



October 5, 2011

Don Fox
Acting Director and General Counsel
Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3917

RE: RIN 3209-AA04
[Proposed Amendments Limiting Gifts from Registered Lobbyists and Lobbying Organizations]

Dear Mr. Fox:

ASAE is appreciative of the opportunity to comment on proposed rule RIN 3209-AA04, which restricts all executive branch employees of the Federal Government from using certain exceptions to accept gifts from registered federal lobbyists and lobbying organizations, including invitations to widely attended gatherings ("WAGs").

The American Society of Association Executives ("ASAE") is a section 501(c)(6) individual membership organization of more than 22,000 association executives and industry partners representing nearly 12,000 tax-exempt organizations. Its members manage leading trade associations, professional societies, and voluntary organizations across the United States and in 50 countries around the globe. We advocate for associations so that they may continue to fulfill their important missions and improve the quality of life in the United States and abroad.

ASAE fully supports OGE's mission to promote high ethical standards for executive branch employees, and is generally accepting of OGE's intention to limit some of the exceptions that may have been used on occasion to permit certain gifts, such as invites to holiday parties or other social events, where the nexus to the government's interest is attenuated.

ASAE is encouraged, further, by OGE's acknowledgement that certain widely attended gatherings can serve important government purposes. OGE justly asserts in its proposed rule that federal employees, including political appointees, should be able to accept offers of free attendance to "substantive events that would provide a legitimate educational or professional development benefit that furthers the interests of an agency."

In crafting that exception, OGE proposes to allow government employees to accept invitations to attend educational and professional development activities held by Section 501(c)(3) organizations, institutions

of higher education, and nonprofit professional associations, scientific organizations and learned societies, without regard to the LDA registration status of these entities. In explaining the WAG exception, OGE correctly points to the valuable educational and professional development opportunities at these types of programs, but then inexplicably leaves trade associations out of the limited exclusion.

OGE contends in its proposed rule that trade associations “may sponsor educational activities for their members and even the public, but the primary concern of such associations generally is not the education and development of members of a profession or discipline, which is the focus of the proposed exclusion.”

This narrow reading of trade association activities based on a definition from Encyclopedia Britannica ignores the important role these organizations play in virtually every industry that the government seeks to regulate. Companies join trade associations to promote common interests, share best practices and learn about the latest developments in their industry. While many trade associations engage in advocacy, they also help resolve industry-wide issues that could otherwise threaten economic growth, and set safety and technical standards that benefit everyone in exactly the same way as professional associations, scientific organizations and learned societies.

A considerable intersection exists between government and trade associations’ interests. Today’s mixed economy – where government and business both play important roles with regard to production, consumption, job creation, and investment – requires mutual understanding and a free exchange of ideas, knowledge and expertise to ensure informed policymaking and economic progress.

Lawrence Summers, former director of the White House National Economic Council, said last year, “Business and government have important mutual obligations. Government must recognize the importance of building the foundations for businesses to succeed and ensuring a stable business environment. Likewise, businesses must carefully consider their obligations to their fellow citizens.”

In an address earlier this year to the U.S. Chamber of Commerce, President Obama said he envisioned a partnership between the public and private sectors that he called “Winning the Future,” promising to lay the foundation for businesses to grow and innovate and asking businesses to invest in America.

Setting policies that restrict knowledge-sharing between the government and trade associations is counterproductive to the administration’s stated aspirations to work in partnership with the business community to create jobs and grow the economy.

Trade associations are among the many types of nonprofit organizations that sponsor programs in consonance with government interests and with Federal employees’ professional development aspirations. They regularly hold seminars, conferences, trade shows and other programs that forecast industry performance and spotlight concerns. Government employees tasked with promulgating regulations most assuredly benefit from attending programs where they can learn about latest developments, see new product demonstrations, and understand how industries might be impacted by rulemaking. At the same time, trade association members have the opportunity to learn more about agencies’ interests and processes and are better prepared to comply with federal regulations.

These educational and professional development programs conducted by trade associations are virtually indistinguishable from those conducted by the other types of organizations listed in the proposed rule. They offer the same benefits to government employees and should qualify for the same exclusion.

