



NLLEA GRAM

National Liquor Law Enforcement Association

Volume 13, Issue 2

Spring, 2003

Inside This Issue

- 1 Message from the President
- 2 What's New
- 4 NHTSA Corner
- 6 Hot Issues
- 8 On The Legal Side
- 10 2003 NLLEA Conference

Message from the President

Dear Fellow NLLEA Members,

I want to tell you of two people I know. **Mark Hicks** is one of the Mississippi ABC's Agents-In-Charge, responsible for overseeing the personnel of our District IV. I haven't seen him for a few months and the people he is with now call him Sgt. Hicks. He is a military policeman serving somewhere in Operation Iraqi Freedom. Mark is an able person and he will take good care of the troops under his command.

ABC Agent, **Sr. Alva Lee Cook** (known to us as Robbie) is also away from us for an unknown length of time. Major Cook's military specialty is reconstructing civil government services. Last I heard, he was being transported to a hospital in Germany for medical tests, but he is undoubtedly back with his unit by now.

Mark and Robbie are away from their children, and their wives are dealing with all the family's concerns—supported by friends and relatives, but alone. Their co-workers keep in contact and I know Mark and Robbie appreciate their concerns.

Their plight is repeated 4,500 times in Mississippi and thousands upon thousands of times throughout our nation. All of us have friends or family

members involved in this massive undertaking overseas. Members of the NLLEA have been activated; **Charlie Davis** of Arkansas is currently away, **Tommy Marvell** of Oklahoma has only recently returned and there are others of which you are aware—our thoughts are with them and their families.

I wish I could tell each of my admiration for their dedication to this country and my thanks for their personal sacrifices. I know you join me in wishing them safety in their service and a rapid return home. Please keep Mark, Robbie, Charlie and all in your prayers, and may God's grace and peace be with us.

Be safe,

David Wilson

2002-2003 NLLEA President

Best Wishes for a Speedy Recovery to Gary Sullivan, Assistant Deputy Director of the Ohio Investigative Unit



Get Well Soon!

Ed Duvall Jr., Deputy Director of the Ohio Investigative Unit, has asked that the NLLEA join him in supporting and encouraging Assistant Deputy Director Gary Sullivan as he works to overcome cancer. Mr. Duvall had the following kind words to share with the NLLEA membership:

Many of you who attended our NLLEA Conference in Cleveland Ohio will fondly remember Gary Sullivan and all the hard work he dedicated to our membership. He has recently has been diagnosed with cancer and after surgery has been released home for recuperation. We expect with Gary's iron will and strong work ethic, he will be back to work soon.

While Gary is confined to his farm in Southern Ohio I am positive he would love to get cards of encouragement from all our membership across this great land. Gary can be reached at:

**Gary Sullivan
1109 Thorpe Rd.
Sabrina, Ohio 45169**

Thanks for your thoughts and prayers. In these difficult times at home and abroad it just heightens the awareness that the NLLEA needs to stand united. God Bless.

What's New

Liquor Law Enforcement Strained by State Budget Cuts

State budget deficits totaled approximately \$40 billion in Fiscal Year 2002 and \$50 billion for FY03. This deficit is mainly a result of weakening state revenues (the worst revenue decline since World War I), and the budget shortfalls are not projected to abate in the near future. To close the widening gap between revenues and expenditures, states are reducing spending on a variety of programs and essential services, including Liquor Law Enforcement. The American Public Health Association, along with countless other public health and law enforcement advocates, has urged legislators that critical programs and public health infrastructure affecting human health and safety be protected despite any fiscal difficulties states may be facing. Despite these appeals, the Maine Bureau of Liquor Enforcement and the Massachusetts Alcoholic Beverage Control Commission, whose plight is described below, have already begun to feel the strain of state budget cuts.

Maine's Bureau of Liquor Enforcement

The Maine Legislature recently passed a \$5.3 billion, 2 year budget that Governor John Baldacci signed into law. The budget, while successfully closing the upcoming predicted budget shortfall without raising state taxes, controversially eliminates the Maine Bureau of Liquor Enforcement entirely. It also arranges for the closing of all remaining state liquor stores and lays the groundwork for a 10-year lease of the state's wholesale liquor business. The Bureau of Enforcement currently employs 20 staff, 16 of which are enforcement officers.

The budget was passed despite a vehement protest by the Legal and Veterans Affairs Committee and numerous letters of support (including one from the NLLEA), both of which unanimously condemned Baldacci's plan to close the Bureau of Liquor Enforcement.

