

Plaintiffs' Exhibit 1



Indiana Republican State Committee
Complaint / Affidavit Seeking Response from Authority to Hear Complaint
FORM CM-1 (January 2023)

Complainant

Tim Clark, 676 Town Hill Rd. _____ (name, address, phone)
Nashville, IN 47448 (317-674-5931)

Respondent

Mark Bowman, 4146 Weber Hill Rd. _____ (name, address, phone)
Trafalgar, IN 46181 (317-691-7394)

I, Tim Clark do solemnly swear that the facts listed below to be true and correct. Documents to support this complaint are attached hereto.

Please list Indiana Republican State Committee rules, statutes, procedures, actions, or any related instance of alleged violation below or attach a separate document hereto.

The Complainant alleges that Mr. Bowman, as the Chair of the Brown County Republican Party, violated Rule 1-25 by failing to support Mr. Clark's 2024 campaign and by "actively or openly support[ing]" Greg Taggart, an Independent candidate, in the 2024 general election against Mr. Clark, the Republican candidate for Commissioner, District 3.

Please list the relief that you are seeking in order to benefit the Indiana Republican State Committee (IRSC) and resolve the existing problem using IRSC rules and statues or attach a separate document hereto.

The Complainant seeks the removal of Mr. Bowman from his position as a Precinct Committeeman and his position as Chair of the Brown County Republican Party. The Complainant also seeks a 5 year ban against Mr. Bowman holding any official Republican office or running for elected office as a Republican.

SIGNATURE

DEC 19, 2024

DATE

NOTE: All local complaints (within a county) that cannot be resolved by conciliation between parties may be filed with the appropriate district secretary and the secretary of the Indiana Republican State Committee. Counties in split congressional districts must file with the district secretary with the most precincts in the county. All complaints (within a district or the state committee) that cannot be resolved by conciliation between parties may be filed with the appropriate secretary of the committee in question and the secretary of the Indiana Republican State Committee.

**INDIANA GOP
NINTH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE**

Tim Clark, Brown County)	
Commissioner Elect, District 3)	Amanda Lowery, District 9 Chair
Complainant,)	
)	
vs.)	
)	
Mark Bowman, Brown County Precinct)	
Committeeman, Hamblen 2 and)	
Chair of the Brown County)	
Republican Party,)	
Respondent.)	
)	

**MEMORANDUM IN SUPPORT OF COMPLAINANT’S COMPLAINT TO REMOVE
MARK BOWMAN FROM HIS CURRENTLY HELD OFFICIAL REPUBLICAN
POSITIONS OF BROWN COUNTY PRECINCT COMMITTEEMAN AND CHAIR OF
THE BROWN COUNTY REPUBLICAN PARTY**

I. INTRODUCTION

Mark Bowman currently holds two related official positions with the Brown County Republican Party. The first position Mr. Bowman holds is Precinct Committeeman for the Hamlin 2 Precinct, and the second position he holds is Chair of the Brown County Republican Party.

Tim Clark campaigned for and won the 2024 Republican primary for Brown County Commissioner of District 3. Mr. Clark ultimately won the 2024 general election for that office and will assume the role of Brown County Commissioner in January of 2025.

This complaint arises out of Mr. Clark’s 2024 primary and general election campaigns, which Mr. Bowman willfully opposed. More specifically, Mr. Bowman refused to support Tim Clark’s campaign for County Commissioner, and even more

egregiously, Mr. Bowman actively and openly supported an Independent candidate, Greg Taggart, against Tim Clark in the 2024 general election.

Mr. Clark's principal contention is that Mr. Bowman's actions in support of Mr. Taggart against Mr. Clark in the 2024 general election constitutes a clear and undeniable violation of Rule 1-25 of the Indiana GOP rules. Mr. Clark further contends that the appropriate remedy for this violation is removal of Mark Bowman from the official positions he holds within the Brown County Republican Party and a bar against Mr. Bowman running for elected office as a Republican for 5 years.

II. JURISDICTION

This complaint falls squarely within the jurisdiction of the Ninth District Republican Congressional Committee. As set forth in the Indiana GOP rules, local complaints concerning "the precinct or County committee level, its officers, activities or members" are to be decided by "the officers of the District Committee in which the complaint took place". (Rule 1-33 (a)-(b)). Since Brown County falls within District 9 of the Indiana GOP, the current complaint is properly filed with the District 9 Officers.

Upon determining that a proper complaint has been filed, the District 9 Officers are obligated to set a hearing within 45 days of the filing of the complaint. (Rule 1-33(d)). Further, the District 9 Officers are obligated to make a decision concerning the complaint by a majority vote of the District 9 Officers. (Rule 1-33(f)). This decision should be done by providing a written decision to the Complainant and the Respondent following the hearing. (Appendix C, Hearing Guidelines ¶ 16). Decisions by the District 9 Officers may be appealed to the Indiana Republican State Committee. (Rule 1-35).

Mr. Clark contends that Mr. Bowman violated Indiana GOP Rule 1-25 by failing to support Mr. Clark's primary and general election campaigns, and even more egregiously, by actively and openly supporting a non-Republican candidate (Mr. Taggart) against Mr. Clark in the 2024 general election. Mr. Bowman's active and open support for Mr. Taggart against Mr. Clark for the Brown County Commissioner, District 3 office warrants removal of Mr. Bowman from his positions of Brown County Precinct Committeeman, Hamlin 2 and Chair of the Brown County Republican Party. The Indiana GOP rules expressly set forth that elected Precinct Committeemen "shall be subject to removal for Cause" by the District Officers responsible for the precinct at issue. (Rules 3-6 and 1-33(b)). With respect to the current complaint, "cause" is defined by the Indiana GOP rules as either "any willful violation of these Rules" or "gross misconduct affecting the party organization". (Rule 1-13). Further, upon a ruling that Mr. Bowman is not a Republican in Good-Standing (which is the crux of the current complaint), Mr. Bowman is not permitted to be an officer of the Brown County Republican Party since officers of county committees must be Republicans in Good-Standing in order to serve in such a role. (Rules 4-11(2) and 1-24).

III. BACKGROUND

The rift between Mr. Bowman and Mr. Clark goes back to the very beginning of the 2024 election campaign, but even today, it is unclear whether and to what extent Mr. Bowman and Mr. Clark disagree with each other on any particular political issue. In other words, Mr. Bowman never approached Mr. Clark to argue that Mr. Clark was on the wrong side of this or that particular political issue. Instead, it is Mr. Clark's

perception that the divide between them is principally about control. That is, Mr. Clark sought to be a candidate of and for the people of Brown County, but Mr. Bowman seemed to only want a candidate who would submit to his control.

One political issue that does come up frequently in Brown County involves various questions about future commercialization efforts within the county. It is generally thought by some in the county that Mr. Bowman is in favor of expansive commercialization of the county since Mr. Bowman owns a real estate business that operates in Brown County. Mr. Clark does not oppose all commercialization efforts in the county, but his view is that commercialization should be reasonable in scope and the desires of current Brown County residents should be factored into such decisions. However, even if there is a divide between Mr. Bowman and Mr. Clark with regard to this particular political issue, the lines of any such divide are not clear-cut and do not constitute a basis for the present complaint. That is, Mr. Bowman and Mr. Clark are both entitled to their own political views on questions concerning something like future commercialization of Brown County. Moreover, Mr. Clark is unaware of any time in which Mr. Bowman directly attacked Mr. Clark for his political position on this or any other issue.

For further clarification, most of this complaint relies upon events that occurred after the 2024 primary which Mr. Clark won. During the primary, Mr. Bowman supported Mr. Clark's opponent who was the Republican incumbent (Jerry Pittman) instead of Mr. Clark. Mr. Clark does not fault Mr. Bowman for that choice because it is understood that a key role of the Republican Party is to select preferred candidates in

the primary. Nevertheless, Mr. Bowman's opposition to Mr. Clark's candidacy did actually cross the line of appropriate conduct even during the primary in several ways.

Having won the 2024 Republican primary against Mr. Pittman, Mr. Clark became the Republican candidate in May of 2024 for Brown County Commissioner, District 3 in the forthcoming general election. And here is where the main thrust of the present complaint arises. The reason for this is that Mr. Bowman refused to drop his opposition to Mr. Clark's campaign after Mr. Clark won the Republican primary. Instead, Mr. Bowman did the unthinkable. After his preferred candidate (Mr. Pittman) lost in the primary, he chose to shift his support to a new candidate (Mr. Taggart) to run against Mr. Clark in the general election. Because Mr. Taggart could not run as a Republican (since Mr. Clark had already won the Republican nomination in the primary), Mr. Taggart ran an Independent campaign with Mr. Bowman's support against Mr. Clark.

The problem for Mr. Bowman is that he held and still holds official positions with the Republican Party. If Mr. Bowman were merely an ordinary Republican voter, he would have been entitled to support any candidate he chose to in both the Republican primary and the general election even if such candidates were not running as Republicans. But, as an official of the Republican Party, he most certainly is not allowed to support non-Republican candidates against Republican candidates. Indeed, if the Republican Party cannot even control its own officials to support its own candidates, then it would be unsurprising to see the Republican Party splinter into numerous fiefdoms in direct conflict with each other.

Mr. Bowman's support of Mr. Taggart against Mr. Clark in the 2024 general election has caused a scandal in Brown County. As noted, there was no specific

political issue in the 2024 general election that Mr. Bowman or Mr. Taggart directly challenged Mr. Clark about. Instead, it seems that they primarily relied upon a rumor campaign against Mr. Clark alleging that he is a RINO, which is emphatically false and lacks any real definition of what that term even means when it comes to political issues in Brown County.

