

IN THE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

RICHARD STANLEY, JR	)	
and TIM CLARK	)	
	)	Cause No. 25-1482
Plaintiffs,	)	
	)	
vs.	)	
	)	
BROWN COUNTY ELECTION	)	
BOARD	)	
	)	
Defendant.	)	
	)	

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Plaintiffs, Richard Stanley, Jr. and Tim Clark, by counsel, pursuant to Federal Rule of Civil Procedure 56 and Southern District of Indiana Local Rules 7-1 and 56-1, respectfully file their Motion for Summary Judgment. In support of this Motion, Plaintiffs state as follows:

1. The Indiana Republican Party has issued a final, unappealable decision against Mr. Stanley and Mr. Clark which held both of them to be not in good-standing with the Indiana Republican Party for a period of five years.
2. Pursuant to *Hero v. Lake County Election Board*, 42 F.4<sup>th</sup> 768 (2022), Mr. Stanley and Mr. Clark are now subject to being prevented from running for election as Republicans by the Brown County Election Board.
3. Although the present case raises important Constitutional concerns, the Court may rule in favor of Mr. Stanley on the non-Constitutional grounds that the Indiana Republican Party made a factual error in convicting Mr. Stanley.

4. Similarly, the Court may rule in favor of Mr. Clark on the non-Constitutional grounds that the decision of the Indiana Republican Party against Mr. Clark is too vague for judicial review, and therefore, is unenforceable.

5. Notwithstanding the non-Constitutional grounds for ruling in Plaintiffs' favor, the decision of the Indiana Republican Party against Mr. Stanley and Mr. Clark would violate the U.S. Constitution if it is enforced against Mr. Stanley and Mr. Clark by the Brown County Election Board. That is, on the one hand, the Indiana Republican Party is a private organization that is not bound by the U.S. Constitution. However, the Brown County Election Board is a government body that is prohibited from violating the U.S. Constitution. If the Brown County Election Board were allowed to enforce the private action of the Indiana Republican Party against Mr. Stanley and Mr. Clark, the discriminatory private action of the Indiana Republican Party would then become state action that violates the U.S. Constitution.

6. Therefore, Plaintiffs' seek a permanent injunction against the Brown County Election Board to prevent the Brown County Election Board from enforcing the Indiana Republican Party's decision against Mr. Stanley and Mr. Clark.

Dated: August 13, 2025

By: Richard E. Stanley, Jr.  
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**CERTIFICATE OF SERVICE**

I certify that on August 13, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. A copy of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

By: Rich Stanley  
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