STATE OF INDIANA)
) SS:
COUNTY OF MARION)

MARION COUNTY SUPERIOR COURT
ENVIRONMENTAL DIVISION, COURT NO. 12
CAUSE NO. 49F12-1002-MI-007318

CITY OF GARY and
GARY SANITARY DISTRICT,

Petitioners,

v.

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT,

Respondent,

and

CITY OF HOBART,

Respondent-Permittee,

FILED
(194) MAY 26 2011
[signature]
CLERK OF THE MARION CIRCUIT COURT

FINDINGS OF FACT,
CONCLUSIONS OF LAW AND JUDGMENT

This cause comes before the Court on a Verified Petition for Judicial Review filed by the Petitioner City of Gary and Gary Sanitary District (hereinafter collectively referred to as "Gary"). The issues having been heard before the Court, the Court now enters its Findings of Fact, Conclusions of Law and Judgment.

FINDINGS OF FACT

1. Respondent, the Indiana Department of Environmental Management ("IDEM"), is charged with the implementation and enforcement of the environmental laws, and rules promulgated thereunder, for the State of Indiana. Ind. Code § 13-14-1-1 *et seq.*

2. On April 1, 2004, IDEM issued National Pollutant Discharge Elimination System ("NPDES") Permit No. IN0061344 to the City of Hobart, Indiana ("Hobart") to operate a new Wastewater Treatment Plant ("WWTP") to be constructed along the Deep River.

3. The Deep River flows into Lake Michigan through the Burns Ditch and Burns Waterway. Pursuant to 327 IAC 2-1.5-19(b)(2), Lake Michigan is an Outstanding State Resource Water ("OSRW").

4. Hobart's WWTP is a new discharger to a tributary of an OSRW pursuant to 327 IAC 5-2-11.7(a)(2).

5. At the time Hobart's NPDES permit was issued, Hobart's wastewater was treated by the Gary Sanitary District and at the Nob Hill WWTP, which is owned by Hobart.

6. The Nob Hill WWTP is an aging facility that discharges into a tributary of the Deep River and has difficulty consistently meeting its permit limits.

7. IDEM took an enforcement action against Hobart relating to this facility. Hobart entered into an Agreed Order in response to a Notice of Violation that was issued to Hobart for violations that occurred at the Nob Hill WWTP.

8. Hobart proposed to construct a new 4.8 million gallon per day WWTP which would allow it to shut down the Nob Hill WWTP and disconnect from Gary.

9. Gary holds NPDES Permit No. IN0022977, authorizing it to discharge to the Lake Michigan basin.

10. Gary utilizes a collection system comprised of partially combined sewers which are designed with a number of combined sewer overflows ("CSOs"), which routinely discharge untreated wastewater during wet weather into the Grand Calumet and Little Calumet rivers, which are both tributaries to Lake Michigan.

11. Gary has up to eight (8) CSO outfalls that Hobart wastewater may discharge through before reaching Gary's WWTP to be treated. One of the pollutants that goes untreated when wastewater is allowed to discharge through a CSO is mercury.

12. The September 30, 1994, permit for Gary's WWTP established a monthly average limit of 30 parts per trillion ("ppt") per day and a daily maximum limit of 70 ppt of mercury.

13. The permitted mercury limits for the proposed Hobart WWTP are a monthly average of 1.3 ppt per day and a daily maximum limit of 3.2 ppt. The proposed new Hobart WWTP will avoid discharging untreated sewage because it will not utilize CSOs.

14. In April 2004, Gary filed a petition for administrative review of the issuance of NPDES Permit No. IN0061344 to Hobart.

15. Motions for Summary Judgment were filed, fully briefed, and argued in the administrative matter before the Indiana Office of Environmental Adjudication (OEA).

16. On January 19, 2010, the Environmental Law Judge ("ELJ") issued the Findings of Fact, Conclusion of Law and Final Order ("Final Order") granting IDEM summary judgment and dismissing the administrative review. The ELJ found that IDEM's determination that the mercury discharge limits in Hobart's NPDES permit would result in an overall improvement in water quality is consistent with Ind. Code § 13-11-2-50.5 and Ind. Code § 13-18-3-2. Therefore, IDEM's issuance of Hobart's NPDES permit complied with applicable law.

