

LAW REVIEW¹ 19056
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USERRA Coverage of National Guard Personnel

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¹ I invite the reader's attention to www.roa.org/lawcenter. You will find more than 1700 "Law Review" articles about the Uniformed Services Employment and Reemployment Rights Act (USERRA), the Servicemembers Civil Relief Act (SCRA), the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA), the Uniformed Services Former Spouse Protection Act (USFSPA), and other laws that are especially pertinent to those who serve our country in uniform. You will also find a detailed Subject Index, to facilitate finding articles about very specific topics. The Reserve Officers Association (ROA) initiated this column in 1997. I am the author of more than 1500 of the articles.

² BA 1973 Northwestern University, JD (law degree) 1976 University of Houston, LLM (advanced law degree) 1980 Georgetown University. I served in the Navy and Navy Reserve as a Judge Advocate General's Corps officer and retired in 2007. I am a life member of ROA. For 43 years, I have worked with volunteers around the country to reform absentee voting laws and procedures to facilitate the enfranchisement of the brave young men and women who serve our country in uniform. I have also dealt with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and the Veterans' Reemployment Rights Act (VRRA—the 1940 version of the federal reemployment statute) for 36 years. I developed the interest and expertise in this law during the decade (1982-92) that I worked for the United States Department of Labor (DOL) as an attorney. Together with one other DOL attorney (Susan M. Webman), I largely drafted the proposed VRRA rewrite that President George H.W. Bush presented to Congress, as his proposal, in February 1991. On 10/13/1994, President Bill Clinton signed into law USERRA, Public Law 103-353, 108 Stat. 3162. The version of USERRA that President Clinton signed in 1994 was 85% the same as the Webman-Wright draft. USERRA is codified in title 38 of the United States Code at sections 4301 through 4335 (38 U.S.C. 4301-35). I have also dealt with the VRRA and USERRA as a judge advocate in the Navy and Navy Reserve, as an attorney for the Department of Defense (DOD) organization called Employer Support of the Guard and Reserve (ESGR), as an attorney for the United States Office of Special Counsel (OSC), as an attorney in private practice, and as the Director of the Service Members Law Center (SMLC), as a full-time employee of ROA, for six years (2009-15). Please see Law Review 15052 (June 2015), concerning the accomplishments of the SMLC. My paid employment with ROA ended 5/31/2015, but I have continued the work of the SMLC as a volunteer. You can reach me by e-mail at SWright@roa.org.

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Mueller v. City of Joliet, 2018 U.S. Dist. LEXIS 74145 (N.D. Ill. May 2, 2018).

David Mueller is a Sergeant in the Police Department of Joliet, Illinois and an enlisted member of the Illinois Army National Guard. In 2016, he volunteered for and was called to 144 days (5/9/2016 to 9/30/2016) of full-time duty under section 502(f) of title 32 of the United States Code. For reasons that are not made clear in the opinion, Mueller’s full-time military service was in fact cut off after just 83 days, on 8/1/2016.

When Mueller learned that he would be on full-time military duty starting on 5/9/2016, he gave proper notice to his police department supervisor and to the police department’s personnel department. The department informed him that he was only entitled to an *unpaid* military leave for this military duty and that he would not earn police department annual leave or vacation during his full-time military service. Mueller’s military pay while on active duty was less than his regular civilian pay, so he lost money while on this active duty period.

Was Mueller entitled to differential pay or paid military leave under USERRA? Maybe.

As I have explained in Law Review 15116 (December 2015) and many other articles, Mueller was entitled to reemployment in his police department job when he returned from active military service, provided he met five simple conditions:

- a. He was required to leave his civilian job to perform “service in the uniformed services” as defined by USERRA. He clearly did that in May 2016.³
- b. He was required to give his civilian employer prior oral or written notice that he would be leaving his job to perform service. He clearly gave such notice.
- c. He must not have exceeded the five-year cumulative limit on the duration of his period or periods of uniformed service, related to his employment relationship with the City of Joliet.⁴

³ As I shall explain later, the judge in this case held that Mueller’s full-time military duty in 2016 was “state” duty and was not protected. The judge was wrong—Mueller’s 2016 duty was protected by USERRA.

