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Monday Morning Quarterback: Maryland v. Wilson Revisited: For the Petitioner

J. Joseph Curran Jr.
Former Maryland Attorney General

Kathryn Grill Graeff
Judge, Maryland Court of Special Appeals

FOR THE PETITIONER

J. Joseph Curran, Jr., Attorney General of Maryland,
with Kathryn Grill Graeff, Assistant Attorney General

Do police officers have the authority, during a traffic stop, to order the passengers to exit the vehicle? This question implicates the Fourth Amendment's prohibition against unreasonable searches and seizures, and it involves the weighing of the liberty and privacy interests of persons traveling on the public roadways against the safety of police officers who conduct thousands of traffic stops every day. Courts throughout the nation were divided on the answer to this question. On February 19, 1997, the Supreme Court resolved the controversy; it held that a police officer making a traffic stop may, as a matter of course, order the passengers to get out of the car pending completion of the stop. *Maryland v. Wilson*, 117 S. Ct. 882, 886 (1997).

The case started on June 8, 1994, when a Maryland State Trooper observed a car speeding on Interstate 95 in Baltimore County, with what appeared to be suspicious license plate tags. The officer activated his cruiser's lights and siren, but the driver continued driving for approximately one and one-half miles before finally stopping. During the pursuit, the officer observed that the two passengers in the car turned and looked at the officer several times, repeatedly ducking below the seat level and then reappearing.

Once the car stopped, the officer continued to see a lot of movement in the car, which made him hesitant to approach it. The officer, who was alone in his cruiser, got out and saw that the driver of the vehicle had already exited the car. The officer directed the driver to step back toward him, and the officer met the driver between their vehicles. The driver, who was unusually nervous, produced a valid Connecticut driver's license and stated that the rental papers were in the car.

The officer told the driver to retrieve the rental papers, and the driver went back to the car. The officer observed that the front seat passenger, Jerry Lee Wilson, was sweating and extremely nervous. Because the officer was concerned for his safety, he asked Wilson to get out of the car and step toward him. After initially refusing to comply with this request, Wilson opened the door and took one step out, whereupon crack cocaine dropped to the ground. Wilson was indicted on charges of possession of cocaine with the intent to distribute, as well as related offenses. Prior to trial in the Circuit Court for Baltimore County, Wilson moved to suppress the cocaine, arguing that the officer had violated Wilson's Fourth Amendment right to be free from unreasonable seizures by ordering him to step out of the car. The circuit court agreed, ruling that an officer could not order a passenger out of a car without reasonable articulable suspicion that the passenger was involved in criminal activity, and that there was no such suspicion in this case. Accordingly, the circuit court ruled that the exit order was an unlawful seizure and the evidence of cocaine should be suppressed.

The State of Maryland appealed the trial court's suppression order to the Court of Special Appeals of Maryland. The State argued that the Fourth Amendment prohibits only unreasonable searches and seizures, the seizure in this case was not unreasonable. Initially, the State argued that it was reasonable for an officer making a traffic stop to order a passenger out of the vehicle without any suspicion that the passenger was involved in criminal activity. The ultimate test of whether the Fourth Amendment right against unreasonable searches and seizures has been violated is reasonableness, and reasonableness "is judged by balancing [the] intrusion on the individual's Fourth Amendment interests against its promotion of legitimate governmental interests." *Delaware v. Prouse*, 440 U.S. 648, 654 (1979).

The State noted that, twenty years ago, in *Pennsylvania v. Mimms*, 434 U.S. 106 (1977), the Supreme Court had applied this balancing test to hold that an officer conducting a traffic stop could order the driver to exit the vehicle without any particularized suspicion that the driver had committed any wrongdoing independent of the traffic stop. The Supreme Court balanced the driver's privacy and liberty interests against the State's interest in protecting its police officers during potentially dangerous traffic stops. *Id.* at 110-11. The Court concluded that the State's

interest in the safety of its officers far outweighed the driver's interest in not routinely being made to step out of the car after it had been stopped for a traffic violation. *Id.* at 111. The Court stated that "[w]hat is at most a mere inconvenience cannot prevail when balanced against legitimate concerns for the officer's safety." *Id.*

The State argued that the *Mimms* analysis applied to any occupant of a vehicle stopped for a traffic violation. A passenger presents as significant a danger to the safety of the police officer as the driver and, indeed, the potential danger to an officer increases with the number of occupants in a car. Accordingly, the State argued, it was reasonable for an officer to automatically order the passenger to exit the vehicle during a traffic stop.