17. On February 18, 2010, Gary filed a Verified Petition for Judicial Review ("Petition") seeking judicial review of the ELJ's January 19, 2010 Final Order.

18. On April 8, 2010, IDEM filed its Answer and Affirmative Defenses to the Petition.

19. The issues on judicial review were fully briefed by the parties, and oral arguments were heard on March 14, 2011, in the Marion Superior Court's Environmental Division before Presiding Judge David Certo.

20. To the extent any of these findings of fact are construed to be conclusions of law, they are hereby included as additional conclusions of law. To the extent that the conclusions of law are construed to be findings of fact, they are hereby included as additional findings of fact.

CONCLUSIONS OF LAW

1. This case involves judicial review of an agency determination under the Administrative Orders and Procedures Act ("AOPA"). Ind. Code § 4-21.5-5-1 *et seq.*

2. As the party seeking review, Gary carries "the burden of demonstrating the invalidity of agency action." Ind. Code § 4-21.5-5-14(a).

3. This Court's judicial review must be confined to the agency record. Ind. Code § 4-21.5-5-11.

4. A reviewing court may neither try the case de novo nor substitute its judgment for that of the agency. Ind. Code 4-21.5-5-11; *Indiana Dept. of Environmental Management v. Schnippel Construction Inc.,* 778 N.E.2d 407 (Ind. Ct. App. 2002).

5. The validity of the agency action "shall be determined in accordance with the standards of review" provided in Ind. Code § 4-21.5-5-14(d). Upon judicial review, a trial court shall uphold the administrative decision unless the decision violates one of the five standards specified. *Id.*

6. By statute, this Court may only overturn a finding of fact if it is "unsupported by substantial evidence." Ind. Code § 4-21.5-5-14(d)(5). The Indiana Court of Appeals has stated

that when reviewing an agency decision, "the court is bound by the findings of fact made by the agency if those findings are supported by substantial evidence." *Hamilton County Department of Public Welfare v. Smith,* 567 N.E.2d 165, 167-168 (Ind. Ct. App. 1991). The Court of Appeals has also stated:

> Findings of fact are clearly erroneous when the record lacks any facts or reasonable inferences to support them. *Lawson v. Raney Mfg., Inc.,* 678 N.E.2d 122, 126 (Ind.Ct.App. 1997), *trans.* denied. In determining whether the findings of fact are clearly erroneous, we consider the evidence most favorable to the judgment along with the reasonable inferences to be drawn therefrom. *Id.*

Save the Valley, Inc. v. Indiana Department of Environmental Management, 724 N.E.2d 665, 668 (Ind. Ct. App. 2000).

7. The Indiana Supreme Court held that "[a]n agency decision may be reversed by an appellate court only where it is purely arbitrary, or an error of law has been made." *Indiana Civil Rights Commission v. Delaware County Circuit Court,* 668 N.E.2d 1219, 1221 (1996) (citing *Indiana State Bd. Of Public Welfare v. Tioga Pines Living Center, Inc.,* 622 N.E.2d 935, 939 (Ind. 1993), *cert. denied*). The Court went on to explain that "[a]n action of an administrative agency is arbitrary and capricious only where there is no reasonable basis for the action." *Id.* (citing *Natural Resources Comm'n v. Sugar Creek Mobile Estates,* 646 N.E.2d 61, 64 (Ind. Ct. App. 1995), *trans. denied*). An agency acts arbitrarily or capriciously if its action constitutes a willful or unreasonable action, without consideration and in disregard of the facts and circumstances of the case or without some basis, which would lead a reasonable and honest person to such action. *Indiana Bd. of Pharmacy v. Crick,* 433 N.E.2d 32, 39 (Ind. Ct. App. 1982).

8. In *Indiana Department of Environmental Management v. Boone County Resource Recovery Systems, Inc.,* 803 N.E.2d 267 (Ind. Ct. App. 2004), *trans. denied,* the Indiana Court of Appeals held,

> "[w]hen a statute is subject to different interpretations, the interpretation of the statute by the administrative agency charged with the duty of enforcing the statute is entitled to great weight, unless that interpretation is inconsistent with the statute itself. When a court is faced with two reasonable interpretations of a statute, one of which is supplied by an administrative agency charged with enforcing the statute, the court should defer to the agency. When a court determines that an administrative agency's interpretation is reasonable, it should 'terminate its analysis' and not address the reasonableness of the other party's interpretation. Terminating the analysis recognizes 'the general policies of acknowledging the expertise of the agencies empowered to interpret and enforce statutes and increasing public reliance on agency interpretations.'"

