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**| Subscription Sales  
 Training Manual**

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Compliance Week: An Overview

Big Pitch: Compliance Week is an information service on corporate compliance.

Compliance Week, published by Haymarket Media, Inc., is an information service on corporate governance, risk and compliance that features a content-rich, constantly updated website, weekly electronic newsletters, monthly print magazine, proprietary databases, industry-leading events, and a variety of interactive features and forums.

Founded in 2002, Compliance Week has quickly become one of the most important go-to resources for public companies on governance, risk and compliance.

Compliance Week is [located](http://www.complianceweek.com/contact-us/section/1779#location) in Boston, Massachusetts, with correspondents and columnists in Washington, D.C., Chicago, London, Brussels, Hong Kong, and elsewhere throughout the world.

Editor-in-Chief & Publisher: Matt Kelly. Executive Editor: Joseph McCafferty.

# Mission

To help our subscribers comprehend and comply with the constantly evolving global regulations and standards to which public companies must adhere. We provide critical, independent guidance for financial, legal, risk, audit and compliance executives at public companies i.e. Visa International, Goldman Sachs, HSBC Bank, Morningstar. Thousands of executives at the majority of the Fortune 1000 rely on Compliance Week to keep them informed.

# Our Focus

Critical regulatory and compliance issues related to financial reporting, regulatory enforcement, corporate governance, enterprise risk management, and related global issues, from CSR to XBRL.

# Credibility

Compliance Week publishes information from known, credible, trusted securities and governance experts, such as former SEC Deputy Chief Accountant Scott Taub and former Financial Accounting Standards Board (“FASB”) Chairman Robert Herz. We deliver commentary and guidance from the SEC, FASB, International Accounting Standards Board (“IASB”), the Public Company Accounting Oversight Board (“PCAOB”), the Department of Justice (“DoJ”), and European Union Internal Markets, among others.

Compliance Week is completely independent; we offer no products or services that could impact our ability to serve our readers in an impartial and independent manner. That’s why our subscribers include thousands of compliance, legal, and risk executives at companies like Pfizer, HP, Target, Nike, Comcast, GE, Walmart, and BP.

# Community

Compliance Week is at the center of the compliance discipline and has created a community of professionals for the exchange of information. Compliance Week gathers professionals through live events such as our conferences, online events such as virtual events and webcasts, and more intimate local roundtable discussions.

# Resources & Databases

We also make available resources that save our subscribers time and money, including checklists, questionnaires, surveys, charters, assessment tools, and other resources that have been provided by other corporate executives. This ‘Resource Exchange’ is unique in the industry, and has helped our subscribers save time and money in research, development, and fees paid to lawyers, accountants, and advisors.”

In addition, we publish numerous searchable databases of compliance information—including SEC probes, internal control weaknesses, class action lawsuits, auditor changes, risk factors, and other disclosures and developments—that are critical to compliance professionals and practitioners.

# Events

We also host a series of small, monthly, intimate Roundtables that enable executives to discuss compliance matters in a safe environment. The chief compliance officers at companies such as Google, Apple, GE, and Coca-Cola have participated in these Roundtables, and they are outstanding forums for sharing with your peers.

We host a three-day annual conference, in Washington DC, which has quickly become the compliance industry’s premier summit. The event features regulators, federal officials, standard setters, CEOs, and corporate executives sharing their compliance practices, and we regularly welcome officials from the SEC and Department of Justice. The conference includes several closed door, off the record private discussions for compliance professionals to freely exchange ideas. We also host a similar conference on the west coast spanning two half days and are planning our first European conference.

# Free CPE Credit

Not only do we offer CPE, CLE, and director-education credits for our conference, but we provide subscribers with a library of free, educational, “on-demand” Webcasts that offer CPE credit at any time, in any location.

# Sign-Off

As former SEC Chairman Harvey Pitt wrote in our magazine: sometimes bad things happen to good companies. Compliance Week can help you avoid those problems, and can help minimize the impact of those incidents when they inevitably occur.

Who Reads Compliance Week

Anyone interested in the behaviors within a company including professionals tasked with governance, risk and compliance.

