IBOP Indiana Breeder & Owner Protection
Protecting Owner's & Breeder's Rights

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IBOP's Semi-Annual Progress Report

By Eddie Martin, IBOP President

The concepts behind Indiana Breeder & Owner Protection, Inc., (IBOP) were established long before our incorporation as a non-profit under the laws of the State of Indiana in September, 2011. Many of our board members have served horsemen's interests for years. At the request of Indiana's Inspector General (IG), a number of our board members became active participants in the IG's investigation of the Indiana Horse Racing Commission (IHRC) from mid-2010 until the close of the investigation in September, 2011. Two of our board members became escorts for other horsemen who wanted to talk with the IG's investigators. Through these experiences, and knowing what was not put into the IG's report, we realized that there was a significant need for a different type of horsemen's organization.

When our first newsletter was published in November, 2011, the reactions were immediate and positive. (You can find our first newsletter, and subsequent newsletters, at our Newsletter Archive page on our blog at http://www.ibopindy.blogspot.com.) Soon after our first newsletter, IBOP picked up its first advertisers and financial supporters. Two board members reported that a prominent owner/breeder in New York thought that the concept of IBOP was "fantastic" and that every state ought to have an organization like IBOP. We couldn't agree more, but more importantly, we hope you agree. We believe that IBOP is having an impact in Indiana, and we wanted to provide you with a progress report for the first half of 2012.

IBOP's primary mission is to educate and a mainstay in doing so is our newsletters. Our January newsletter focused on the IG's report which made some very specific recommendations where change was needed at the IHRC. Our February newsletter provided a progress report on the IHRC's actions as they pertained to the IG's report with our grade on their efforts. However, we believe that the biggest impact that IBOP has had to date was the February newsletter article entitled, "Emergencies Rule." This article shed some light on the way in which the IHRC creates their administrative rules, which carry the rule of law, without any meaningful oversight via an emergency rulemaking process. It only took 19 years of emergency rules for an organization to call the IHRC's actions into question. This type of public scrutiny has caused the IHRC to completely rethink their rulemaking process.

On May 14th, IHRC Executive Director Joe Gorajec sent out an email to all the horsemen's groups stating, "Chairman McNaught has asked me to consider proposing to the Commission a policy on its rulemaking process. Specifically, the use of the emergency rulemaking process versus the general process." While we have no idea as to

whether or not other horsemen's groups provided input prior to the established deadline of June 14th, IBOP surely did. If we had enough space in our newsletter we'd publish exactly what we forwarded to the IHRC staff and each commissioner. Instead, we've added a section to our blog (www.ibopindy.blogspot.com) that will be dedicated to publishing our 'Letters to the Commissioners.' If you go to our blog you can find this section on the main toolbar and you will be able to review our input on a rulemaking policy as per their request.

Normally, after the IHRC has a deadline for input, the topic appears at their next regularly scheduled meeting. However, there was no discussion of a rulemaking policy at the IHRC's meeting on June 25th. Given the sudden resignation of Commissioner Chair Sarah McNaught, whose term wasn't due to expire until September, 2014, this is understandable. Knowing that Mrs. McNaught was resigning, any change to policy will be at the direction of William Diener who was appointed as the new Chairman for the IHRC. In spite of the leadership change, we have seen the IHRC begin to change their approach to rulemaking already.

At their April 19th meeting, the commissioners approved nine separate emergency rules. Eight of the nine emergency rules were filed with the Indiana Register on May 16th making them effective. (The IHRC staff actually forgot to file one of the approved rules, so more on this missing rule later.) Then on May 30th, for the first time in the history of the IHRC, the new legal staff filed a 'Notice of Intent to Adopt a Rule' for those eight emergency rules. This means that the IHRC will be undertaking the regular rulemaking process with these eight rules which included a controversial rule change that would reallocate purse and breed development funding from the thoroughbred and standardbred programs to the quarter horse program.

