

Plaintiffs' Exhibit 10

July 2, 2025

From: Richard Stanley, Jr.
4356 Lanam Ridge Rd.
Nashville, IN 47448
stanleyiplaw@yahoo.com
312-310-4279

To: Brown County Election Board
Attn: Mark Williams – Board President
20 E. Main Street
Nashville, IN 47448
elections@browncounty-in.gov

Subject: Potential Lawsuit Against the Brown County Election Board

Dear Mark:

Attached hereto for your review is a draft Complaint against the Brown County Election Board. I am also forwarding to you Plaintiffs' Exhibits 1-9 to be filed with the Complaint.

I intend to file this Complaint on behalf of myself and Tim Clark in the Southern District of Indiana if the Election Board does not issue a written statement by July 24, 2025 clearly stating that the Election Board will not enforce the decision of the Indiana Republican Party against myself and Mr. Clark by preventing myself and Mr. Clark from running for elected office as Republicans.

Please feel free to contact me if you have any questions or comments.

Sincerely,

A handwritten signature in blue ink that reads "Rich Stanley". The signature is written in a cursive, slightly slanted style.

Richard Stanley, Jr.

1/4 Notice of Possible Lawsuit

From: Richard Stanley Jr (stanleyiplaw@yahoo.com)

To: elections@browncounty-in.gov

Cc: miw.williamslaw@gmail.com; rkelley434927@aol.com; banksp@browncounty-in.us; tjclark2036@gmail.com

Date: Wednesday, July 2, 2025 at 10:45 AM EDT

Mark,

Please see the attached with regard to a possible lawsuit against the Brown County Election Board.

Rich Stanley



2025 07 02 Rich Stanley Election Board Letter.pdf

113.9 kB



Draft Complaint - Stanley et al v. Election Board.pdf

117.4 kB

2/4 Notice of Possible Lawsuit

From: Richard Stanley Jr (stanleyiplaw@yahoo.com)

To: elections@browncounty-in.gov

Cc: miw.williamslaw@gmail.com; rkelley434927@aol.com; banksp@browncounty-in.us; tjclark2036@gmail.com

Date: Wednesday, July 2, 2025 at 10:46 AM EDT

On Wednesday, July 2, 2025 at 10:45:21 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

Mark,

Please see the attached with regard to a possible lawsuit against the Brown County Election Board.

Rich Stanley



Plaintiffs' Exhibit 1.pdf
5.5 MB



Plaintiffs' Exhibit 2.pdf
4.5 MB

3/4 Notice of Possible Lawsuit

From: Richard Stanley Jr (stanleyiplaw@yahoo.com)

To: elections@browncounty-in.gov

Cc: miw.williamslaw@gmail.com; rkelley434927@aol.com; banksp@browncounty-in.us; tjclark2036@gmail.com

Date: Wednesday, July 2, 2025 at 10:46 AM EDT

On Wednesday, July 2, 2025 at 10:46:11 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

On Wednesday, July 2, 2025 at 10:45:21 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

Mark,

Please see the attached with regard to a possible lawsuit against the Brown County Election Board.

Rich Stanley



Plaintiffs' Exhibit 3.pdf
13.7 MB

4/4 Notice of Possible Lawsuit

From: Richard Stanley Jr (stanleyiplaw@yahoo.com)

To: elections@browncounty-in.gov

Cc: miw.williamslaw@gmail.com; rkelley434927@aol.com; banksp@browncounty-in.us; tjclark2036@gmail.com

Date: Wednesday, July 2, 2025 at 10:47 AM EDT

On Wednesday, July 2, 2025 at 10:46:53 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

On Wednesday, July 2, 2025 at 10:46:11 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

On Wednesday, July 2, 2025 at 10:45:21 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

Mark,

Please see the attached with regard to a possible lawsuit against the Brown County Election Board.