* Senior Legal Executives
  + General Counsel
  + Asst./Associate General Counsel
  + Chief Legal Officer & Chief Ethics Officer
  + VP, Legal
* Senior Financial Executives
  + Chief Financial Officer
  + Chief Accounting Officer
  + Global Accounting Director
  + VP Finance
  + VP Internal Audit
  + Treasurer
  + Assistant Treasurer
  + Controller & Assistant Controller
* Senior Governance / Executive Positions
  + Chief Compliance Officer
  + Chief Risk Officer
  + Corporate Secretary
  + Chief Executive Officer
  + President
  + Board Director
  + Chairman of the Board

Editorial: Why Read Compliance Week?

Compliance is a fairly new business discipline and compliance’s “Big Bang” came in 2002 with Sarbanes Oxley.

CW started at this time, just over 10 years ago, to help companies navigate the quickly changing environment and help keep good companies out of trouble.

Companies were getting into trouble with the government who said there must be processes in place to ensure everything financially etc. is done legally and ethically.

CW was set up as an easy place to see what they need to do to meet the rules and a forum to discuss this as the rules are not always clear.

Companies that do compliance really well now and speak at our conferences are often those corporations that had problems before and *learned* the hard way.

Compliance Week is about GRC: Governance, Risk and Compliance.

Every year, when companies must file papers with the Securities and Exchange Commission (SEC), we do a great job of reporting/advising on that. Accountants, auditing and legal functions are all involved.

Board-level executives, CEOs and CFOs must sign the report so they need to make sure they are aware of the broader changes and we cover corporate governance issues, shareholder meetings etc. to speak to that audience.

Law firms and software companies help support the clients in reaching compliance and we report on new products and services and that market too.

The audit committee chairman tends to care most about what we do.

Tammy Whitehouse, our accounting and audit columnist, is a leading name and very well respected. See blogs.

Risk is looking deeper at enterprise risks i.e. data protection.

Three key areas we focus on are:

* Accounting and auditing.
* Rules and regulations, i.e. everything coming out of the SEC.
* Enforcement: covering issues as they occur and how a law suit is playing out as this may create regulatory change and record breaking settlements.

We also cover Global compliance i.e. looking at China and Europe; we have correspondents in Hong Kong and UK.

Our blog written specifically for the board is “Boards and Governance” and comes out weekly.

We have blogs specific to the various categories.

On the website the first two columns of articles on the left are news focused (blogs) and on the right column is a deeper analysis. We are giving readers news they can eat “actionable news”.

Top Themes and Issues by Reader Segment:

1] Legal executives: General Counsel, Chief Legal Officers:

This segment is highly interested in our coverage of enforcement and the enforcement and litigation blog by Bruce carton. They are interested in the whistleblowing part of the Dodd-Frank Act, which we cover in-depth and developments at the SEC.

They also follow our coverage of:

* The Foreign Corrupt Practices Act (FCPA)
* Insider trading and white-collar crime
* Whistleblower provision of Dodd-Frank
* The U.S. Sentencing Guidelines
* Shareholder proposals and corporate governance news
* Supreme Court biz rulings and shareholder litigation
* e-Discovery

Compliance Week helps corporate lawyers monitor the impact of regulatory developments, whether they be enforcement and litigation, or FCPA and whistleblower issues.

2] Financial Executives; CFOs, VP Finance, Treasurers, Controllers:

These readers are concerned with all things accounting, auditing, and reporting. They will be interested in Tammy Whitehouse’s blog, Accounting & Auditing, and our blanket coverage of all accounting standard proposals and changes from the Financial Accounting Standards Board (FASB).

Some other topics are:

* Accounting convergence (move to international accounting standards)
* All things FASB and IASB (International Accounting Standards)
* Internal controls
* All changes to financial reporting rules
* XBRL (a new digital tagging and reporting system)
* restatements and accounting problems

Compliance Week helps financial executives monitor and comply with complex global standards and regulations, from SOX to accounting convergence.

3] Audit: VP Internal Audit, Chief Audit Executive, Audit Director:

All of the above for financial executives, but with more of a focus on audit, including developments at the Big 4 accounting firms (KPMG,PWC, Deloitte, and E&Y). They are also concerned with developments at the PCAOB (Public Company Accounting Oversight Board).

Other topics:

* The role of internal audit
* continuous auditing and monitoring
* audit inspections

4] Chief Compliance Officers, Chief Risk officers, Chief Ethics Officers:

This is the main segment, so they follow all the developments mentioned above, but also, policy management, FCPA, reporting rule changes, all things SEC.

