

Plaintiffs' Exhibit 2



Indiana Republican State Committee
Complaint / Sample Discovery Form
FORM CM-3 (January 2023)

NAME OF COMPLAINANT: Tim Clark

NAME OF RESPONDENT: Mark Bowman

DATE OF COMPLAINT FILING: 12/20/2024

DATE OF HEARING: 1/23/2025

TIME OF HEARING: 6:30 PM

LOCATION OF HEARING: Jackson County Historic Courthouse

The Complainant and Respondent must identify in writing the 1) name 2) address and 3) party positions of the persons to represent them and/or testify on their behalf at least forty-eight (48) hours prior to the start of the hearing.

(1) Tim Clark, 676 Town Hill Rd., Nashville, IN, Witness, Complainant, Brown County Commissioner, registered Republican; (2) Charles Shaw, 3345 Hoover Rd., Nashville, IN, Witness, Brown County Precinct Committeeman, registered Republican; (3) Ben Phillips, 1147 Elkinsville Rd., Nashville, IN, Witness, former Brown County Precinct Committeeman, registered Republican; (4) Richard Stanley, Jr., 4356 Lanam Ridge Rd., Nashville, IN, Representative, registered Republican.

The Complainant and Respondent must identify the documents to be introduced by each party by title of the document and a brief description at least forty-eight (48) hours before the hearing.

Exhibits attached to original complaint including: (1) 9/17/2024 Letter to the Editor; (2) 10/1/2024 Letter to the Editor; (3) 10/11/2024 Letter; (4) Tim Clark Witness Statement; (5) Ben Phillips Witness Statement; (6) Charles Shaw Witness Statement; (7) Election Board Challenge; (8) Photo of Brown County Republican Party County Fair Booth; (9) Photo of Cindy Wolpert; (10) Photo of Glenda Stogsdill; (11) Photo of Tina Higgins; (12) Photo of Kevin Patrick, Robyn Bowman and Tanner Bowman. Additional Exhibits attached hereto including: (13) Kevin Patrick Campaign Finance Report; (14) Tim Clark Campaign Sign; (15) Tim Clark Supplemental Witness Statement; (16) Photo of Blake Wolpert.

EMAIL THIS FORM TO THE DISTRICT CHAIRMAN AT: alowery75@hotmail.com

NOTE: A copy of the lists of persons and documents will be emailed to the Complainant and Respondent at least twenty-four (24) hours prior to the hearing.

COMPLAINANT EMAIL ADDRESS: tjclark2036@gmail.com

RESPONDENTE EMAIL ADDRESS: mebow45@yahoo.com

**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.)	
)	

**SUPPLEMENTAL 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**

As argued on page 10 in section IV.B of Mr. Clark’s original Memorandum, Mr. Bowman failed to offer any support whatsoever for Mr. Clark’s campaign at any time during his campaign. Since Mr. Bowman was the Chair of the Brown County Republican Party at the time, Mr. Bowman could have supported Mr. Clark’s campaign by contributing financial support from the Brown County Republican Party to Mr. Clark’s campaign. However, as detailed in Mr. Clark’s Witness Statement in paragraph 3 thereof, Mr. Clark never received any financial support at all from the Brown County Republican Party.

And yet, we now see in Exhibit 13 that the Brown County Republican Party did choose to provide financial support to Kevin Patrick during the 2024 general election campaign. (Exhibit 13, pg. 3, Schedule A-5). Mr. Patrick is a Republican who was running for a different county Commissioner seat than Mr. Clark, and he ultimately won

his election like Mr. Clark. It is clear from Mr. Patrick's campaign finance report that Mr. Bowman was in fact distributing campaign finance support from the Brown County Republican Party. However, because Mr. Bowman was manipulating the Brown County Republican Party to promote his own preferred candidates, and since Mr. Clark was clearly not Mr. Bowman's preferred candidate, Mr. Bowman chose to contribute Republican Party financial support to Mr. Patrick but not to Mr. Clark.

Turning to pages 12-13 in section IV.D of Mr. Clark's original Memorandum, one of Mr. Clark's campaign signs is shown in Exhibit 14. As previously argued, Mr. Bowman refused to allow Mr. Clark to post his campaign sign at the Brown County Republican Party booth at the Brown County Fair during the general election campaign. A photo of the Brown County Republican Party booth at the Brown County Fair with the various campaign signs posted at the booth was previously provided in Exhibit 8. A comparison of Exhibits 8 and 14 clearly indicates that Mr. Clark's campaign sign was in fact not present at the Brown County Republican Party booth during the Brown County Fair because of Mr. Bowman's refusal to allow Mr. Clark to post his own campaign sign with the rest of the Republican campaign signs at the booth.