Rich Stanley



Plaintiffs' Exhibit 4.pdf
263.6 kB



Plaintiffs' Exhibit 5.pdf
182.1 kB



Plaintiffs' Exhibit 6.pdf
720.7 kB



Plaintiffs' Exhibit 7.pdf
155 kB



Plaintiffs' Exhibit 8.pdf
123.2 kB



Plaintiffs' Exhibit 9.pdf
965.5 kB

Re: 1/4 Notice of Possible Lawsuit

From: Richard Stanley Jr (stanleyiplaw@yahoo.com)

To: miw.williamslaw@gmail.com

Cc: elections@browncounty-in.gov; rkelley434927@aol.com; banksp@browncounty-in.us; tjclark2036@gmail.com

Date: Wednesday, July 16, 2025 at 11:19 AM EDT

Dear Mark,

I am following up on my previous correspondence regarding the possible lawsuit I notified you of.

As I indicated below, it would be helpful if you would provide some clarity on how the Election Board intends to treat the decision of the Indiana Republican Party against myself and Tim Clark. You should understand that a refusal by you to provide any clarity whatsoever on this matter should be reasonably interpreted by myself, Tim and the court to reflect an intention by the Election Board to enforce the Indiana Republican Party's decision against myself and Tim.

I am confident that the court will agree with me that the unwillingness of the Election Board to clearly state that it will not enforce the Indiana Republican Party's decision against myself and Tim creates a justiciable controversy that can be remedied by the court. Therefore, unless the Election Board issues a written statement by July 24, 2025 clearly stating that the Indiana Republican Party's decision will not be enforced against myself and Tim, I will proceed to file a lawsuit against the Brown County Election Board in the District Court for the Southern District of Indiana.

Rich

On Wednesday, July 2, 2025 at 11:57:00 AM EDT, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

Dear Mark,

I take your response to be evasive, and I believe the court will see it that way as well.

I have no doubt that the Election Board has the ability to meet in an executive session at any time it wishes to evaluate the merits of this possible lawsuit, and you have not denied that.

I would prefer to have a clear answer from the Election Board as to how they intend to respond to this matter, but if you refuse to provide any clarity on this matter, it will be fair for myself and the court to interpret your refusal as an intention to enforce the Indiana Republican Party's decision against us.

As to your point that we are requesting an improper advisory opinion and should wait until candidate objections can be made after we officially begin our candidacies, you are legally wrong on that point. This is a justiciable controversy at this point in time, and I am confident

that the court will entertain our lawsuit despite your specious argument.

It seems that you have made a decision on behalf of the Election Board to fight this matter. Does that then mean that the Election Board is refusing to issue the written statement that I requested so that I can go ahead and file the lawsuit immediately without waiting until July 24?

Any additional evasiveness on your part will be brought to the attention of the court.

Rich

On Wednesday, July 2, 2025 at 11:34:21 AM EDT, Mark Williams <miw.williamslaw@gmail.com> wrote:

Dear Mr. Stanley,

Thank you for your courtesy letter notifying the Election Board of your planned lawsuit.

The Election Board has been no party to the matters you cite.

You ask the Board to take action based on a hypothetical situation.

I do not speak for all members of the Election Board, but as Chair, I will not bring your request up in advance of July 24 for the following reasons:

1. The Clerk will not attend the meeting scheduled for July 8 as she will be attending a meeting of County Clerks and Rick Kelley will not attend as he will be out of town. Therefore, the meeting on the 8th will be cancelled.
2. No other Election Board meeting is scheduled before July 24.
3. Regarding primary candidate challenges, the Election Board is in the business of applying the law based, in part, on facts taken from witnesses having then been placed under oath and before the Board in a public meeting.
4. The law will control in any event. The Election Board does not make law: that is the role of the General Assembly and the courts.
5. I see no good reason why the Board should issue an advance advisory opinion. That action would be bad precedent and of dubious value as a matter of law.

Of course, it is for Mr. Clark and you to take whatever action you may deem appropriate given the concerns that you allege. I do not presume to persuade you as to any action (or the timing thereof) you may choose.

Very truly yours,

Mark I. Williams, Chair,
Brown County Election Board

On Jul 2, 2025, at 10:45 AM, Richard Stanley Jr <stanleyiplaw@yahoo.com> wrote:

Mark,

Please see the attached with regard to a possible lawsuit against the Brown County

Election Board.

Rich Stanley

<2025 07 02 Rich Stanley Election Board Letter.pdf><Draft Complaint - Stanley et al v. Election Board.pdf>