As a reminder, after the Notice of Intent the process includes; Solicitation of Comments, Public Notices, a Draft Rule submitted to the Indiana Register, a Public Hearing, and if the administrative rule is then approved, a review by the Indiana Attorney General's Office and a review by the Governor's Office before any filing of the rule with the Indiana Secretary of State and Indiana Register to become effective. This is a far cry from just a commission approval and the filing of the final rule with the Indiana Register. To compare the different rulemaking procedures, you can go to our blog and on the tool bar you will see a link to 'Rulemaking in Indiana" which provides a simple chart of the differences in rulemaking procedures in Indiana.

Administrative Rule of the Month Debuts in 2012

On January 1, 2012, IBOP's 'Administrative Rule of the Month' made its debut to our blog. Each month we are taking a look at a specific rule within IHRC's rulebook that just may need some work, or frankly, a rule that isn't being followed. We believe we are having an impact with pointing out the problems within the IHRC's rulebooks. We've added an archive to our blog so you can view each one of our monthly posts.

Our January 'Administrative Rule of the Month' focused on the new requirement for thoroughbred and quarter horse trainers to have four hours of continuing education to be eligible for a license in 2012. IBOP chose to highlight this rule as our first because the start date for the rule was supposed to be January 1, 2012. This blog post was aptly entitled "Trainer Continuing Education." While our mission is to support owners and breeders, we recognized that what can affect a trainer can surely affect an owner. We recognized that this rule, if applied as written, could have a detrimental effect to owners as well.

The IHRC had adopted this Association of Racing Commissioners International (ARCI) Model Rule in 2010 with a 2012 effective date. Only one other racing state (Montana) had adopted a similar rule. IBOP's concern was that this rule would be considered a negative to participation in the Indiana thoroughbred and quarter horse programs since they rely heavily on shippers from other states. (Please Note: No such continuing education requirement applies to obtaining a standardbred trainer's license in Indiana.) We were also concerned about potential selective application of this requirement.

IBOP's recommendation read as follows, "We are suggesting that the implementation of this administrative rule be delayed into the future until there is a practical and effective way to deliver approved continuing education to ALL trainers, regardless of where they are based." At their March 7, 2012, the IHRC modified the trainer continuing education rule and delayed its implementation until 2013. While a one year delay doesn't quite fix this rule's problems, we feel that other changes made by the IHRC actually made the rule worse. Therefore, 'Trainer Continuing Education (Revisited)' became our July 'Administrative Rule of the Month.' Check out our blog for the commentary on the 'new' trainer continuing education requirement.

In February, 2012, our 'Administrative Rule of the Month was entitled, "Taking Samples" which highlighted the changes to **71 IAC 8.5-2-4 Taking of samples.** More specifically, we focused on 71 IAC 8.5-2-4(3) which is the subsection of the rule that allows an owner of a horse the opportunity to witness and to confirm the taking of blood, urine, and other samples from their horses for testing purposes. Essentially, at their January 25th meeting, the IHRC without consideration that an owner of a horse has property rights eliminated the owner's ability to witness the taking of any samples for testing from his or her horse. Feel welcome to read our evaluation on our blog.

While we can't prove that anyone from the IHRC ever read our evaluation, what we do know is that at their March 7th meeting this subsection of the rule was reinstated to the original language that allows for an owner to witness the taking of samples from his or her horses. What was interesting about this reversal was that there was never any mention at the meeting or an indication within the rule's subsection as presented to the commissioners that the language was going back to the version that existed prior to the January 25th meeting.

In March, 2012, Our March Administrative Rule of the Month focused on **71 IAC 7.5-2-2 Scratches,** and more specifically, how the IHRC has handled horses mistakenly scratched from a race. We chronicled how two horses were scratched from their races in error, but were handled differently even though they were just two days apart at Indiana Downs' thoroughbred/quarter horse meet in 2011. After being officially reported as a scratch, one horse was allowed back into its race while the other horse was sent back home to Illinois. While neither horse was scratched by their owner or trainer, an error was made and the fix was to handle each mistake differently. Rather than penalize an owner for someone else's mistake, IBOP called for an administrative rule that would allow a horse scratched in error to run for purse money only.