Even though Mr. Bowman and Mr. Taggart failed to raise any specific issue against Mr. Clark, the fact that Mr. Bowman was supporting Mr. Taggart's Independent campaign against Mr. Clark was well known in the county. One incident that occurred during the 2024 general election illustrates the overtness of Mr. Bowman's support of Mr. Taggart. This incident will be discussed further below, but in summary, Mr. Bowman intentionally excluded Mr. Clark from attending the 2024 Lincoln Day Dinner in Brown County. Even more insulting, Mr. Taggart (who was not even a Republican candidate but who was running as an Independent candidate against Mr. Clark) was allowed to attend the Lincoln Day Dinner. This incident became publicly known in the county, and one supporter of Mr. Bowman publicly stated that he was happy Mr. Clark was excluded from the event. (Exhibits 1-3). Mr. Bowman's actions have poisoned the political atmosphere in Brown County and risks serious harm to the Republican Party in this county.

IV. MR. BOWMAN'S VIOLATIONS OF RULE 1-25

It is well-established that political parties like the Indiana GOP have First Amendment rights under the U.S. Constitution to control their membership. For

example, the Indiana Supreme Court very recently summarized the rights of political parties in this way:

[W]e again acknowledge a first principle: political parties have legitimate First Amendment interests in choosing—and excluding—their members and leaders. Political parties enjoy these associational rights like any other organization. Its determination of the structure which best allows it to pursue its political goals, is protected by the Constitution. The Supreme Court has vigorously affirmed, and specifically recognized, this special place reserved by the First Amendment. A party's associational rights presuppose the freedom to identify those who constitute the association, and to limit the association to those people. Free association also generally encompasses a political party's decision about the process for electing its leaders. The Supreme Court has also embraced—with increasing firmness—the view that the First Amendment guarantees a political party great leeway in governing its own affairs. A party thus has an indispensable interest in protecting itself against unaffiliated people who may seriously distort its collective decisions, and thus encroach its essential functions. Rightfully so.

Morales v. Rust, 228 N.E.3d 1025, 1041 (Ind. 2024) (citations and extraneous punctuation removed). In this particular case, Mr. Rust was seeking to run in the Republican primary to be a U.S. Senator. *Morales*, 228 N.E.3d at 1032. However, he had failed to vote in two recent Republican primaries according to state law, and the local Republican Party refused to certify his membership in the Republican Party. *Id.* The Indiana Supreme Court held that Mr. Rust was rightfully excluded from the Republican primary and that he could not force his way into the Republican primary against the local Republican Party wishes. *Morales*, 228 N.E.3d at 1031.

Another recent case involving an Indiana politician is directly on point with the present complaint against Mr. Bowman. *Hero v. Lake County Election Board*, 42 F.4th 768 (7th Cir. 2022). In this case, Mr. Hero was a Republican who became disgruntled by decisions that had been made by local elected Republicans. *Hero*, 42 F.4th at 770. Because of his dissatisfaction, he lent his support to two independent candidates

running against Republican candidates by “offering legal advice, posting yard signs, and making his opinions publicly known.” *Id.* In response, the Indiana GOP held that Mr. Hero was not a Republican in Good-Standing and barred him from seeking elected office in Indiana as a Republican for 10 years. *Hero*, 42 F.4th at 770-771. In deciding the case, the Seventh Circuit Court of Appeals recognized that “Political parties may accordingly protect themselves from intrusion by those with adverse political principles, so too can a state protect the First Amendment rights of a political party, as the Election Board did here by allowing the Republican Party to determine its own membership and restrict its standard bearers to members in good standing.” *Hero*, 42 F.4th at 776-777 (citations and extraneous punctuation removed). Accordingly, the court upheld the Indiana GOP’s decision to bar Mr. Hero from seeking elected office as a Republican. *Hero*, 42 F.4th at 770.

Although the *Hero* case is extremely similar to the present complaint against Mr. Bowman, there are two differences that make the present complaint even more serious. First, although Mr. Hero was a Precinct Committeeman, he was not the Chair of the local Republican Party as Mr. Bowman is. As such, Mr. Bowman wields much more power in the local Republican Party than Mr. Hero did, and concomitant with that greater power is a greater responsibility to follow the Indiana GOP rules. Second, the questionable activities that Mr. Hero engaged in appear to be significantly less egregious than what Mr. Bowman did in opposing Mr. Clark’s campaign.

The punishment that the Indiana GOP meted out in Mr. Hero’s case was also notably greater than what Mr. Clark is seeking in the present case. That is, Mr. Clark is only seeking the minimum punishment which he is hopeful will rectify the harms caused

by Mr. Bowman. That is, while Mr. Hero was banned for a period of 10 years, Mr. Clark is only seeking a ban of 5 years. Thus, Mr. Clark's requested remedy is significantly less than what was imposed in Mr. Hero's case for conduct that is even worse than in Mr. Hero's case. Because of this, Mr. Clark fully understands and accepts that the District 9 Officers may decide to impose a harsher punishment against Mr. Bowman than Mr. Clark has requested in his complaint.

A. *Mr. Bowman Had Improper Motives In Challenging Mr. Clark's Candidacy With The Election Board*

Normally, filing a challenge against a potential candidate with the local county Election Board would not constitute a violation of Rule 1-25. However, in the unusual circumstances of the present case, Mr. Bowman's Election Board challenge against Mr. Clark did violate Rule 1-25 because of his motives for filing his challenge.

On February 14, 2024, Mr. Bowman filed a formal challenge with the Brown County Election Board in which Mr. Bowman asserted that Mr. Clark was ineligible to run as a Republican because he was allegedly "Independent. Not affiliated w/the Republican Party." (Exhibit 7). However, Mr. Bowman's challenge was not made in good faith and it was unanimously rejected. (Exhibit 4 ¶ 2). Because Mr. Bowman had access to Mr. Clark's public voting records, he knew or should have known that his challenge had no merit whatsoever before he filed it. (Exhibit 4 ¶ 2).

It is readily apparent that Mr. Bowman's true motive in filing his Election Board challenge against Mr. Clark was to damage Mr. Clark's campaign. (Exhibit 4 ¶ 2). Thus, Mr. Bowman's challenge was baseless and illegitimate. Therefore, although an Election Board challenge would not normally constitute a violation of Rule 1-25, in the present case Mr. Bowman's improper motive and baseless nature of his challenge does

constitute a violation of Rule 1-25. Further, Mr. Bowman's Election Board challenge against Mr. Clark was only the beginning of Mr. Bowman's ongoing and relentless opposition to Mr. Clark's campaign.

B. Mr. Bowman Offered Absolutely No Support Whatsoever To Mr. Clark's Campaign

Rule 1-25 has two parts. First, Rule 1-25 requires a Republican in Good-Standing to be a "a Republican who supports Republican nominees". Second, Rule 1-25 prohibits a Republican in Good-Standing from "actively or openly support[ing] another candidate against a Republican nominee." The first part of Rule 1-25 is an overarching principle that Republicans must support the campaigns of other Republicans. The second part of Rule 1-25 spells out a more specific offense that clearly demonstrates a violation of the first part.

Here, Mr. Clark asserts that Mr. Bowman violated the overarching principle of the first part of Rule 1-25 by failing to offer any support whatsoever for Mr. Clark's campaign at any time during his campaign. (Exhibit 4 ¶ 3). As the Chair of the Brown County Republican Party, it was Mr. Bowman's duty to offer at least modest support for Mr. Clark's campaign. (Exhibit 4 ¶ 3). And yet, Mr. Bowman did absolutely nothing to aid Mr. Clark's campaign. Instead, he did the opposite—at every opportunity he sought to undermine Mr. Clark's campaign. Therefore, Mr. Bowman's failure to offer even a minimal amount of support for Mr. Clark's campaign constitutes a violation of Rule 1-25.

C. Mr. Bowman Tried To Exclude Mr. Clark From The Brown County Republican Women's Club Meet & Greet for Republican Candidates

Shortly after filing his challenge against Mr. Clark with the Brown County Election Board, a member of the Brown County Women's Club attended a regularly scheduled meeting of the Brown County Republican Party on February 22, 2024. (Exhibit 5 ¶ 2).

This person was at the meeting to discuss a meet and greet event that the Women's Club was planning for Republican election candidates. (Exhibit 5 ¶ 2). During the meeting, one of the Precinct Committeemen asked Mr. Bowman if Mr. Clark would be allowed to attend the meet and greet event. (Exhibit 5 ¶ 3). Mr. Bowman's answer was an emphatic "no". (Exhibit 5 ¶ 3). Despite Mr. Bowman's attempt to exclude Mr. Clark from this event, Mr. Clark ultimately was allowed to attend the meet and greet because the Brown County Women's Club refused to follow Mr. Bowman's directive. (Exhibit 5 ¶ 3).

The timing of this incident makes the question of a Rule 1-25 violation less clear, but when fully considered, this should be considered to be another violation of Rule 1-25. That is, this incident occurred during the primary campaign before the general election campaign, and it is understood that the Republican Party and its officials play an important role in selecting preferred candidates during the primary process. Thus, for example, Mr. Clark does not fault Mr. Bowman for preferring a different Republican candidate than Mr. Clark during the primary. (Exhibit 4 ¶ 2).

However, what Mr. Bowman was trying to do went beyond preferring a different Republican candidate over Mr. Clark. Instead, Mr. Bowman was trying to single out Mr. Clark and demanding that he be treated differently than other Republican candidates by excluding Mr. Clark from an official Republican event. (Exhibit 5 ¶ 4). Thus, Mr. Bowman's attempt to exclude Mr. Clark from the Women's Club meet and greet was a violation of the first prong of Rule 1-25 which requires Republicans in Good-Standing to "support[] Republican nominees".

D. Mr. Bowman Refused To Allow Mr. Clark To Post His Campaign Sign At The Republican Party Booth At The Brown County Fair

An even clearer violation of Rule 1-25 occurred later during the general election campaign in late June. The Brown County Republican Party regularly sets up and runs a booth at the Brown County Fair. Since 2024 was an election year, the Republican Party posted campaign signs for numerous Republican candidates at its booth for passers-by to see. (Exhibit 8).