Id. at 273. *See also Peabody Coal Co. v. Ind. Dept. of Natural Resources,* 629 N.E.2d 925 (Ind. Ct. App. 1994); *Indiana Wholesale Wine and Liquor Co., Inc. v. State ex rel. Indiana Alcoholic Beverage Commission*, 695 N.E.2d 99 (Ind. 1998); *State Board of Registration for Professional Engineers v. Eberenz*, 723 N.E.2d 922 (Ind. 2000); and *LTV Steel Co. v. Griffin*, 730 N.E.2d 1251, 1257 (Ind. 2000) ("interpretation of a statute by an administrative agency charged with the duty of enforcing the statute is entitled to great weight."); *Dennistarr Environmental, Inc. v. Indiana Department of Environmental Management,* 741 N.E.2d 1284, 1288 (Ind. Ct. App. 2001).

9. Controlling case law in Indiana requires that a reviewing court should pay great deference to an agency's reasonable interpretation of a silent or ambiguous statute if that agency has been charged with the statute's administration. *Indiana Dept. of Public Welfare v. Hupp*, 605 N.E.2d 768 (Ind. Ct. App. 1992), *trans. denied.* If there are multiple interpretations, the court should defer to the agency's interpretation. *Indiana Wholesaler Wine & Liquor Company, Inc*, 695 N.E.2d at 103-04 (Ind. 1998). If the agency's actions are based on a reasonable

consideration of its governing statutes and regulations, then the court should defer to the agency's interpretation. *Peabody Coal Co,* 629 N.E.2d at 630 (Ind. Ct. App. 1994).

10. The federal laws relevant to this matter are found in the Clean Water Act ("CWA), 33 U.S.C. §§ 1251, *et. seq*. Section 402 of the CWA authorizes IDEM to be the agency delegated authority by United States Environmental Protection Agency ("EPA") to administer the NPDES program and to issue NPDES permits for the discharge of pollutants for the State of Indiana. *See* 33 U.S.C. § 1342. Pursuant to federal law, IDEM is charged with the implementation and enforcement of the CWA in Indiana, as well as administering and enforcing Indiana's environmental laws and rules.

11. 327 IAC 5-2-11.7(a)(2), which is the antidegradation requirement for OSRWs, states,

> (a) In order to implement the antidegradation standard in 327 IAC 2-1.5-4(c), the commissioner shall ensure that the water quality of a waterbody designated as an outstanding state resource water (OSRW) under 327 IAC 2-1.5-19(b) is maintained and protected in its present high quality without degradation by requiring the following:...
>
> (2) For a new or increased discharge of a pollutant or pollutant parameter from a new or existing Great Lakes discharger into a tributary of an OSRW for which a new or increased permit limit would be required:
>
> (A) section 11.3(a) and 11.3(b) of this rule apply to the new or increased discharge of a pollutant or pollutant parameter into the tributary; and
>
> (B) the discharge shall not cause a significant lowering of water quality in the OSRW.
>
> (C) The requirements of this subdivision will be considered to have been met when:
>
> (i) one (1) or more of the items listed in section 11.3(b)(1)(C)(i), 11.3(b)(1)(C)(ii), 11.3(b)(1)(C)(iii)(BB), 11.3(b)(1)(C)(iii)(FF), or 11.3(b)(1)(C)(iii)(II) of this rule apply; or
>
> (ii) all three (3) of the following are met:
>
> (AA) one (1) or more of the subitems in section 11.3(b)(1)(C)(iii)(AA), 11.3(b)(1)(C)(iii)(CC), 11.3(b)(1)(C)(iii)(EE), 11.3(b)(1)(C)(iii)(GG),

11.3(b)(1)(C)(iii)(HH), 11.3(b)(1)(C)(iii)(LL) of this rule apply;

(BB) the applicant demonstrates that the increase is necessary; and

(CC) the public notice requirements in subsection (c)(6) are met; or

(iii) all four (4) of the following are met:

(AA) one (1) or more of the subitems in section 11.3(b)(1)(C)(iii)(DD), 11.3(b)(1)(C)(iii)(JJ), or 11.3(b)(1)(C)(iii)(KK) of this rule apply;

(BB) the applicant demonstrates that the increase is necessary;

(CC) the applicant demonstrates that it will result in a net environmental improvement; and

(DD) the public notice requirements in subsection (c)(6) are met.