⁴ As I have explained in Law Review 16043 (May 2016), there are nine exemptions from the five-year limit. That is, there are nine kinds of service that do not count toward exhausting the individual’s five-year limit with a specific employer. Mueller’s 83-day active duty period may have been exempt from the five-year limit—that is unclear, but also probably irrelevant, because the 83-day period in 2016 would not put him over the five-year limit even if it is not exempt.

- d. He must have been released from the period of service without having received a disqualifying bad discharge from the military.⁵
- e. He must have made a timely application for reemployment after release from the period of service.⁶

Mueller apparently returned to work for the police department after his 83-day active duty period, but we do not know how long the department made him wait, and we do not know if he was properly reinstated in the position that he *would have attained if he had been continuously employed (possibly a better position than the one he left)*. We do not know if his health insurance coverage, through his civilian job, was promptly and properly reinstated upon his return to work. We do not know if his rate of pay upon reemployment was correct. We do not know if Mueller has been properly credited with the seniority and pension credit that he would have earned if he had been continuously employed. We do not know whether Mueller has been discriminated against with respect to promotions or benefits of employment, because the city is annoyed with him about the 2016 absence from work for military service, as well as earlier and later absences.

Mueller's claim was dismissed on a motion to dismiss, at the very outset of the litigation, so there has been no discovery. Mueller and his attorney have had no opportunity to obtain evidence from the city to prove USERRA violations.

USERRA entitled Mueller to an *unpaid but job-protected military leave of absence* for his 83-day military service period in 2016. USERRA did not require the City of Joliet to pay Mueller for the time that he was away from work for service in 2016, nor did USERRA require the City to make up the difference between his military pay and his regular civilian pay.

As I explained in detail in Law Review 19026 (February 2019), a National Guard or Reserve service member like Mueller is at least arguably entitled to *paid* military leave under USERRA's "furlough or leave of absence" clause⁷ for periods of military service, if and to the extent that the employer grants *paid* leave for non-military leaves of absence of comparable duration. Mueller's 2016 military leave was originally scheduled to last for 144 days and it in fact lasted for 83. Mueller has not had the opportunity to conduct discovery to determine how other police officers who have been granted non-military leaves of absence of comparable duration have been treated during their leaves.

⁵ Under 38 U.S.C. 4304, Mueller would have been disqualified for reemployment if he had received a punitive discharge by court martial or an "other than honorable" administrative discharge. Mueller was not discharged—he was simply released from active duty. He is still a member of the Illinois Army National Guard—he has not been discharged. Mueller served honorably during his 83-day active duty period in 2016 and at all other times.

⁶ After a period of service of more than 30 days but less than 181 days, the returning service member is required to apply for reemployment within 14 days after the date of release from service. 38 U.S.C. 4312(e)(1)(C). It seems clear that Mueller made a timely application for reemployment in August 2016 and returned to work.

⁷ 38 U.S.C. 4316(b).

Was Mueller entitled to differential pay under Illinois law? Maybe.

In his federal court lawsuit, Mueller claimed that he was entitled to differential pay from the City of Joliet during his 2016 active duty period under Illinois law.⁸ The state law provision he cited was repealed in 2018, effective 1/1/2019.⁹ Mueller may have been entitled to differential pay based on the Illinois law as it existed in 2016, when he was away from his civilian job for 83 days of military duty.

The City of Joliet argued that Mueller was not entitled to differential pay for his 2016 military duty period because he did not meet the qualifications under the state law as it existed in 2016. The City also argued that it was excused from the obligation to pay differential pay by the Illinois State Mandates Act.¹⁰ The federal judge did not rule on any of these state law arguments.

Was Mueller entitled to continue accruing vacation or annual leave in his civilian job, under USERRA, during the 83 days that he was away from his job for military service in 2016? Maybe.