Mr. Clark also reserved a booth at the fair to support his own campaign. (Exhibit 4 ¶ 4). On the day before the fair opened, Mr. Clark was at the fairgrounds setting up his own campaign booth, and he saw Mr. Bowman near the Republican Party booth. (Exhibit 4 ¶ 4). He then walked over to Mr. Bowman and asked if one of his campaign signs could be posted with the other Republican campaign signs. (Exhibit 4 ¶ 4). Mr. Bowman's response was "Absolutely not". (Exhibit 4 ¶ 4). Mr. Clark did not pursue the matter further, and as a result, Mr. Clark's campaign sign was noticeably absent from the Republican Party booth during the Brown County Fair. (Exhibit 4 ¶ 4; Exhibit 8).

This is a clear violation of Rule 1-25. Unlike the Women's Club meet and greet event which occurred during the primary, this incident occurred during the general election campaign when Mr. Clark was the only Republican running for the Commissioner, District 3 seat. Moreover, unlike some of the incidents discussed herein where the District 9 Officers may need to make reasonable inferences based on what occurred, this incident involves Mr. Bowman's own words directed right to Mr. Clark's face.

And, it could be argued that this incident is where Mr. Bowman's opposition to Mr. Clark really went off the rails. That is, despite Mr. Bowman's earlier opposition to Mr. Clark's campaign, Mr. Clark was still hopeful that a bridge could be built between them and the past but behind them. (Exhibit 4 ¶ 4). But Mr. Bowman would not have it. Unfortunately, as it turned out Mr. Bowman never relented in his campaign against Mr. Clark.

E. Mr. Bowman Allowed Pictures Of Prominent Brown County Republicans Wearing Campaign T-shirts Promoting Mr. Clark's Opponent (Mr. Taggart) To Be Published On The Brown County Republican Facebook Page

Mr. Bowman also used the Brown County Fair in yet another scheme to undermine Mr. Clark's campaign. During the fair, a number of prominent county Republicans could be seen wearing campaign T-shirts for Mr. Taggart, who was running an Independent campaign against Mr. Clark. It is highly likely that this was coordinated by Mr. Bowman, but Mr. Clark does not presently have direct evidence of this.

Nevertheless, photos of these individuals wearing Mr. Taggart's campaign T-shirts were promptly posted on the Brown County Republican Facebook page. (Exhibit 5 ¶ 5; Exhibits 9-11). Because Mr. Bowman was the Chair of the Brown County Republican Party, responsibility for what is posted on their Facebook page falls squarely on Mr. Bowman himself even if he did not post the photos directly himself. Moreover, it is reasonable to infer that Mr. Bowman at a minimum condoned of these photos being posted on the Brown County Republican Facebook page, and it is also reasonable to infer that Mr. Bowman was actively involved in posting these photos on the Brown County Republican Facebook page. Therefore, the posting of photos of local Republicans wearing campaign T-shirts for Mr. Taggart (Mr. Clark's Independent opponent) constitutes another violation of Rule 1-25.

F. Mr. Bowman Openly Announced His Opposition To Mr. Clark's Campaign At An Official Brown County Republican Party Meeting During The General Election

Another incident that involved Mr. Bowman's own words occurred on June 27, 2024. (Exhibit 6 ¶ 3). On that day, a newly elected Precinct Committeeman was attending his first regularly scheduled Brown County Republican Party meeting. (Exhibit 6 ¶ 3). At the beginning of the meeting, Mr. Bowman announced to everyone that "I have the power to shut down his campaign" and "I have the data that proves he is not a good Republican." (Exhibit 6 ¶ 3). In response, the new Precinct Committeeman spoke up to remind Mr. Bowman that Mr. Clark had already been vetted by the Election Board, but Mr. Bowman argued that "I don't have to follow the election board decisions." (Exhibit 6 ¶ 4). Mr. Bowman then personally attacked the new Precinct Committeeman for having spent time during the recent county fair talking to Mr. Clark. (Exhibit 6 ¶ 4).

Later in the meeting, the new Precinct Committeeman pressed Mr. Bowman to provide the evidence that he supposedly possessed showing that Mr. Clark was not a good Republican, but Mr. Bowman would only say that "I have the data" and that the new Precinct Committeeman should go "online" to find it. (Exhibit 6 ¶ 6). Mr. Bowman then challenged the new Precinct Committeeman by asking him "what is your agenda?" (Exhibit 6 ¶ 7). The new Precinct Committeeman responded by asking if the Brown County Republican Party follows the GOP rules. (Exhibit 6 ¶ 7). Mr. Bowman responded by saying "yes". (Exhibit 6 ¶ 7). The new Precinct Committeeman then pointed out Rule 1-25 and paraphrased the rule. (Exhibit 6 ¶ 7). At this point, almost the whole room turned against the new Precinct Committeeman, but he persevered and told the group that it was wrong to be supporting an Independent candidate (Mr. Taggart) against Mr. Clark and that it should stop. (Exhibit 6 ¶ 7-8). Understandably,

this experience was very disturbing and upsetting to the new Precinct Committeeman. (Exhibit 6 ¶ 8).

It is hard to imagine a more overt violation of Rule 1-25 than this incident. That is, Mr. Bowman openly admitted in his own words that he was trying to “shut down” Mr. Clark’s campaign. This also occurred during the general election campaign when only non-Republicans were running against Mr. Clark. Further, the new Precinct Committeeman who challenged Mr. Bowman explicitly referred to Rule 1-25. Certainly, Mr. Bowman did not need to be informed of Rule 1-25 to establish a violation of the rule because prior knowledge is not a requirement of the rule and it is also reasonable to impute knowledge of the rule to Mr. Bowman since he was the Chair of the Brown County Republican Party at the time. And yet, if Mr. Bowman somehow through negligence didn’t actually know about Rule 1-25 at the time, he was expressly informed about the rule at this meeting.

Accordingly, Mr. Bowman violated Rule 1-25 again at the June 27, 2024 Brown County Republican Party meeting.

G. Mr. Bowman Appointed A Republican Who Was Openly Supporting Mr. Clark’s Opponent (Mr. Taggart) To An Official Republican Position

It is obvious that Mr. Bowman holds little regard for the Republican in Good-Standing standard of Rule 1-25. This was demonstrated quite clearly by his appointment of a loyalist to a vacant Precinct Committeeman position who had previously established herself as being a Republican who was not in Good-Standing.

Referring back to section IV.E above, one of the photos that the Brown County Republican Party posted on its Facebook page was of Cindy Wolpert. (Exhibit 9; Exhibit 5 ¶ 5). In that photo, Ms. Wolpert can be seen prominently wearing a campaign

T-shirt for Mr. Taggart, who was the Independent candidate running against Mr. Clark in the general election campaign. (Exhibit 9; Exhibit 5 ¶ 5). Moreover, this photo was taken right in front of the Republican Party fundraiser booth, which is apparent from the sign in front of the table which is partially cut off in the photo. (Exhibit 9; Exhibit 5 ¶ 5).

As noted above, Mr. Bowman violated Rule 1-25 by allowing this photo to be published on the Brown County Republican Party Facebook page, but at the time Ms. Wolpert herself was free to wear Mr. Taggart's campaign T-shirt because she did not hold any elected office or official position within the Republican Party. (Exhibit 5 ¶ 6). Ms. Wolpert has been active in Brown County politics for years, but in the May 2024 primary she lost her incumbent Precinct Committeeman position to another Republican. (Exhibit 5 ¶ 6). Thus, when this photo was taken in late June, she did not hold any elected office or official position in the Republican Party despite being a well-known Republican politician. (Exhibit 5 ¶ 6).

However, sometime after this photo was taken and posted on the Brown County Republican Party Facebook page, one of the elected Precinct Committeemen resigned from their position. (Exhibit 5 ¶ 7). And lo and behold, Mr. Bowman chose to appoint Ms. Wolpert to the vacant Precinct Committeeman position. (Exhibit 5 ¶ 7). This is yet another violation of Rule 1-25 by Mr. Bowman because the GOP Rules require Precinct Committeemen to be Republicans in Good-Standing. (Rules 1-6; 1-24). And, Mr. Bowman cannot hide behind a lack of knowledge because it was his duty to inquire whether or not the person he was appointing satisfied the standard of a Republican in Good-Standing. Further, as noted above, Mr. Bowman was responsible for posting this very photo on the Brown County Republican Party Facebook page. Thus, not only did

Mr. Bowman have a duty to vet Ms. Wolpert before appointing her, but he already knew or should have known from the posting of this photo that Ms. Wolpert was not a Republican in Good-Standing, and therefore, was ineligible to be appointed to be a Precinct Committeeman.

H. Mr. Bowman Excluded Mr. Clark And An Elected Republican Precinct Committeeman From An Official Republican Campaign Event (The Lincoln Day Dinner) And Allowed Mr. Clark's Opponent (Mr. Taggart) To Attend The Event

This incident is probably the most insulting of all of Mr. Bowman's Rule 1-25 violations. The Lincoln Day Dinner is an annual Republican event that is held in most counties in Indiana as a celebration of the Republican Party and as a fundraising event. However, in 2024 Mr. Bowman decided to use the Brown County Lincoln Day Dinner for yet another purpose. That is, Mr. Bowman used the Brown County Lincoln Day Dinner as a weapon against Mr. Clark, and even more insulting, as an opportunity to promote the Independent candidate who was running against Mr. Clark.

