

STATE OF INDIANA
IN THE MARION COUNTY SUPERIOR COURT

CAUSE NUMBER

STATE OF INDIANA,

Plaintiff,

v.

WILDLIFE IN NEED AND
WILDLIFE IN DEED, INC.,
TIMOTHY STARK, and
MELISA LANE,

Defendants.

**ATTORNEY GENERAL'S
COMPLAINT FOR
APPOINTMENT OF RECEIVER
AND PERMANENT REMOVAL OF
DIRECTORS**

SUMMARY

Wildlife in Need and Wildlife In Deed, Inc. ("WIN") is an Indiana nonprofit corporation located in Charlestown, Indiana. WIN represents to the public that its purposes include the rescue and rehabilitation of wildlife and returning animals to their native habitats. In actuality, WIN, under the direction and control of Timothy Stark and Melisa Lane, has abused and neglected the animals in its care, has failed to return exotic animals to their native habitats, and has misapplied or wasted its assets. WIN is unable to continue its stated purposes. The defendants have engaged in conduct warranting WIN's judicial dissolution, a court appointed receivership to effect WIN's orderly dissolution, and the other remedies sought through this civil

action under the Attorney General's authority under Indiana's Nonprofit Corporation Act and Deceptive Consumer Sales Act.

Attorney General Curtis T. Hill Jr., by Deputy Attorneys General Philip G. Rizzo and Tamara L. Weaver, files his Complaint initiating this civil action and moves the Court to 1) remove Timothy Stark and Melisa Lane from their director and officer positions at WIN; 2) issue an order requiring Timothy Stark and Melisa Lane to return to WIN all funds and assets misappropriated from WIN; 3) issue an order dissolving WIN and appointing a receiver to wind up WIN's affairs, recover misapplied assets and assets misappropriated by Timothy Stark and Melisa Lane in an amount to be determined by the receiver, liquidate WIN's assets, and arrange placement of all WIN animals into court approved animal sanctuaries; and 4) issue an injunction enjoining WIN, Timothy Stark, and Melisa Lane, including their agents, employees, directors, officers, and all other persons acting or purporting to act on their behalf, from acquiring, owning, or exhibiting any exotic or native animals. In support of his complaint, the Attorney General asserts:

1. ATTORNEY GENERAL'S AUTHORITY

1. The Attorney General brings this civil action under Indiana Code §§ 23-17-24-1, 23-17-24-1.5, and *Zoeller v. East Chicago Second Century*, 904 N.E.2d 213 (Ind. 2009), which together give the Attorney General the authority to protect the public's interest in charitable and benevolent instrumentalities and to ensure the integrity of nonprofit entities operating within the State of Indiana.
2. Indiana Code §§ 23-17-24-1 and 23-17-24-1.5(b)(1) provide that the Attorney General may seek an injunction to remedy the acts of a domestic or foreign

nonprofit corporation that has continued to exceed or abuse the authority conferred on it by law and/or is no longer able to carry out the corporation's purpose.

3. Indiana Code §§ 23-17-24-1 and 23-17-24-1.5(b)(3) provide that the Attorney General may seek the permanent removal of trustees, corporate officers, or directors who have breached the fiduciary duty to remedy the acts of a domestic or foreign nonprofit corporation that has continued to exceed or abuse the authority conferred on it by law and/or is no longer able to carry out the corporation's purpose.
4. Indiana Code §§ 23-17-24-1 and 23-17-24-1.5(b)(4) provide that the Attorney General may seek the appointment of permanent court approved replacement trustees, corporate officers or directors, and members to remedy the acts of a domestic or foreign nonprofit corporation that has continued to exceed or abuse the authority conferred on it by law and/or is no longer able to carry out the corporation's purpose.
5. Indiana Code § 24-5-0.5-4(c) provides that the Attorney General may bring an action to enjoin deceptive acts connected to consumer transactions and has authority to seek injunctive relief and civil penalties.

2. PARTIES

6. Curtis T. Hill, Jr. is the Attorney General of the State of Indiana with a principal office located at 302 W. Washington St., 5th Floor, Indianapolis, Indiana, 46204.