At their April 19, 2012, meeting, the IHRC approved two new rules **(71 IAC 3-2-7.1 and 71 IAC 3.5-2-7.1)** that granted the stewards and judges the authority to allow a horse to run for purse money only. With this authority, the stewards or judges can disallow wagering on a horse; yet at the same time allow the horse to run. Having this rule allows the stewards and judges to fix an error without penalizing a horse's owner. While IBOP received no recognition for our contribution toward this rule, it's easy to see what can happen with a little publicity on a subject.

In April, 2012, our 'Administrative Rule of the Month' was entitled 'Breeder Definition,' which pointed out a significant error within the IHRC's administrative rulebooks. The net result of this error was that the definition of "breeder" in the standardbred rulebook was being applied to the thoroughbred breed development program! We traced this error back to a mistake made in rule construction when a change was made in April 2004. For those who don't know, the standardbred definition of the breeder is the owner of the mare at the time of conception. This is very different from The Jockey Club definition that the breeder of a thoroughbred is the owner of the mare at foaling. Since administrative rules carry the rule of law, many who believe they are the breeder of a particular horse, and eligible for breeder awards, are actually not under the IHRC's "law." This was a huge mistake that never should have happened, and in part, the emergency rulemaking process by the IHRC was to blame.

We notified the IHRC staff of this error in late March as well as the commissioners in early April. Via a procedural request established in the IHRC rules, IBOP requested that this error be fixed at the next IHRC meeting which was to be held on April 19th. Unfortunately, when an administrative rule is changed, any change is only effective moving forward and not retroactively. We were told that the rule would be forwarded to the Thoroughbred Breed Development Advisory Committee for review rather than be placed on the agenda for the April 19th meeting. At their meeting on June 14th, the committee was briefed on the definition problem, but they took no official action. Finally, at their June, 25th meeting, the IHRC adopted a rule change to fix the "applicability" of the breeder definition for the thoroughbred program. As of this writing, no rule change has been filed with the Indiana Register. Until this happens, the definition of breeder in the thoroughbred program is still the owner of the mare at the time on conception.

In May, 2012 our 'Administrative Rule of the Month' was regarding "Threshold Levels." Over the winter, the IHRC had made a number of changes to the medication rules in both the standardbred and flat racing rulebooks. This blog post is a must read because it took a while to get to the main point, but the minor points tell a great story too. To make a long story short, one of the thresholds established by the IHRC was for legal use of DMSO. This new administrative rule created a small threshold for DMSO, but actually referenced another rule that prohibits

the use of DMSO! So, simultaneously Indiana has a rule that allows for the use of DMSO and another that prohibits its use. IBOP reported this conflict to the IHRC staff and each commissioner yet no effort was made to fix these conflicting rules at the June 25th IHRC meeting.

There's more to the 'Threshold Levels' too. There were a number of other errors in how these rules were established. In IBOP's input to the IHRC regarding a rulemaking policy, we used the "Threshold Levels" rules as an example to the commissioners of how the emergency rulemaking process is fraught with the potential for errors. We used this example of what not to do in our input to the IHRC regarding their rulemaking process. Again, see 'Letters to the Commissioners' on our blog.

In June, 2012, our 'Administrative Rule of the Month' was regarding the Indiana-Bred Preference within the thoroughbred program. Essentially, this blog post was a copy of a May 13th email that we sent to the IHRC regarding Indiana-bred preferred and Indiana-sired preferred thoroughbred races that were being run at Indiana Downs. These races were open at the entry box, but with the Indiana-bred preference the fields were comprised of Indiana-breds. The first thing that we pointed out was that preference for an Indiana-bred in an 'open race' is determined by commission rules and these rules were being ignored. What we also pointed out that these 'open races' should have provided an additional 40% purse supplement to the first three finishers and that breeder and any stallion awards be calculated with the purse supplement as per commission rules.