(D) As used in this subdivision, "tributary of an OSRW" includes the upstream segments of a receiving waterbody when some or all of the downstream segments of the receiving waterbody are designated as an OSRW.

12. 327 IAC 5-2-11.7(a)(2) is written to ensure that the water quality of an OSRW is maintained and protected by applying certain requirements on new or increased discharges into a tributary of the OSRW. It states that for such discharges for which a new or increased permit limit would be required, clauses (A) and (B) will apply.

13. The "and" between (A) and (B) clearly reflects that for such discharges for which a new permit limit would be required both (A) and (B) will apply. There is no "and" connecting clauses (C) or (D) to clauses (A) and (B). Therefore, clauses (C) and (D) must be read independently of (A) and (B).

14. 327 IAC 5-2-11.7(a)(2)(C) simply states that the requirements of subdivision (2) will be considered met by the items listed in clause (C). The items in clause (C) are not the exclusive means for meeting the requirements of subdivision (2). Clause (C) refers to subdivision (2), not to clause (B).

15. IDEM and the ELJ interpreted subdivision (2) to mean that a new discharger into a tributary of an OSRW for which a new permit limit would be required will have to satisfy

clauses (A) and (B), ***or*** it can satisfy the rule by meeting the requirements listed in clause (C). The rule does not preclude IDEM from granting a new permit limit if clauses (A) and (B) are met independent of the items listed in clause (C).

16. The ELJ reasonably concluded that the express language of 327 IAC 5-2-11.7(a)(2)(C) supports IDEM's interpretation. Clause (C) is stated in clear and unambiguous terms. Those terms do not state that clause (C) is the exclusive means by which to determine that 327 IAC 5-2-11.7(a)(2) is met but that satisfying clause (C) is one way to meet the rule requirements.

17. The ELJ reasonably concluded that Gary's "interpretation of 327 IAC 5-2-11.7(a)(2) would require stricter requirements for discharge into an OSRW tributary than for discharge directly into an OSRW, contrary to the express, clear terms of the applicable regulations" (OEA final order, January 19, 2010, paragraph 18).

18. The Final Order proffers a reasonable interpretation of 327 IAC 5-2-11.7(a)(2). IDEM is the agency charged with implementation of 327 IAC 5-2-11.7(a)(2). Because Gary has not shown that IDEM's and the ELJ's interpretation of the law is unreasonable, the Final Order must be affirmed. *See, Indiana Department of Environmental Management v. Boone County Resource Recovery Systems, Inc.*, 803 N.E.2d at 273.

19. The Court concludes as a matter of law that the plain language of 327 IAC 5-2-11.7(a)(2) supports the ELJ's and IDEM's reasonable interpretation of the rule.

20. The ELJ's and IDEM's reasonable interpretation of 327 IAC 5-2-11.7(a)(2)(A) requires that 327 IAC 5-2-11.3(a) and 11.3(b) apply to Hobart. Section 11.3(a) applies to waters where ambient pollutant concentrations are greater than water quality criteria, also known as

impaired waters. Section 11.3(b) applies to "high quality waters that are not designated as an outstanding state resource water."

21. The ELJ reasonably concluded that because Hobart will discharge wastewater to the Deep River, which is not a high quality water for mercury due to existing levels of pollution in the Deep River, only 327 IAC 5-2-11.3(a) applies.

22. 327 IAC 5-2-11.3(a) reads as follows:

> (a) For all waters within the Great Lakes system, the commissioner shall ensure that the level of water quality necessary to protect existing uses is maintained ... Where water quality does not support the designated uses of a waterbody or ambient pollutant concentrations are greater than water quality criteria applicable to that waterbody, the commissioner shall not allow a lowering of water quality for the pollutant or pollutants that prevents the attainment of such uses or the water quality criterion.