7. Timothy L. Stark is the sole acting Director and registered agent of Wildlife in Need and Wildlife In Deed, Inc. and resides at 3320 Jack Teeple Road, Charlestown, Indiana, 47111.
8. Melisa Lane (formerly Melisa Stark) is the Secretary and Treasurer of Wildlife in Need and Wildlife In Deed, Inc. and is last known to reside at 1927 Harmony Lane, Charlestown, Indiana, 47111.
9. Wildlife in Need and Wildlife In Deed, Inc. (“WIN”) is a nonprofit corporation with a corporate and principal office located at 3320 Jack Teeple Road, Charlestown, Indiana, 47111.

3. VENUE

10. Venue is proper because venue for a proceeding brought by the Attorney General against a corporation or its directors lies in Marion County. See Ind. Code § 23-17-24-2.

4. FACTUAL ALLEGATIONS

A. BACKGROUND

11. WIN was incorporated in 1999 and its Articles of Incorporation states its purpose is “dedicated to the rescue and rehabilitation of all wildlife The main objective is to return the creature to the wild.”
12. WIN advertises to the public “It is the goal of Wildlife In Need, its owners, and staff to provide the highest level of care possible for our animals, and to ensure that they live happily at our facility, whether that be until they are able to be released into the wild or for the rest of their lives. Every animal that comes to

our facility is cared for as an individual, not just a new member of the group, and we strive to ensure that each animal gets an appropriate amount of care, handling and interaction that they need to be happy.”

13. Although WIN purports to have a board of directors, the board of directors does not participate in any significant decision-making regarding animal care, corporate resources, or corporate finances. Stark and Lane control all operations, administration, and decision-making at WIN. Stark and Lane are responsible for all of WIN’s conduct.

**B. DEFENDANTS HAVE ABUSED AND NEGLECTED ANIMALS AND
HAVE FAILED TO RETURN ANIMALS TO THEIR NATIVE
HABITATS, CONTRARY TO WIN’S STATED NONPROFIT
PURPOSES**

The majority of animals at Wildlife in Need are neither rescued nor rehabilitated; animals at WIN are abused and the majority are never returned to the wild.

14. Between 2012 and 2018, WIN’s number of animals reported to the United States Department of Agriculture increased from 43 to 293.

15. While Stark has continued to bring more animals to WIN, WIN’s staff has not been able keep up with the increasing number of animals. Hundreds of animals have been harmed, abused, and died of disease at Stark and WIN’s hands. For years, animals at WIN have lived in deplorable conditions. Hundreds of animals live in cages that are nearly impossible for staff members to properly clean. In many instances, 1-3 employees have been left to care for over 300 animals.

16. Many animals, such as different species of primates, have been forced to live in dog cages and bird cages, providing insufficient space to move, inside of a

building that provides the animals little to no sunlight and minimal ventilation.

17. Stark has had numerous tigers declawed when there was no medical need for such procedures. In 2016 alone, Stark had approximately 12 tigers declawed. Stark has stated “declawing them just makes it easier to play with them.”
18. Declawing of big cats is against USDA standards due to the injurious nature of the process, and the American Veterinary Medical Association (AVMA) expressly condemns the declawing of big cats. Further, the USDA, which enforces the Animal Welfare Act, maintains that declawing of big cats for any reason other than medical necessity constitutes a violation of the Animal Welfare Act.
19. Stark has indicated that he, and thus WIN, has no intentions of returning big cats to the wild as he has stated “no cat in captivity needs their claws.”
20. Although Stark applies for renewal of his USDA animal exhibitor license annually, he admits that he has not reviewed the USDA Animal Care Policy, which governs the procedures of caring for exotic animals.
21. In numerous instances, aside from the dangerous declawing procedures performed at Stark’s direction, Stark himself has physically abused and neglected other WIN animals.
22. At a show in 2017, when a sloth did not want to come out for pictures with guests, Stark punched the sloth in the face. At the same show in 2017, a monkey was not diapered and ready for the show, so Stark threw the monkey across the room.
23. In spring 2017, Stark brought a young Dromedary camel to WIN. When the

camel fell ill, Stark and WIN employees learned that the camel needed deworming medication. Stark refused to provide the camel medication and had the camel living in an area of the property where the camel was always standing in mud up to the camel's knees. The camel died in December 2018.

