

# Plaintiffs' Exhibit 14

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

RICHARD STANLEY, JR	)	
and TIM CLARK	)	
	)	No:
Plaintiffs,	)	
	)	
vs.	)	
	)	
BROWN COUNTY ELECTION	)	
BOARD	)	
	)	
Defendant.	)	
	)	

**SECOND WITNESS STATEMENT OF RICHARD STANLEY, JR.**

I, Richard Stanley, Jr., testify to the following, based upon my personal knowledge:

1. In my previous Witness Statement dated June 30, 2025, it was my position that “[t]he elected office I currently intend to run for is Township Advisory Board Member for Jackson Township in Brown County.” “But, regardless of what elected office I ultimately choose to run for, I am 100% committed to running for an elected office in Brown County.” (Plaintiffs’ Exhibit 8, Doc. # 1-10 at ¶ 4). On August 25, 2025 when Plaintiffs filed their response to Defendant’s Motion to Dismiss, my position at the time was that I was “unwilling to formally announce [my] candidacy for any position as long as the cloud of the Indiana Republican Party’s decision remains over [my] head.” (Plaintiffs’ Response, Doc. # 12 at pg. 6). I also identified practical political considerations for my reticence at the time. (Plaintiffs’ Response, Doc. # 12 at pg. 6).

2. During the almost four months that has passed since I signed my prior witness statement and the almost two months that has passed since I signed Plaintiff's Response to Defendant's Motion to Dismiss, my position has been evolving as to what elected office I plan to run for and when I plan to run for elected office. However, I have now decided to run for the elected office of County Commissioner in Brown County Indiana in the 2026 election cycle. On October 20, 2025, I announced this plan in the public forum of a Brown County Council meeting. (This can be seen on the Brown County Indiana Government Meetings channel on YouTube in the October 20, 2025 Brown County Council Meeting at 2:54:00-2:57:00). My 10/20/2025 announcement speech was as follows:

My name is Rich Stanley, and I intend to run for county commissioner in the next election despite the attempt of the Republican Party and the Brown County Election Board to prevent me from running. I am currently litigating a federal lawsuit against the Brown County Election Board over this illegitimate effort to deprive me of my Constitutional rights. If that lawsuit is resolved in my favor, I will be running for county commissioner in the 2026 election.

Being that I plan to be a commissioner after the next election, I would like you to consider the following with regard to the Brown County Music Center. First of all, I don't agree with Ron Sander's effort to sell the Music Center. I don't begrudge him for exploring that option, but it has been well-demonstrated that that would result in a huge financial loss to the county. Along those lines, it has also been well-demonstrated that the Music Center is not financially viable as a private enterprise.

It should be remembered that the Music Center is not privately owned. Instead, the Music Center is a public asset that only exists due to the taxing authority of the county. My main concern with this matter is that public assets should be managed by elected officials for the benefit of all of the residents of Brown County. Public assets should not be turned over to private business interests in a way that would primarily benefit those business interests over the interests of the public at large.

In my opinion, I believe that the Music Center is currently being managed for the most part in a generally responsible way, and we should keep it that way. However, there are two changes that I believe should be made to how the Music Center is managed. First, the majority of the managing board for the Music Center should be made up of elected

officials. That is, the seven-member board for the Music Center should have four elected officials on the board instead of only two as it now does, so that a majority of the board members would be elected officials. I would personally leave three non-elected members on the board who represent the tourism industry.

Second, 100% of the profit from the Music Center should go back to the county to offset county expenses. Currently, a substantial amount of the Music Center's profit is being diverted to a private entity. I'll say it again, the Music Center is a public asset that is supported by the county's taxing authority. It is not a private enterprise. What that means is that the profit from that public asset belongs to the county, and therefore, the profit should be returned back to the county.

3. At this point in time, we are about three months from the deadline for filing candidacy declarations for the 2026 primary election. One of the Brown County offices that will be coming up for election in 2026 is County Commissioner for District 2. In order to run for that office, the candidate must live in that district, although voting for the office is county wide. I happen to live in District 2, and therefore, I qualify to run for County Commissioner for District 2. The other two County Commissioner offices are unavailable to me because I do not live in those districts, and additionally, those two Commissioner offices are elected in presidential election years (e.g., 2028).

4. It is possible that the 2026 Republican primary election for Brown County Commissioner, District 2 could be very competitive and contentious. Currently, the District 2 Commissioner office is being held by Ron Sanders. Mr. Sanders has not publicly stated whether he intends to run again as an incumbent for the office that he currently holds, but I assume that there is a reasonable likelihood that he will ultimately do so. One month ago on September 20, 2025, the Brown County Republican Party held a "Big Beautiful Bash" at which it was advertised that their preferred "2026 Candidates" would presumably be announced. (Plaintiffs' Exhibit 13, Doc. # 12-1). I have no direct knowledge of who the Brown County Republican Party will be supporting

in the 2026 election for Brown County Commissioner, District 2, but I do know that it won't be me and I am confident that it won't be Mr. Sanders either. I believe however that it is very likely that the Brown County Republican Party did actually announce their preferred 2026 candidate for Brown County Commissioner, District 2 at their September 20, 2025 Big Beautiful Bash. It also seems likely that whoever the Brown County Republican Party is supporting for this position in the 2026 election that that person is probably already preparing for the 2026 campaign.

5. It seems obvious to me that the 2026 campaign for Brown County Commissioner, District 2 has already begun. The deadline for filing candidacy declarations for the 2026 primary election is only about three months away. The Brown County Republican Party has probably already identified and announced their own preferred candidate for this office. And, there is an incumbent (Mr. Sanders) currently holding this office who may also run for Brown County Commissioner, District 2. Thus, it is likely that the 2026 Republican primary election for Brown County Commissioner, District 2 could be a highly competitive three-way race. Because of this, I have concluded that it would be detrimental for me to hold off any longer on announcing my candidacy.

6. Not only have I made a public announcement of my 2026 candidacy for Brown County Commissioner, District 2, but I have also begun actual preparations for my campaign. Without revealing sensitive campaign strategies, I can say that I have designed and ordered sample campaign materials; I have authored substantial promotional materials; and I have begun spreading the news of my candidacy to voters in Brown County through personal contact. Although my candidacy is still ultimately

dependent upon a ruling by the present Court, I have concluded that for political reasons I need to actively begin my campaign now even before obtaining a ruling from the Court, since waiting any longer to begin my campaign could undermine my chances of success.

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

Dated: October 23, 2025

By: Richard Stanley  
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