In its first case construing the 1940 reemployment statute, the Supreme Court held: “[The returning veteran] does not step back on the seniority escalator at the point he stepped off. He steps back on at the precise point he would have occupied had he kept his position continuously during the war.”¹¹ This “escalator principle” is restated in section 4316(a) of USERRA.¹²

The escalator principle does not apply to all the good things that might have happened to the service member if he or she had remained in the civilian job instead of leaving the job for uniformed service. Rather, the escalator principle applies to *perquisites of seniority*. A two-pronged test determines whether a benefit qualifies as a perquisite of seniority:

- a. The benefit must qualify as a *reward for length of service*, rather than a form of short-term compensation.

⁸ 5 ILCS 325/1.

⁹ 2018 P.A. 100-1101, section 90-5, effective 1/1/2019.

¹⁰ 30 ILCS 805/8(a). The City of Joliet argued that, under Illinois law, the State Legislature in Springfield was precluded from imposing a costly mandate on a city like Joliet without also appropriating state funds to reimburse the city for the cost of complying with the mandate.

¹¹ *Fishgold v. Sullivan Drydock & Repair Corp.*, 328 U.S. 275, 284-85 (1946). I discuss *Fishgold* in detail in Law Review 0803 (January 2008).

¹² 38 U.S.C. 4316(a).

- b. It must be *reasonably certain* (not necessarily absolutely certain, but more than a possibility) that the service member would have enjoyed the benefit if he or she had remained continuously employed in the civilian job.

The Supreme Court has held that vacation days fail under the first prong of this test.¹³ Mueller is entitled to be treated *as if he had been continuously employed* in the civilian job during the 80-plus days that he was away from work for uniformed service in 2016 in determining the *rate at which he earns vacation or annual leave* after returning to work.¹⁴ Under *Foster*, Mueller did not continue accruing vacation or annual leave days during the time that he was away from work for service in 2016, at least not under the escalator principle.

Under USERRA's "furlough or leave of absence clause,"¹⁵ an employee who is away from work for a period of uniformed service may be entitled to continue accruing vacation or annual leave days if and to the extent that other employees who are away from their jobs for non-military leaves of absence of comparable duration continue accruing vacation or annual leave days during those leaves of absence.¹⁶ Because no discovery has been conducted, we do not know how the City of Joliet treats other police officers, with respect to continuing to accrue vacation days while on non-military leaves of absence of comparable duration.

Was Mueller entitled to continue accruing vacation or annual leave days while away from work for military service in 2016 under Illinois law? Perhaps.

Under section 4302(a) of USERRA,¹⁷ USERRA does not supersede or override a state law that provides *greater or additional rights*, over and above USERRA. It is possible, although unlikely, that Mueller was entitled to continue accruing vacation or annual leave days while he was away from his civilian job for service.

What is supplemental jurisdiction?

Ordinarily, state law claims are made in state court and federal law claims in federal court. If a party has federal law claims and state law claims arising out of the same transaction or occurrence, he or she can sometimes bring suit in federal court and get the federal court to adjudicate the closely related state law claims under a federal statutory provision that reads as follows:

¹³ *Foster v. Dravo Corp.*, 420 U.S. 92 (1975). I discuss *Foster* in detail in Law Review 0907 (February 2009).

¹⁴ For example, let us assume that Joliet police officers start earning 30 days of vacation per year, rather than 20 days, when they have ten years of seniority with the department. In such a system, Mueller is entitled to be treated as if he had been continuously employed in the civilian job.

¹⁵ 38 U.S.C. 4316(b).

¹⁶ Please see Law Review 17083 (August 2017).

¹⁷ 38 U.S.C. 4302(a).

