) in the Senate — are sponsoring legislation that will allow a vast increase in flights at O'Hare.

**O'Hare — An Accident Waiting to Happen.** The Suburban O'Hare Commission has documented how these flight expansion proposals will have devastating impacts on safety, noise, toxic air pollution, passenger delays, and expansion of high monopoly pricing. Just recently a senior American Airlines pilot with over 30 years of O'Hare experience wrote Governor Ryan:

*"I have seen the volume of traffic at O'Hare pick up and exceed anyone's expectations, so much so, that on occasion mid-air's were only seconds apart. O'Hare is at maximum capacity, if not over capacity. It is my opinion that it is only a matter of time until two airliners collide making disastrous headlines."*

The only way to squeeze these additional flights into O'Hare is by jamming the aircraft closer and closer together — especially in bad weather, low-visibility conditions. O'Hare is an accident waiting to happen.

**One Man Standing For Principle — Henry Hyde.** Standing against an army of airline lobbyists and gushers of corporate political cash pushing for O'Hare flight expansion has been one man of principle — Henry Hyde.

We know why certain Democrats are for flight expansion at O'Hare. Mayor Daley wants dramatic flight expansion. The airlines have been major financial contributors to the President. Finally, there is obvious animus against Mr. Hyde for his principled stance that lying under oath is a serious offense to the rule of law. Defeating Mr. Hyde on the O'Hare flight expansion issue — even at the cost of harming hundreds of thousands of O'Hare area residents — may appear to some as "payback" from some Democrats.

But we are concerned about the Republicans in Illinois — not the Democrats.

**A Plea For Leadership and Action by Illinois Republicans.** Representative Schuster and Senator McCain do not live in Illinois. But they should know (especially Senator McCain who will be seeking support in Illinois for his presidential campaign) that Republicans in Illinois have consistently asked for and received voter majorities in our communities — from Republican, Democratic and Independent voters — on the repeated promise that Illinois Republican leaders would stop O'Hare expansion and build a new airport.

We respectfully ask our Illinois Republican leaders to stand with Henry Hyde in his fight to defeat these flight expansion proposals. We respectfully ask these leaders for results that match the rhetoric — the O'Hare flight expansion proposals must be defeated. We have federal and state Republican officials with enormous power who individually and collectively should help Henry Hyde win this fight:

### 1. Governor Ryan (312-814-2121)

Governor, you vigorously campaigned promising to stop further expansion of O'Hare and to build a new airport. We respectfully ask you to stand with Henry Hyde and to persuade Speaker Hastert and the rest of the Illinois Congressional delegation to fight against the Schuster and McCain flight expansion proposals and any other so-called "compromises" which add more flights to O'Hare.

We know that as Governor you have enormous influence with the Illinois Congressional delegation, and we ask you to make defeat of the O'Hare expansion proposals in Congress a top priority.

### 2. Speaker Hastert (630-406-1114)

Speaker Hastert we ask you to stand by Henry Hyde and defeat the O'Hare flight expansion proposals. Neighbors need to help neighbors. We ask that you use your leadership position — just as Speaker Gingrich did last year — to help your friend and colleague Henry Hyde defeat the O'Hare flight expansion proposals.

### 3. Senator Pate Philip (630-941-0094)

Pate, like Henry Hyde, you have been with us all the way. Now we are asking you to use your great prestige and credibility with the Governor, Speaker Hastert, and the Illinois Republican Congressional delegation to help Henry Hyde and defeat the O'Hare flight expansion proposals. Pate, you won the Lake Calumet fight against those who said you could never win. We need you in there leading the charge to win this fight for Henry Hyde and our communities.

### 4. Minority Leader Daniels (630-530-2700)

Lee, like Pate you have written letters in support of Henry Hyde and our communities in this fight. But we are asking you for extraordinary effort to use your great prestige and credibility with the Governor, Speaker Hastert, and the Illinois Republican Congressional delegation to help Henry Hyde and defeat the O'Hare flight expansion proposals.

### 5. Senator Fitzgerald (312-886-3506)

As a state senator and as candidate for United States Senate, you campaigned as a vocal opponent of O'Hare expansion and an advocate of a new airport.

We cannot imagine how increased flights can be jammed into O'Hare by Republican leadership in Congress if you fine Illinois Republicans stand together with Congressman Hyde to protect our communities. We cannot imagine how Congressman Schuster and Senator McCain can force additional flights into O'Hare in the face of your unified aggressive leadership against flight expansion proposals at O'Hare.

And To Henry Hyde we say: God Bless You. Hang Tough Henry! No more flights! We would rather you continue to stand for principle than accept a so-called "compromise" that harms our communities.

John Geils President of Bensenville	Ron Wietecha Mayor of Park Ridge
Tom Marcucci Mayor of Elmhurst	Craig Johnson President of Elk Grove Village
Gigi Gryber President of Itasca	Gayle Smolinski Mayor of Roselle
Paul Sung Mayor of Des Plaines	Ron Ghilardi Mayor of Lisle
Ken Johnson Mayor of Wood Dale	Larry Hartwig Mayor of Addison
Bob Schillerstrom Chairman of DuPage County Board	

## SUBURBAN O'HARE COMMISSION

177 East Green Street, Bensenville, Illinois 60106 • 630/860-7101

A joint and cooperative effort to represent the interests of citizens affected by O'Hare International Airport

630-406-1114