Baldacci and state officials defended the budget plan, claiming that enforcing liquor laws is not an area that the state needs to be involved with, since local law enforcement officers can arrest for liquor-law violations. Additionally, the Baldacci administration feels that local law enforcement will be able to pick up the slack regarding enforcement, and that 3 additional civilian positions in the Department of Public Safety will be able to handle licensing and other responsibilities previously undertaken by the Bureau.

Many legislators and public health and law enforcement officials strongly disagree, voicing concerns about the potential policy shift away from state agencies enforcing liquor laws and the loss of jobs. These experts all concur that a specialized, independent law enforcement agency possessing specific knowledge and professional skills is necessary for effective and efficient enforcement of state liquor laws. Most agree that there are more effective alternative approaches to generating revenue and reducing expenditures than eliminating state enforcement agencies, such as increasing licensing fees, alcohol and tobacco taxes, violation fines and wholesale leasing costs. As House Democratic Leader John Richardson said, "Public Safety is a service which really cannot be shortchanged."

Massachusetts Alcoholic Beverage Control Commission

Governor of Massachusetts Mitt Romney recently approved a budget which reduces funding to the Massachusetts Alcoholic Beverage Control Commission (ABCC). The reduction all but eliminates the enforcement mechanism of the agency by eliminating 11 agents. The decision comes despite support from the NLLEA, which sent a letter of protest to the Governor's office detailing the importance of a statewide liquor-law enforcement agency and imploring Governor Romney's administration to restore all funding to the ABCC. Romney's administration defended the decision to reduce the ABCC's funding, calling it the result of careful deliberation in conjunction with the FY04 budget and the fiscal constraints that Massachusetts is facing.

Unfortunately, it appears that many of our agencies are facing similar cuts. During these difficult times, we must remain optimistic that policy makers will begin to understand the important role of liquor law enforcement in protecting public health and safety.

The NLLEA sends its support and best wishes to the agents of both the Maine Bureau of Liquor Enforcement and the Massachusetts Alcoholic Beverage Control Commission.

South Wales Police Prevent Alcohol Assaults

Cardiff, the capital city of Wales in the United Kingdom, is experiencing an economic renaissance. The central city has a vibrant business district by day and a booming entertainment district by night – and herein lays the problem. With almost unfettered growth in nightclubs and alcohol sales, community problems with alcohol-related violence have grown commensurate with the expansion of the entertainment district.

The Cardiff entertainment district boasts dozens of alcohol outlets, ranging in occupancy from 3,500 patrons to smaller establishments with 100 or fewer occupants, nestled together in close proximity to one another. From Thursday through Sunday night this district attracts thousands of youth and young adults who commute from the suburbs to typically drink until they drop. Closing hours for alcohol outlets vary from 11:00 pm to 4:00 am, and bar hopping is subsequently frequent and easy. The proximity of hundreds of drunk young men formulaically leads to multiple assaults and injuries.

In July, 2000, the British Home Office funded the South Wales Police to implement the Tackling Alcohol Related Street Crime in Cardiff Project (TASC), to reduce the levels

NHTSA Corner

By: Dean Kuznieski

Impaired driving is one of the most frequently committed crimes in America – causing one death every 30 minutes. The national goal for 2003-2004 is to reduce the rate of alcohol related fatalities to represent no more than 0.53 deaths per 100 million vehicle miles traveled which equates to approximately 2,000 lives saved annually.

NHTSA is working with States, Traffic Safety Advocates, and Law Enforcement Agencies to conduct two national crackdowns each year in July and December.

Currently, 31 states and the District of Columbia are using the "You Drink & Drive, You Lose" message as a part of their impaired driving prevention efforts. The campaign's message focuses on the relevant consequences of impaired driving like losing your license, money, time, job, friends and/or vehicle to deter impaired driving.

The campaign supports agency and state program efforts focused on conducting highly visible traffic enforcement of impaired driving prevention laws. Research has clearly demonstrated that this approach has immediate and sustained impact on knowledge, awareness, and influencing positive behavior. When the audience perceives that the risk of being caught is high, they are less likely to drive impaired.

The goal for 2003 is to build on the success and conduct national crackdowns during the July 4th and December holiday season, each period consisting of 16 nights of high-intensity enforcement.

The Congress has appropriated resources in FY 2003 for a national media buy to support state and local efforts during the national crackdowns.

