

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION**

ESTATE OF LILDON WILLIAMS, by and
through its administratrix, RANNISHA
WILLIAMS, RANNISHA LIVEIOUS,
individually as wife of LilDon Williams, and as
mother and guardian of R.W., a minor child,

Plaintiffs,

v.

CAESARS ENTERTAINMENT, INC., EBCI
HOLDINGS, LLC, VICI PROPERTIES INC.,
ERIC GOLEBIEWSKI, and CSI OPERATING
COMPANY, LLC,

Defendants.

CASE NO. 4:24-cv-00145-TWP-KMB

**MEMORANDUM IN SUPPORT OF DEFENDANTS'
SECOND MOTION TO DISMISS**

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I. FACTUAL BACKGROUND

This litigation arises out of a shooting that occurred on the premises of the Caesars Southern Indiana Hotel & Casino in Elizabeth, Indiana. Plaintiffs have now filed their *Second Amended Complaint* [Dkt. #30] (the “Complaint”), alleging state-law claims of: (1) Negligence; (2) Wrongful Death; and, (3) Loss of Consortium. Plaintiffs assert that the Court has original jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a)(1), and supplemental jurisdiction over these state-law claims pursuant to 28 U.S.C. § 1367(a).

Defendant CSI Operating Company, LLC, is wholly owned by Defendant EBCI Holdings, LLC. In turn, EBCI Holdings, LLC, is wholly owned by the Eastern Band of Cherokee Indians, a federally recognized Native American tribe.

Defendants now move to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(1) for lack of subject matter jurisdiction, as there is not complete diversity between the parties for purposes of §1332.¹

II. LEGAL STANDARD

A motion to dismiss under Rule 12(b)(1) is meant to test the sufficiency of the complaint, not to decide the merits of the case. *Ctr. for Dermatology & Skin Cancer, Ltd. v. Burwell*, 770 F.3d 586, 588 (7th Cir. 2014) (*internal citations omitted*). “[A] plaintiff faced with a 12(b)(1) motion to dismiss bears the burden of establishing that the jurisdictional requirements have been met.” *Id.* at 588-89. The Court must dismiss this action if it determines, at any time, “that it lacks subject-matter jurisdiction[.]” *See* Fed. R. Civ. P. 12(h)(3).

¹ As the Court is likely aware, a similar *Motion to Dismiss* is also pending before the U.S. District Court for the Southern District of Indiana under cause no. 4:24-cv-00140-SEB-KMB. The cases involve several of the same defendants (including EBCI Holdings and CSI Operating Company) the same undersigned counsel, and the same plaintiffs’ counsel. The parties’ filings to date in both cases have also been substantially identical.

“Federal Courts are courts of limited jurisdiction: It is to be presumed that a cause lies outside [a court’s] limited jurisdiction, and the burden of establishing the contrary rests upon the party asserting jurisdiction.” *Hart v. FedEx Ground Package Sys. Inc.*, 457 F.3d 675, 679 (7th Cir. 2006), *citing Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994). A party may meet this burden by offering evidence “to a reasonable probability that jurisdiction exists.” *Gould v. Artisoft, Inc.*, 1 F.3d 544, 547 (7th Cir. 1993). “Jurisdiction may not be sustained on a theory that the plaintiff has not advanced...The plaintiff is absolute master of what jurisdiction he will appeal to.” (*internal citations omitted*) *Merrell Dow Pharmaceuticals, Inc. v. Thompson*, 478 U.S. 804, 809 n.6 (1986).