The State made the alternate argument that, even if suspicion of criminal activity was necessary to authorize a police officer to order a passenger out of a car, the officer had the requisite suspicion here. We argued that the extreme nervousness of Wilson and the driver, along with the furtive movements of the passengers and that the vehicle did not pull over for one and one-half miles after being pursued with flashing lights and sirens, gave the officer reasonable suspicion to believe that the occupants of the vehicle were, or had been, involved in a crime. Accordingly, we asked the court of special appeals to reverse the circuit court's suppression order.

The court of special appeals rejected the State's argument that the officer had reasonable suspicion to believe that the passenger was involved in criminal activity. *Maryland v. Wilson*, 106 Md. App. 24, 28-31 (1995). With respect to the argument that a police officer has the automatic right to order a passenger to exit the vehicle, the Court of Special Appeals of Maryland recognized that some states had adopted this position. *Id.* at 46-47. It believed, however, that the result of the balancing process was different for a passenger than it was for a driver, suggesting that the "cost" of the exit order was higher for the passenger because the passenger had not committed the traffic violation that resulted in the vehicle's stop. *Id.* at 42-43. Accordingly, the Court of Special Appeals affirmed the lower court's suppression order, holding that it was reasonable for a police officer to order a passenger out of the vehicle only when the officer had some suspicion of danger. *Id.* at 48.

The State then filed a petition for a writ of certiorari, asking the Court of Appeals of Maryland to hear the case. On November 22, 1995, the Court of Appeals denied the State's petition.

The State then had to decide whether to take the issue to the United States Supreme Court. Over 6,000 petitions for a writ of certiorari are filed in the United States Supreme Court every year, and, in recent terms, the Supreme Court has granted review in fewer than 100 cases. 66 U.S.L.W. 3136 (August 12, 1997). Thus, it takes more than an interesting issue to prompt the Supreme Court to decide to hear a case, and the State wanted to do everything possible to increase the odds that the Supreme Court would grant our petition in this case. Knowing that one factor that weighs heavily in the Supreme Court's decision to hear a case is whether there is a split of authority in the United States, we researched the law in all the states and federal districts. There was a definite split of authority on the issue of whether a police officer could automatically order a passenger to exit a vehicle during a traffic stop. Twenty states,[1] and five federal courts,[2] were of the view that an officer

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[1] *State v. Webster*, 824 P.2d 768, 770 (Ariz. 1991); *People v. Melgosa*, 753 P.2d 221, 225 (Colo. 1988); *State v. Dukes*, 547 A.2d 10, 22 (Conn. 1988); *Thomas v. United States*, 553 A.2d 1206, 1207 n.7 (D.C. 1989); *Doctor v. State*, 573 So. 2d 157, 159 (Fla. Dist. Ct. App. 1991), *rev'd in part on other grounds*, 596 So. 2d 442 (Fla. 1992); *People v. Salvator*, 602 N.E.2d 953, 963 (Ill. App. Ct. 1992), *appeal denied*, 610 N.E.2d 1273 (Ill. 1993); *Warr v. State*, 580 N.E.2d 265, 267 (Ind. Ct. App. 1991); *State v. Landry*, 588 So. 2d 345, 347 (La. 1991); *Commonwealth v. Pappalardo*, 10 Mass. App. 409 N.E.2d 815, 816 (Mass. App. Ct. 1980); *People v. Martinez*, 466 N.W.2d 380, 384 n.5 (Mich. Ct. App. 1991), *vacated on other grounds*, 483 N.W.2d 868 (Mich. 1992); *State v. Ferrise*, 269 N.W.2d 888, 890-91 (Minn. 1978); *State v. Reynolds*, 753 S.W.2d 1, 2 (Mo. App. 1988); *People v. Robinson*, 543 N.E.2d 733, 733-34 (N.Y. 1989), *cert. denied*, 493 U.S. 966 (1989); *State v. Collins*, 248 S.E.2d 405, 407 (N.C. Ct. App. 1978); *State v. Gilberts*, 497 N.W.2d 93, 96 (N.D. 1993); *State v. Williams*, 641 N.E.2d 239, 243 (Ohio Ct. App. 1994), *dismissed*, 639 N.E.2d 114 (Ohio 1994); *Commonwealth v. Brown*, 654 A.2d 1096, 1102 (Pa. Super. Ct. 1995), *appeal denied*, 664 A.2d 972 (Pa. 1995); *State v. Soares*, 648 A.2d 804, 806 (R.I. 1994); *Graham v. State*, 893 S.W.2d 4, 7 (Tex. Ct. App. 1994); *Bethea v. Commonwealth*, 14 Va. App. 419 S.E.2d 249, 250-52 (Va. App. 1992) (en banc), *aff'd on other grounds*, 429 S.E.2d 211 (Va. 1993); *State v. Richardson*, 456 N.W.2d 830, 836 (Wis. 1990).