NHTSA will also coordinate mass media out-reach during time periods when alcohol use and alcohol-related crashes increase such as Mardi Gras, St. Patrick's Day, Spring Break, Halloween, and major national sporting events.

of alcohol-related violence and disorder in Cardiff city center. The project is now nearing its completion and has yielded outstanding results: **Despite a 10% increase in bar capacity during the project, overall alcohol-related assaults have been reduced by 8%.**

While the TASC program consists of several components, the most effective intervention has been a novel new program to regulate and train bar door staff. Based on his patrol experience, Sergeant Tumelty observed that door staff were initiating as many bar fights as they were preventing. Beginning with the city's inadequate mandatory training program for Licensed Premises Supervisors (LPS), the TASC project secured Cardiff official approval to expand the LPS training from 8 to 16 hours, incorporate five hours of mediation skill building in the training, strengthen background checks of applicants and impose performance standards for LPS license retention and renewal. The training fee, paid by job applicants, was increased to make the training and records keeping program self-sufficient. Today, South Wales constables monitor the performance of bar door staff through a 'penalty-point' system designed to record performance errors and failures.

In addition to the LPS training program, the South Wales Police initiated unannounced premises inspections and began targeting 'hot spots' for targeted policing operations. Importantly, the Police initiated formal dialogue with licensed premise owners and managers to sustain open lines of communication between parties.

In March, South Wales Police Inspector Tony Rees and Sergeant Ian Tumelty visited the NLLEA offices in Washington to discuss the TASC program before traveling on to Richmond, Virginia, to meet with officials of the Virginia ABC.

Following a round table discussion with Sergeant Tumelty and Inspector Rees, Rebecca Ramirez commented that "After

my interviews with enforcement staff in more than 40 U.S. states, this is one of the first programs I have heard about that establishes performance standards and licenses for bar bouncers. This is a very innovative and potentially effective intervention that we need to learn more about.” Ramirez, of course, volunteered to travel to Cardiff on a fact-finding mission, but was pre-empted by the PIRE Center Director.



South Wales Police Sergeant Ian Tumelty (left), and Inspector Tony Rees (right).



From left to right: South Wales Police Inspector Tony Rees, Virginia ABC Commissioner Esther H. Vassar, Senior Special Agent Wayne Wright, South Wales Police Sergeant Ian Tumelty.

Sergeant Tumelty and Inspector Rees then traveled to Richmond to meet with Commissioner Esther H. Vassar, Senior Special Agent Wayne Wright, Director of the Law Enforcement Bureau Chris Curtis, Special Agent in Charge Shawn Walker, and the rest of the Virginia ABC, to discuss enforcement efforts and exchange ideas and experiences. The Virginia ABC provided an overview of the agency’s education and enforcement programs, including initiatives such as Project Sticker Shock and Operation Undergrad, aimed at promoting and developing community education and partnership.

At the close of their U.S. visit, Inspector Rees expressed his surprise at the policy options available to U.S. alcohol law enforcement that are not available in the United Kingdom. Said Rees, “I had no idea that the U.S. allows for effective regulation of alcohol retailers. When we tried to prohibit price discounting of drinks, we were advised that this action could leave us open to litigation for restraint of trade. Basically, the United Kingdom treats alcohol as a normal commercial product, and trade agreements do not allow us to impose special regulations on alcohol retailers other than opening hours and customer capacities.” While the South Wales Police know only too well the burden of massive expansion of alcohol outlets and sales on the Cardiff Police and community, alcohol policies in the United Kingdom do not now permit consideration of outlet density, hours of sale, discount pricing and other health and safety considerations to limit commercial market forces.

After meeting with Inspector Rees and Sergeant Tumelty, Bob Reynolds of PIRE stated, “I don’t think that even Bourbon Street in New Orleans is comparable to the Cardiff drinking environment. In this context, the TASC achievements are remarkable.”

Hot Issues

TTB Issues Proposed Rule Changes for Flavored Malt Beverages

The U.S. Department of the Treasury, Alcohol and Tobacco Trade and Tax Bureau (TTB), has released proposed rule changes regarding the treatment of flavored malt beverages (FMBs) for tax and distribution purposes. The TTB release:

- Proposes treating all beverages containing flavorings which contain over .5% percent alcohol as distilled spirits.
- Presents results of a TTB study finding that the alcohol content derived from added alcohol flavors accounted for 75%-100% of the majority of FMBs total alcohol content.
- Clarifies the definition of flavored malt beverages, requires producers to supply detailed formulas for their products and to clearly label those products as alcohol not beer or malt.