While ASAE appreciates OGE's stipulation that government employees can accept free attendance at events where they are speaking or presenting information on behalf of the administration, the unbalanced treatment of trade association programs in the proposed rulemaking will likely discourage federal employees from availing themselves of these opportunities. Further, the implication in the proposed rule that trade associations use invitations to events as a means of cultivating access by registered lobbyists makes it unlikely federal employees would pay out-of-pocket to attend these types of programs and events, even if they would benefit from attending.

Another unintended consequence of this proposed rulemaking could be that it causes trade associations to deregister as lobbyists so as not to fall under the restriction on gifts such as widely attended gatherings. This would undermine the administration's stated interest in transparency, which we share.

There are countless examples of legitimate, substantive trade association programming that intersect with the government's interests. Trade associations exist for every industry that the federal government regulates, from food safety and insurance to energy and telecommunications, just to name a few. These organizations and the industries they represent want to work with the administration to grow the economy, reduce unemployment, and protect America's standing and credibility in the world. In order to work together, we need the administration to recognize associations as something more than lobbying groups working to exert undue influence over federal agencies and their employees.

ASAE and the attached list of associations urge OGE to revise its proposed exception for gifts to allow federal employees to attend substantive educational programs and events held by trade associations, for the same reasons that this exception has been extended to the other types of organizations listed in the proposed rule.

Thank you in advance for your consideration and if you have any questions, please contact Jim Clarke, senior vice president of public policy at ASAE, at 202-626-2865 or jclarke@asaenet.org.

Sincerely,



John H. Graham IV, CAE
President and CEO

Association Names Listed by State

Alabama

Alabama Association of Realtors
Montgomery

American Society for Reproductive Medicine
Birmingham

Arizona

American Association of Cosmetology Schools
Scottsdale

The Software Defined Radio Forum, Inc.
Phoenix

Arkansas

Arkansas Timber Producers Association
Little Rock

California

Association for Play Therapy
Clovis

Association Management Services, Inc.
Pasadena

Bobrow and Associates
Citrus Heights

CAHSAH: The California Association for Health
Services at Home
Sacramento

California, Nevada, Arizona Automotive
Wholesalers Association
Rancho Cordova

CASS – An International Separation Science
Society
Emeryville

Electronics Representatives Association,
Southern California Chapter
Irvine

Hollywood Post Alliance
Los Angeles

Independent Pool and Spa Service Association
Granada Hills

International Association of Plumbing and
Mechanical Officials (IAPMO)
Ontario

Medical Oncology Association of Southern
California, Inc.
Upland

Motorcycle Industry Council
Irvine

Motorcycle Safety Foundation
Irvine

National Public Employer Labor Relations
Association
Oceanside

Pacific-West Fastener Association
Los Alamitos

Recreational Off-Highway Vehicle Association
Irvine

San Francisco Travel Association
San Francisco

Specialty Equipment Market Association
Diamond Bar

Specialty Vehicle Institute of America
Irvine

World Pet Association, Inc.
Monrovia

Connecticut

National Shooting Sports Foundation
Newtown

Delaware

Vehicle Protection Association
Selbyville

District of Columbia

AAEI: American Association of Exporters and
Importers

AdvaMed – Advanced Medical Technology
Association

Agriculture Retailers Association

Airports Council International – North America

American Association of State Colleges and
Universities

American Astronomical Society	Biotechnology Industry Organization
American Bakers Association	Building Owners and Managers Association (BOMA) International
American Beverage Association	Coalition for Health Funding
American Chemistry Council	Coalition for Health Services Research
American Cleaning Institute	COMPTEL: The Competitive Communications Association
American College of Emergency Physicians	Consumer Healthcare Products Association
American Council of Engineering Companies	Consumer Specialty Products Association
American Council of Independent Laboratories	Council for Advancement & Support of Education (CASE)
American Council on International Personnel	Council for Responsible Nutrition
American Health Care Association	Credit Union National Association
The American Hotel & Lodging Association	CropLife America
American Immigration Lawyers Association	Direct Marketing Association
American Nursery & Landscaping Association	Edison Electric Institute
American Public Power Association	The ESOP Association
American Public Transportation Association	The Fertilizer Institute
American Road & Transportation Builders Association	General Aviation Manufacturers Association (GAMA)
America's Blood Centers	Hearing Industries Association
Animal Health Institute	Independent Community Bankers of America
Association of Cable Communicators	Industrial Minerals Association – North America
Association of Community College Trustees	Institute of Makers of Explosives
Association of Corporate Counsel	Institute of Scrap Recycling Industries, Inc. (ISRI)
Association of Defense Communities	
Association of Global Automakers	
Association of Home Appliance Manufacturers	

