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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

AUG 31 3 52 PM '99

BRENT M. CHRISTENSEN

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August 23, 1999

F. Andrew Turley, Esq.
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Turley:

I enclose a complaint against Respondent Suburban O'Hare Commission. Although the Respondent in this complaint is the same as the Respondent in MUR 4896, the enclosed complaint cites a completely different transaction and occurrence with respect to possible violations of Federal Election Law.

Sincerely,


Brent M. Christensen

BMC/gld

Encl

cc: Suburban O'Hare Commission

BEFORE THE FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA

AUG 31 3 52 PM '99

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

BRENT CHRISTENSEN,

Complainant,

vs.

SUBURBAN O'HARE COMMISSION
117 E. Green St.
Bensenville, IL 60106,

Respondent.

MUR 4922

COMPLAINT

Now comes Brent Christensen and complaining of Suburban O'Hare Commission alleges as follows:


1. Suburban O'Hare Commission ("SOC") is a consortium of approximately 15 Illinois municipal corporations.
2. SOC describes itself as "a joint and cooperative effort to represent the interests of citizens affected by O'Hare International Airport."
3. SOC claims to be a public body duly constituted under the Illinois Intergovernmental Cooperation Act and the laws of the State of Illinois. It is not registered as a political committee under Illinois or Federal law.
4. SOC is publicly funded by quarterly "assessments" levied upon its member municipalities and grants from the State of Illinois.
5. On or about October 30, 1998 SOC by its officers and agents caused to be printed and distributed a publication entitled "SOC News." A copy of this publication is attached hereto and made a part hereof.

6. "SOC News" as alleged above was created and distributed by SOC using public funds.
7. "SOC News" as alleged above was distributed by mail to numerous registered voters residing in Illinois' 6th Congressional District shortly before the 1998 general election.
8. "SOC News" as herein alleged, when read in its totality and drawing all reasonable inferences, expressly advocated for the election of several candidates including Henry Hyde who stood for election for Illinois' 6th Congressional District in the 1998 general election.
9. "SOC News" as herein alleged contained express advocacy:


A. By alleging there were specific problems caused by O'Hare International Airport for voters in SOC communities, identifying specific solutions for those problems, and then identifying Hyde as the candidate who supported such solutions without identifying his opponent; and

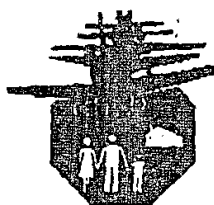
B. After identifying "Congressman Hyde" "[a]s a tenacious and aggressive fighter on our behalf on the issues of O'Hare expansion" claiming, "[i]t is essential that we have a strong and knowledgeable advocate on this issue as our Congressman."

WHEREFORE, 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 Christensen
Two Mid America Plaza
Suite 800
Oakbrook Terrace, IL 60181

SIGNED AND SWORN TO BEFORE ME THIS 23RD DAY OF AUGUST, 1999


Notary Public
OFFICIAL SEAL
BARBARA J COLBY
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXP. APR. 1 2001



SOC NEWS

TUESDAY - NOVEMBER 3 KEY VOTE ON NEW O'HARE RUNWAYS, O'HARE EXPANSION

On Tuesday November 3, voters in Suburban O'Hare Commission (SOC) communities have a critical opportunity to decide the future of our communities and the related issue of O'Hare expansion — including the explosive issue of new runways and major traffic expansion at O'Hare and the increased noise, toxic air pollution and safety concerns that will result from such expansion.

On November 3, we will elect a new Governor, a new United States Senator, a Congressman, and numerous other state and local officials. The new Governor, the new United States Senator, and our Congressman will be key players in the decisions as to O'Hare expansion — including the new runways and O'Hare air traffic growth being pushed by Chicago.

Their decisions as to O'Hare expansion — and the related problems of noise, toxic air pollution and safety problems associated with O'Hare traffic — will have a dramatic effect on quality of life in our communities, the value of our residential property, and the health of our children and families. Your vote on November 3 for candidates for these offices will decide your future.

Who is SOC?

The Suburban O'Hare Commission is a consortium of the local governments in your communities organized to protect your quality of life and health in the face of attempts to expand O'Hare. SOC is non-partisan and does not endorse any particular candidate. But we believe it is critical that you know the positions of the major candidates on these issues and equally important that you vote on November 3.

What's the Problem?

Noise. At 900,000 flights per year O'Hare is bursting at the seams. Right now tens of thousands of homes in our communities suffer unacceptable levels of noise as thousands of planes from O'Hare operations roar over their homes day and night.

Toxic Air Pollution. Noise isn't the only problem. By concentrating thousands of aircraft operations at O'Hare every day, the toxic emissions from all those aircraft create a cloud of toxic air pollution that drifts into many of our residential neighborhoods. These toxic pollutants — which our neighbors often call "that kerosene smell!" — is actually made up of highly hazardous chemicals such as Benzene, Formaldehyde, and

SUBURBAN O'HARE COMMISSION

Addison • Bensenville • Des Plaines • Du Page County • Elk Grove • Elk Grove Township
Eimhurst • Harwood Heights • Itasca • Lisle • Maine Township • Park Ridge • Roselle • Schiller Park • Wood Dale

a host of so-called PAHs (Polynuclear Aromatic Hydrocarbons). These chemicals are known to cause cancer and other serious health problems for adults and especially for children and the elderly.