24. In April 2018, Stark put an ostrich in WIN's emu enclosure. The emu killed the ostrich and the ostrich's body was left to rot inside the emu enclosure for multiple days.

25. At an animal show in spring 2018, Stark tried to play with a tiger cub. When the teething cub bit Stark, Stark threw the cub on the ground, kicked it, and repeatedly stomped on it.

26. In July 2019, Stark attempted to transport approximately 100 animals to a zoo in Oklahoma; this was part of his attempt to enter into a partnership to run a for-profit zoo. Stark placed approximately 100 animals in a 28-foot enclosed trailer with no water, no air conditioning, and no air circulation. During the trip, Stark stopped overnight and left the animals in the trailer. The trip took approximately 36 hours, and by the time Stark arrived in Oklahoma, over 30 animals had died in the trailer and several others sustained heat-related injuries.

27. Over the years, Stark has euthanized animals by striking the animals with baseball bats. In one instance, Stark killed a leopard with a baseball bat because it was malnourished.

28. Although WIN's purpose statement states "the main objective is to return the

creature to the wild,” the majority of WIN animals are never returned to the wild. A significant portion of WIN’s animals are native to Africa, Asia, and South America; WIN does not release animals to Africa, Asia, and South America. While WIN may rehabilitate and release some native animals in Indiana, WIN implies in its purpose statement that it returns both native and exotic animals to the wild.

29. On February 3, 2020, the United States Department of Agriculture ordered Stark’s animal exhibitor license revoked due to violations of animal welfare regulations. The revocation of Stark’s exhibition license will substantially hinder WIN’s ability to raise money to feed and rehabilitate the hundreds of animals at WIN as WIN’s primary source of revenue comes from animal exhibition. As recently as November 2019, WIN’s bank account held approximately \$6,500 and the upcoming loss of revenue will most likely make it impossible for WIN to be able to afford to feed and care for its animals.

C. DEFENDANTS HAVE MISMANAGED WIN AND HAVE CAUSED WIN TO ABUSE ITS LEGAL AUTHORITY

30. Stark and Lane have engaged in conduct that prevents WIN’s purposes from being properly carried out, including WIN having numerous deficiencies ranging from safety issues to mismanagement to failing to report wrongdoing.

Timothy Stark and Melisa Lane’s mismanagement and misapplication of WIN resources have undermined WIN’s purposes.

31. By 2019, WIN’s enclosures became dilapidated and in serious need of repair. At the same time in 2019, Stark attempted to form a for-profit zoo partnership in Thackerville, Oklahoma that was to be called Red River Safari. Instead of

directing WIN assets to complete repairs at WIN, Stark loaded up nearly all of WIN's building materials, tools, and machinery and had them transported to Oklahoma for the attempted for-profit zoo partnership.

32. WIN has had numerous incidents of its wolves escaping. One incident involved a wolf getting within 200 feet of a neighbor's house. The wolves are still at risk of escaping due to the fact Stark has recently decided to enclose the wolves in a fenced area toward the back of the property near dead trees. If a dead tree were to fall and knock the fence down, the wolves would be able to escape. At times, the electricity on the fence for the wolf enclosure has not functioned properly.
33. Until June 2019, the enclosures for lions, tigers, hybrid big cats, hyenas, and bears at WIN were secured with combination locks with the combinations being all 5's or all 7's.
34. WIN additionally has no security systems in place to keep trespassers from being able to come onto the property and release the animals.
35. In June 2019, WIN maintenance worker Scott Ehley was attacked by a hyena that escaped from its enclosure. Ehley suffered serious injuries, and WIN has never determined how the hyena escaped from its enclosure.

Timothy Stark and Melisa Lane have prevented reporting of wrongdoing at WIN.

36. In late 2017 or early 2018, under Stark's and Lane's direction, all employees were required to sign a "trade secrets" agreement. The agreement asserted that any employees who reported anything they saw or learned at WIN would be required to pay WIN \$20,000. The agreement was used as a scare tactic to

prevent reporting of wrongdoing at WIN.

37. When WIN employee Steven Dufour was attacked by a tiger in 2016 and required 40 stitches, Stark told Dufour to lie and say he had a chainsaw accident if asked about what happened.