TTBs Explanation of Flavored Malt Beverages

The proposed rules explain that FMBs are taxed as beer but differ from traditional brewery products in the following ways:

- The beer base is treated to remove taste, aroma, bitterness and extracts, leaving a base;
- Their taste is derived from added flavors rather than from fermentation of malt or other fermentable materials;
- They have low carbonation;
- They are clear in color, or their color is derived from added flavoring or coloring materials;

- Their alcohol content is derived in large part from the distilled spirits contained in the added flavorings materials, rather than from the fermentation of malt or other materials.

The Study

The TTB conducted a study to find out how flavored malt beverages are produced, what ingredients are used, and where the alcohol in them is derived. Of the 114 FMB products analyzed, 105 contained over 76% added alcohol content from flavorings, 5 contained between 51- 75% added alcohol from flavorings, and 4 contained under 25% added alcohol from flavorings. The highest percentage of alcohol from flavorings found was 99.98%.

Of the 144 FMB products analyzed, 95% of the FMBs contained less than 25% alcohol volume from beer base, 4 contained from 26-50% alcohol volume from beer base, 14 contained 51-75% alcohol volume from beer base and 1 contained alcohol volume from beer base of 76-100%.

The rule notice states that the alcohol content present in the vast majority of FMBs is not derived from fermentation but from distilled spirits. They believe that the definition of beer and malt in the relevant federal statutes requires that a product derive a substantial portion of its alcohol from fermentation.

Proposed Rules

Proposed Rule Language for Beer:

Under proposed 27 CFR 25.15, to be taxed as 'beer' a product must contain less than 0.5% alc/vol derived from added materials, including flavorings, that contain distilled spirits. The rule notice calls for comments to this rule. As an example of alternative rules, they offer "requiring that the alcohol content of a malt beverage be 'predominantly,' i.e., at least 51%, derived from fermentation at the brewery".

Proposed Rule for FMBs Containing more than 0.5% alc/vol:

The proposed 0.5% rule would require that beverages containing over 0.5% alc/vol must be produced at a distilled spirits plant, must be taxed at distilled spirits rates, and must be distributed, labeled and advertised as distilled spirits.

Proposed FMB Alcohol Content Labeling Requirements:

TTB explains that FMBs which carry distilled spirit brand names confuse consumers into thinking that they are high in alcohol content. Those FMBs which are not liquor branded and packaged like nonalcoholic 'new age' drinks are likely to confuse consumers about their identity as alcohol products.

The proposed rule would require FMBs to display the alcohol percentage by volume on the front brand label. Type size for containers under 1/2 pint, containers must be minimum 1 mm, containers of more than 1/2 pint require minimum 2 mm type.

Proposed Rules for Labeling and Advertising

The proposed rule would prohibit labeling or advertising statements or representation which tends to create the impression that a malt beverage:

- Contains distilled spirits (other than "non-beverage" flavors containing alcohol),
- Is similar to a distilled spirit, or
- Has intoxicating qualities.

The rule incorporates the ATF statement that the use of spirit brand names is not inherently confusing to consumers. The proposed rule would allow distilled spirit brand names to be included in the FMB name, but prohibit the use of the brand name in any other malt beverage labeling or advertising.

Proposed Rules for Filing Formulas for FMBs

FMB makers would be required to file the formula for any beverages which undergo special processing or filtration, or any other process

not used in traditional brewing. If flavors are present in a fermented product, the formulation filing must include:

- The name of the flavor;
- The product number, if any;
- The name and location of the flavor manufacturer; and
- The TTB or ATF formula number and approval date, if any, of the flavor, and the alcohol content of the flavor.

If flavors or any other ingredients which contain alcohol are used on the product, the maker must indicate in the formula:

- The volume and alcohol content of the beer base;
- The maximum volumes of flavors or other ingredients containing alcohol;
- The alcohol strength of flavors or other materials containing flavors;
- The alcohol contribution to the finished product made by flavors and ingredients containing flavors; and
- The final volume and alcohol strength of the finished product.

Superceding formulas must be filed if a product production process or ingredients change. Existing approved formulas remain valid if the products are in compliance with all of the new rule amendments.