[2] *Ruvalcaba v. City of Los Angeles*, 64 F.3d 1323, 1327 (9th Cir. 1995), *cert. denied*, 116 S. Ct. 1841 (1996); *United States v. Hill*, 60 F.3d 672, 682 (10th Cir 1995.), *cert. denied*, 116 S. Ct. 432 (1995); *United States v. Powell*, 929 F.2d 1190, 1195 (7th Cir. 1991), *cert. denied*, 502 U.S. 981 (1991); *United States v. Sanders*, 631

did have this automatic authority, whereas five states[3] took the position that an officer must have some level of suspicion to issue an exit order.

Once we found this split of authority, there were tactical decisions to make. For example, we had to decide whether to raise the issue of reasonable suspicion to order the passenger to exit the vehicle. Although we believed that the nervousness, the furtive movements, and the initial failure to stop gave the officer reasonable suspicion to believe the occupants of the vehicle were involved in criminal activity, we decided not to include this issue in our petition for a writ of certiorari. The issue of whether the officer had reasonable suspicion to justify a Fourth Amendment seizure involved a routine application of the facts to a well-established principle of law and was unlikely to be reviewed by the Supreme Court. Including this issue might detract from the other issue, not yet decided by the Supreme Court, whether the police had the automatic right to order passengers to exit the vehicle. Accordingly, we decided to confine our petition to this one novel issue.

The State also sought amicus support for its argument. That other states or organizations are willing to take the time to write an amicus brief signals to the Court the importance of the issue involved. Indeed, statistics compiled indicate that of the state petitions for a writ of certiorari filed in the United States Supreme Court that are filed with amicus support, fifty percent are granted. *Supreme Court Report* (National Association of Attorneys General, Washington, D.C.), October 10, 1997, at 2. Thus, having amicus support may increase the chances that a petition will be granted.

The National Association for Attorneys General sent notice to the Office of the Attorney General in every state, setting forth the issue to be presented to the Supreme Court and asking if any state was interested in providing amicus support. The Ohio Attorney General's Office ultimately agreed to write an amicus curiae ("friend of the court") brief in support of Maryland's petition, and twenty-five states and the Virgin Islands joined Ohio's amicus brief.

After we filed our petition for a writ of certiorari, we became aware that this same issue was pending before the Supreme Court in another case. In *Ruvalcaba v. City of Los Angeles,* 64 F.3d 1323 (9th Cir. 1995), the Ninth Circuit, in a civil rights case, had taken a different position from the one taken by the Maryland Court of Special Appeals and held that a police officer *could* order a passenger out of the vehicle without any reasonable suspicion. That case was scheduled to be conferenced by the Supreme Court shortly before Maryland's petition was set to be conferenced. When the Supreme Court denied the petition for writ of certiorari in *Ruvalcaba*, it was unclear what import that decision had on Maryland's case. We had the answer several weeks later. On June 17, 1996, however, the Supreme Court granted Maryland's petition for a writ of certiorari. We had forty five days to write our brief, file an appendix with pertinent lower court proceedings, and coordinate amicus briefs.

The team of lawyers that had been involved in the petition for a writ of certiorari began work on the brief. This team consisted of the authors of this article: Gary Bair, Chief of the Criminal Appeals Division, and Mary Ellen Barbera, Deputy Chief of the Criminal Appeals Division.