38. When WIN employee Sara Fetz was attacked by a spider monkey and suffered nerve damage in her hand, Lane ripped off Fetz's WIN shirt, made Fetz drive herself to the hospital, and told Fetz not to tell anyone that Fetz was injured at WIN. Days later, Stark told Fetz not to tell anyone that she was injured at WIN and told her "I know people." Stark told Fetz to make up a story about how she was injured, and not to tell anyone that she was injured at WIN.

Timothy Stark and Melisa Lane have caused WIN to exceed its legal authority by violating USDA animal exhibition regulations.

39. As an exhibitor of animals regulated by the United States Department of Agriculture under the federal Animal Welfare Act, Stark and WIN are required to be licensed by the USDA in order to exhibit animals. For several years, Stark and WIN have been cited for violations by the Animal and Plant Health Inspection Service (APHIS) of the USDA. Administrative proceedings were held regarding the violations and on February 3, 2020, the USDA ordered Stark's USDA exhibitor license revoked as a result of the violations and WIN was ordered to pay the maximum amount of civil penalties allowed under law for its violations.

40. In the USDA administrative proceedings, Chief Administrative Law Judge

Channing Strother found WIN and Stark committed over 100 violations of Animal Welfare Act regulations including: failing to employ veterinarians to provide adequate care to animals, failing to properly maintain animal acquisition and disposition records, failing to handle animals with proper care, failing to maintain sufficient barriers between the public and animals, physically abusing animals, and failing to meet minimum standards with respect to structural strength and containment for enclosures for tigers, lions, hyenas, and coyotes.

41. The Chief Administrative Judge additionally found that WIN and Stark have failed to meet AWA standards for animal housing, proper animal diet, adequate protection of animal food supply, appropriate animal exercise plans, appropriate animal environmental enhancement, potable water supply for animals, and numbers of adequately trained employees.

42. While Stark is in charge of operations at WIN regarding the care of animals, Lane has held that role during times when Stark has been absent from WIN's premises for extended periods of time. Lane has also taken part in animal record keeping violations by falsifying animal acquisition records to misrepresent that animals were born at WIN when the animals were in fact not born at WIN.

D. DEFENDANTS HAVE MISAPPROPRIATED AND MISAPPLIED CORPORATE RESOURCES

Timothy Stark and Melisa Lane's uses of WIN resources are contrary to WIN's purposes.

43. Board meetings were rarely held at WIN and meeting minutes were rarely, if ever, taken. Stark and Lane are the only people who have access to WIN's finances. Stark and Lane handle all decision-making at WIN.
44. While WIN collects donations purportedly to be used for the "rescue" and "rehabilitation" of animals, Stark has routinely embezzled WIN moneys for non-WIN uses. In soliciting donations at WIN events, Stark tells guests that he receives no income from WIN and that all donations go towards helping WIN's animals.
45. However, Stark has directed thousands of dollars' worth of WIN assets for non-WIN purposes. In 2019, Stark bought a brand new Dodge Ram pickup truck and used it to transport WIN materials and machinery to Oklahoma to use for his attempted for-profit zoo partnership. WIN machinery Stark had transported to Oklahoma included a bulldozer, an LC 200 excavator, and a John Deere skid steer.
46. As treasurer, it is Lane's responsibility to keep track of WIN's money and books. As treasurer, Lane has allowed and enabled Stark to embezzle WIN moneys for several years.
47. Tickets for WIN's animal exhibition shows are sold by WIN using the service Eventbrite. At Stark's direction, WIN charges guests cash to have photos taken with animals after the shows. The animal photos are not sold through Eventbrite and Stark has stated that the reason for this is so he can collect cash from the photo sales. Stark has told at least two people that he accepts cash for

animal photos so he can keep the money for himself.

48. When Stark renews his USDA exhibitor license every year, he states in his application that he “owns” all animals at WIN, yet most, if not all, animals at WIN were bought with WIN money. For example, between November 9, 2015 and September 6, 2018, over \$250,000 was wire transferred from WIN’s bank account to animal breeders and/or traffickers over at least 32 transactions.