While a defendant may waive arguments as to personal jurisdiction by either express or implied consent, parties cannot waive or consent to the requirements for subject matter jurisdiction, including diversity jurisdiction. *See, e.g., Heller Financial, Inc. v. Midwhey Powder Co.*, 883 F.2d 1286, 1290, (7th Cir. 1989). Federal courts have an independent duty to ensure subject-matter jurisdiction, and neither the parties nor their lawyers may waive arguments that the court lacks jurisdiction. *Dexia Credit Local v. Rogan*, 602 F.3d 879, 883 (7th Cir. 2010) (*citing United States v. Tittjung*, 235 F.3d 330, 335 (7th Cir. 2000); and *Dave v. Ashcroft*, 363 F.3d 649, 652 (7th Cir. 2004)). “The lack of complete diversity between the parties is not a pleading defect, it is a fact that cannot be overcome and one that means the absence of subject matter jurisdiction cannot be cured by more jurisdictional discovery or by further amendment of the pleadings[.]” *Galaxy Precision Mfg. v. Grupo Indus. San Abelardo S.A. de C.V.*, 2022 U.S. Dist. LEXIS 99470, *9, 2022 WL 1908978.

III. ARGUMENT

The Plaintiffs' Complaint should be dismissed pursuant to Fed. R. Civ. P. 12(b)(1) for lack of subject matter jurisdiction, as there is not complete diversity among the parties. Two of the Defendants in this case, EBCI Holdings, LLC, and CSI Operating Company, LLC, are 'stateless' for purposes of diversity jurisdiction under 28 U.S.C. § 1332. Stateless citizens, by definition, are not a citizen of any State, as required by § 1332(a), and their presence in a suit serves to destroy complete diversity from being achieved.

The sole question raised at this stage is whether complete diversity exists among the parties for purposes of subject matter jurisdiction premised under 28 U.S.C. §1332. The clear and unambiguous answer to this question is that it is lacking. Because there is no other independent basis for the Court to maintain subject matter jurisdiction over the Plaintiffs' claims, the Complaint must be dismissed in its entirety.

A. Diversity Jurisdiction in General

The criteria for a federal court to maintain subject matter jurisdiction over cases premised upon the diversity of citizenship between the parties is well established: "The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between—(1) Citizens of different States[.]" 28 U.S.C. § 1332(a)(1). This requirement has long been interpreted to require 'complete diversity' between the parties, and to preclude complete diversity from being achieved where a party who is not citizens of any State (*i.e.*, 'stateless') is present:

The Complete Diversity Requirement. For well over 200 years, the Supreme Court has interpreted statutory diversity jurisdiction to require "complete diversity" between the parties. See *Strawbridge v. Curtiss*, 7 U.S. (3 Cranch) 267, 267, 2 L. Ed. 435 (1806). Usually this means that a federal court must satisfy itself that no party on the plaintiff's side of the suit shares

citizenship with any party on the defendant's side. See *Wis. Dep't of Corr. v. Schacht*, 524 U.S. 381, 388, 118 S. Ct. 2047, 141 L. Ed. 2d 364 (1998) ("A case falls within the federal district court's 'original' diversity 'jurisdiction' only if diversity of citizenship among the parties is complete, *i.e.*, only if there is no plaintiff and no defendant who are citizens of the same State."). With limited exceptions for class action suits not relevant here, shared citizenship between just one party on both sides of the lawsuit destroys complete diversity. See *id.*

Though complete diversity typically hinges on whether any parties on both sides of a lawsuit share citizenship, there is another nuanced and sometimes overlooked component to the inquiry: all parties must fall within the jurisdiction created by the diversity statute. Put another way, if a party cannot sue or be sued under one of the provisions of the diversity statute, the suit lacks complete diversity. See *Kamel*, 108 F.3d at 805 ("When a plaintiff sues multiple defendants in a diversity action, complete diversity must be present. That is, the plaintiff must satisfy the diversity requirements for each defendant or else encounter dismissal." (citing *Newman-Green*, 490 U.S. at 829)). ***What this means here is that stateless citizens—because they are not (by definition) a citizen of a state, as § 1332(a) requires—destroy complete diversity just as much as a defendant who shares citizenship with a plaintiff.***

(*emphasis added*). Page v. *Democratic Nat'l Comm.*, 2 F.4th 630, 636 (7th Cir. 2021).