Except as provided in subsections (b) or (c) or as expressly provided otherwise by Federal statute, in any civil action in which the [Federal] district courts have original jurisdiction, the district courts shall have supplemental jurisdiction over all other claims that are so related to claims in the action that they form part of the case or controversy under Article III of the United States Constitution. Such supplemental jurisdiction shall include claims that involve joinder or intervention of additional parties.¹⁸

The district courts may decline to exercise supplemental jurisdiction over a claim under subsection (a) if—

- (1) the claim raises a novel or complex issue of State law;
- (2) the claim substantially predominates over the claim or claims over which the district court has original jurisdiction;
- (3) *the district court has dismissed all claims over which it has original jurisdiction*; or
- (4) in exceptional circumstances, there are other compelling reasons to decline jurisdiction.¹⁹

The idea behind supplemental jurisdiction is that it is wasteful of judicial and other resources if a party must bring two separate lawsuits, one in federal court and one in state court, to assert closely related claims.

Mueller's federal court lawsuit

Mueller sued the City of Joliet²⁰ in the United States District Court for the Northern District of Illinois. The case was assigned to Judge Harry D. Leinenweber²¹ of that court.

In the lawsuit, Mueller claimed that the City of Joliet violated his USERRA rights. Mueller also claimed that his rights under the Illinois Military Leave of Absence Act (IMLAA)²² were violated by the City of Joliet, and he claimed that the federal court had jurisdiction of that claim under its supplemental jurisdiction.

The City of Joliet filed a *motion to dismiss* Mueller's USERRA claim, under Rule 12(b)(6) of the Federal Rules of Civil Procedure,²³ contending that Mueller's 83-day military period in 2016 constituted *state active duty* not protected by the federal law (USERRA). Judge Leinenweber

¹⁸ 28 U.S.C. 1337(a).

¹⁹ 28 U.S.C. 1337(c) (emphasis supplied).

²⁰ He also sued Brian Benton, the police chief, and Edgar Gregory, another police official.

²¹ Judge Leinenweber joined the court in 1985, after he was nominated by President Ronald Reagan and confirmed by the Senate. Some years ago, he took senior status so that another judge could be appointed, but he continues to hear an active docket of cases.

²² 5 ILCS 325/1.

²³ Under Rule 12(b)(6), a federal judge should dismiss a claim at the outset of the litigation if the judge can say that the plaintiff has failed to state a cause of action for which the court can award relief, *even assuming that all of the plaintiff's factual assertions are true*.

granted the city's motion to dismiss, holding: "Because Plaintiff's tour of duty was clearly under the authority of the State of Illinois, USERRA has no applicability to this case." Having dismissed Mueller's federal (USERRA) claim, Judge Leinenweber declined to exercise supplemental jurisdiction over his state law claim, under section 1367(c)(3).²⁴

Judge Leinenweber erred when he held that Mueller's 2016 duty was not protected by USERRA.

Judge Leinenweber apparently believes that there are two kinds of military duty performed by National Guard members and that only one of them is protected by USERRA. He apparently puts National Guard duty into two boxes:

- a. Federal active duty under title 10 of the United States Code—protected by USERRA.
- b. State active duty under title 32 of the United States Code—not protected by USERRA.

In fact, National Guard duty needs to be considered in three boxes:

- a. Federal active duty under title 10—protected by USERRA.
- b. State active duty under title 32—protected by USERRA. Although this form of duty is considered state duty, it is authorized by federal law—title 32 of the United States Code—and the Federal Government (not the state) pays the salary and benefits of National Guard members on title 32 duty. The purpose of title 32 duty is to ensure the readiness of National Guard personnel for the federal mission—defending our country.
- c. State active duty—called by the Governor, under state authority, paid with state funds, for state emergencies like floods, tornadoes, and riots, etc. State active duty is not protected by USERRA, but every state has a law protecting the civilian jobs of National Guard members performing state active duty.²⁵

When a federal statute defines terms, the statutory definitions control for purposes of that statute. Section 4303 of USERRA²⁶ defines 16 terms, including "uniformed services" and "service in the uniformed services." USERRA defines the term "uniformed services" as follows:

The term "uniformed services" means the Armed Forces, *the Army National Guard and the Air National Guard when engaged in active duty for training, inactive duty training, or full-time National Guard duty*, the commissioned corps of the Public Health Service, System members of the National Urban Search and Rescue Response System during a

²⁴ 28 U.S.C. 1367(c)(3).