49. On November 19, 2019, Stark filed a lawsuit in Oklahoma alleging that he owns approximately 45 animals that are being kept at Greater Wynnewood Exotic Animal Park in Oklahoma. In the Oklahoma lawsuit, Stark alleges that Greater Wynnewood Exotic Animal Park’s owner, Jeff Lowe, owes moneys to Stark, in Stark’s personal capacity, for exhibiting those animals. However, the animals in the Oklahoma lawsuit are the property of WIN, so any claim for moneys owed for exhibiting those animals should be made on behalf of WIN, for WIN’s recovery. WIN currently does not have a functioning board of directors to intervene in Stark’s lawsuit to protect and preserve its assets from Stark’s attempted misappropriation.

5. COUNTS

COUNT I: WILDLIFE IN NEED IS NO LONGER ABLE TO CARRY OUT ITS STATED PURPOSE.

50. The Attorney General incorporates by reference the preceding paragraphs of this Complaint.

51. WIN’s stated primary purposes are to rescue and rehabilitate animals, return

animals to the wild, and provide appropriate care to injured and abandoned wildlife.

52. WIN does not provide an appropriate level of care to properly rescue and rehabilitate animals and WIN does not provide appropriate care to injured and abandoned wildlife.

53. The majority of animals at WIN are never returned to the wild.

54. In violation of Indiana Code § 23-17-24-1(a)(1)(D), WIN can no longer carry out its stated purposes due to its inability to provide proper care to its animals.

55. In violation of Indiana Code § 23-17-24-1(a)(1)(D), WIN can no longer carry out its stated purposes due to the physical abuse inflicted on animals in WIN's care and due to animal deaths resulting from the defendants' conduct.

56. In violation of Indiana Code § 23-17-24-1(a)(1)(D), WIN can no longer carry out its purposes because it cannot maintain an adequate staff to care for its animals.

57. In violation of Indiana Code § 23-17-24-1(a)(1)(D), WIN can no longer carry out its purposes because of the misapplication and waste of its assets by its director Stark during times when the assets are needed to repair and improve living conditions for WIN's animals.

**COUNT II: WILDLIFE IN NEED HAS MISAPPLIED OR WASTED
CORPORATE ASSETS.**

58. The Attorney General incorporates by reference the preceding paragraphs of this Complaint.

59. In violation of Indiana Code § 23-17-24-1(a)(1)(C), Stark and Lane, the only

acting director and officer, have used their positions as director and treasurer of WIN to misapply and/or waste corporate assets by using the assets for purposes that are not in furtherance of WIN's corporate purposes.

**COUNT III: WILDLIFE IN NEED HAS EXCEEDED AUTHORITY
CONFERRED UPON IT BY LAW.**

60. The Attorney General incorporates by reference the preceding paragraphs of this Complaint.

61. In violation of Indiana Code § 23-17-24-1(a)(1)(B), Stark and Lane have caused WIN to exceed the authority conferred upon it by law by misleading the public regarding its purposes and objectives.

62. In violation of Indiana Code § 23-17-24-1(a)(1)(B), WIN's continuing failure to fulfill its stated purposes constitutes a misrepresentation to the public.

63. In violation of Indiana Code § 23-17-24-1(a)(1)(B), Stark and Lane have caused WIN to exceed the authority conferred upon it by law by attempting to prohibit and prevent reporting of wrongdoing occurring at WIN through imposing employee confidentiality agreements and telling employees injured by animals at WIN to lie about the cause of their injuries.

64. In violation of Indiana Code § 23-17-24-1(a)(1)(B), Stark and Lane have caused WIN to exceed the authority conferred upon it by law by failing to comply with USDA animal exhibition regulations.

**COUNT IV: TIMOTHY STARK HAS DISCHARGED HIS DUTIES AS A
DIRECTOR IN BAD FAITH.**

65. The Attorney General incorporates by reference the preceding paragraphs of this

Complaint.

66. In violation of Indiana Code § 23-17-13-1(a)(1), WIN director Stark discharged his duties as director in bad faith by repeatedly abusing and neglecting animals leading to injuries and deaths to animals.

67. In violation of Indiana Code § 23-17-13-1(a)(1), Stark has discharged his duties as director in bad faith by deceiving the public when soliciting donations by stating that he receives no income from WIN and stating that all donations go to animal care.