Some others include:

* Whistleblower hotlines
* Fraud monitoring
* Compliance careers and pay
* Third-party risk management
* Risk assessments
* Conducting internal investigations
* Ethics and corporate culture (this is a big one)
* Data security, privacy and IT compliance

Compliance Week helps audit and risk executives minimize risk to their organizations, by providing risk-management tools, comparables, and information.

Subscriber Benefits & Packages

For the price of only a couple hours with your outside lawyer or auditor, Compliance Week offers a full-year of news, resources, data, and independent commentary on addressing compliance and risk challenges in the 21st century. And our flexible pricing can accommodate you, your department, or every member of your global risk, compliance, legal, audit, and finance teams.

*Why Subscribe to Compliance Week?*

*Because Bad Things Happen to Good Companies*

Compliance Week is the leading information service on corporate governance, risk, and compliance. Unbiased and independent, Compliance Week combines expert commentary and analysis, rigorous news gathering and market-leading events to help companies comply with complex global standards more efficiently and effectively.

**Subscribe now and receive….**

Compliance Week's weekly newsletter delivered straight to your inbox, providing unique business intelligence with in-depth news and analysis.

The Compliance Weekend edition arriving via email each Friday, to give you a quick review of the week’s key developments [news/updates/pipeline things to look out for].

Full online access to our comprehensive archives and research databases. Access to the website [research databases, archives ensuring executives can be complaint to the letter of the law and keeps them updated on changes in regulations and procedures].

The monthly print magazine, packed with best practices, perspective, tools, research, and "true life" examples.

Free CPE credit in our On-Demand CPE Library [access to getting Continuing Professional Education credits].

Resource Exchange—shared tools from public companies that will save you time and money [shared ideas and tools for reaching Compliance].

Discounts on annual conference registration, seminars and workshops

The benefits in detail:

# Compliance Week’s Weekly Newsletter

Compliance Week Tuesday Edition is delivered on a weekly basis to subscriber’s inboxes, along with the content being available on the website. The newsletter delves deep into the latest regulatory developments coming out of the United States, European Union, and other major world markets to keep subscribers up to date in their field. It is completely focused on the disclosure, reporting, and compliance requirements of CWs subscribers.

The newsletter features in depth case studies and Q&A interviews from top compliance officers at major Fortune 500 companies, to help readers gain a better perspective on how to tackle their toughest compliance, risk and audit issues.

# Compliance Weekend

Compliance Weekend provides a quick, “plain-English” review of the week’s key regulatory developments. Highlighting some of Compliance Week's myriad real-time data offerings, from the latest investigations to the most recent auditor changes, Compliance Weekend ensures subscribers haven't missed the week's most interesting regulatory developments.

Compliance Weekend is delivered to subscriber’s inboxes every Friday afternoon, and is the ideal publication to wrap any compliance officer’s work week in regards to keeping them updated with the week’s most important developments.

# Monthly Print Magazine

The magazine features the same distinguished columnists and pressing compliance topics as the newsletter and is consolidated and organized into a high-quality monthly magazine available for subscribers only.

# Online

The CW website is updated constantly and provides subscribers with access to the entire archive of articles dating back to 2004 along with CW’s research databases and the Resource Exchange – offering shared tools from public companies that will save you time and money.

# Databases

Compliance Week maintains a library of disclosure databases allowing subscribers to retrieve, extract and analyze data. Some of our databases include:

Auditor Changes: Searchable database of all changes in certifying accountants, updated weekly and downloadable to Microsoft Excel.

Bylaws & Policies: Searchable database of more than 1,000 corporate bylaws, certificates of incorporation, and corporate governance guidelines.

Whistleblower Guidelines: Compare and contrast hundreds of whistleblower guidelines, including contact options and “what happens” steps, as disclosed under SOX.

# Packages

Single-user 1 year: $1199 [$999 special rate i.e.$200 off]

Multi-user 1 year up to 5: $3500 Multi-user 1 year up to 20: $4499 Multi-user 1 year up to 10:$3999 Multi-user 1 year up to 50: $5499

Sales Pitch & Objections

# Pitching–The Opening Call:

The clients and gatekeepers you reach will judge your seniority within the Compliance Week team based on how confident and experienced you sound. Preparing exactly what you will say depending on who you reach is vital in helping you achieve this.

Gatekeepers will also be looking for early indicators that you are trying to “sell them something”. Some clients receive many calls from media trying to sell subscriptions and so many assistants will ask right from the start “is this about a subscription?”. It is important that you use strategies to bypass the gatekeeper and/or engage the customer from the beginning in the wider context of the call.