The 2024 Brown County Lincoln Day Dinner was held September 6 and the RSVP deadline was September 2. (Exhibit 4 ¶ 5; Exhibit 6 ¶ 10). About a month before the event, Mr. Clark contacted the Brown County Republican Party and requested a reservation for a table at the event. (Exhibit 4 ¶ 5; Exhibit 6 ¶ 9). This request was never responded to. (Exhibit 4 ¶ 5). Later, Mr. Clark happened to see Robyn Bowman (Mr. Bowman's wife) at a county meeting and asked her about his reservation. (Exhibit 4 ¶ 6). Her response was "I'm not acknowledging you. You are not allowed to attend the dinner. You're not a Republican." (Exhibit 4 ¶ 6; Exhibit 6 ¶ 9).

A Brown County Precinct Committeeman then offered to reserve a table at the event and invited Mr. Clark to sit with him at his table. (Exhibit 4 ¶ 7; Exhibit 6 ¶ 10).

This attempt to reserve a table at the Lincoln Day Dinner occurred on August 20-21, which was also well ahead of the RSVP deadline of September 2. (Exhibit 6 ¶ 10). However, like Mr. Clark's attempt to reserve a table, the Precinct Committeeman received no response to his request either. (Exhibit 6 ¶ 10). When he called Ms. Bowman on August 30 for an update, she told him that she had not received his check and that there were no open tables available. (Exhibit 6 ¶ 10). When he then asked if there were any individual seats available, she would not answer his question. (Exhibit 6 ¶ 10).

As a result, neither Mr. Clark nor the Precinct Committeeman were able to attend the 2024 Brown County Lincoln Day Dinner. (Exhibit 4 ¶ 7; Exhibit 6 ¶ 11). But what's more, Mr. Clark learned after the event that Mr. Taggart, his Independent opponent, was actually in attendance at the event. (Exhibit 4 ¶ 7; Exhibit 6 ¶ 13). Thus, unlike the Women's Club meet and greet (section IV.C above), where Mr. Bowman was ultimately unsuccessful in excluding Mr. Clark, Mr. Bowman succeeded in spades with the Lincoln Day Dinner by successfully excluding Mr. Clark and the supportive Precinct Committeeman while also allowing Mr. Clark's non-Republican opponent to attend the event.

If the Indiana GOP is unable to reprimand a Republican official for such an egregious abuse of power like this, then it is hard to see how the Indiana GOP has any control whatsoever over local officials. The end result of failing to address problems like this is obvious. County politics will naturally devolve into cabals pursuing their own personal interests, which hurts local constituents and undermines the credibility of the

Republican Party as a whole. This must be stopped, both for the good of local residents and for the larger Republican Party itself.

I. Mr. Bowman's Wife And Son Arranged A Campaign Photo Op Of A Favored Republican Candidate Associating With Mr. Clark's Opponent

Mr. Bowman never relented in his personal campaign against Mr. Clark. In the waning days of the election campaign during early voting, one of Mr. Clark's supporters saw Ms. Bowman and Mr. Bowman's son arranging a photo op with one of Mr. Bowman's preferred candidates in an obvious attempt to link this preferred candidate with Mr. Taggart. (Exhibit 5 ¶ 10). More specifically, Ms. Bowman was seen leading this preferred candidate over to Mr. Taggart's campaign tent, sitting him down underneath Mr. Taggart's campaign tent with Taggart campaign signs surrounding him, and taking a photo of the arrangement. (Exhibit 5 ¶ 10).

The preferred candidate who was the subject of this photo op was running for County Commissioner for a different district than Mr. Clark's district. (Exhibit 5 ¶ 9). And as previously noted herein, Mr. Taggart was running as an Independent for County Commissioner for the same district as Mr. Clark. Those were the only two County Commissioner seats up for election in 2024. So, what is obvious from the photo op is that Mr. Bowman's two preferred candidates for the two open County Commissioner seats were Mr. Taggart and the candidate who was the subject of the photo op. (Exhibit 5 ¶ 10). And, what is also obvious is that Mr. Bowman preferred Mr. Taggart over Mr. Clark, even though Mr. Clark was the Republican candidate and Mr. Taggart was running an Independent campaign against Mr. Clark.

In addition to the overarching principle of Rule 1-25 that requires Republicans in Good-Standing to "support[] Republican nominees", Rule 1-25 also specifically prohibits

a Republican in Good-Standing from “actively or openly support[ing] another candidate against a Republican nominee.” Not only did Mr. Bowman fail to satisfy the overarching principle of Rule 1-25, but he also blatantly violated the specific prohibition of Rule 1-25 by supporting Mr. Taggart’s Independent campaign against Mr. Clark.

V. THE APPROPRIATE REMEDY IS REMOVAL OF MR. BOWMAN FROM HIS OFFICIAL POSITIONS IN THE BROWN COUNTY REPUBLICAN PARTY

Mr. Bowman willfully flouted the GOP rules that prohibit Republican officials from supporting non-Republicans against Republicans, presumably because he didn’t believe the state GOP would do anything about it. The only appropriate remedy for this willful act is Mr. Bowman’s removal from both of the official positions he currently holds with the Brown County Republican Party and a bar against Mr. Bowman running or being appointed as a Republican.

One simple reason for why this is the appropriate remedy is the clear contempt that Mr. Bowman exhibited for the Indiana GOP rules themselves. The necessity of a rule like Rule 1-25 which requires Republican officials to support Republican candidates and prohibits Republican officials from supporting non-Republican candidates against Republican candidates is so obvious that one might question why such a rule even needs to be written down. And yet, when such a rule has been expressly written down in the Indiana GOP rules, Mr. Bowman could not bring himself to follow it. The Indiana GOP cannot afford to allow a Republican official to flout the rules like this and still hold their official Republican positions. If the Indiana GOP allowed this to occur with no consequences, then it would raise serious questions about whether local Republican parties really have to follow any of the rules that are set forth by the Indiana GOP.

But another reason that Mr. Bowman needs to be removed from his official Republican positions is the scandal that has been caused in Brown County over his opposition to Mr. Clark's candidacy. The voters of Brown County voted in favor of Mr. Clark twice—once in the primary and also again in the general election. Mr. Clark's victories were in spite of Mr. Bowman's opposition to Mr. Clark both in the primary and the general election. And on the other hand, Mr. Bowman lost twice—once in the primary with Mr. Pittman and again in the general election with Mr. Taggart. The divisions that Mr. Bowman has caused in the county over his support of an Independent candidate against Mr. Clark are going to be difficult for Mr. Clark to repair, especially if the District 9 Officers allow Mr. Bowman to retain his official positions within the Brown County Republican Party.

Still another reason why Mr. Bowman needs to be removed is because his continued role as Chair of the Brown County Republican Party would be an obstacle to a core principle that Mr. Clark campaigned on. That is, Mr. Clark believes and campaigned on the principle that Brown County's governance should be more responsive to the interests of the residence of Brown County instead of the loudest voices. That was a winning campaign promise and admirable. But here's where a problem lies. Ideally, the best place for a government official like Mr. Clark to gain community feedback on particular political issues is the county Republican Party itself and its elected Precinct Committeemen. But unfortunately, Mr. Bowman's actions in the general election has caused a difficult fracture between the Brown County Republican Party and Mr. Clark. That is, one cannot seriously expect Mr. Clark, who won the general election without the support of the local Republican Party and despite active

and open opposition by the Chair of the Party, to now seek input from that body if it is still chaired by Mr. Bowman. Thus, Mr. Bowman's continued role in official positions in the Brown County Republican Party will only hinder Mr. Clark's efforts to gain feedback from the community since he will understandably be forced to seek such input elsewhere outside of the local Republican Party.

For the good of the Brown County Republican Party, the divisiveness caused by Mr. Bowman's support of an Independent candidate against Mr. Clark must come to an end. Republican voters of Brown County must be given a chance to heal their divisions and move past the toxic leadership that Mr. Bowman represents. However, this will be extremely difficult to achieve and likely is not even possible as long as Mr. Bowman remains in his official positions in the Brown County Republican Party. Therefore, decisive action by the District 9 Officers is needed to heal the damage that Mr. Bowman has caused to the Brown County Republican Party.

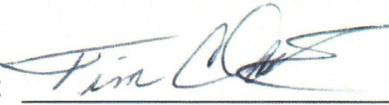
VI. CONCLUSION

For the foregoing reasons, the Complainant submits that the District 9 Officers should hold that (1) Mr. Bowman violated Rule 1-25 by failing to support Mr. Clark's campaign for Brown County Commissioner, District 3 and by actively and openly supporting an Independent candidate against Mr. Clark; (2) the appropriate remedy for such conduct is removal of Mr. Bowman from his position as Precinct Committeeman, Hamblin 2 according to Rule 3-6; (3) Mr. Bowman is not permitted to hold the office of Chair of the Brown County Republican Party according to Rule 4-11(2); and (4) Mr. Bowman is banned from holding any official Republican office or running for elected

office as a Republican for 5 years in line with *Hero v. Lake County Election Board*, 42 F.4th 768 (7th Cir. 2022).

The Complainant has read this Memorandum and the attached Exhibits and verifies that all statements herein are factually accurate.

Dated: December 19, 2024

By: 

Tim Clark
Complainant
676 Town Hill Rd. E.
Nashville, IN 47448
317-674-5931

Dated: December 19, 2024

By: 

Richard E. Stanley, Jr. (IN Atty No. 31838-49)
Representative for Complainant
4356 Lanam Ridge Rd.
Nashville, IN 47448
312-310-4279

Exhibit 1

Letter to the editor: Rich Stanley

By **Staff Reports** - September 17, 2024



Editor:

We need a change in the leadership of the Brown County Republican Party. Specifically, I am referring to Mark Bowman, the Chairman of the Brown County Republican Central Committee. There has been indications for some time that Mark is running the Brown County Republican Party for his own personal ambitions instead of the good of the party. But, a recent event and scandal confirms that Mark Bowman cannot be trusted to lead our party, and we must remove him from political office.