68. In violation of Indiana Code § 23-17-13-1(a)(1), Stark has discharged his duties as director in bad faith by repeatedly misappropriating and embezzling WIN resources.

69. In violation of Indiana Code § 23-17-13-1(a)(1), Stark has discharged his duties as director in bad faith by intimidating and using scare tactics on WIN volunteers and employees in his efforts to prevent reporting of wrongdoing and incidents at WIN.

COUNT V: TIMOTHY STARK HAS DISCHARGED HIS DUTIES AS A DIRECTOR WITHOUT REASONABLE CARE.

70. The Attorney General incorporates by reference the preceding paragraphs of this Complaint.

71. In violation of Indiana Code § 23-17-13-1(a)(2), WIN director Stark has discharged his duties as director without reasonable care by repeatedly abusing and neglecting animals leading to injury and death to animals.

72. In violation of Indiana Code § 23-17-13-1(a)(2), Stark has discharged his duties

as director without reasonable care by deceiving the public when soliciting donations by stating that he receives no income from WIN and stating that all donations go to animal care.

73. In violation of Indiana Code § 23-17-13-1(a)(2), Stark has discharged his duties as director without reasonable care by repeatedly misappropriating and embezzling WIN resources.

74. In violation of Indiana Code § 23-17-13-1(a)(2), Stark has discharged his duties as director without reasonable care by intimidating and using scare tactics on WIN volunteers and employees in his efforts to prevent reporting of wrongdoing and incidents at WIN.

COUNT VI: TIMOTHY STARK HAS FAILED TO DISCHARGE HIS DUTIES AS A DIRECTOR IN THE BEST INTERESTS OF THE CORPORATION.

75. The Attorney General incorporates by reference the preceding paragraphs of this Complaint.

76. In violation of Indiana Code § 23-17-13-1(a)(3), WIN director Stark has failed to discharge his duties as a director in the best interest of WIN due to his repeated abuse and neglect of animals leading to injury and death of animals.

77. In violation of Indiana Code § 23-17-13-1(a)(3), Stark has failed to discharge his duties as a director in the best interest of WIN due to his deceiving the public when soliciting donations by stating that he receives no income from WIN and stating that all donations go to animal care.

78. In violation of Indiana Code § 23-17-13-1(a)(3), Stark has failed to discharge his

duties as a director in the best interest of WIN due to his repeated misappropriation and embezzlement of WIN resources.

79. In violation of Indiana Code § 23-17-13-1(a)(3), Stark has failed to discharge his duties as a director in the best interest of WIN due to his intimidation and use of scare tactics on WIN volunteers and employees in his efforts to prevent reporting of wrongdoing and incidents at WIN.

COUNT VII: WILDLIFE IN NEED, TIMOTHY STARK, AND MELISA LANE HAVE ENGAGED IN DECEPTIVE CONSUMER SALES.

80. The Attorney General incorporates by reference the preceding paragraphs of this Complaint.

81. In violation of Indiana Code § 24-5-0.5-3(a), WIN, through Stark and Lane, has deceived the public when soliciting donations when WIN was not fulfilling its purposes as a public benefit corporation.

82. In violation of Indiana Code § 24-5-0.5-3(a), WIN, through Stark and Lane, has deceived the public when soliciting donations by misappropriating or misapplying corporate assets.

6. RELIEF REQUESTED

The Attorney General respectfully requests that this court enter an Order:

- a. Preliminarily and permanently removing Timothy Stark and Melisa Lane from their positions at WIN;
- b. Requiring Timothy Stark and Melisa Lane to return to WIN all funds and assets misappropriated from WIN;
- c. Dissolving WIN and appointing a receiver to wind up WIN's affairs, recover

- assets misappropriated by Timothy Stark and Melisa Lane in an amount to be determined by the receiver, liquidate WIN's assets, and arrange placement of all WIN animals into court approved animal sanctuaries;
- d. Preliminarily and permanently enjoining WIN, Timothy Stark, and Melisa Lane, including their agents, employees, directors, officers, and all other persons acting or purporting to act on their behalf, from acquiring, owning, and exhibiting any exotic or native animals, including all mammals, birds, reptiles, and amphibians;
- e. Providing any other relief that this Court deems appropriate.

Respectfully submitted,

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