While the IHRC has never took an official position, what they did do at their June 25th meeting was to add a new definition in the rulebook that attempts to justify what had already taken place. At this meeting, the IHRC adopted a definition of an open race as "a contest whose starters are not comprised of exclusively Indiana Bred and/or Indiana Sired horses." To add a new definition after the fact, instead of owning up to the existing rules on the books at the time, is a perfect example of a why IBOP is necessary. We have a commission that can't even enforce their own emergency rules that they created that are supposed to have the rule of law. This was one of the most openly defiant, disingenuous acts of the commission that we have ever witnessed. The IHRC changed a rule, which can only be effective moving forward, yet they are applying the new rule definition retroactively. In what other world does this happen? And, there's more…

Other 'Letters to the Commissioners'

With the 'Indiana-Bred Preference' issue, the IHRC was retroactively applying an intent that was never communicated after a definition was added to the rulebook. What happens when the commissioners specifically voice their intent, yet the commission staff doesn't follow through with that intent? The short answer is that you have to scratch your horse from a stakes races. At least that is what happened to owners Penny Lauer and Mast Thoroughbreds, LLC. Each owner had to scratch a horse from an $84,000 Indiana-bred stakes races on June 20th. Both owners had two entries in the body of the race, but what was being applied was a portion of the 'Coupled entries' rule that reads, "in no circumstances may two (2) horses having common ties of ownership start to the exclusion of a single entry." If that's the rule, then why were they drawn into the body of the race over three horses in one race and six horses in another?

At the January 25th IHRC meeting, the commissioners approved the thoroughbred breed development program for 2012. In that program was a recommendation to eliminate the above mentioned coupled entry rule for Indiana-bred stakes races with the stated goal of allowing the best horses in the race. Yet, what happened was that the IHRC staff didn't follow through with any modification of the 'coupled entry' rule. The two horses were scratched at 11:29 AM the morning of the race. By 12:26 PM, IBOP petitioned the IHRC to add a New Business item to their agenda for their June 25th meeting to correct this obvious oversight. This agenda item was added to the meeting and corrected. You can read our comments to the IHRC on our blog under "Letters to the Commissioners."

The 'coupled entry' rule was not the only oversight of the IHRC staff where the commissioners expressed a particular intent. Earlier in this Progress Report, we noted that from the April 19th IHRC meeting only 8 of 9 approved emergency rules were filed with the Indiana Register. At that meeting Jeff Johnston from The Jockey's Guild presented the ARCI Model Rule regarding the scale of weights for flat racing. At that meeting, the commissioners approved the model rule and at their June 25th meeting approved the minutes from the April 19th meeting that confirmed the new scale of weights was approved. The only problem was that the rule change was never filed with the Indiana Register, and is not currently in effect. We pointed this out to the IHRC staff and commissioners as well as The Jockey's Guild. You can also read our comments in "Letter to the Commissioners" on our blog.

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"Out-of-Competition Testing"
Part 1

By Jim Hartman, IBOP Vice-President

On March 28, 2012, Indiana Breeder & Owner Protection, Inc. (IBOP) petitioned the Indiana Horse Racing Commission (IHRC) to review their 'out-of-competition testing' definitions. There is an administrative rule in the IHRC rulebook that allows for anyone to request the commission to create a rule, amend a rule or request the repeal of a rule. This procedural rule can be found under '71 IAC 2-12-1 Procedures.' According to this rule, "All petitions filed with the commission more than ten (10) days prior to a regularly scheduled meeting date may be placed on the agenda of the commission, at the discretion of the commission, at its next regularly scheduled meeting." Of course, the key phrase is "may be placed on the agenda" which never guarantees a request under this rule will see the light of day.

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Not only did we submit this particular request to the IHRC's Executive Director and Assistant Executive Director, we sent our request to each of the five commissioners. This strategy was two-fold. First, we wanted to point out that the IHRC staff had made an error when submitting the 'out-of-competition testing' definitions approved by the commissioners in July, 2007. Instead of having, as the commissioners approved, a definition in the standardbred rule book and another in the flat racing rule book, both definitions were incorporated into the standardbred rulebook. The result was that the flat racing rulebook had no definition. However, that wasn't our main point.

The second reason we forwarded our petition to each commissioner is because we wanted them to read what the definition actually said. Here's the definition from the standardbred rule book that was supposed to have been put in the flat racing rule book:

71 IAC 1-1-67.5
"Out of competition testing" defined

Authority: IC 4-31-3-9
Affected: IC 4-31

Sec. 67.5. "Out of competition testing" means that the commission may test horses at any time and at any location within the state of Indiana for any prohibited substances, practices, and procedures set forth in 71 IAC 8.5-2-5.