# Action:

Prepare written versions of your opening for-

if you reach the client

the voicemail you will leave if you don’t

opening pitches to the assistant

I have given examples below and you will need to put these into words you are comfortable with but bear in mind what is included and omitted in these examples and why.

Example Phone call with decision makers assistant/pa:

“Hi it’s Mike at Compliance Week I am trying to reach John”

note using first names suggests there is an existing relationship

Assistant: “What is this in regards to? Does he know what this is in regards to?”

“John recently did a Q&A with [was recently covered in] Compliance Week and we wanted to discuss organizing access for him.”

This refers back to the existing relationship and suggests this is something John would likely want. This is of course relevant where the lead has come from editorial coverage. If not you can use something like:

“ I am calling to discuss with John organizing access for Compliance Week”

We are selling a service and looking to set up access. This is a more subtle way to refer to a subscription and may in some cases get a better result than asking to discuss setting up a subscription.

If the decision maker is not in, ask if you can email them and if they can’t give out his or her email ask for the assistant/pa’s email, so you can email them and they can forward this on. You should also bear in mind that the majority of email addresses can be found on the internet through some smart searches.

If you catch them on the phone:

“Hi John this is Mike with Compliance Week it was wonderful to have the opportunity to include you within Compliance Week’s editorial and we were surprised to see that you don’t currently enjoy access to Compliance Week so wanted to see if we can get this organized for you”

Pause give them a chance to respond before going into full sales pitch mode

If you have to leave a voice message for the decision maker:

“Hi John, this is Mike with Compliance Week, it was wonderful to have you included within Compliance Week, we suddenly realized you don’t enjoy access to our invaluable resources and as our website is gated for subscribers we are reaching out so we can discuss getting this organized for you. My number is xxx xxx xxxx and I look forward to being in contact.”

Notice no cost is mentioned yet and the language is about getting this “organized”.

# Example email pitch with benefits:

Dear John,

I just tried to reach you by phone but unfortunately missed you and wanted to see when would be a good time for a short chat.

As a leader in Compliance, we were surprised to notice that you do not currently enjoy access to Compliance Week's resources and would love to get this organized for you.

Year-long access to Compliance Week includes the following invaluable resources:

• Compliance Week's weekly newsletter delivered straight to your inbox, providing unique business intelligence with in-depth news and analysis.

• Full online access to our comprehensive site including all archives and research databases.

• The Compliance Weekend edition arriving via email each Friday, to give you a quick review of the week's key developments.

• The monthly print magazine, packed with best practices, perspective, tools, research, and "true life" examples.

• Free CPE credit in our On-Demand CPE Library.

• Resource Exchange—shared tools from public companies that will save you time and money.

• Discounts on annual conference registration, seminars and workshops.

The cost for a full year of access for a single user is only $1199.

Please let me know if you would like us to organize your Compliance Week access, or when we can schedule a few minutes over the next week to discuss this.

Thanks and all the best,

XXXXXXXXXXX

Insert name, address, email, web address.

# Example email pitch for trial:

Dear Joe,

I just tried to reach you by phone but unfortunately missed you. I would like to speak with you briefly to discuss setting up access for Compliance Week.

As a leader in Compliance, we were surprised to notice that you’re not currently able to access Compliance Week’s invaluable resources and would like to offer you a free trial.

Access to Compliance Week includes the following:

Compliance Week’s weekly newsletter delivered straight to your inbox, providing unique business intelligence with in-depth news and analysis.

Full online access to our comprehensive site including all archives and research databases.

The Compliance Weekend edition arriving via email each Friday, to give you a quick review of the week’s key developments.

The monthly print magazine, packed with best practices, perspective, tools, research, and “true life” examples.

Free CPE credit in our On-Demand CPE Library.

Resource Exchange – shared tools from public companies that will save you time and money.

Discounts on annual conference registration, seminars and workshops.

Please let me know if you would like to take advantage of our free trial to Compliance Week, or when we can schedule a few minutes over the next week to discuss.

Regards,

Insert name, address, email, web address.

# Classic Objections

It is important when getting objections to recognize them as buying signs, they are engaging in the discussion and thinking about why they might/might not buy. Your position should be one of someone who is looking to help ensure they can enjoy access to Compliance Week.