International Biometrics & Identification Association

Metal Construction Association

Medical Device Manufacturers Association

Mortgage Bankers Association

National Agricultural Aviation Association

National Association for Surface Finishing

National Association of Affordable Housing Lenders

National Association of Broadcasters

National Association of Clean Water Agencies (NACWA)

National Association of County Behavioral Health and Development Disability Directors

National Association of Enrolled Agents

National Association of Home Builders

National Association of Manufacturers

National Association of Realtors®

National Association of Surety Bond Producers

National Association of Water Companies

National Association of Wheat Growers

National Cable and Telecommunications Association

National Center for Assisted Living

National Cooperative Business Association

National Corn Growers Association

National Customs Brokers and Forwarders Association of America, Inc.

National Leased Housing Association

Nuclear Energy Institute

Pharmaceutical Research and Manufacturers of America

Railway Engineering-Maintenance Suppliers Association

RISE (Responsible Industry for a Sound Environment)

Safety Net Hospitals for Pharmaceutical Access

Small Business Legislative Council

Specialized Carriers & Rigging Association

Society for Neuroscience

Tate & Tryon, CPAs and Consultants

TechAmerica

United Fresh Produce Association

United States Telecom Association

U.S. Chamber of Commerce

U.S. Grains Council

U.S. Travel Association

Vinyl Siding Institute

Washington Area New Automobile Dealers Association

Washington Metropolitan Area Corporate Counsel Association (WMACCA)

Florida

Florida Assisted Living Association
Tallahassee

Florida Chiropractic Association
Oakland

Florida Fruit and Vegetable Association
Maitland

Florida Police Chiefs Association
Tallahassee

Laser Institute of America, Inc.
Orlando

Manatee Chamber of Commerce
Bradenton

National Council of Youth Sports (NCYS)
Stuart

PGA of America
Palm Beach Gardens, FL

Georgia

American College of Rheumatology
Atlanta

Georgia Association of Water Professionals
Marietta

Georgia Chiropractic Association
Tucker

Georgia Society of Association Executives
Atlanta

The Georgia Society of CPAs
Atlanta

Greater Atlanta Homebuilders Association
Atlanta

National Poultry & Food Distributors
Association
St. Marys

Southeastern Affordable Housing Management
Association
Atlanta

Southern Association of Independent Schools
Alpharetta

Southern Crop Production Association
Dawson

Illinois

Academy of General Dentistry
Chicago

AMC: Association Management Center
Glenview

American Academy of Periodontology
Foundation
Chicago

American Architectural Manufacturers
Association
Schaumburg

American Association of Neurological Surgeons
Rolling Meadows

American Dietetic Association
Chicago

American Fence Association
Glen Ellyn

American Health Information Management
Association
Chicago

American Osteopathic Association
Chicago

American Supply Association
Chicago

American Veterinary Medical Association
Schaumburg

Appraisal Institute
Chicago

Associated Equipment Distributors
Oak Brook

Associated General Contractors of the Quad
Cities
Rock Island

Association Forum of Chicagoland
Chicago

Association of Rotational Molders
Glen Ellyn

Bearing Specialists Association
Glen Ellyn

CCIM Institute
Chicago

Ceramic Tile Distributors Association
Glen Ellyn

Concrete Reinforcing Steel Institute
Schaumburg

Cook-Witter, Inc.
Springfield

Exit Planning Institute
Algonquin

Illinois Academy of Family Physicians
Lisle

Illinois Retail Merchants Association
Chicago

Illinois Society of Association Executives
Springfield

Institute of Food Technologists
Chicago

Institute of Real Estate Management
Chicago

International Association of Diecutting and
Diemaking
Crystal Lake

International Association of Lighting Designers
Chicago

IPC Association Connecting Electronics
Industries
Bannockburn

Media Financial Management Association
Northfield

Metals Service Center Institute
Rolling Meadows

NAMA: National Automatic Merchandising
Association
Chicago

National Association of Architectural Metal
Manufacturers
Glen Ellyn

National Church Goods Association
Glen Ellyn

National Marine Manufacturers Association
Chicago

National Roofing Contractors Association
Rosemont

National Sporting Goods Association
Mount Prospect

Plastic Pipe and Fittings Association
Glen Ellyn

Pressure Sensitive Tape Council
Naperville, IL

Plumbing Manufacturers International
Rolling Meadows

Portland Cement Association
Skokie

Precast/Prestressed Concrete Institute
Chicago

Pressure Vessel Manufacturers Association
Glen Ellyn

The Sherwood Group
Deerfield

Southern Illinois Builders Association, a chapter
of the Associated General Contractors of
America
O'Fallon