For purposes of diversity jurisdiction, the citizenship of a limited liability company is the citizenship of its members. *Cosgrove v. Bartolotta*, 150 F.3d 729, 731 (7th Cir. 1998). The citizenship of an unincorporated entity, such as a limited liability company or limited partnership, must be traced through however many layers of partners or members there may be. *Hart v. Terminex Int'l*, 336 F.3d 541, 543 (7th Cir. 2003). "If even one investor in an LP or LLC has the same citizenship as any party on the other side of the litigation, complete diversity is missing and the suit must be dismissed." *White Pearl Inversiones S.A. (Uruguay) v. Cemusa, Inc.*, 647 F.3d 684, 686 (7th Cir. 2011).

B. The Seventh Circuit has Followed the Majority View that Only Incorporated Tribal Entities are Treated as Citizens for Diversity Jurisdiction.

In *Wells Fargo v. Lake of the Torches Econ. Dev. Corp.*, a bank sued a federal tribal corporation for a contract claim, with subject matter jurisdiction premised in diversity under § 1332. *Wells Fargo Bank, N.A. v. Lake of the Torches Econ. Dev. Corp.*, 658 F.3d 684 (7th Cir. 2011). The Seventh Circuit noted that the assertion as to the citizenship of the tribal corporation “requires close scrutiny.” *Id.* at 692. “Although neither the Supreme Court nor this court has addressed the issue previously, most courts agree that Indian tribes are not citizens of any state for purposes of the diversity statute and therefore may not sue or be sued in federal court under § 1332.” *Id.* The *Wells Fargo* Court analyzed several cases from around the country, and concluded that *incorporated* tribal entities only should be treated as the citizen of a State under §1332. *Id.* at 693. This principle was in keeping with the “clear rule ‘treat[ing] any corporation as a corporation for diversity purposes’ and...that the diversity statute itself does not distinguish between types of corporations or limit its reach to businesses incorporated under state law.’” *Id.*

Though the Seventh Circuit did not address the specific question of how *unincorporated* tribal entities are to be treated in this Circuit, it strongly indicated that this key distinction would have altered its analysis, and the outcome in *Wells Fargo*:

Relatedly, in holding that a tribal housing agency was a stateless entity under the diversity statute, the First Circuit indicated that the result would have been different had the housing authority been a corporation: “We see no reason why the Authority (an arm of the Tribe, *not separately incorporated*) should be treated any differently for jurisdictional purposes.” *Ninigret Dev. Corp. v. Narragansett Indian Wetuomuck Hous. Auth.*, 207 F.3d 21, 27 (1st Cir. 2000) (emphasis added); *cf. Miccosukee Tribe of Indians of Florida*, 607 F.3d at 1276 (stating that the “majority view . . . is that *unincorporated* Indian tribes cannot sue or be sued in diversity” (emphasis added) (quotation marks omitted)).

Id. at 693.

The Seventh Circuit ultimately decided to follow the Ninth and Tenth Circuits in the question of how such incorporated entities should be treated for purposes of diversity jurisdiction:

Thus, we join our colleagues in the Ninth and Tenth Circuits and hold that a corporation chartered under Native American tribal law should be treated as a citizen of a state pursuant to § 1332(c). *Cf. Hoagland*, 385 F.3d at 740 (citing with approval cases treating tribal corporations as state citizens for diversity purposes). We understand the Eighth Circuit's decision to apply only to *unincorporated* tribal agencies. *Cf. Auto-Owners Ins. Co.*, 495 F.3d at 1021 (quoting *Dillon v. Yankton Sioux Tribe Hous. Auth.*, 144 F.3d 581, 583 (8th Cir. 1998), as distinguishing between a tribal agency and "'a separate corporate entity created by the tribe'").

(*emphasis in original*) *Id.* at 693-694.

C. The Majority View Throughout the Circuits has been that Unincorporated Tribal Entities are ‘Stateless’ for Purposes of Diversity Jurisdiction.