“I am sure we receive Compliance Week or someone on the team gets it.”

“That’s great. Each individual subscription is for individual use only and log in credentials may not be shared. To protect our customers and our content, Compliance Week monitors usage and log ins. We would love to see if we can get you and/or the wider team set up with your own access.”

“Send me details and I will take a look at it/speak to my team.”

“Great I will send over full details on the invaluable resources Compliance Week access bring and follow up next Tuesday once you have had a chance to review this.”

“We pay for a media service where they pull the news for us on the key topics and clients so we don’t need to pay for individual subscriptions.”

“That’s interesting and we have firms who use this as a supplemental resource however Compliance Week’s full portfolio of resources is only available through organizing full access.”

“Can I ask what service that is? I know for example, Compliance Week content is no longer available through Factiva/Dow Jones.”

“I already have a subscription I think.”

“Oh let me take a look and make sure this is still active as you have been flagged as a non subscriber.” Check Salesforce.

“I used to get Compliance Week in the office and found I was not using it.”

“The resources available through Compliance Week have grown exponentially over the last few years, so much so that thousands of executives responsible for compliance and the vast majority of Fortune 1000 firms have set up access to Compliance Week. You will likely be amazed by what we now include with access. As a senior leader in Compliance we are happy to set you up with a 10 day free trial access so you can experience these invaluable resources first hand and I will loop back with you XX date. If it is more convenient for us to step you through access, I’d be happy to do that as well.

“Our budget for subscriptions has been cut and we have no money for this.”

“I appreciate how hard it is to work within tight budgets. Many of Compliance Week’s subscribers are facing similar challenges, one way that many have overcome budget issues is by building the cost of Compliance Week access into different areas of the budget when you think that an entire year’s access is equivalent to less than the cost of 2 hours with outside counsel you can see it represents real value. Companies are getting true ROI from their CW subscription by utilizing our checklists, questionnaires, policies and other time saving devices. Many of our customers do not consider this a subscription but rather annual licensing, and others classify as training/education expense.”

# Top Tips:

Have the short summary of what is included with access in front of you so you can easily and concisely run through this and you don’t miss any key elements. This takes the pressure off you and allows you to focus your energy on the things you may be less sure of i.e. which objections they may raise.

Present the opportunity of a 10-day free trial as something we would like to offer them as a leading Compliance Officer [playing to their ego to make them feel special].

Avoid telling them they are going to be spending lots of money on audit firms as we don’t know this, but instead make a general comment about we both know how expensive audit, legal counsel and consultant’s advice can be and the fact our content is independent.

Avoid using terms like a lot cheaper when talking about multi access packages as these suggest 1 subscription is expensive. I would just say we have some great packages that can provide access for your team that we can tailor to fit your needs. How many people are involved in compliance, audit and corporate governance at your firm nationwide?

It is important that you present all of the elements of what Compliance Week access can give them and we do not become too focused on any one part – print magazine or website. Many of these folks may be as interested in the print edition, newsletters and content we push out etc so for this reason before you start talking or showing folks the website you should present an overview of all the elements included in CW access.

We can deliver the content of most interest to them through the newsletters, blogs, search mechanism, topics and easy navigation tools on the website etc.

Example Subscribers

Compliance Week Subscribers from the S&P 500 & Fortune 1000:

Asbury Automotive Group, Inc.

Ashland Inc.

Assurant, Inc.

Automatic Data Processing

Avery Dennison

Avis Budget Group Inc.

Avnet, Inc.

Avon Products, Inc.

Baker Hughes Incorporated

Barnes & Noble, Inc.

Barr Pharmaceuticals, Inc.

BASF Catalysts LLC

Bausch & Lomb Inc.

Baxter International Inc.

BB&T Corporation

BellSouth Corporation

Berkshire Hathaway Inc.

Best Buy Co., Inc.

Biogen Idec Inc.

BJ Services Company

BJ's Wholesale Club, Inc.

BlueLinx Holdings Inc.

Blyth, Inc.

BMC Software, Inc.

Borders Group, Inc.

BorgWarner

Boston Scientific Corp.

Bowater Incorporated

Boyd Gaming Corporation

Brightpoint, Inc.

Bristol Myers Squibb Co.

Broadcom Corporation

Building Materials Holding Corporation

Burlington Northern Santa Fe Corporation

C.R. Bard, Inc.

CA, Inc.