Thermoset Resin Formulators Association
Glen Ellyn

Third Season Consulting, LLC
Deerfield

Turfgrass Producers International
East Dundee

Indiana

American Bus Association
Indianapolis

Delta Sigma Phi Fraternity
Indianapolis

Indiana Bankers Association
Indianapolis

Indiana Funeral Directors Association
Indianapolis

Indiana Society of Association Executives
Indianapolis

Project Health, The Indianapolis Medical Society
Indianapolis

Iowa

Iowa Telecommunications Association
Urbandale

Kansas

American College of Clinical Pharmacy (ACCP)
Lenexa

American Council of Engineering Companies of
Kansas
Topeka

Angel Capital Association
Overland Park

Golf Course Superintendents Association of
America
Lawrence

Kansas Livestock Association
Topeka

Kansas Organization of Recyclers
Topeka

Kansas Pest Control Association
Topeka

Kansas Society of Association Executives
Topeka

National Association of Trailer Manufacturers
Topeka, KS

Louisiana

International Freight Forwarders & Custom
Brokers Association of New Orleans
Metairie

Louisiana Association of Criminal Defense
Lawyers
Baton Rouge, LA

Louisiana Dental Association
Baton Rouge

Louisiana Gas Association
Baton Rouge

Louisiana Industry for Film and Entertainment
Baton Rouge

Louisiana Society of Association Executives
Baton Rouge

National Association of Insurance & Financial
Advisors - Louisiana
Baton Rouge

Maine

Maine Association of Broadcasters, Inc.
Augusta

Maryland

American Gastroenterological Association
Bethesda

American Nurses Association
Silver Spring

American Speech-Language-Hearing Association
(ASHA)
Rockville

Automotive Aftermarket Industry Association
Bethesda

Forest Resources Association
Rockville

Home Ports, Inc.
Chestertown

National Association of School Psychologists
Bethesda

National Electrical Contractors Association
Bethesda

National Asphalt Pavement Association
Lanham

National School Supply & Equipment
Association
Silver Spring

National Ready Mixed Concrete Association
Silver Spring

Sporting Goods Manufacturers Association
Silver Spring

Massachusetts

The Association Advantage LLC
Wakefield

The Guild Associates, Inc.
Malden

Infusion Nurses Society
Norwood

Michigan

Association of Directory Publishers
Traverse City

Association Services of Michigan
Lansing

The Engineering Society of Detroit
Southfield

National Truck Equipment Association
Farmington Hills

Post-Tensioning Institute
Farmington Hills

Minnesota

American Academy of Neurology
St. Paul

American Association of Neuromuscular &
Electrodiagnostic Medicine (AANEM)
Rochester

The Harrington Company
Minneapolis

Joint Commission on Allied Health Personnel in
Ophthalmology
St. Paul

Missouri

AGC of Saint Louis
St. Louis

EPCOR
Kansas City

International Association of Assessing Officers
Kansas City

National Christmas Tree Association
Chesterfield

St. Louis Council of Construction Consumers
Manchester

Montana

Montana Health Care Association
Helena

Montana Society of Association Executives
Helena

Montana Telecommunications Association
Helena

Nebraska

Nebraska Bankers Association
Lincoln

Nebraska REALTORS Association
Lincoln

Nevada

Nevada Society of Association Executives
Las Vegas

New Hampshire

New Hampshire Dental Society
Concord

New Jersey

APMI International
Princeton

Association of Food Industries
Neptune

Juvenile Products Manufacturers Association
Mount Laurel

Metal Powder Industries Federation
Princeton

National Coalition of Estheticians,
Manufacturers/Distributors & Associations
Ridgewood