We wanted the commissioners to actually read the rule that essentially defines 'out-of-competition testing' in one of the most arrogant ways there could possibly be. To suggest that the IHRC has the authority to "test horses at any time and at any location within the state of Indiana" is indicative of a commission that is acting well beyond its statutory authority, and actually what we believe, beyond both Indiana's Constitution and the US Constitution. Article 1, Section 11 of the Indiana Constitution, which mirrors the 4th Amendment to the US Constitution states, "The right of the people to be secure in their persons, houses, papers,

and effects, against unreasonable search or seizure, shall not be violated; and no warrant shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the person or thing to be seized." The definition the IHRC used for out-of-competition testing is tantamount to saying that they can conduct warrantless searches without any probable cause to conduct such a search! The federal government doesn't even have that authority. Given that the IHRC has been creating emergency administrative rules that by-pass any review by Indiana's Attorney General (AG) for legality; we believe that had the AG's office reviewed the current out-of-competition testing administrative rules they wouldn't exist today.

In the definition above (71 IAC 1-1-67.5), you'll see a reference to "71 IAC 8.5-2-5" which is the actual out-of-competition testing administrative rule. While this is somewhat meaningless, at their June 25th meeting, the IHRC approved a new definition of out-of-competition testing for both the standardbred and the flat racing rulebooks. Once this change is filed with the Indiana Register, here's how the definition will look in the flat racing rule book:

71 IAC 1-1-67.5
"Out of competition testing" defined

Authority: IC 4-31-3-9
Affected: IC 4-31

Sec. 67.5. "Out of competition testing" means a test conducted by the commission on a horse located in Indiana as provided in 71 IAC 8.5-2-5.

Obviously, someone noticed they had a problem with their definition. However, the same arrogance in the former definition is evident within 71 IAC 8.5-2-5. Frankly, we're hopeful that the commissioners will now actually read 71 IAC 8.5-2-5, this newsletter and a decision by the State of New York Supreme Court. In August, 2011, the NY Supreme Court threw out entire out-of-competition testing regulations created by the New York State Racing and Wagering Board (NYRWB). The NY Supreme Court found their out-of-competition testing administrative rules "are so lacking in reason as to require nullification in their entirety." And, in our opinion, many of the same reasons the NY Supreme Court used to invalid the NY out-of-competition testing rules would also apply to Indiana's as well.

While there are differences between Indiana's out-of-competition testing rules and the former New York rules, there are enough similarities that we decided to conduct this review. In Part 1 of our series, we will cover the primary reason the NY Supreme Court over-turned NY's out-of-competition testing rules. Using the NY Supreme Court ruling as a template, we believe that portions of Indiana's out-of-competition testing would be invalidated upon judicial review, if not the entire rule itself.

The New York Supreme Court Decision

The key to any judicial review of an administrative agency's rules is whether there is statutory authority to create such a rule. The key to the ruling in NY was the statutory authority granted to the NYRWB to create rules. Specifically, the NY Legislature allows rulemaking authority for "equine drug testing **AT RACE MEETINGS.**" (Emphasis added) The phrase "at race meetings" limited the authority of the NYRWB to on-track activities, and therefore, does not extend to off-track activities. The NY Supreme Court Judge said that the NY out-of-competition testing went "beyond the Board's enabling legislation." On that basis alone, and citing the plain language of NY statute, the NY Supreme Court threw out the NY rules as "illegal, null and void." Yet, the opinion rendered continued to review each aspect of the out-of-competition testing rules so the NYRWB could use the decision "to guide" to more appropriate and legal regulations. We will cover these aspects in Part 2 of our series.

What is the Indiana Horse Racing Commission's Authority?

So, the first question regarding the Indiana out-of-competition testing rule is, does Indiana statute allow for the IHRC to create rules for activities beyond a recognized race meeting? We don't believe such authority exists. Title 4, Article 31 of the Indiana statutes is entitled, "Pari-Mutuel Wagering On Horse Races." IC 4-31-1-1 states, "This article does not apply to horse racing meetings at which pari-mutuel wagering is not permitted." If this statement is applied, then logic dictates that the opposite must be true in that Article 31 would only "apply to horse racing meetings" at which pari-mutuel wagering IS permitted. The Indiana Legislature granted the IHRC authority over "horse racing meetings" and not beyond. For this same reason alone, the NY Supreme Court vacated the NY's out-of-competition testing rules. Plus, the words "out-of-competition testing" do not appear in the Title 4, Article 31, so there is no statutory requirement to have such a testing program in Indiana.