Cablevision Systems Corporation

Cabot Corporation

Cameron International Corporation

Campbell Soup Company

Cardinal Health, Inc.

Career Education Corp.

CarMax, Inc

Carnival Corporation

Caterpillar Inc.

CB Richard Ellis Group, Inc.

ABM Industries, Inc.

ACE Limited

Acuity Brands, Inc.

Adobe Systems Incorporated

Advance Auto Parts, Inc.

Advanced Micro Devices, Inc.

AEGON N.V.

Affiliated Computer Services, Inc.

Agilent Technologies, Inc.

Agilysys, Inc.

Air Products and Chemicals, Inc.

Aleris International Inc.

Alexander & Baldwin, Inc.

Allergan, Inc.

Alliant Energy Corporation

Allied Waste Industries

Alpha Natural Resources, Inc.

Altera Corp.

Altria Group, Inc.

Ambac Financial Group, Inc.

AMC Entertainment Inc.

American Axle & Mfg.

American Eagle Outfitters

American Electric Power Company, Inc.

American Financial Grp.

American International Group, Inc.

American Standard Companies Inc.

AmeriCredit Corp.

AMERIGROUP Corporation

AmerisourceBergen Corp.

Amgen, Inc.

Anadarko Petroleum Corporation

Analog Devices, Inc.

Andrew Corporation

Apache Corporation

Apollo Group, Inc.

Applied Materials, Inc.

Aquila, Inc.

ARAMARK Corporation

Arch Coal, Inc.

Archer Daniels Midland Company

Armor Holdings, Inc.

Armor Holdings, Inc.

Armstrong World Industries, Inc.

Arrow Electronics, Inc.

Arthur J. Gallagher & Co.

CBRL Group, Inc.

Celanese Corporation

Centene Corporation

Centex Corporation

CenturyTel, Inc.

Ceridian Corporation

CF Industries Holdings, Inc.

CH2M Hill Companies, Ltd.

Chevron Corporation

Chicago Mercantile Exchange Holdings

Chiquita Brands International, Inc.

Church & Dwight Co., Inc.

Ciena Corporation

CIGNA Corporation

Cincinnati Financial

Circuit City Stores, Inc.

Cisco Systems, Inc.

CIT Group Inc.

Citizens Communications Co.

Cleveland-Cliffs Inc.

Coach, Inc.

Coca-Cola Enterprises Inc.

Colgate-Palmolive Company

Comcast Corporation

Commerce Bancorp, Inc.

Commerce Group

Commercial Metals Company

Community Health Systems

Compass Bancshares, Inc.

Computer Sciences Corporation

ConocoPhillips

Consolidated Edison, Inc.

Convergys Corporation

Con-way Inc.

Corn Products International, Inc.

Corning Incorporated

Countrywide Financial Corporation

Coventry Health Care, Inc.

Crane Co.

CSK Auto Corporation

Cummins, Inc.

CUNA Mutual Group

CVS Corporation

Cytec Industries Inc.

Dana Corporation

Darden Restaurants, Inc.

DaVita Inc.

Del Monte Foods

Delphi Corporation

DENTSPLY International Inc.

Diebold, Incorporated

Dollar General Corp.

Dollar Thrifty Automotive Group, Inc.

Donaldson Company, Inc.

Dover Corporation

DTE Energy Company

Duke Energy Corporation

Dupont E I De Nemours & Co

Dynegy Inc.

Eastman Chemical Company

Eastman Kodak Company

Eaton Corporation

eBay, Inc.

Ecolab Inc.

Edison International

El Paso Corporation

Electronic Data Systems Corporation

Eli Lilly & Co.

Embarq Corporation

EMCOR Group, Inc.

Emerson Electric Co.

Energy East Corporation

Equifax Inc.

Equity Office Properties Trust

Erie Insurance Group

Exelon Corporation

Exide Technologies

Exxon Mobil Corporation Family Dollar Stores, Inc

FedEx Corporation

First Data Corporation

FirstEnergy Corp.

Fiserv, Inc.

Fleetwood Enterprises, Inc.

Flowers Foods, Inc.

FMC Corporation

FMC Technologies, Inc.

Foot Locker, Inc.

Ford Motor Company

Freeport-McMoRan Cpr. & Gld

Freescale Semiconductor, Inc.

General Cable Corporation

General Electric Company

General Mills, Inc.

Genesis HealthCare Corporation

Genzyme Corporation

Georgia Gulf Corporation

Giant Industries

Gilead Sciences, Inc.