We poured through Supreme Court jurisprudence, including all decisions dealing with the Fourth Amendment right against unreasonable searches and seizures and the applicable balancing analysis. The first component was the governmental interest to be served by allowing officers to automatically order passengers from the vehicle during a traffic stop. We culled through the decisions holding that officer safety is a compelling governmental interest, *see Maryland v. Buie*, 494 U.S. 325, 333-34 (1990); *New York v. Class*, 475 U.S. 106, 116 (1986); *Pennsylvania v. Mimms*, 434 U.S. at 110-11, and recognizing that traffic stops are particularly dangerous to police officers, *see Michigan v. Long*, 463 U.S. 1032, 1049 (1983); *New York v. Class*, 475 U.S. at 116-17; *Foley v. Connelie*, 435 U.S. 291, 298 (1978). We noted that the danger inherent in roadside encounters only

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F.2d 1309, 1312 n.2 (8th Cir. 1980), *cert. denied*, 449 U.S. 1127 (1981); *United States v. McCoy*, 824 F. Supp. 467, 474 (D. Del. 1993).

[3] *People v. Maxwell*, 206 Cal. App. 3d 1004, 1008-09, 254 Cal. Rptr. 124, 126-27 (1988); *State v. Becker*, 458 N.W.2d 604, 607 (Iowa 1990); *State v. Wilson*, 664 A.2d 1, 12 (Md. App. 1995), *cert. denied*, 667 A.2d 342 (Md. 1995), *rev'd*, 117 S. Ct. 882 (1997); *State v. Smith*, 637 A.2d 158, 166 (N.J. 1994); *Johnson v. State*, 601 S.W.2d 326, 328-29 (Tenn. Crim. App. 1980).

increases when passengers are present. Passengers, like drivers, are likely to have access to weapons that may be inside the passenger area of a car. Moreover, the passenger could act with the driver or other passengers to attack the officer, or ambush the officer while he or she is dealing with the driver.

We compiled statistics from the Department of Justice showing that over five thousand police officers are assaulted each year during the course of traffic stops. We also visited the scene of the crime to get a better idea of what an officer faces. The traffic stop in this case occurred on a busy highway, Interstate 95, in Baltimore County. As we sat on the shoulder of the highway, with the cars speeding by, it became much more apparent how necessary it was for an officer to be able take control of the traffic stop.

We then looked at the other side of the balancing equation - the intrusion on the passenger. We compiled Supreme Court cases detailing that there was a lesser expectation of privacy in a vehicle due to the public nature of automobile travel and the pervasive governmental regulations on automobile travel. *See New York v. Class*, 475 U.S. at 113; *South Dakota v. Opperman*, 428 U.S. 364, 368 (1976); *Cady v. Dombrowski*, 413 U.S. 433, 441 (1973). Because people who travel on the public roadways are subject to being stopped by a governmental agent at sobriety checkpoints, toll booths, or for traffic violations, passengers, like drivers, enjoy only minimal privacy and liberty interests.

In addition to the decreased expectation of privacy in the car, the intrusion at issue here was minimal. In *Pennsylvania v. Mimms*, the Supreme Court described the intrusion of asking the driver to step out of the vehicle as "*de minimis*" and "a mere inconvenience." 434 U.S. at 111. The order to the passenger to step out of the vehicle is similarly an inconsequential intrusion.

We anticipated that Wilson would argue, as the Maryland Court of Special Appeals had found, that the analysis was different for the passenger because the passenger, as opposed to the driver, had committed no wrongdoing. We wanted to counter that argument by pointing to other instances where the police have the authority to control the movements of people without any suspicion of wrongdoing. We noted that the police interfere with the movement of people when they evacuate a building in response to a bomb threat, secure a crime scene, or reroute traffic around a parade or traffic accident. Thus, the fact that the police had no knowledge that the passenger had done anything wrong did not make the seizure unreasonable.

In addition to assessing the legal arguments, we had to consider the practical effect this case would have on police officers. Although the officer in this case testified that he ordered the passenger out of the vehicle for his safety, we recognized that, in some instances, it might be safer for the officer to order all the passengers to remain in the car while the officer completed the traffic stop. We spoke with police officers throughout the State regarding how officers are trained to respond to a traffic stop. As it turned out, police officers are typically trained to order all occupants, drivers and passengers alike, to remain seated inside the vehicle while the police officer completes the traffic stop.