²⁵ Some of those laws are better than others. Please see the "state leave laws" section at www.roa.org/lawcenter. You will find 54 articles, one for each state plus the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands. These articles cover the state laws that protect the civilian jobs of National Guard members when they are on state active duty.

²⁶ 38 U.S.C. 4303.

period of appointment into Federal service under section 327 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act [[42 USCS § 5165f](#)], and any other category of persons designated by the President in time of war or national emergency.²⁷

USERRA defines the term “service in the uniformed services” as follows:

The term “service in the uniformed services” means the performance of duty on a voluntary or involuntary basis in a uniformed service under competent authority and includes active duty, active duty for training, initial active duty for training, inactive duty training, *full-time National Guard duty*, a period for which a person is absent from a position of employment for the purpose of an examination to determine the fitness of the person to perform any such duty, a period for which a System member of the National Urban Search and Rescue Response System is absent from a position of employment due to an appointment into Federal service under section 327 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, and a period for which a person is absent from employment for the purpose of performing funeral honors duty as authorized by section 12503 of title 10 or section 115 of title 32.²⁸

Both section 4303(13) and section 4303(16) include the term “full-time National Guard duty” in the definition of “service in the uniformed services” and “uniformed services.” The term “full-time National Guard duty” is not defined in USERRA, but it is defined in the definitions section of title 10 of the United States Code, as follows:

The term “full-time National Guard duty” means training *or other duty*, other than inactive duty, *performed by a member of the Army National Guard of the United States or the Air National Guard of the United States in the member’s status as a member of the National Guard of a State or territory* under section 316, 502, 503, 504, or 505 of title 32 *for which the member is entitled to pay from the United States* or for which the member has waived pay from the United States.²⁹

When Mueller enlisted in the Army National Guard, he took two enlistment oaths and joined two overlapping but legally distinct organizations. He joined the *Illinois* Army National Guard, which is the present-day successor of the Illinois state militia.³⁰ Mueller is a member of this *state entity* all the time, except when he volunteers for or is called to federal active duty under title 10 of the United States Code. On most days when Mueller is in state status, he performs no military duty—on those days he is performing his civilian job as a Joliet police officer. On some

²⁷ 38 U.S.C. 4303(16) (emphasis supplied).

²⁸ 38 U.S.C. 4303(13) (emphasis supplied).

²⁹ 10 U.S.C. 101(a)(5) (emphasis supplied). The identical definition appears in the definitions section of title 32, 32 U.S.C. 101(19).

³⁰ The National Guard traces its origin to 1636, when the Massachusetts Bay Colony established its militia to protect the colonists from the Pequot Indians.

days, while in state status, Mueller performs *state active duty*, and he is not protected by USERRA for his duty on those days.

On other days, while in state status, Mueller performs inactive duty training (drills—usually but not always on weekends), active duty for training (annual training—traditionally for two weeks at a time but now often for substantially longer periods), and *full-time National Guard duty*. *Mueller is in state status on these days, but his duty is protected by USERRA because USERRA expressly so provides.*

Mueller’s orders for his 83-day period of full-time National Guard duty in 2016 cite 32 U.S.C. 502(f). Section 502 is one of the title 32 sections that is mentioned in the definition of “full-time National Guard duty.” *Mueller performed 83 days of full-time National Guard duty in 2016, and his civilian job was protected by USERRA for that period.*

Effect of the Posse Comitatus Act

In his opinion, Judge Leinenweber wrote:

An important limitation on the federal use of the National Guard is the Posse Comitatus Act, 18 U.S.C. 1385 (PCA).³¹ This Act prohibits the use of the Army or Air Force in the execution of criminal laws of the United States. The PCA only applies to the National Guard when it is placed in federal service as part of the Army or Air Force and does not apply to the National Guard when it is in its militia status, i.e., under state control.

Memorandum Opinion of Douglas W. Kmiec, Assistant Attorney General Office of Legal Counsel, April 4, 1989.