The facts and circumstances of this latest scandal are simple and clear—and appalling. It involves the Brown County Republican Lincoln Day Dinner that was held September 6, 2024 at the Seasons Event Center in Nashville. This is a regularly scheduled event where active members of the Brown County Republican Party get together to mingle, have

dinner together and listen to well-known Republican speakers. There were about 150 people in attendance at this year's event. Individual tickets sold for \$45 and a table for eight could be reserved for \$500. In general, there are no restrictions on who can attend beyond the basic limitation of the number of seats available. This year's event was well-attended and went smoothly.

But here's the scandal. Mark Bowman refused to allow Tim Clark, who is the Republican candidate for Commissioner for District 3, to attend the Lincoln Day Dinner event. On its face, this sounds hard to believe, but it is true. The head of the Republican Party in Brown County (Mark Bowman) excluded a Republican candidate (Tim Clark) from an official Republican event (the Lincoln Day Dinner). I doubt that Mark Bowman would want to admit that he did this, but at the same time, I doubt that Mark would deny it either.

I am not going to try to delve into Mark's personal agenda here. But this particular event I can speak to. Tim Clark won the Republican primary this past May against Jerry Pittman for the District 3 Commissioner seat. For some reason, Mark Bowman has been unwilling to accept Tim Clark's primary victory and has been working to undermine Tim Clark's campaign even though the majority of Brown County Republicans voted for Tim Clark over Jerry Pittman. Excluding Tim from the Lincoln Day Dinner was just one more part of Mark's own personal campaign against Tim.

But what happened with the Lincoln Day Dinner event is categorically different and indefensible—it's scandalous. Tim Clark sent a check to the Brown County Republican Central Committee for seats to the dinner about a month before the event. However, they refused to deposit his check and give him any seats at the event. Tim then found someone else who was willing to buy tickets for him, but Mark apparently found out about this attempt too and still refused to allow Tim to have a ticket to the event. In the end, Mark was successful in excluding Tim from the Lincoln Day Dinner.

I am going to emphasize this again. This was an OFFICIAL Republican event where the LEADER of the Republican Party intentionally excluded a Republican CANDIDATE.

We cannot have a leader of our Republican Party undermining our own candidates. In fact, according to the Indiana GOP rules, Mark Bowman is no longer a Republican in good-standing because Rule 1-25 specifically defines a "Republican in Good-Standing" as "a Republican who supports Republican nominees". Because Mark has actively tried to undermine Tim's campaign by excluding Tim from an official Republican event, Mark Bowman has violated Rule 1-25 and is not currently a Republican in good-standing.

We cannot have a leader of the Republican Party in Brown County who is at odds with our very own candidates. Besides the GOP rules that explicitly forbid this kind of conduct, it violates common decency. It is time for Brown County Republicans to take back control of our own party and clean house.

Rich Stanley

Exhibit 2

Letter to the editor: Paul Hazelwood

By **Staff Reports** - October 1, 2024



Letter to the Editor:

In response to the recent calls to remove Mark Bowman as Chairman of the Brown County Republican Party, I feel it's important to offer a clearer perspective on this situation, particularly when it comes to Tim Clark's candidacy.

First and foremost, Tim Clark does not represent the core values of the local Republican Party. He runs a blog labeled Independent Voters of Brown County IN, which makes it clear that his true political leanings lie outside the Republican Party. This is a classic example of a "Republican In Name Only" (RINO). If Clark really aligned with the GOP, why would he run an independent blog that undermines the very party he claims to represent?

Clark's stance on local issues also raises concerns. He consistently opposes economic development and tourism, both of which are essential to Brown County's prosperity. In fact, Clark has repeatedly stated in public meetings that Brown County is not a tourism county. Anyone who's walked the streets of Nashville on a busy day can see how central tourism is to our community. His stance is not just misguided—it's completely out of touch with the reality of what makes our local economy thrive. Why should we support a candidate who dismisses the very thing that supports our local businesses?

The controversy around the Lincoln Day Dinner is another point that deserves clarification. I attended the dinner with my wife, and it was a fantastic event. I don't know the true details, but Tim Clark's "exclusion" wasn't about Tim Clark—it was about protecting the integrity of the Republican Party. How can we justify supporting a candidate at a Republican event when that individual does not support the values that the local GOP stands for? Why would he even want to attend an event that doesn't align with his political views? Personally, I'm glad he didn't attend. It was an evening meant to support the local GOP, not a stage for Clark's ego, self-praising and attention-seeking antics to take center stage.

Yes, Tim Clark won the primary—but let's not forget it was a very close vote. The slim margin can likely be attributed to the smear campaign Clark and his supporters ran against Mr. Pittman. Instead of winning voters with real solutions, Clark relied on negative tactics to edge out the victory. That's not the kind of leadership we need in Brown County.

Now, let's address Rich Stanley. Who is Rich? I haven't seen him at any Republican events, county meetings or town halls. Rich, are you even a Republican—or a "RINO" in hiding as well? It's easy for a keyboard warrior like yourself to hide behind the screen and take potshots at someone rather than actually take action, participate, interact, or simply be involved. It's obvious you've never met the Bowmans, or you'd have written the same type of letter against Tim Clark.

Mark Bowman, on the other hand, has stood up when so many others hide, taking criticism on the chin while continuing to put in tremendous effort to improve our community. He's worked tirelessly to support local businesses and promote tourism—initiatives that have made our county stronger year after year. Maybe, Rich, you could follow suit and get involved? Attacking someone who has been a staunch advocate for our community simply makes no sense. Tim Clark's smear campaign, which helped him win the primary, shows a lack of integrity and solutions. Instead of working toward progress, he's constantly tearing down what our GOP leaders have built.

In the end, Tim Clark's campaign is nothing more than an opportunistic attempt to ride the coattails of the GOP without genuinely standing for what we believe in. Mark Bowman, through his dedication and service, has shown that he is the right person to lead our party. It's time to stand behind those who support Brown County, not those who undermine it.

Sincerely,

Paul Hazelwood

Morgantown

Staff Reports

Nobody covers Brown County like the Democrat!



Exhibit 3

Independent Voters of Brown County IN

Working towards "a more perfect Union," county, and community

Letter: Change needed in local Republican Party Leadership

🕒 October 11, 2024 📁 Uncategorized

This post at [Brown County Matters](#).

Context. Rich Stanley wrote a letter in the Democrat ([Stanley, 9/17/2024](#)) calling for a change in the leadership of the local Republican Party led by Mark Bowman. A response to Rich's letter was provided through a surrogate.

The Brown County Democrat declined to publish Richard's rebuttal in its entirety to include the names of individuals who supported Rich's response. The individuals include *Clara Stanley, Greg DeLong, Dara DeLong, Vivian Wolf, Michael Painter, Charles F. Shaw, Jeanne Shaw, Jacob Adams, Amie Yoder, Charlene Marsh, Ben Phillips, Mercy Phillips, Daniel C. Huston, Holly H. Huston, Willow Snider, Ron Lawson, Jeff Marshall, Joy Martin.*

Rich's letter in its entirety is provided below.

LETTER: Richard Stanley: Response to Paul Hazelwood's October 1, 2024, letter to the Editor.

There are a number things about [Paul's letter](#) (Sep 17, 2024) that I feel should be addressed, and the least important of those issues is Paul's question of "Who is Rich?" I don't fault Paul for not being sure who I am because I am more commonly known in the county as "Clara's husband". But besides being less well-known than my wife, I am a woodworker, a horseman, a hunter, a gardener and a churchgoer. What I mean by that is that in some way or another, I am no different than most people in Brown County. And one thing you are most certainly wrong about Paul is that I am not a RINO. I have never once in my entire life voted for a Democrat – or even an independent for that matter, and I do not foresee myself ever voting for a Democrat or an independent.

But let's talk more about your sloppy RINO accusations. At the local level here in Brown County, what does that term really even mean? Definitionally, it refers to someone who pretends to be a Republican but who in reality does not support core Republican values. So, in order to use that term correctly, we would need to know what the core values of the Republican Party are in Brown County. And yet, Paul, you failed in your letter to directly explain what the core values of the Republican party are in Brown County. However, your letter does offer some clues about what you appear to believe are the core values of Brown County Republicans.

First, you seem to believe that the primary core value of Brown County Republicans is unrestrained commercialization of the county. I am just an ordinary Brown County Republican voter, but that is not what I support. I do, however, support reasonable commercialization of the county as opposed to unrestrained commercialization. And your letter completely mischaracterizes this issue. Nobody (including Tim Clark) wants to shut down tourism in the county – that's absurd. Tourism is an important part of our county that we all ap-

preciate. But let's also be honest. The vast majority of residents in Brown County do not have financial interests that are tied to Brown County tourism. I don't mean this in any negative way at all, but the number of people in Brown County who are economically impacted by tourism is a minority, not the majority. When it comes to governance in Brown County, we need to take into consideration the interests of all Brown County residents.

You also seem to believe that Brown County should be run by the few for the benefit of the few. I don't agree with you about this either, and the Lincoln Day Dinner controversy is emblematic of this problem in Brown County. You expressly state in your letter that you approve of Mark Bowman's exclusion of Tim Clark from that event ("Personally, I'm glad he didn't attend."). But what I want is open, honest and responsible governance in Brown County. Above all, that is the seminal issue of Tim Clark's campaign. He simply wants to open up Brown County governance and get more input from the public on matters that affect all of us. That is most certainly not what Mark Bowman was doing when he excluded a Republican candidate (Tim Clark) who is the preferred candidate of a majority of the Republicans in the county.

And your support of Mark Bowman as Chairman of the Republican Party in Brown County is the height of duplicity. You accuse myself and Tim of being RINOs (which is not true), but it's already been established that Mark actually does satisfy the definition of a RINO according to the Indiana GOP rules. ([Rich Stanley, BC Democrat, 9/17/2024](#)). If your concern was really about RINOs, you would be attacking Mark Bowman, not Tim Clark and myself.