New Jersey Association of Mental Health and
Addiction Agencies, Inc.
Mercerville

New Jersey Hospice and Palliative Care
Organization
Scotch Plains

New Jersey Landscape Contractors Association
Elmwood Park

NJAFED – NJ Association of Fire Equipment
Distributors
Plainfield

Professional Association of Innkeepers
International
Haddon Heights

New Mexico

IIANM: Independent Insurance Agents of New
Mexico
Albuquerque

New York

American Business Media
New York City

Empire State Society of Association Executives,
Inc.
East Greenbush

Illuminating Engineering Society
New York

Independent Insurance Agents & Brokers of
New York
Syracuse

International Trademark Association (ITA)
New York City

MPA – The Association of Magazine Media
New York City

National Student Nurses' Association
Brooklyn

New York Association of Convenience Stores
Albany

New York State Motor Truck Association
Albany

NYBFAA – NY Burglar & Fire Alarm Association
Albany

North Carolina

Association Executives of North Carolina
Raleigh

Carolina/Virginia Dairy Products Association
Morrisville

Carolinas AGC
Charlotte

The Hosiery Association
Charlotte, NC

IMI Association Executives
Morrisville

Motor & Equipment Manufacturers Association
Research Triangle

National Association of Professional Background
Screeners
Morrisville

United States Lactation Consultant Association
Morrisville

Wilmington Regional Association of REALTORS,
Inc.
Wilmington

Ohio

Experience Columbus
Columbus

Marble Institute of America
Cleveland

National Association of College Stores
Oberlin

National Ground Water Association
Westerville

OFA – The Association for Horticulture
Professionals
Columbus

Ohio Council for Home Care and Hospice
Columbus

Ohio Osteopathic Association
Columbus

Ohio Podiatric Medical Association
Columbus

Ohio Provider Resource Association
Columbus

Ohio Society of Association Executives
Columbus, OH

Ohio Society of Certified Public Accountants
Columbus

Ohio State Medical Association
Hilliard

Precision Metalforming Association
Independence, OH

Oklahoma

Associated Wire Rope Fabricators
Tulsa

Oklahoma Association of Realtors
Oklahoma City

United Suburban Schools Association
Oklahoma City

Oregon

ComNet Marketing Group
Medford

Oregon Society of Association Management
(OSAM)
Portland

Professional Land Surveyors of Oregon
Salem

Pennsylvania

AASP-PA
Harrisburg

Alliance of Automotive Service Providers of
Pennsylvania, Inc.
Harrisburg

American Association of Birth Centers
Perkiomenville

Industrial Supply Association
Philadelphia

Installation Quality Certification Program
Erie

Manufacturer and Business Association
Erie

PAFED – PA Association of Fire Equipment
Distributors
Erie

PBFAA – Pennsylvania Burglar & Fire Alarm
Association
Erie

Pennsylvania Bankers Association
Harrisburg

Soroptimist International of the Americas
Philadelphia

Rhode Island

Association of Marina Industries
Warren

South Carolina

Home Builders Association of South Carolina
Columbia

Tennessee

AALAS: American Association for Laboratory
Animal Science
Memphis

America Outdoors Association
Knoxville

American Council of Engineering Companies of
Tennessee
Nashville

College and University Professional Association
for Human Resources
Knoxville

Tennessee Medical Association
Nashville

Tennessee Road Builders Association
Nashville

Texas

American Lighting Association
Dallas

CMP Management, Inc.
Austin

ESA, Electronic Security Association
Irving

Greater Houston Homebuilders Association
Houston

Houston Apartment Association
Houston

IAEE: International Association of Exhibitions
and Events
Dallas

International Institute of Synthetic Rubber
Producers, Inc.
Houston

National Independent Automobile Dealers
Association
Arlington

Promotional Products Association International
Irving, TX

San Antonio Society of Association Executives
San Antonio

Southwestern Automated Clearing House
Association
Dallas

Texas and Southwestern Cattle Raisers
Association
Fort Worth

Texas Apartment Association
Austin

Texas Association for Home Care & Hospice
Austin

Texas Credit Union League
Dallas

Texas Poultry Federation
Round Rock

Texas Society of CPAs
Dallas

Virginia

Aerospace Industries Association of America,
Inc.
Arlington

Air Conditioning Contractors of America
Arlington

Air-Conditioning, Heating and Refrigeration
Institute
Arlington

Alliance for Women in Media
McLean

American Academy of Audiology
Reston

American Academy of Physician Assistants
Alexandria

American Association for the Study of Liver
Disease
Alexandria

American College of Radiology