Judge Leinenweber inferred that Mueller’s 2016 active duty must be “state” service, and not protected by USERRA, because if his service had been federal his “counterdrug” activities would have violated the PCA. Judge Leinenweber fundamentally misunderstood the kind of “counterdrug” activities that National Guard members routinely undertake. Most of those efforts against drug abuse focus on the demand side, not the supply side, and education rather than law enforcement. Most of those National Guard efforts are through the Drug Abuse

³¹ The PCA was enacted in 1877 to fulfill the corrupt bargain the settled the disputed presidential election of 1876. The Southern Democrats agreed to let Rutherford B. Hayes, the Republican nominee, be inaugurated, in exchange for his agreement to withdraw federal troops from the former Confederate states and end the Reconstruction Era. Throughout the Administration of President Ulysses S. Grant (1869-1877), the Federal Government made valiant efforts to enforce the 13th, 14th, and 15th Amendments to the United States Constitution and the federal civil rights statutes that were enacted in the years following the end of the Civil War. After federal troops withdrew, all federal efforts to enforce the civil rights of the former slaves and their descendants ended, and the result was the lamentable “Jim Crow” era when the former slaves and their offspring were reduced to a status that was not much better than their former slave status. The PCA ensured that federal troops would not be reintroduced to the former Confederate states. Serious federal efforts to enforce civil rights did not resume until the 1960s, almost a century later.

Resistance Education (DARE) program, and those efforts focus on “teaching student decision making for safe and healthy living.”³²

I concede that some of the National Guard counterdrug efforts are a little closer to law enforcement and may push the PCA envelope. For example, National Guard soldiers and airmen operate helicopters and fixed wing aircraft to surveil border areas and report to law enforcement on observed instances of smuggling or other illegal activities. These soldiers and airmen do not land the aircraft and attempt to arrest the smugglers. I hope that disputes about the outer limits of the PCA prohibition do not result in individual National Guard soldiers and airmen losing their civilian jobs.

Conclusion

Judge Leinenweber’s dismissal of Mueller’s claim must be overturned on appeal. Mueller and his attorney must be given the opportunity to conduct discovery to develop facts to prove their case that the City of Joliet violated USERRA and Illinois state law.

UPDATE SEPTEMBER 2020

Mueller v. City of Joliet, 943 F.3d 834 (7th Cir. 2019).

After the District Court dismissed his claim under Rule 12(b)(6) of the Federal Rules of Civil Procedure, Mueller appealed to the United States Court of Appeals for the 7th Circuit, the federal appellate court that sits in Chicago and hears appeals from district courts in Illinois, Indiana, and Wisconsin. A three-judge panel of the 7th Circuit reversed the dismissal and remanded the case to the United States District Court for the Northern District of Illinois. The appellate court panel held: “We find that the plain language of USERRA covers Title 32 full-time National Guard duty and reverse the district court’s dismissal.”

Now that the case is back in the District Court, there must be discovery and then a trial, unless the parties settle. We will keep the readers informed of developments in this interesting and important case.

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This article is one of 1800-plus “Law Review” articles available at www.roa.org/lawcenter. The Reserve Officers Association, now doing business as the Reserve Organization of America (ROA), initiated this column in 1997. New articles are added each month.

³² See <https://dare.org>.

ROA is almost a century old—it was established in 1922 by a group of veterans of “The Great War,” as World War I was then known. One of those veterans was Captain Harry S. Truman. As President, in 1950, he signed our congressional charter. Under that charter, our mission is to advocate for the implementation of policies that provide for adequate national security. For many decades, we have argued that the Reserve Components, including the National Guard, are a cost-effective way to meet our nation’s national defense needs.

Through these articles, and by other means, we have sought to educate service members, their spouses, and their attorneys about their legal rights and about how to exercise and enforce those rights. We provide information to service members, without regard to whether they are members of ROA or eligible to join, but please understand that ROA members, through their dues and contributions, pay the costs of providing this service and all the other great services that ROA provides.

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If you are not eligible to join, please contribute financially, to help us keep up and expand this effort on behalf of those who serve. Please mail us a contribution to:

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