We wondered if this general police policy to keep passengers in the vehicle would weaken our position that it was reasonable automatically to order a passenger to exit the vehicle. We were told, however, that, although the general policy is to keep passengers in the vehicle, the officer ultimately is taught to control the risk during a traffic stop. The officer attending the traffic stop is the only one who can assess, under the circumstances of that particular stop, whether it is safer to keep the passengers in the car or to order them out of the car where the officer can better see if they have any weapons. Thus, the State's position was that if an officer felt it was safer to ask the passenger to exit the vehicle while he or she completed the traffic stop, this was reasonable conduct under the Fourth Amendment.

Although our case involved only an exit order, we decided to propose a rule that would cover both an exit order and an order to remain in the vehicle. Such a rule would cover this case, as well as the typical police practice, and another decision that had recently been issued by the Court of Appeals of Maryland, *Dennis v. State*, 674 A.2d 928 (Md. 1996), *vacated*, 117 S. Ct. 40 (1996).

In *Dennis*, a police officer ordered the passenger to stay in the vehicle and the passenger

refused. The passenger got out of the car and started to walk away. The officer again told the passenger to stay with the vehicle, and when the passenger refused to comply, the officer forcibly stopped the passenger. A struggle ensued, and the passenger was ultimately charged with disorderly conduct and battery. *Id.* at 199. The Court of Appeals of Maryland reversed the convictions, holding that the officer did not have the legal right to order the passenger to remain in the vehicle and Dennis, therefore, had the right to resist the ensuing unlawful arrest. *Id.* at 211-12.

Maryland was filing a petition for a writ of certiorari in the *Dennis* case as well,[4] and we decided to propose a rule in this case that would allow both types of orders, an order to the passenger to exit the vehicle or an order to stay in the vehicle, whichever the police officer thought was the best way to safely complete the traffic stop. Accordingly, the State proposed a rule that would allow the police to take limited steps to control the movements of the passengers during the brief time it took to complete the traffic stop.

Argument was set for December 11, 1996. Each side would get thirty minutes to argue its position. For Petitioner, the State of Maryland would have twenty minutes and the United States, as amicus, would get ten minutes. J. Joseph Curran, Jr., Maryland's Attorney General, would be arguing for the State of Maryland, his second argument before the United States Supreme Court. Janet Reno, the United States Attorney General, would be arguing for the United States, her first argument before the Court.

Although the brief had already been written, there was much to be done. Cases were read and reread. Numerous hypotheticals were devised. Although our rule seemed simple, the police could take limited steps to control the movements of all occupants of the vehicle during the time it took to complete the traffic stop, the boundaries of these limited steps were not so clear. Although our case involved nothing more than the exit order, we needed to be prepared to explain exactly how far our proposed rule would go. We ultimately decided to ask for a rule that allowed an officer to order a passenger to get out of the vehicle, show his hands, and remain at the scene until the officer completed the traffic stop. Although further actions might be reasonable in certain circumstances, even without any suspicion of wrongdoing, it was Maryland's position that it was always reasonable to order the passenger to exit, to show his hands and to remain at the scene during the traffic stop.

We set up a schedule of moot courts, tapping lawyers with expertise in the Fourth Amendment and experience arguing in the Supreme Court. Each moot court presented new "worst case" scenarios. Was it reasonable to order a passenger to exit the vehicle if the passenger was disabled? If the passenger was a young child? If it was pouring rain and the passenger was on her way to the prom? Our response to each of these scenarios was the same: we expect our police officers to use their judgment in responding to a traffic stop, and a police officer probably would not require a passenger to exit in those circumstances. If an officer did issue an exit order under those circumstances, there might be administrative sanctions, but it would not constitute a violation of the Fourth Amendment.

In addition to reviewing the case law, devising hypotheticals and engaging in moot courts, we took other steps to prepare for the argument. We attended a Supreme Court argument in *Ohio v. Robinette*, another traffic stop case. We thought the Supreme Court's questioning might give us insight on the Justices' thoughts regarding police power during traffic stops. We also met with Janet Reno and the Solicitor General's office to discuss our strategy during the argument.