In inviting comments on the formulations, the TTB states that it is particularly interested in whether the proposed system will be easier and less confusing than the present statement of process requirements. Written comments must be received by June 23, 2003. For the entire copy of the proposed rule changes, see <http://www.treas.gov/press/releases/docs/noticeno.pdf>.

On The Legal Side

"Say, Can I get a Beer Here?"

By Aidan Moore

In the case of *Ben's Bar Inc. v. Village of Somerset* (7th Cir. 01/17/2003), the Seventh Circuit for the United States Court of Appeals was asked to determine whether a municipality may restrict the sale or consumption of alcohol on the premises of businesses that serve as venues for adult entertainment, without violating the First Amendment of the United States Constitution.

The Facts of the Case

On October 24, 2000, the Village of Somerset, a municipal corporation located in St. Croix County, Wisconsin enacted Ordinance A-472, entitled "Sexually Oriented Business Ordinance". Its purpose is to regulate "Sexually Oriented Businesses and related activities to promote the health, safety, and general welfare of the citizens of the Village of Somerset, and to establish reasonable and uniform regulations to prevent the deleterious location and concentration of Sexually Oriented Businesses within the Village of Somerset." The Ordinance regulated hours of operation, location, distance between patrons and performers, and other aspects concerning the operations of Sexually Oriented Businesses.

Based on evidence concerning the adverse secondary effects of Sexually Oriented Businesses on the community in reports made available to the Village Board, the holdings and findings in [numerous Supreme Court, federal appellate, and state appellate judicial decisions], studies and summaries of studies conducted in other cities, findings reported in the Regulation of Adult Entertainment Establishments in St. Croix County, Wisconsin and the Report of the Attorney General's Working Group of Sexually Oriented Businesses, the Village Board found that:

(a) Crime statistics show that all types of crimes, especially sex-related crimes, occur

with more frequency in neighborhoods where sexually oriented businesses are located.

(b) Studies of the relationship between sexually oriented businesses and neighborhood property values have found a negative impact on both residential and commercial property values.

(c) Sexually oriented businesses may contribute to an increased public health risk through the spread of sexually transmitted diseases.

(d) There is an increase in the potential for infiltration by organized crime for the purpose of unlawful conduct.

(e) The consumption of alcoholic beverages on the premises of a Sexually Oriented Business exacerbates the deleterious secondary effects of such businesses on the community.

On February 2, 2001, two months before the Ordinance's effective date of April 1, 2001, Ben's Bar, Inc. ("Ben's Bar"), a tavern in the Village featuring nude and semi-nude barroom dance, and two of its dancers, Shannen Richards and Jamie Sleight, filed a four-count complaint against the Village, pursuant to 42 U.S.C. § 1983 and Wis. Stat. § 806.04 (the State's "Uniform Declaratory Judgments Act"), in the United States District Court for the Western District of Wisconsin. The plaintiffs' complaint alleged that portions of the Ordinance were unconstitutional and preempted by Wisconsin law, sought a declaratory judgment resolving those issues, and requested permanent injunctive relief. Specifically, the plaintiffs argued that the Ordinance:

(1) Violated their right of free expression under the First and Fourteenth Amendments to the United States Constitution and Article I, § 3 of the Wisconsin Constitution;

(2) violated their right to equal protection under the Fourteenth Amendment to the United States Constitution and Article 1, § 1 of the Wisconsin Constitution;

(3) Was an illegal "policy or custom" of the Village within the meaning of *Monell v. New York City Dep't of Social Services*, 436 U.S. 658 (1978), and *Owen v. City of Independence, Missouri*, 445 U.S. 622 (1980); and

(4) Was an ultra vires legislative act in violation of Wis. Stat. § 66.0107(3).⁴

Discussion of the Law

The Court notes that the United States Supreme Court addressed the precise issue before them

in *California v. LaRue*, 409 U.S. 109 (1972), when the Court considered the constitutionality of regulations promulgated by California's Department of Alcoholic Beverages that prohibited bars and nightclubs from featuring varying degrees of adult entertainment. The Department enacted the regulations, after holding public hearings, because it concluded that the consumption of alcohol in adult entertainment establishments resulted in a number of adverse secondary effects—e.g., acts of public indecency and sex-related crimes. As in this case, adult entertainment businesses filed suit alleging that the regulations violated the First Amendment. The *LaRue* Court rejected the plaintiffs' contention that the state's regulatory authority over "intoxicating beverages" was limited, as applied to adult entertainment establishments. The *LaRue* Court ended its analysis by noting that "[t]he Department's conclusion, embodied in these regulations, that certain sexual performances and the dispensation of liquor by the drink ought not to occur at premises that have licenses was not an irrational one," and that "[g]iven the added presumption in favor of the validity of the state regulation in this area that the Twenty-first Amendment requires, we cannot hold that the regulations on their face violate the Federal Constitution."