Safety Hazards. In addition to noise and toxic air pollution, continuing to stuff more and more planes into O'Hare is an invitation to a safety disaster — both for airline passengers and the residents of our communities who live under the flight paths. O'Hare was designed over 40 years ago for a much lower level of operations. The only way Chicago, the FAA, and the airlines get their 900,000 current flights is by squeezing the aircraft operations closer and closer together — especially in bad weather and at night.

Property Value. Next, there is the issue of property value. Numerous studies have shown that a home adversely impacted by aircraft noise sells for a significant loss in sales price as compared to a similar home not impacted by noise. Our homeowners are already suffering serious financial loss from the current levels of noise at O'Hare.

What's the Future — a million more new operations at O'Hare?

Your vote on November 3 will determine the future. Air traffic demand is already outstripping the capacity at O'Hare. FAA and the State of Illinois predict that passenger demand will grow in coming years to a demand level of 1,500,000 — 2,000,000 aircraft operations — up to a million more operations than currently use O'Hare.

Chicago and the dominant airlines at O'Hare want to stuff most of this growth into a vastly expanded O'Hare — adding several hundred thousand more flights each year over your homes and making the problems of noise, vibration, toxic air pollution, safety risks, public health, and property devaluation much worse. To accomplish this goal, they want to stuff O'Hare by adding new runways at O'Hare and also by increasing O'Hare capacity through a variety of terminal and roadway changes.

What's the Solution — the Hyde-Jackson Partnership.

Congressman Henry Hyde and Congressman Jesse Jackson, Jr. — a Republican and a Democrat — have offered a bipartisan "WIN/WIN" solution to the problem of air traffic growth in our region. They have called for:

- 1) a ban on further O'Hare expansion — including a ban on new runways — and
- 2) the fast-track construction of a new regional airport to serve in partnership with a vital O'Hare and Midway. Under the Hyde-Jackson proposal, the new airport would be able to handle the new air traffic growth in an environmentally acceptable manner through the use of large open space buffers — something O'Hare does not have.

Further, unlike the proposal being put forward by Chicago, the Hyde-Jackson proposal keeps all the economic benefits associated with air traffic growth in the metropolitan Chicago region. Chicago proposes shifting some traffic growth — and the jobs and economic benefits — to other cities such as Denver and Dallas.

VOTE ON NOV. 3

Who can do something about the O'Hare problem and the Hyde-Jackson "WIN/WIN" solution?

The key officials who can prevent this problem from getting worse — and solve the current problems — are the new Governor, the new United States Senator, our Congressman, and state senators and representatives.

The Governor. The Governor has the power under existing state law to prohibit construction of new runways and other changes designed to expand O'Hare. Conversely, the new Governor can let the massive O'Hare expansion and new O'Hare runways go forward. The next Governor will also have the power to take action against the toxic air pollution and noise problems at O'Hare. It is obvious that whomever we elect as Governor is critically important to your quality of life, your health, your safety and the value of your home.

United States Senator. Our United States Senator is critical to the battle over airport expansion. If our next Senator is beholden to Chicago, he or she will work in favor of massive O'Hare expansion and against a new regional airport. Conversely, an independent Senator will work with Congressman Hyde, Congressman Jackson and our new governor to block further O'Hare expansion and to build the new regional airport.

Congressman. Congressman Hyde has been a tenacious and aggressive fighter on our behalf on the issues of O'Hare expansion. He recently single-handedly defeated attempts to add more than 60 new slots at O'Hare. Congress has announced that next year will be the "Year of Aviation" in Congress. The debate over expansion of O'Hare and construction of a new regional airport will be at the center of the action. It is essential that we have a strong and knowledgeable advocate on this issue as our Congressman.

State Legislators. The new Governor is going to have to work with the Legislature to get additional O'Hare protection laws passed and to build the new airport. State Senate President Pate Philip and House Minority Leader Lee Daniels have pledged to work with Congressmen Hyde and Jackson to achieve the two goals of the bipartisan Hyde-Jackson Partnership: 1) a ban on further O'Hare expansion — including a ban on new runways — and 2) the fast-track construction of a new regional airport to serve in partnership with a vital O'Hare and Midway. In Cook County, State Senator Marty Butler and Representative Rosemary Mulligan have promised to fight for a strong air toxics protection bill to address the air toxics issue around O'Hare.

Other Officials. It is important to remember that over 100 mayors and communities representing both political parties — Republican and Democrat — have endorsed the goals of the bipartisan Hyde-Jackson Partnership. While local officials don't have the same direct authority over the issues as do federal and state officials, their voices count. One local candidate who has spoken out very strongly in favor of the goals of the Hyde-Jackson Partnership is Aurelia Pucinski, candidate for President of the Cook County Board. In DuPage County, Bob Schillerstrom, candidate for President of the DuPage County Board — along with the members of the DuPage County Board — have been strong advocates of the Hyde-Jackson Partnership.

VOTE ON NOV. 3