In determining whether a new discharge would be allowed to an impaired water, IDEM correctly applied rules and guidance documents properly promulgated by the EPA. IDEM's interpretation of "lowering of water quality" in 327 IAC 5-2-11.3(a), is consistent with the EPA's view that a wasteload allocation equal to the most stringent criterion applied "end-of-pipe" is permissible for discharges to impaired waters. An "end-of-pipe" criterion provides no mixing zone for dilution in the polluted waterway. A point source which discharges at levels equal to the water quality criterion at the "end of pipe" point of discharge will contain a lower concentration of the pollutant than the receiving water and will not increase the pollutant concentration in the waterway because the discharge contains a lower concentration of the pollutant than the receiving waterway. In fact, discharges that meet the applicable water quality criteria at the "end of pipe" may cause the pollutant concentration in the impaired waterway to decrease by diluting the existing pollutants in the waterway.

23. Based on the EPA criteria, the level of mercury in Hobart's discharge from its proposed wastewater treatment plant is lower than the ambient levels of mercury in Deep River. Indiana applied the more stringent EPA wildlife criterion for mercury of 1.3 parts per trillion to the discharge at the "end-of-pipe," a standard that is cleaner than the EPA's human health criterion for mercury of 1.8 parts per trillion. Based on this criterion, there will not be a lowering of water quality in the Deep River because of Hobart's proposed wastewater discharge, satisfying clause (A) for the purpose of issuing Hobart's permit.

24. The ELJ relied on this substantial evidence when issuing the Final Order. The Final Order discusses the EPA guidance document and IDEM's application of the more stringent "end-of-pipe" criteria in determining that the discharge would not cause a lowering of water quality. The ELJ cited substantial evidence in the Final Order that shows there was a reasonable basis for the ruling that Hobart's discharge would not lower the water quality.

25. 327 IAC 5-2-11.7(a)(2)(B) states the discharge is not to cause "a significant lowering of water quality in the OSRW" (emphasis added).

26. IDEM applied its March 23, 1998, Nonrule Policy Document, Water-002-NRD, to provide further guidance as to what constitutes a "significant lowering of water quality" for OSRWs. The non-rule policy states that it only affects 327 IAC 5-2-11.7(a)(2)(B), which did not change in the 2000 revision of the rule. As a result, IDEM's reliance on the Nonrule Policy Document today is still proper. The non-rule policy states that a new or increased discharge into a tributary of Lake Michigan will not cause a significant lowering of water quality in Lake Michigan if the new or increased discharge will result in significant overall environmental benefit to Lake Michigan.

27. Ind. Code § 13-11-2-50.5 states, in relevant part,

"Degradation", for the purposes of IC 13-18-3, means with respect to a National Pollutant Discharge Elimination System permit, the following:

> (2) With respect to an outstanding state resource water or an exceptional use water, any new or increased discharge of a pollutant or pollutant parameter that results in a significant lowering of water quality for that pollutant or pollutant parameter, unless:
>
> > (A) the activity causing the increased discharge:
> >
> > > (i) results in an overall improvement in water quality in the outstanding state resource water or exceptional use water; and
> > >
> > > (ii) meets the applicable requirements of 327 IAC 2-1-2(1) and (2) and 327 IAC 2-1.5-4(a) and (b);

28. Ind. Code § 13-18-3-2 states, in relevant part,

> (l) For a water body designated as an outstanding state resource water, the board shall provide by rule procedures that will:
>
> > (1) prevent degradation; and
> >
> > (2) allow for increases and additions in pollutant loadings from an existing or new discharge if:
> >
> > > (A) there will be an overall improvement in water quality for the outstanding state resource water as described in this section; and
> > >
> > > (B) the applicable requirements of 327 IAC 2-1-2(1) and 327 IAC 2-1-2(2) and 327 IAC 2-1.5-4(a) and 327 IAC 2-1.5-4(b) are met.

29. The ELJ was bound by Indiana's environmental statutes and properly considered IDEM's application of its Non-Rule Policy to determine that IDEM's interpretation is reasonable. The ELJ reasonably concluded that "Indiana's legislature has provided recognition for 'overall environmental benefit' as a factor when determining whether to allow new or increase discharge into an OSRW" (OEA final order, January 19, 2010, paragraph 25).