Now, let's talk about special interests, and I have to point out that you, Paul, are the epitome of a special interest. You pushed through the off-road vehicle ordinance that permits almost unrestricted use of off-road vehicles on Brown County roads, even though the number of Brown County residents who will actually benefit from this is exceedingly few. And you did it in such a rushed manner that the opposition had little chance to offer any input. ([Rich Stanley, BC Democrat, 7/30/2024](#)). Special interests are fundamentally undemocratic because they seek to benefit a minority while burdening the majority. I am fundamentally against this type of special interest governance, but you seem to think special interest governance is a core value of Brown County Republicans.

In your letter, you also argue that Tim Clark only won the primary against Jerry Pitman because of a smear campaign. But, your hypocrisy is shocking! First, no one intends any ill will towards Jerry, but he knows himself why he lost and it had nothing to do with a smear campaign. He lost of his own accord. And second, Republicans in Brown County want a change in the way our county is governed and that is why the majority of Republicans voted for Tim Clark over Jerry Pitman. The real smear campaign has been against Tim Clark. I have heard far too many smears against him, and every one of them is either so vague as to lack any real meaning or are outright lies and distortions. I say this to everyone. If there are county issues that you are concerned about, go talk to Tim. He does not play favorites and will talk to anyone who has good faith concerns.

Paul, you also criticize me in your letter in one way that I actually agree with. You say, "I haven't seen [Rich] at any Republican events, county meetings or town halls." Generally speaking, that's somewhat true. I am coming to realize that it is a problem when very few people show up to county events like this. But, on the other hand, that is one of the key reasons why I am supporting Tim Clark. Even though this is Tim Clark's first campaign and he has never held elected office, he has been attending every single one of these events for years. Tim Clark is very levelheaded, and I am so thankful to him for spending the amount of time that he does on county governance. Admittedly, having someone like Tim Clark in office allows someone like me to

be a bit lazier than I should be.

I am not alone in believing that Brown County needs a change in our governance. Perhaps we should start by defining what the core values of Brown County Republicans actually are. The undersigned are in agreement that the following should be considered to be core values of the Republican Party in Brown County. Tim Clark represents these core values, and therefore Paul, you are wrong to call Tim Clark a RINO.

1. We are against special interests.
2. We are for open, honest and responsible governance.
3. We are for common decency, including for those we disagree with.
4. We are for fiscal responsibility.
5. We are for maintaining the unique character of Brown County, which includes nature, solitude and tourism.
6. We are for reasonable commercial development.

Rich Stanley, Clara Stanley, Greg DeLong, Dara DeLong, Vivian Wolf, Michael Painter, Charles F. Shaw, Jeanne Shaw, Jacob Adams, Amie Yoder, Charlene Marsh, Ben Phillips, Mercy Phillips, Daniel C. Huston, Holly H. Huston, Willow Snider, Ron Lawson, Jeff Marshall, Joy Martin.

Afterword. I would like to briefly explain why I did not publish this letter in the Brown County Democrat. When I submitted the letter to the **Editor of the Brown County Democrat, Dave Stafford** objected to including signatories and also to the length of the letter.

In response, I requested that the Brown County Democrat publish an alternate letter that I provided which was only a paragraph long and simply stated that I had drafted a response to Paul Hazelwood and that it would be published at independentvotersofbrowncountyin.com.

The Editor also refused to publish my alternative letter. My view is that the Brown County Democrat is seeking to minimize political debate in its newspaper, and that is yet another thing that I fundamentally disagree with. We need more public debate in Brown County, not less.

Tim Clark has inspired a movement that we desperately need in this county. In order to effectuate those changes, we need to keep up the charge against those entrenched forces who would stifle this movement.

Brown County Democrat – Policy on Letters and Guest Opinions. **The new editor of the Democrat** has reduced the length of articles that have been allowed previously. Clarification on the current policy on the length of letters was published in the October 22, 2024 edition of the paper. **Dave Stafford: We're setting some standard rules for letters**

Exhibit 4

**INDIANA GOP
NINTH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE**

Tim Clark, Brown County)	
Commissioner Elect, District 3)	Amanda Lowery, District 9 Chair
Complainant,)	
)	
vs.)	
)	
Mark Bowman, Brown County Precinct)	
Committeeman, Hamblen 2 and)	
Chair of the Brown County)	
Republican Party,)	
Respondent.)	
)	

WITNESS STATEMENT OF TIM CLARK

I, Tim Clark, testify to the following, based upon my personal knowledge:

1. I am a resident of Brown County and have been attending nearly every county Commissioner meeting for the last seven years as an observer. Because of various decisions that have been made by the Commissioners over that time, I decided to run for the position of Brown County Commissioner, District 3 in the 2024 primary against the incumbent Jerry Pittman. I won my primary race against Mr. Pittman, and I also won the general election race against the Democratic candidate, Justin Schwenk, and against an Independent candidate, Greg Taggart, that also ran against me.

2. I believe Mark Bowman, who was and still is the Chair of the Brown County Republican Party, violated Rule 1-25 in numerous ways by opposing my campaign for Brown County Commissioner. I do not fault Mr. Bowman for some of his actions during the 2024 primary race, since I understand that the local Republican Party is allowed to select preferred candidates during the primary. However, I believe that

some of his actions even during the 2024 primary race were questionable and could constitute violations of Rule 1-25. For example, right from the beginning, Mr. Bowman opposed my candidacy in any possible way that he could conceive of. On February 14, 2024, Mr. Bowman filed a challenge to my candidacy with the local Election Board. (Exhibit 7). The premise of his challenge to my candidacy was essentially that I was not a Republican in Good-Standing. (Exhibit 7 “Independent. Not affiliated w/the Republican Party”). Cindy Wolpert represented Mr. Bowman in his challenge to my candidacy. This challenge was unanimously rejected by the local Election Board, but Mr. Bowman should have never filed his challenge. Specifically, Mr. Bowman had access to my prior voting records, and thus, he knew prior to filing the challenge that it was completely baseless. The only logical reason Mr. Bowman filed his challenge against my campaign was because he intended to use it as a PR stunt to try to damage my campaign since he already knew that his challenge had no chance of success with the Election Board.

3. Throughout my campaign, including the entire primary race and the general election race, Mr. Bowman never once provided any support whatsoever to my campaign. I never received any financial support at all from the Brown County Republican Party during either the primary or the general election. I also was offered absolutely no other support from Mr. Bowman or the Brown County Republican Party during the primary and general election even though such support was offered to other Republican candidates. In other words, Mr. Bowman did everything he could to stifle and isolate my campaign in an effort to defeat me in both the primary against Mr. Pittman and more importantly during the general election against Mr. Taggart and Mr.

Schwenk. Although I ultimately won the primary and the general election, I accomplished this by my own campaign efforts without any support from Mr. Bowman or the Brown County Republican Party and despite the open and active support that Mr. Bowman provided to Mr. Taggart against me in the general election. Separate and apart from Mr. Bowman's support of Mr. Taggart in the general election, I believe that Mr. Bowman violated the basic tenet of Rule 1-25 which requires Republicans in Good-Standing to "support[] Republican nominees" since Mr. Bowman failed to offer even the barest amount of support to my campaign at a time when he was most certainly in a position to do so as the Chair of the Brown County Republican Party.

4. Later in June of 2024 during the general election campaign, I rented a campaign booth at the Brown County Fair. The Brown County Republican Party also had a booth at the fair. The day before the fair officially opened I went to the fairgrounds to set up my campaign booth. While I was there, I noticed Mr. Bowman at the Republican Party booth. Since it was clear from the beginning that Mr. Bowman opposed my candidacy, my direct interactions with Mr. Bowman had been limited. But, since I saw Mr. Bowman there, I thought it was worth approaching him to test the waters to see if there was any chance of building a bridge between us. So, I walked over to Mr. Bowman and asked him if he would put up one of my campaign signs in the Republican Party booth. His response was "Absolutely not." I did not pursue the matter with him any further and simply walked away. A picture of the Republican Party booth at the 2024 Brown County Fair is reproduced in Exhibit 8. As shown, there were many campaign signs posted at the booth, but there was no sign promoting my campaign because Mr. Bowman would not allow it.

5. Still later in August of 2024, again during the general election campaign, the Brown County Republican Party was selling tickets to the annual Lincoln Day Dinner. This event draws in many local Republicans and is a good opportunity to get to know active Republicans in the county. I naturally believed that this would be a good opportunity to get to know local Republicans who could help support my campaign and/or vote for me in the general election. So, I mailed a check for a full table to the Brown County Republican Party on August 5, which was about a month before the RSVP deadline of September 2. Shortly thereafter, I sent an email to Robyn Bowman, Mr. Bowman's wife, requesting a table reservation and providing her with my guest list which included Charlie Shaw. I never received a response to my email, and my check, which I had sent certified, was later returned to me.

6. During one of the county meetings, I happened to notice Ms. Bowman there, and I had not yet received confirmation of my Lincoln Day Dinner reservation. So, I walked up to her to ask her about the status of my reservation. Although she saw me approaching her, she turned away from me and walked towards the opposite side of the room. When I reached her, I asked about my Lincoln Day Dinner reservation. Her response was, "I'm not acknowledging you. You are not allowed to attend the dinner. You're not a Republican." I left it at that, and did not press the matter with her further.