Reston

American Composites Manufacturers
Association
Arlington

American Council of Engineering Companies of
Virginia
Richmond

American Counseling Association
Alexandria

American Frozen Food Institute
McLean

American Industrial Hygiene Association
Fairfax

American Institute for International Steel
Falls Church

American Moving & Storage Association
Alexandria

American Network of Community Options and
Resource
Alexandria

American Seed Trade Association
Alexandria

American Society of Travel Agents
Alexandria

American Staffing Association
Alexandria

American Traffic Safety Services Association
Fredericksburg

American Wood Council
Leesburg

Associated General Contractors
Arlington

Association for Metallically Stabilized Earth
McLean

Association Management Group
McLean

Brick Industry Association
Reston

CMAA: Construction Management Association
of America
McLean

Compressed Gas Association
Chantilly, VA

Construction Industry Round Table
McLean

The Consumer Electronics Association
Arlington

Convention Industry Council
Alexandria

Council for Affordable and Rural Housing
Alexandria

Door and Hardware Institute
Chantilly

EastPay Inc.
Richmond

Effective Database Management
Hamilton

Emergency Department Practice Management
Association
McLean

Healthcare Distribution Management
Association
Arlington

Hearth, Patio & Barbecue Association
Arlington

ICPI, Interlocking Concrete Pavement Institute
Herndon

Independent Office Products and Furniture
Dealers Association
Alexandria

InfoComm International
Fairfax

International Academy of Compounding
Pharmacists
Alexandria

International Association of Amusement Parks
and Attractions
Alexandria

International Cooperative and Mutual Insurance
Federation/ Regional Association for the
Americas
McLean

International Liquid Terminals Association (ILTA)
Arlington

International Sign Association
Alexandria

International Wood Products Association
Alexandria

Irrigation Association
Falls Church

Kitchen Cabinet Manufacturers Association
Reston, VA

LarsonAllen LLP
Arlington

The M Companies
Arlington

Military Officers' Association of America
Alexandria

NACHA – The Electronic Payments Association
Herndon

NAMI (National Alliance on Mental Illness)
Arlington

National Affordable Housing Management
Association
Alexandria

National Alliance of State Pharmacy
Associations
Richmond

National Association of Chain Drug Stores
Alexandria

National Association of Chemical Distributors
(NACD)
Arlington

National Association of Children's Hospitals
Alexandria

National Association of Development
Companies
McLean

National Association of Professional Insurance
Agents
Alexandria

National Association of Court Reporters
Vienna

National Association of Insurance and Financial
Advisors
Falls Church

National Automobile Dealers Association
McLean

National Council of Agricultural Employers
Vienna

National Electrical Manufacturers Association
Arlington

National Industries for the Blind
Alexandria

National Milk Producers Federation
Arlington

National Office Products Alliance
Alexandria

National Rural Electric Cooperative Association
Arlington

National RV Dealers Association
Fairfax

National Society of Professional Engineers
Alexandria

NATSO, Representing America's Travel Plazas
and Truckstops
Alexandria

Non-Profit Help
Alexandria

Office Furniture Dealers Association
Alexandria

Pellet Fuels Institute
Arlington

Petroleum Marketers Association of America
Arlington

Plumbing-Heating-Cooling Contractors –
National Association
McLean

Professional Landcare Network
Herndon

Professional Services Council
Arlington

Security Industry Association (SIA)
Alexandria

Sheet Metal and Air Conditioning Contractors'
National Association (SMACNA)
Chantilly

Society of American Florists
Alexandria

Society of Government Meeting Professionals
Alexandria

Special Libraries Association
Alexandria

Student & Youth Travel Association
McLean

Tecker International LLC
Clifton

Telecommunications Industry Association
Arlington

United Motorcoach Association
Alexandria

U.S. Clean Heat & Power Association
Falls Church

Virginia Association of Chiefs of Police
Richmond

Virginia Nurses Association
Richmond

Virginia Society of Association Executives
Glen Allen

Virginia Society of CPAs
Glen Allen, VA

Virginia Trucking Association
Richmond

Washington

King County (Seattle) Bar Association
Seattle

Wisconsin

American Malting Barley Association
Milwaukee

National Funeral Directors Association
Brookfield

Snow & Ice Management Association, Inc.
Milwaukee