The Court cited to the road map provided by the Supreme Court in *44 Liquormart, Inc. v. Rhode Island*, 517 U.S. 484 (1996), and concluded that a liquor regulation prohibiting the sale or consumption of alcohol on the premises of adult entertainment establishments is constitutional if:

- (1) the State is regulating pursuant to a legitimate governmental power,
- (2) The regulation does not completely prohibit adult entertainment,
- (3) The regulation is aimed not at the suppression of expression, but rather at combating the negative secondary effects caused by adult entertainment establishments and
- (4) The regulation is designed to serve a substantial government interest, narrowly tailored, and reasonable alternative avenues of communication remain available.

Summary

The Court held that the municipal regulation of Sexually Oriented Businesses within the community had no impact whatsoever on Ben's Bar's ability to offer nude or semi-nude dancing to its patrons; it seeks to regulate alcohol and nude or semi-nude dancing without prohibiting either. The Court noted that the citizens of the Village of Somerset may still buy a drink or watch nude or semi-nude dancing. They are not, however, constitutionally entitled to do both at the same time and in the same place.

Agencies that issue beverage alcohol licenses at the state level should be aware of the potential impact of their licensing process and procedure as it relates to and interfaces with local ordinances that regulate constitutionally protected areas.

The NLLEA would like to thank the following contributors:

Matt Boomershine

Lynn Cayford

Ed Duvall, Jr.

Amy Fairweather

Dean Kuznieski

Aidan Moore

Bob Reynolds

Shawn Walker

David Wilson

If you are aware of recent or upcoming local, state or national Liquor Law Enforcement issues, events or stories, and would like to see them covered in the next NLLEA newsletter, please forward your story, along with any relevant materials, to:

Rebecca Ramirez

rramirez@pire.org

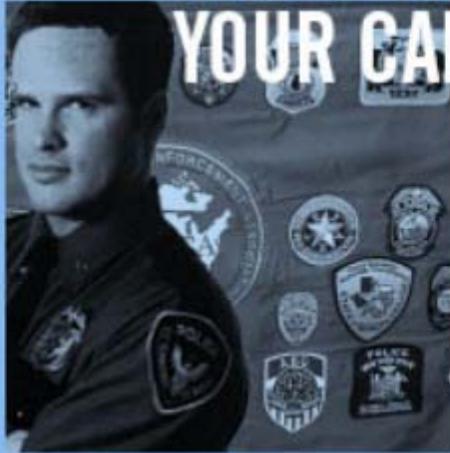
(301) 755 - 2761

(301) 755 - 2779 (FAX)

MARK

SEPT. 17-20

YOUR CALENDAR 2003



NATIONAL LIQUOR LAW Enforcement Association 2003 CONFERENCE

**Hyatt Regency Atlanta - Atlanta, GA
September 17 - 20, 2003**

Register today at www.nllea.org

Hosted in Partnership with The Georgia Department of
Revenue, Alcohol and Tobacco Division and the Center for
Enforcing Underage Drinking Laws Program



PROGRAM

INFORMATION

Be sure to attend the 2003 NLLEA Annual Conference being held in conjunction with the Enforcing Underage Drinking Laws Programs - National Leadership Conference. More than 900 attendees are expected to attend both conferences this year - an unprecedented gathering of enforcement officers, professionals, volunteers and youth leaders all working to prevent alcohol related problems.

Three reasons why the NLLEA Annual Conference is the most important event in 2003 for you to attend:

- 1. Comprehensive Content** - virtually every topic relevant to alcohol law enforcement will be covered in one of our workshops.
- 2. Practical Information** - Leave the conference with messages, skills and tools to assist you in your work locally.
- 3. Networking Opportunities** - Extensive peer-to-peer interaction will provide you with new ideas and solutions, as well as the beginning of many valuable relationships that will continue far beyond the conference.



Special Conference Highlights:

- Optional Pre-Conference Training Activities on Wednesday, September 17th
- Advanced Law Enforcement Track
- Updates on the latest research related to alcohol law enforcement
- New technology tools to facilitate enforcement

**For all registration and
hotel information,
please visit:**

www.nllea.org