7. Shortly, thereafter, Charles Shaw offered to reserve a table in his name and allow me to attend the Lincoln Day Dinner as his guest. However, the Brown County Republican Party also refused to allow Mr. Shaw to purchase tickets to the Lincoln Day Dinner. It is obvious to me that the reason that Mr. Shaw was unable to buy tickets to the Lincoln Day Dinner was because I had listed his name on my guest

list which I had emailed to Ms. Bowman earlier. Because the Brown County Republican Party refused to allow either me or Mr. Shaw to purchase tickets to the event, neither of us ended up attending the event. But, what is even more insulting is that I learned after the Lincoln Day Dinner that Mr. Taggart had been allowed to attend the event and was there in attendance. Thus, not only was I unfairly excluded from an important political event in the county, but my opponent (who was running as an Independent, not as a Republican) was actually allowed to attend the event instead of me. This is a clear violation of Rule 1-25.

I have read the above Witness Statement and verify that all statements herein are factually accurate.

Dated: December 16, 2024

By: 

Tim Clark
676 Town Hill Rd. E.
Nashville, IN 47448
317-674-5931

Exhibit 5

**INDIANA GOP
NINTH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE**

Tim Clark, Brown County)	
Commissioner Elect, District 3)	Amanda Lowery, District 9 Chair
Complainant,)	
)	
vs.)	
)	
Mark Bowman, Brown County Precinct)	
Committeeman, Hamblen 2 and)	
Chair of the Brown County)	
Republican Party,)	
Respondent.)	
)	

WITNESS STATEMENT OF BEN PHILLIPS

I, Ben Phillips, testify to the following, based upon my personal knowledge:

1. I was a Precinct Committeeman in Brown County for many years. I still live in Brown County, but I decided to give up my Precinct Committeeman position earlier this year and did not run for Precinct Committeeman in the May 2024 primary.

2. Mark Bowman has been adamantly against Tim Clark’s campaign for county Commissioner from the very beginning of Mr. Clark’s campaign. One example of Mr. Bowman’s resistance to Mr. Clark that I experienced occurred prior to the May 2024 primary. At that time, I was still a Precinct Committeeman and I was attending one of the regularly scheduled meetings of the Brown County Republican Party. The particular meeting that I am referring to was on February 22, 2024. At the meeting, Pearletta Banks was in attendance to talk about a meet and greet for political candidates that the Brown County Republican Women’s Club was planning.

3. Because I knew at the time that Mr. Bowman was against Mr. Clark's campaign, I asked during the meeting whether Mr. Clark would be allowed to attend the meet and greet that the Brown County Republican Women's Club was planning. In response, Mr. Bowman emphatically said that "no" Mr. Clark was not allowed to attend the meet and greet. I then redirected my question to Ms. Banks since she was the primary organizer of the event, and she responded that Mr. Clark would be allowed to attend the event. Mr. Bowman appeared to be unhappy with Ms. Banks' response, so I responded back to Mr. Bowman by asking him what he was going to do about it. I continued my query to Mr. Bowman by asking him if he was going to call the police and have us arrested. That ended the conversation, and Mr. Clark was ultimately allowed to attend that event.

4. I believe this particular situation involving the Brown County Republican Women's Club meet and greet event may constitute a violation of Rule 1-25. That is, on the one hand, this occurred prior to the 2024 primary, and it is my understanding that the Brown County Republican Party and its officials are allowed to select preferable Republican candidates over other Republican candidates in the primary. And yet, on the other hand, Mr. Bowman was demanding that we treat Mr. Clark differently from other Republican candidates, specifically by excluding him from a Republican campaign event. I believe that Mr. Bowman's attempt to exclude Mr. Clark from this event could be considered to be a violation of the first prong of Rule 1-25 which requires Republicans in Good-Standing to be a "Republican who supports Republican nominees". By singling out Mr. Clark from other Republican candidates and trying to

exclude him from an official Republican event, I believe that Mr. Bowman violated Rule 1-25 even though this occurred prior to the Republican primary.

5. Another highly problematic choice the Brown County Republican Party made occurred during and immediately after the Brown County Fair in late June 2024. Apparently, Mr. Bowman and his loyalists thought it would be a good idea to use the fair as an opportunity to boost Mr. Taggart's Independent campaign against Mr. Clark. So, they took pictures of various prominent Brown County Republicans at the fair wearing Mr. Taggart's campaign T-shirts. Each of these individuals (Cindy Wolpert (Exhibit 9), Glenda Stogsdill (Exhibit 10), and Tina Higgins (Exhibit 11)) are well-known in Brown County and each of them were previously a Brown County Republican Party official and/or a Republican elected official. One of the photos was taken directly in front of the Brown County Republican Party's fundraiser booth. (Exhibit 9). And, another of the photos was taken directly in front of the Brown County Republican Women's Club booth. (Exhibit 10). The Brown County Republican Party then chose to post these photos on the official Brown County Republican Party Facebook page. Clearly, responsibility for this falls on Mr. Bowman since he was and remains the Chair of the Brown County Republican Party and could have prevented the posting of such pictures if he had any inclination whatsoever to follow the strictures of Rule 1-25.

6. Ms. Wolpert was the subject of another violation of Rule 1-25 sometime later after the Brown County Fair concluded. At the time of the Brown County Fair, Ms. Wolpert was no longer a Precinct Committeeman of the Brown County Republican Party since she had lost her race for that position to Charles Shaw in the 2024 primary. Thus, at the time that the above photo was taken of Ms. Wolpert wearing Mr. Taggart's

campaign T-shirt, she was not a Republican Party official, and thus, in her personal capacity she was entitled to wear Mr. Taggart's campaign T-shirt if she so chose to. (Exhibit 9). But, what it does mean is that, by posing for a photo in front of the Brown County Republican Party fundraiser booth wearing Mr. Taggart's campaign T-shirt, Ms. Wolpert established herself as not being a Republican in Good-Standing.

7. Subsequent to Ms. Wolpert having her picture taken wearing Mr. Taggart's campaign T-shirt and the Brown County Republican Party posting this picture on their Facebook page, Mr. Bowman decided to appoint Ms. Wolpert to be a Precinct Committeeman for an opening that had occurred due to a resignation. I consider this to be a clear violation of Rule 1-25 because Mr. Bowman certainly knew, or at least should have known, that Ms. Wolpert was not a Republican in Good-Standing because she was a supporter of Mr. Taggart against Mr. Clark. In fact, as noted the Brown County Republican Party had posted this photo of Ms. Wolpert wearing Mr. Taggart's campaign T-shirt on its own Facebook page, so Mr. Bowman certainly knew that Ms. Wolpert was a supporter of Mr. Taggart (which, of course, Mr. Bowman was too). Because Ms. Wolpert was not a Republican in Good-Standing as demonstrated by her open and active support of Mr. Taggart, Mr. Bowman violated the Republican rules by appointing Ms. Wolpert to be a Precinct Committeeman because only Republicans in Good-Standing are permitted to hold official positions within the Republican Party.

8. Another indication of Mr. Bowman's support for Mr. Taggart's Independent campaign against Mr. Clark occurred shortly before election day in November of 2024. During early voting, I frequently stood at the Brown County early voting site with Mr. Clark to support his campaign. Mr. Clark and I were commonly situated on the south

side of the parking lot entrance to the early voting site. On the north side of the parking lot entrance, there were two campaign tents situated side-by-side. One of the tents was Mr. Taggart's tent and the other tent was either the Republican Party tent or Kevin Patrick's tent (Mr. Patrick is another Republican). I believe the arrangement of the tents for the Republican Party (or Mr. Patrick) and Mr. Taggart being side-by-side was more a result of the space available than anything else.

9. While I was campaigning with Mr. Clark at the early voting site, I did witness one unusual incident that I am confident was directly tied to Mr. Bowman's support of Mr. Taggart's Independent campaign against Mr. Clark. On the particular day of this incident, Mr. Patrick was present at the early voting site campaigning in support of his own campaign. Mr. Patrick is a Republican who was running for another county Commissioner seat and was known to be a loyalist of Mr. Bowman. On most days, including the day in question, Mr. Patrick was situated in front of the Republican Party tent (or possibly it was his own tent). At some point, Robyn Bowman and Tanner Bowman also showed up at the early voting site. Ms. Bowman is Mr. Bowman's wife and Tanner Bowman is Mr. Bowman's son. Ms. Bowman and Tanner Bowman are both Vice Precinct Committeemen who were appointed to their positions by Mr. Bowman.

10. I then noticed Ms. Bowman lead Mr. Patrick over to Mr. Taggart's tent, and Mr. Patrick sat down in a chair under Mr. Taggart's tent which was surrounded by Mr. Taggart's campaign signs. Ms. Bowman also took one of Mr. Patrick's campaign signs and put it in the ground under Mr. Taggart's tent next to Mr. Patrick. Ms. Bowman then stepped back and used her phone to take a picture of Mr. Patrick sitting in Mr. Taggart's tent. (Exhibit 12). Tanner Bowman was standing nearby watching Ms. Bowman's photo

shoot of Mr. Patrick under Mr. Taggart's tent. (Exhibit 12). I did not speak to Ms. Bowman, Mr. Patrick or Tanner Bowman about the photo shoot, but it was obvious to me that Ms. Bowman was intentionally taking a photo of Mr. Patrick sitting under Mr. Taggart's tent. It is fairly apparent to me that Ms. Bowman planned to use this photo in some campaign manner to link Mr. Patrick and Mr. Taggart together as their preferred candidates for the two county Commissioner positions that were up for election at the time. I also cannot imagine that Mr. Bowman did not know that his wife and his son were attempting to boost Mr. Taggart's campaign in this way by trying to link Mr. Patrick and Mr. Taggart together. From my perspective, it is clear that Mr. Bowman and his family were using this photo shoot to support Mr. Taggart's Independent campaign against Mr. Clark. Therefore, I consider this to be another instance of Mr. Bowman violating Rule 1-25.

I have read the above Witness Statement and verify that all statements herein are factually accurate.