Turning to pages 15-17 in section IV.G of Mr. Clark's original Memorandum, Mr. Clark hereby supplements the record with yet another new allegation of Mr. Bowman's violations of Rule 1-25 during the 2024 general election. Exhibit 16 shows a photo of Blake Wolpert wearing one of Mr. Taggart's campaign T-shirts. (Exhibit 15 ¶ 8). As explained in Mr. Clark's original Memorandum, Mr. Taggart was the Independent candidate running against Mr. Clark during the 2024 general election, and as previously explained, Mr. Bowman improperly supported Mr. Taggart against Mr. Clark.

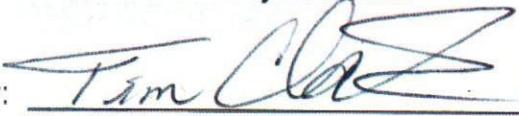
This particular photo of Mr. Wolpert was taken by Mr. Clark himself on June 24 in the Brown County Annex Building during an official government meeting. (Exhibit 15 ¶ 8). Mr. Wolpert is a Republican who was appointed by Mr. Bowman to a vacant County Commissioner seat prior to the 2024 election. Since Mr. Wolpert did not run in the 2024 election for the seat that he held at the time, Mr. Wolpert is no longer a County Commissioner in Brown County.

It is worth noting at this point that Mr. Bowman was not the only Republican in Brown County who was guilty of violating Rule 1-25 by supporting Mr. Taggart against Mr. Clark in the 2024 general election. Although Mr. Clark could file complaints against numerous other people (like Blake Wolpert and his wife Cindy Wolpert), he has not done so at this time since Mr. Bowman was the architect of this improper scheme, and it is hoped by Mr. Clark that removing Mr. Bowman from office will be enough to correct the current problems plaguing the Brown County Republican Party.

For these reasons, Mr. Clark did not present Exhibit 16 in his original Memorandum because it was not apparent at the time how this photo could be tied back to Mr. Bowman. However, it has now been determined that Mr. Bowman actually appointed Mr. Wolpert to be a Vice Precinct Committeeman after the 2024 primary. Thus, just like with Ms. Wolpert (Mr. Wolpert's wife), Mr. Bowman violated Rule 1-25 by appointing a Republican who was in open violation of Rule 1-25 to be an official in the Republican Party. That is, Mr. Bowman had a duty to vet the individuals that he was appointing to official positions in the Brown County Republican Party, and he violated the GOP Rules by appointing individuals who were clearly not Republicans in Good-Standing.

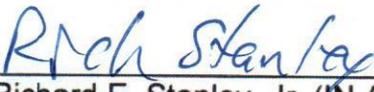
The Complainant has read this Supplemental Memorandum and the attached Exhibits and verifies that all statements herein are factually accurate.

Dated: January 20, 2025

By: 

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

Dated: January 21, 2025

By: 

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

Exhibit 13



REPORT OF RECEIPTS AND EXPENDITURES OF A POLITICAL COMMITTEE

State Form 4606 (R17 / 8-23)
Indiana Election Division (IC 3-9-5-14)

**(CFA-4)
Summary Sheet**

FILE NUMBER
TOTAL PAGES IN ENTIRE CFA-4 REPORT
4

INSTRUCTIONS: Please type or print legibly **IN BLACK INK** all information on this form. For assistance in completing this form, see instructions on the reverse side.

IS THIS AN AMENDMENT? Yes No

COMMITTEE INFORMATION

1. Full Name of Committee (as on *Statement of Organization*) Check if this is a new name.
Kevin Patrick for Brown County

2. Acronym or Abbreviated Name (if any) 3. Committee Telephone Number
(765) 346-4642

4. Mailing Address (*Address where all campaign finance correspondence is received.*) Check if this is a new address.
2124 Twinlake Road

5. City, State, ZIP Code 6. Party Affiliation (if applicable)
Morgantown, IN, 46160

CANDIDATE INFORMATION (For Candidate's Committees Only)

7. Full Name of Candidate (*Include any nickname.*) 8. Party Affiliation or If Independent Candidate
Kevin Dewayne Patrick Republican

9. Office Sought (*Include district number, if any. Not required for exploratory committee.*) 10. County of Residence
Brown County Commissioner, District 1 Brown

TYPE OF REPORT **CONVENTION CANDIDATES ONLY**

11. Check one:
 Pre-Primary Pre-Election Annual Nomination Other _____
 Final / Disbands Committee (*Lines 18, 19, and 20 must be "0".*) Outgoing Treasurer (*Within ten (10) days amend Statement of Organization.*)

Check one:
 Pre-Convention
 Post-Convention

12. Reporting Period (mm/dd/yy): From: 04/13/24 Through: 10/11/24	COLUMN A This Period	COLUMN B Year to Date
13. Cash on hand and investments at the beginning of this reporting period.	100.00	
14. Cash on hand and investments January 1, current year.		0.00

CONTRIBUTIONS AND RECEIPTS

(Note: these amounts include in-kind contributions and loans, as well as cash contributions.)