In following the Ninth and Tenth Circuits in *Wells Fargo*, the Seventh Circuit specifically cited to the cases of *Gaines v. Ski Apache*, 8 F.3d 726 (10th Cir. 1993), and *Cook v. AVI Casino Enters.*, 548 F.3d 718 (9th Cir. 2008), which provide further insight into, and support for the proposition that an unincorporated entity, such as a limited liability company, should be treated as a ‘stateless’ entity where, as here, any one of its members is an unincorporated Native American tribe, and thereby preclude diversity jurisdiction.

In *Gaines v. Ski Apache*, the Tenth Circuit addressed the question of whether federal courts may exercise diversity jurisdiction over the unincorporated arm of a Native American tribe. *Gaines*, 8 F.3d at 728. In analyzing the issue, the Tenth Circuit noted that a tribe may charter a corporation under either the Indian Reorganization Act, 25, U.S.C. § 477, or under its own tribal laws, and that the corporation thereby becomes deemed a citizen of the state by which it was incorporated, and the State in which it has its principal place of business. *Id.* at 729. The Tenth Circuit rejected arguments that the unincorporated tribe itself should be considered as a corporation for diversity purposes, even where the tribe’s constitution referred to it being ‘in the nature of a

non-profit corporation’, noting that “the Supreme Court has rejected attempts to treat entities in the nature of corporations *as* corporations for purposes of diversity jurisdiction.” (*emphasis in original*) *Id.* at 729-730 (citing *United Steelworkers of America v. R.H. Bouligny, Inc.*, 382 U.S. 145, 149-51 (1965)).

Fifteen years later, in *Cook v. AVI Casino Enters.*, the Ninth Circuit analyzed how corporations organized and incorporated under tribal law are to be treated for diversity purposes. *Cook*, 548 F.3d at 723. In so examining, and more relevant here, the Ninth Circuit relied heavily on its prior decision in *American Vantage Cos. v. Table Mt. Rancheria*, 292 F.3d 1091 (9th Cir. 2002), where the citizenship of an *unincorporated* tribe was examined for purposes of diversity jurisdiction.

In *American Vantage*, the Ninth Circuit adopted the reasoning found in the prior decisions of the First, Second, Eighth, and Tenth Circuits (specifically referring to *Gaines*) in holding that “unincorporated Indian tribes cannot sue or be sued in diversity because they are not citizens of any state.” *American Vantage*, 292 F.3d at 1095. The Ninth Circuit based this conclusion on three primary considerations: (1) as dependent domestic sovereign nations, Native American tribes are not State citizens; (2) Congress has not conferred State citizenship on these tribes, despite ample opportunity to do so (“We [] find it implausible that Congress intended the diversity statute to reach unincorporated Indian tribes.” *Id.* at 1097); and, (3) holding so was consistent with the other circuits to have addressed the issue, which thereby advanced the interests of uniformity in a “uniquely federal area of law.” *Id.* at 1095. *American Advantage* further rejected alternative arguments that the tribe was a State citizen “because it has waived immunity from suit, behaves like a corporation[,] or is an unincorporated association.” *Id.* at 1098.

D. Diversity Jurisdiction Cannot be Sustained where even a Single LLC Member is ‘Stateless’.

Importantly, the Seventh Circuit has determined that an unincorporated entity made up of even a single ‘stateless’ partner or member, *is itself stateless*, and therefore cannot be sued in diversity. *Page*, 2 F.4th at 636. In coming to this determination, the Court noted that “Every other circuit to have confronted the question has reached the same conclusion.” *Id.* at 637.

District courts within the Seventh Circuit have applied this reasoning to entities owned by Native American tribes, and concluded that “an Indian tribe is not a citizen of any state and cannot sue or be sued in federal court under diversity jurisdiction.” *Merit Mgmt. Group v. Ponca Tribe of Indians*, 778 F. Supp. 2d 916, 917 (N.D. Ill. 2011), *quoting Auto-Owners Ins. Co. v. Tribal Court of the Spirit Lake Indian Reservation*, 495 F.3d 1017, 1020 (8th Cir. 2007).