Dated: December 16, 2024

By: Ben Phillips
Ben Phillips
1147 Elkinsville Rd.
Nashville, IN 47448
812-343-9930

Exhibit 6

3. The first time I attended a Brown County Republican Party meeting was June 27, 2024. This was a little over a month after my election as Precinct Committeeman for the Hamblen 1 Precinct. Shortly after the meeting began, Mark Bowman, who was and is the Chair of the Brown County Republican Party, announced that “I have the power to shut down his campaign.” It was clear from the beginning and confirmed by the ensuing conversation that Mr. Bowman was referring to Tim Clark’s general election campaign for Brown County Commissioner, District 3. Mr. Bowman continued his announcement by stating that “I have the data that proves he is not a good Republican.” However, Mr. Bowman never explained in the meeting what data he had or why it proved that Mr. Clark was not a “good Republican”.

4. In response to this announcement, I spoke up and reminded Mr. Bowman that the election board had already vetted Mr. Clark and approved him as a legitimate Republican candidate. Mr. Bowman then responded to my comment by stating that “I don’t have to follow the election board decisions.” It seemed that my comment offended Mr. Bowman because he then personally attacked me by saying, “You spent all the shitting time at the fair talking with him.” What Mr. Bowman was referring to was the Brown County Fair that had occurred a couple of weeks before this meeting. At the fair, I did spend time talking to Mr. Clark, which Mr. Bowman had apparently taken notice of. And now at the June 27 Republican Party meeting, Mr. Bowman was ostensibly warning me that he thought it was inappropriate for me to talk to Mr. Clark. It was obvious to me that Mr. Bowman was treating Mr. Clark as some type of enemy, although Mr. Bowman never explained why I should be treating Mr. Clark as an enemy too.

5. I prefer conversations to be polite and professional, and I was put off by the language Mr. Bowman used to describe me talking to Mr. Clark at the fair, so I responded by telling Mr. Bowman that he didn't need to be cussing. Mr. Bowman then retorted that "I am a grown man and I can cuss anytime I want."

6. Later, in the same June 27, 2024 meeting, I pushed several times for Mr. Bowman to show the meeting participants the data that Mr. Bowman said he had proving that Mr. Clark was not a good Republican. He did clearly say that "I have the data" but he never produced any data in the meeting, and instead, he attempted to end my line of questioning by simply stating that I should go "online" to find it.

7. Mr. Bowman then challenged me directly by asking me, "Charlie, what is your agenda?" I responded by asking whether we (i.e., the Brown County Republican Party) follow the state Republican rule book. He responded affirmatively by saying "yes". I then pointed out the existence of Rule 1-25 in the Indiana Republican rules, which caused someone to ask what that rule is. In response, I paraphrased Rule 1-25 by explaining that the rule states that anyone who openly supports a candidate that is not a Republican candidate is not a Republican in Good-Standing. This caused a noticeable amount of murmuring in the room, and I could clearly sense that most of the room was turning against me. I also heard a number of people mentioning Greg Taggart, who is the Independent candidate who was running against Mr. Clark. Presumably, people were mentioning Mr. Taggart at that point in the conversation because they recognized that this entire conversation was related to Mr. Taggart's campaign against Mr. Clark.

8. There was some additional discussion between myself and others participating in the meeting, but I eventually summed up my position by telling everyone that supporting an Independent candidate against Mr. Clark was wrong and it should stop. I also pointed out that I had not attacked anyone at the meeting, and yet, almost all of them were attacking me. Unfortunately, my first Brown County Republican Party meeting on June 27, 2024 was very disturbing and upsetting to me. I felt at the time and still feel that I was trying to stand up for what is right, and yet, I had almost no support at the meeting from Mr. Bowman or anyone else at the meeting.

9. With regard to the Lincoln Day Dinner controversy, Mr. Clark invited me to sit at a table with him at the event which he planned to reserve for himself and others. Mr. Clark followed up by mailing a check to the Brown County Republican Party in order to reserve a table at the event, and Mr. Clark listed my name on his guest list, which he also provided to the Brown County Republican Party. Later, Mr. Clark reported to me that Robyn Bowman, the wife of Mr. Bowman, had told him that he would not be permitted to attend the Lincoln Day Dinner.

10. I then offered to reserve a table at the Lincoln Day Dinner under my name, and when I mailed my check to the Brown County Republican Party, I did not include Mr. Clark's name, but instead, listed several "to be determined" slots on my guest list. This occurred on August 20 (when I emailed my reservation request) and the next day (when I mailed a check for the reservation), which was well before the September 2 RSVP deadline for the event. Since I had not received any response to my reservation request, I called Ms. Bowman on August 30 to inquire about the status of my reservation. She responded that she had not received my check and that there were no

open tables available anyway. I then asked her if there were any individual seats left, but she would not give me an answer.

11. As a result, neither I nor Mr. Clark attended the Lincoln Day Dinner. However, I was informed after the event by at least one person who did attend the Lincoln Day Dinner that there were individual seats still open at the Lincoln Day Dinner. When these events occurred, I was a Republican official myself (an elected Precinct Committeeman) and Mr. Clark was the Republican candidate for county Commissioner. I consider it to be completely inexcusable that the Brown County Republican Party excluded two active Republicans from the event when we tried to obtain tickets to the event well in advance of any reservation deadline. And, I consider Mr. Bowman to be responsible for this exclusion since he holds the Chair of the Brown County Republican Party.

12. What is not entirely clear to me is whether the Brown County Republican Party would have excluded me from the Lincoln Day Dinner if I had tried to obtain a single seat for myself alone to the event. I personally believe that the exclusion of myself and Mr. Clark was more directed to Mr. Clark himself, since our exclusion originated with Mr. Clark's attempt to obtain seats himself at the event. And, since my name was included on Mr. Clark's earlier guest list, it is logical for me to assume that when I later made my own reservation request that it was understood by the organizers that Mr. Clark would be attending with me. Thus, it is my belief that the exclusion was principally directed against Mr. Clark and less so with me.

13. I also learned after the event, again from at least one person who attended the event, that Mr. Taggart was in attendance at the Lincoln Day Dinner. I

consider this to be very insulting and inappropriate because Mr. Taggart was campaigning at that time as an Independent candidate against Mr. Clark. In other words, the Brown County Republican Party allowed a non-Republican (Mr. Taggart) to attend the Lincoln Day Dinner, at the same time that the Brown County Republican Party was excluding a Republican official (myself) who is actually a member of the Brown County Republican Party itself and also the Republican candidate (Mr. Clark) who was in an election race against the non-Republican (Mr. Taggart) who was allowed to attend the event.

I have read the above Witness Statement and verify that all statements herein are factually accurate.

Dated: December 12, 2024

By: 
Charles Shaw
3345 Hoover Rd.
Nashville, IN 47448
812-988-4784

Exhibit 7



CANDIDATE FILING CHALLENGE
State Form 46437 (R13 / 8-19)
Indiana Election Division (IC 3-8-1-2; IC 3-8-8)

FILED

FEB 14 2024

(CAN-1)

INSTRUCTIONS: This form is used by an individual seeking to challenge the following: the denial of a candidate, the declaration of candidacy, the declaration of intent to be a write-in candidate, a request for ballot placement, a petition for recall or contest nomination, a certificate of candidate selection, or by a candidate seeking to contest the denial of certification due to insufficient signatures by filing this form under IC 3-8-1-2 or IC 3-8-8 to request a hearing before the Indiana Election Commission, the county election board or the Lake, Porter, or Tippecanoe County boards of elections and registration, or a town election board.

STATE OF INDIANA
COUNTY OF Brown

GENERAL INFORMATION

I, Mark Bowman, the undersigned, certify the following:

I am (check one box):

a registered voter of Precinct _____ of the Township of _____

(or of Ward, if applicable _____ of the City or Town of _____), County of _____, State of Indiana;

A county chairman of a major political party in which any part of the election district of the office subject to this challenge is located, OR

A candidate who submitted a petition of nomination under IC 3-8-8.

(2) My residence address is:

4146 Webber Hill Rd Trafalgar Indiana 46181
Complete residence address must be inserted City ZIP Code

(3) My mailing address is (if different from residence address):

SAME _____ Indiana _____
Mailing address (Write "SAME" if both addresses are identical) City ZIP Code

(4) If I am filing this challenge as a registered voter, my voter registration address is located within the election district of the office listed below.

(5) If I am filing this challenge as a registered voter or a county political party chairman, I question the eligibility of the following individual, who is a candidate for the office:

Timothy J Clark Brown County Commissioner District 3
Name of Candidate Office sought (include District, if applicable)

(6) The following facts are known to me and lead me to believe that the individual listed above is ineligible to be a candidate for this office (attach additional sheets if necessary):

Incomplete & untrue candidate forms submitted. Independent. Not affiliated w/the Republican Party.

(7) If I am filing this challenge as a candidate, the following facts are known to me and lead me to believe that the denial of certification of my petition of nomination due to insufficient signatures or the county voter registration office's failure to certify qualified petitioners is not in accordance with law, and I therefore request a hearing on this matter before the appropriate election authority under IC 3-8-1-2 or IC 3-8-8. (attach additional sheets if necessary):

CHALLENGER OR CANDIDATE CERTIFICATION

I swear or affirm under the penalties for perjury that the foregoing statements are true, to the best of my knowledge and belief.

Mark Bowman 02/14/2024 (317) 691-7394
Signature Date signed (MM/DD/YY) Telephone (Day) Telephone (Evening)

COUNTY OF BROWN STATE OF INDIANA

Subscribed and sworn to before me this 14th day of FEBRUARY, 2024

Theresa Ann Cobi
Notary Public or Other Official Administering Oath according to IC 33-42-9



My Commission expires (applies only to Notary Public): 7-5-2029 County of Residence: BROWN

Exhibit 8



Exhibit 9



Exhibit 10



Exhibit 11



Exhibit 12