30. The ELJ also cited substantial evidence in the Final Order that shows there was a reasonable basis for ruling that Hobart's discharge will result in significant overall environmental benefit to Lake Michigan. The ELJ found that the operation of Hobart's new wastewater treatment plant would allow Hobart to close its Nob Hill WWTP, a facility that could not consistently meet its permit limitations on discharging pollutants. The ELJ also found that the new WWTP would divert Hobart's sewage away from Gary's CSOs, preventing the release of Hobart's share of raw sewage that Gary currently discharges during wet weather and allowing that untreated sewage to be treated immediately to comply with stringent new water quality standards. The new WWTP authorized in Hobart's NPDES permit would treat Hobart's sewage to comply with more stringent standards than those in the limits set in Gary's permit that was in effect when Hobart's permit was issued.

31. Gary argued that its existing permits authorized Gary to find another source of wastewater to compensate for the volume of wastewater that would be diverted by Hobart to its new WWTP. If it added new wastewater, Gary argued, the overall amount of pollution to the Lake Michigan basin would have to increase when added to Hobart's proposed discharges. However, no evidence was introduced before the ELJ indicating that Gary could or would add any new source of wastewater to its existing waste stream. As a result, there is no evidence in the record establishing that authorizing Hobart to build its new WWTP will result in additional discharge of pollutants into the OSRW. On the contrary, the record demonstrated and the ELJ concluded that Hobart's new WWTP will result in the discharge of less pollution, not more, as Gary contended.

32. The ELJ addressed Gary's argument about volume directly, ruling that even if Gary's "discharge amount is 'caught up' as the capacity vacated by Hobart is filled, the

incremental difference still results in a significant overall environmental benefit to Deep River and Lake Michigan" (OEA final order, January 19, 2010, paragraph 26).

33. The ELJ properly found that the Hobart NPDES permit "will result in a significant overall environmental benefit to Lake Michigan" because the "new plant will treat mercury discharge significantly more effectively than it is currently being treated at Nob Hill WWTP or GSD WWTP" (*Id.* at paragraphs 26 and 27). Gary has failed to raise any argument countering this fact. There is no dispute that Hobart's Nob Hill WWTP was under an Agreed Order due to its persistent water quality violations, and it is clear that a new wastewater treatment plant that satisfies Hobart's legal and permit obligations by meeting water quality standards is a significant environmental benefit over requiring Hobart to continue to operate a failing WWTP.

34. The ELJ also properly relied on the fact that diverting Hobart's raw sewage from Gary's system and preventing CSOs augmented by Hobart's untreated wastewater is an environmental benefit.

35. These findings of fact clearly demonstrate that the ELJ had a reasonable basis for the decision that Hobart's NPDES permit to operate a new WWTP was issued in accordance with state and federal interpretation of the regulations and that the reasonable basis was supported by substantial evidence. Ind. Code § 4-21.5-5-14(d)(5) and *Indiana Civil Rights Commission,* 668 N.E.2d at 1221 (citing *Natural Resource Comm'n,* 646 N.E.2d at 64).

36. The ELJ's issuance of the January 19, 2010 Final Order is not arbitrary and capricious as a matter of law because there is a reasonable basis for the Final Order. *Indiana Civil Rights Commission v. Delaware County Circuit Court,* 668 N.E.2d at 1221 (citing *Natural Resources Comm'n v. Sugar Creek Mobile Estates,* 646 N.E.2d at 64).

JUDGMENT

Based on the foregoing Findings of Fact and Conclusions of Law, the January 19, 2010, Findings of Fact, Conclusions of Law and Final Order of the Office of Environmental Adjudication is upheld in all respects. The Verified Petition for Judicial Review filed by the City of Gary and the Gary Sanitary District is denied.

Dated: 26 May 2011

Judge, Marion Superior Court

Distribution:

Fredric P. Andes
David T. Ballard
Barnes & Thornburg LLP
1 N. Wacker Drive, 4400
Chicago, IL 60606

Joseph P. Allegretti,
275 Joliet Street
Suite 330
Dyer, IN 46311

Ray L. Szarmach
Szarmach & Fernandez
Easton Court
260 East 90th Drive
Merrillville, IN 46410
E. Sean Griggs
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, IN 46204

Susan M. Severtson
Attorney at Law
10225 Windfield Drive
Munster, IN 46321

James B. Meyer
Meyer & Wyatt, P.C.
363 S. Lake Street
Gary, IN 46403

John P. Bushemi
John P. Bushemi & Associates
8959 Broadway
Merrillville, IN 46410

Sierra L. Alberts
Indiana Attorney General's Office
Indiana Government Center South, Fifth Floor
302 West Washington Street
Indianapolis, Indiana 46204