Two of the Defendants in this litigation (EBCI Holdings, LLC, and CSI Operating Company, LLC) are clearly ‘stateless’ under the well-established method to determine whether diversity jurisdiction is present or not for unincorporated entities. CSI Operating Company is wholly owned by EBCI Holdings, and EBCI Holdings is, in turn, wholly owned by the Eastern Band of Cherokee Indians, a federally recognized Native American tribe. Thus, these unincorporated entities cannot be citizens of *any* State for purposes of diversity jurisdiction, and complete diversity among the parties is precluded.

This situation is directly analogous to that found in *CTGW, LLC v. GSBS, PC*, 2010 U.S. Dist. Lexis 69298 (W.D. Wis. 2010), where the plaintiff LLC disclosed that, after tracing through its membership, one of the members was the Confederated Tribes of the Chehalis Reservation, a federally recognized Native American tribe. Upon this disclosure, the district analyzed the issue, in part, as follows:

Section 1332 does not tell courts how to determine the citizenship of a tribe and the Court of Appeals for the Seventh Circuit has not addressed the issue. However, the majority of courts to consider the issue have concluded that a tribe is not a citizen of *any* state. *E.g.*, *Cook v. AVI Casino Enterprises, Inc.*, 548 F.3d 718, 722 (9th Cir. 2008) ("An Indian tribe or an unincorporated arm of a tribe is not a citizen of any state."); *Ninigret Development Corp. v. Narragansett Indian Wetuomuck Housing Authority*, 207 F.3d 21, 27 (1st Cir. 2000) ("An Indian tribe . . . is not considered to be a citizen of any state"); *Romanella v. Hayward*, 114 F.3d 15, 16 (2d Cir. 1997) (*per curiam*) ("[A]n Indian tribe is not a citizen of any state"); *Gaines v. Ski Apache*, 8 F.3d 726, 729 (10th Cir. 1993) (same); *Standing Rock Sioux Indian Tribe v. Dorgan*, 505 F.2d 1135, 1140 (8th Cir. 1974) (same); *Barker-Hatch v. Viejas Group Baron Long Capitan Grande Band of Digueno Mission Indians*, 83 F. Supp. 2d 1155, 1156-57 (S.D. Cal. 2000) (same); *Abdo v. Fort Randall Casino*, 957 F. Supp. 1111, 1112 (D.S.D. 1997) (same).

Against this weight of authority, a couple of district courts have decided otherwise. *E.g.*, *Warn v. Eastern Band of Cherokee Indians*, 858 F. Supp. 524, 526 (W.D.N.C.1994) (holding that the court had diversity jurisdiction over breach of contract claim by non-Indian against tribe and tribal council members); *Tribal Smokeshop, Inc. v. Alabama-Coushatta Tribes of Texas*, 72 F. Supp. 2d 717, 718 n. 1 (E.D. Tex. 1999) (stating that Indian tribes are deemed to be citizens of state in which they are located for purpose of diversity jurisdiction).

I agree with the majority of courts that have decided this issue and conclude that Indian tribes are not citizens of any state for the purpose of diversity jurisdiction. This rule is supported by the status of Indian tribes as domestic sovereigns. *Alzheimer & Gray v. Sioux Manufacturing Corp.*, 983 F.2d 803, 812 (7th Cir. 1993) ("Indian tribes are considered 'domestic dependent nations' which exercise inherent sovereign authority over their members and territories.") (citations omitted). Tribes "retain[] their original natural rights" as "aboriginal entit[ies] antedating the federal [and state] government[s]," *Romanella*, 114 F.3d at 16 (quoting *Worcester v. Georgia*, 31 U.S. 515, 559, 8 L. Ed. 483 (1832)). It is well established that other domestic sovereigns, such as the states, are not citizens of any state for purposes of diversity jurisdiction. *Indiana Port Commission v. Bethlehem Steel Corp.*, 702 F.2d 107, 109 (7th Cir. 1983). The majority of courts addressing the question of tribal citizenship reason that tribes, as domestic sovereigns, should be treated like states, which are not "citizens" for purpose of diversity jurisdiction.