Gold Kist Inc.

Goldman Sachs Group, Inc.

Goodrich Corporation

Google Inc.

Granite Construction Incorporated

Group 1 Automotive, Inc.

Guidant Corporation

H.J. Heinz Company

Halliburton Company

Harley-Davidson, Inc.

Halliburton Company

Harley-Davidson, Inc.

Lehman Brothers Holdings Inc.

Lennox International Inc.

Levi Strauss & Co.

Liberty Global, Inc.

LifePoint Hospitals

Limited Brands, Inc.

Lithia Motors, Inc.

Liz Claiborne, Inc.

Lockheed Martin Corporation

Loews Corporation

Louisiana-Pacific Corporation

LSI Logic Corporation

Lucent Technologies Inc.

Manitowoc Company, Inc.

Manpower Inc.

Markel Corporation

Marsh & McLennan Companies, Inc.

Martin Marietta Materials, Inc.

Masco Corporation

Massachusetts Mutual Life Insurance

Maverick Tube

MBIA Inc.

McDonald's Corporation

McKesson Corporation

MDU Resources Group, Inc.

MedImmune, Inc.

Medtronic, Inc.

Meredith Corporation

Meritage Homes Corporation

Merrill Lynch & Co., Inc.

MGIC Investment Corporation

Microsoft Corporation

Millipore Corporation

Mirant Corporation

Molex, Inc.

Molson Coors Brewing Company

Monsanto Company

Monster Worldwide, Inc.

Moody's Corporation

Morgan Stanley

Motorola, Inc.

MPS Group, Inc.

Mueller Industries, Inc.

Murphy Oil Corporation

Mylan Laboratories Inc.

Nabors Industries Ltd.

NACCO Industries, Inc.

Nash-Finch Company

National Semiconductor Corporation

Nationwide Mutual Insurance Company

Harman International Industries

Harris Corporation

Hasbro, Inc.

Hawaiian Electric Industries, Inc.

HCC Insurance Holdings, Inc.

Health Management Associates, Inc.

Health Net, Inc.

Hess Corporation

Hewlett-Packard Company

Hexion Specialty Chemicals, Inc.

HNI CORP

Holly Corporation

Hormel Foods Corporation

Hovnanian Enterprises, Inc.

HUB International Limited

Hubbell Incorporated

Humana Inc.

IAC/InterActiveCorp

IKON Office Solutions, Inc.

IMS Health, Inc.

Ingersoll-Rand Company Limited

Intel Corporation

International Business Machines Corp.

International Game Technology

International Paper Company

Intuit Inc.

ITT Industries, Inc.

J. B. Hunt Transport Services

J.C. Penney Company, Inc.

Jack in the Box, Inc.

Janus Capital Group Inc.

JDS Uniphase Corporation

JetBlue Airways Corporation

Johnson & Johnson

Johnson Controls, Inc.

JohnsonDiversey, Inc.

Jones Apparel Group, Inc.

Joy Global Inc.

KB Home

Kellogg Company

Kelly Services, Inc.

Kennametal Inc.

KeySpan Corporation

Kinder Morgan, Inc.

L-3 Communications Holdings, Inc.

LandAmerica Financial Group, Inc.

Landstar System, Inc.

La-Z-Boy Incorporated

Lear Corporation

Legg Mason, Inc.

Prudential Financial, Inc

Public Service Enterprise Group Inc.

Publix Super Markets, Inc.

QUALCOMM, Inc.

Quanex Corporation

Quanta Services, Inc.

Quest Diagnostics Incorporated

Questar Corporation

Qwest Communications International

R.R. Donnelley & Sons Company

Raymond James Financial, Inc.

Raytheon Company

Realogy Corporation

Reynolds American, Inc.

Rite Aid Corporation

Robert Half International Inc.

Rock-Tenn Company

Rohm and Haas Company

Roper Industries, Inc.

Ross Stores, Inc.

Rowan Companies, Inc.

Rush Enterprises, Inc.

Ryder System, Inc.

Sabre Holdings Corporation

SAFECO Corporation

Safeway Inc.

Saks Incorporated

Sanmina-SCI Corporation

Sauer-Danfoss Inc.

Schlumberger Limited

Selective Insurance Group, Inc.

Sempra Energy

Sequa Corporation

Service Corporation International

ServiceMaster Company

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