The day of argument finally arrived. All of our preparations paid off. The questioning was intense, but we had answers, to the extent there were answers, to all of the Justices' questions. However, the court wanted more information in the area of statistics. Although we had provided statistics on the numbers of officers assaulted and killed during

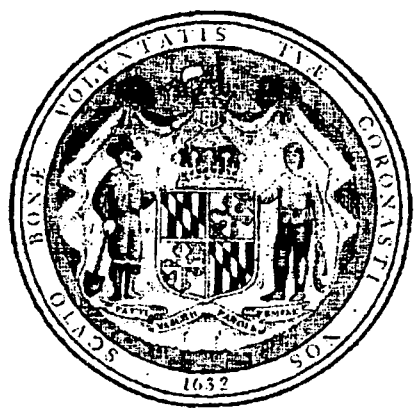
[4] The Supreme Court subsequently granted Maryland's petition and vacated the Court of Appeals' decision in *Dennis*, remanding for the Court of Appeals to reconsider the case in light of another Supreme Court case, *Whren v. United States*, 116 S. Ct. 1769 (1996). *Maryland v. Dennis*, 117 S. Ct. 40 (1996). In *Whren*, the Supreme Court held that police conduct is viewed objectively for Fourth Amendment purposes, and an officer's subjective intent will not make otherwise lawful conduct illegal under the Fourth Amendment. *Id.* at 1774. On remand, the Court of Appeals of Maryland reaffirmed its initial decision, *Dennis v. State*, 345 Md. 654 (1997), and the Supreme Court denied the State's petition for a writ of certiorari, *Maryland v. Dennis*, 118 S. Ct. 329 (1997).

traffic stops, the Justices wanted even more specific information, *i.e.*, how many of those attacks occurred while the person was inside, as opposed to outside, the vehicle. This information was not readily available. Although the Justice Department compiled statistics of the number of officers assaulted and killed each year, the specificity of the statistics was limited. The circumstances under which the assaults and deaths occurred were broken down into thirteen different categories, such as robberies, domestic disputes, bar fights and traffic stops, but there was no further breakdown of the particular circumstances involved in each category.[5] There was no question, however, that traffic stops present a real danger to police officers.

The Court seemed to accept our proposition that, in other instances, the police are permitted to control the movements of innocent persons. The Court indicated that a police officer is permitted to tell bystanders at a crime or arrest scene to stay back, and it suggested that allowing the officer to order the passenger to get out of the vehicle would not give the officer any greater authority than the officer has in the case of a public arrest.

The area with which the Court showed the most concern was our position that the officer had the authority, after issuing the exit order, to order the passenger to remain at the scene during the time it took to complete the traffic stop. Although a holding that an officer could detain a passenger after an exit order was not necessary to our case, since the cocaine fell from Wilson's pants as he was exiting the car, such a ruling was, in our view, the logical next step. Since the rationale for allowing the police to issue an exit order to passengers is to protect officers, it would be logical to allow the officer to require the passengers to remain where the officer can see the passengers, rather than allow the passengers to leave the scene, hide behind a tree or a bush and then ambush the officer as he or she deals with the driver. The State's view was that the officer must be able to control the movements of the occupants to safely effectuate the stop. The officer could not automatically arrest or search the passengers, but he or she should have the authority, if desired, to take the limited step of asking the passenger to remain at the scene during the brief time it takes to complete the traffic stop.

At the end of the argument, it was unclear how the Court would rule. On February 19, 1997, the Supreme Court issued its opinion. The Court agreed with the State's argument that, with respect to the government interest involved, the danger facing an officer during a traffic stop is likely to be greater when there are passengers in addition to the driver in the car. *Maryland v. Wilson*, 117 S. Ct. at 885. On the other side of the balancing equation, the Court held that the intrusion imposed on the passenger, who has already been stopped as a result of the traffic stop, is minimal. *Id.* at 886. Accordingly, the Court held that a police officer conducting a traffic stop may, as a matter of course, order passengers to get out of the car pending completion of the stop. *Id.* An important step was taken to protect the safety of police officers who confront unknown dangers everyday. The Court declined, however, to decide issues not specifically presented by this case. The Court did not decide whether, once the exit order had been issued, the officer could order the passenger to remain at the scene until the traffic stop was completed. Nor did the Court rule on the issue whether police officers could order passengers to remain in the vehicle during a traffic stop. Those are issues for another day.



[5] *See* FEDERAL BUREAU OF INVESTIGATION, U.S. DEP'T OF JUSTICE, UNIFORM CRIME REPORTS: LAW ENFORCEMENT OFFICERS KILLED AND ASSAULTED 1994, at 33 (1996).

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