CTGW, LLC v. GSBS, PC, 2010 U.S. Dist. LEXIS 69298, *3-5 (W.D. Wis. 2010).

The *CTGW* Court further noted that the presence of such a “stateless” entity serves as a “jurisdictional spoiler” for purposes of diversity under § 1332(a)(1). *Id.* at *6-7. It “makes no difference” that the Indian tribe may only be a member of a named unincorporated party, such as an LLC or LP, and not an individually named party; the citizenship of such unincorporated entity is the citizenship of *each* of its members or partners. *Id.* at *7 -8. “If one member of a limited liability company is ‘stateless,’ the limited liability company itself is stateless and jurisdiction cannot be premised on § 1332(a).” *Id.* at *8.

The presence of the Eastern Band of Cherokee Indians as the sole owners of EBCI Holdings, LLC (which, in turn, wholly owns CSI Operating Company, LLC) renders both EBCI and CSI, as a whole, “stateless” for purposes of diversity jurisdiction under § 1332(a). The presence of these stateless entities precludes complete diversity from being achieved and serves as a “jurisdictional spoiler” under § 1332. There remains no other basis for this Court to assert subject matter jurisdiction over the Plaintiffs’ claims, each of which arises out of Indiana state law, and the case must therefore be dismissed in its entirety.

Plaintiffs may also argue that there exist leases, agreements, or other contracts with the other defendants to this lawsuit which must first be examined in order to determine whether EBCI or CSI have consented to jurisdiction here. Yet such an inquiry is plainly unnecessary, as no facts uncovered *could* serve to alter the Court’s analysis here. The lack of subject matter jurisdiction “is not a pleading defect” and “cannot be cured by more jurisdictional discovery or by further amendment of the pleadings[.]” *Galaxy Precision Mfg.*, 2022 U.S. Dist. LEXIS 99470, *9, 2022 WL 1908978. Whether or not EBCI Holdings may have contractually consented to *personal* jurisdiction is wholly irrelevant as to whether *subject matter* jurisdiction is present.

IV. CONCLUSION

The presence of a ‘stateless’ entity, such as a Native American tribe, serves as a “jurisdictional spoiler” for purposes of diversity under § 1332(a)(1). *CTGW, LLC v. GSBS, PC*, 2010 U.S. Dist. LEXIS 69298, *6-7 (W.D. Wis. 2010). It “makes no difference” that the tribe may only be a member of a named unincorporated party, such as an LLC or LP, and not an individually named party; the citizenship of such unincorporated entity is the citizenship of each of its members or partners. *Id.* at *7 -8.

Plaintiffs have not identified any other independent basis for this Court to maintain subject matter jurisdiction over the claims in the Complaint, and “jurisdiction may not be sustained on a theory the plaintiff has not advanced.” *Merrell Dow Pharmaceuticals*, 478 U.S. at 809. Defendants have filed this *Motion to Dismiss* in the interests of protecting the valuable time and resources of all parties to this litigation, as well as the judicial economy of the Court itself: “Parties often spend years litigating claims only to learn that their efforts and expense were wasted in a court that lacked jurisdiction.” *Christianson v. Colt Indus. Operating Corp.*, 486 U.S. 800, 818 (U.S. 1988). It is in the best interests of all parties involved that this issue be raised and addressed now at the outset of the litigation, rather than perhaps years down the line.

WHEREFORE, for the foregoing reasons, Defendants Caesars Entertainment, Inc., EBCI Holdings, LLC, VICI Properties Inc., Eric Golebiewski, and CSI Operating Company, LLC, respectfully request that this Court dismiss this matter in its entirety pursuant to Fed. R. Civ. Proc. 12(b)(1) for lack of subject matter jurisdiction, and for all other just and proper relief.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of February, 2025, a true and correct copy of the foregoing was electronically served upon the following using the Court's CM/ECF system:

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