When you look at the heading of the IHRC's out-of-competition testing rule, you will see (below) the authority line indicated to be "Authority: IC 4-31-3-9" which is defined as "the citation of each Indiana statute (enabling statute) that expressly delegates rulemaking power to the agency to issue a rule on the subject matter of the accompanying rule." This definition comes straight from Administrative Rules Drafting Manual used by the State of Indiana.

71 IAC 8.5-2-5
Out of competition testing

Authority: IC 4-31-3-9
Affected: IC 4-31-12

Over the years, the IHRC has claimed to have broad powers to create administrative rules. We disagree to a point. IC 4-31-3-9(1)(H) provides the IHRC with the power to create "any other regulation that the commission determines is in the public interest **in the conduct of recognized meetings** and wagering on horse racing in Indiana." The NY Supreme Court agreed that the NYRWB had a broad mandate as well, yet "sweepingly broad, it is not unfettered" which means there are limits in NY and we believe there are also limits in Indiana. In the very passage in Indiana statute that the IHRC claims provides them broad powers, the words "in the conduct of recognized meetings" puts a limit on those broad powers to broad powers at a "recognized meeting." Therefore, an out-of-competition testing program that can take place outside of a recognized race meeting, that can take place on the farms of licensed or unlicensed individuals, that can take place outside of the State of Indiana, and that can compel a trainer to bring a horse to Indiana for testing goes beyond what we believe is the IHRC's statutory authority.

If fact, the IHRC's own rules under **'71 IAC 1.5-1-55 "Meeting" defined'** as "the period of time for which permission to conduct horse racing has been granted to an association by the commission." If this definition was applied, as it should be, then any activity outside of a "recognized meeting" is never under the authority of the Indiana Horse Racing Commission. The only exceptions to this would be oversight of the slot funds as required by Indiana's Legislature under IC 4-35-7-12 and of simulcast facilities under IC 4-31-5.5.

Just like the NY Supreme Court decision could have done, we could stop our analysis right here with Indiana's out-of-competition testing rules. However, owners and breeders need to understand exactly what is in Indiana's out-of-competition testing and how they can affect you. In Part 2 of this series, we will cover where we believe the IHRC does have the legal authority to test horses pre-race, and more importantly, why an out-of-competition testing program may not even be needed with available testing technology.

Jim Hartman is a past board member and Treasurer of the Indiana Thoroughbred Owners and Breeders Association as well as a past member of the Indiana Thoroughbred Breed Development Advisory Committee.

...continued from page 4

What's Next for IBOP?

Having just gone beyond the half-way point of the year, we feel like we've accomplished quite a bit. With your help and support, of course, we can do more. The issues that we are focusing on in the second half of the year are; 1) Conflicts of Interest – We've asked the IHRC staff as to why apparent conflicts of interest are being allowed to exist in Indiana racing against IHRC rules. 2) Cancellation of Two Days of Racing at Indiana Downs – The final report, which was created by the IHRC staff, was approved by the IHRC at their June 25th meeting actually raises more questions than provides answers. We will be submitting our findings to the Indiana Inspector General for review while calling for an independent investigation of what transpired. 3) Indiana's Out-of-Competition Testing Rules – We believe that there are significant issues with the legality of this rule and Part 1 of IBOP's review can be found in this newsletter. For updates as they happen, you can follow IBOP on twitter @IBOPIndy. Thank you!

Eddie Martin is a past Indiana Horse Racing Commission member, a past chairman Thoroughbred Development advisory committee, past chairman/co-founder Indiana Horse Racing and Breeding Coalition, past President and co-founder of ITOBA, past 1st V.P. Florida Thoroughbred Breeders and Owners Association. He is also a multiple time member of the Jockey Club's yearly Top 250 breeders in North America based upon money earned.

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