15a. Itemized (Use Schedule A.)	2,359.15	3,044.61
15b. Unitemized	0.00	0.00
15c. Add lines 15a and 15b in both columns. SUBTOTAL	2,359.15	3,044.61
16. Add lines 13 and 15c in Column A and lines 14 and 15c in Column B. TOTAL	2,459.15	3,044.61

EXPENDITURES

(Note: These amounts include in-kind expenditures and loan repayments.)

17a. Itemized (Use Schedule B.) (Public Question: use Schedule C.)	1,609.15	2,194.61
17b. Unitemized	0.00	0.00
17c. Add lines 17a and 17b in both columns. SUBTOTAL	1,609.15	2,194.61
18. Cash on hand and investments at close of this reporting period (Subtract 17c from 16 in both columns.) TOTAL	850.00	850.00
19. Debts OWED BY the committee (Use Schedule D.)		
20. Debts OWED TO the committee (Use Schedule E.)		

CERTIFICATION **FOR OFFICE USE ONLY**

I CERTIFY THAT I HAVE EXAMINED THIS STATEMENT. TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT AND COMPLETE.

Signature of Treasurer <i>Dusa Patrick</i>	Title Treasurer	Date (mm/dd/yy) 10-18-24
Signature of Candidate (if applicable) <i>Kevin D Patrick</i>		Date (mm/dd/yy) 10/18/24

FILED
OCT 18 2024
BROWN COUNTY
ELECTION BOARD

WARNING: Any information contained in this report may not be copied for sale or used for any commercial purpose. (IC 3-9-4-5) A person who knowingly files a fraudulent report commits a Level 6 felony. (IC 3-14-1-13) A person who fails to file a complete or accurate report as required by the Indiana Campaign Finance Law commits a Class B misdemeanor, (IC 3-14-1-14) and may be subject to civil penalties. (IC 3-9-4-16, IC 3-9-4-17, IC 3-9-4-18)

DB 11:09 AM



**REPORT OF RECEIPTS AND EXPENDITURES
OF A POLITICAL COMMITTEE**
State Form 4606 (R17 / 8-23)
Indiana Election Division (IC 3-9-5-14)

**(CFA-4 SCHEDULE A-1)
CONTRIBUTIONS BY INDIVIDUALS
Itemized Contributions and Other Receipts**

INSTRUCTIONS: LIST ONLY CONTRIBUTIONS BY INDIVIDUALS ON THIS SCHEDULE. Please type or print legibly IN BLACK INK all information on this schedule. For assistance in completing this schedule, see instructions on the reverse side. This schedule is used to document contributions and receipts totaled on ITEM 15a of the Summary Sheet. All cumulative contributions from individuals OVER \$100 per contributor, within a calendar year MUST be itemized on this schedule (over \$200, if regular party committee). All cumulative receipts, (such as loan proceeds and repayments, refunds, rebates, returns of deposit, proceeds from sales, interest or other income) OVER \$100 per contributor, within a calendar year, MUST be itemized on this schedule (over \$200 if regular party committee). A contributor's occupation is required if an individual makes at least \$1,000 in contributions during the calendar year. Otherwise, this is optional.

FILE NUMBER	
Page	1 of 2

CONTRIBUTOR'S FULL NAME AND OCCUPATION FULL MAILING ADDRESS <i>(street, number, city, state, ZIP code)</i>	TYPE OF CONTRIBUTION OR OTHER RECEIPT	COLUMN A AMOUNT THIS PERIOD	COLUMN B CUMULATIVE YEAR-TO-DATE	DATE RECEIVED <i>(mm/dd/yy)</i>
				RECEIVED BY
1. Kevin Patrick Self Employed 2124 Twinlake Road Morgantown, IN 46160 Contributor's Occupation <i>(if required)</i> _____	Contributions: <input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <i>(describe)</i> <u>Shirt Embroidery</u> Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____	\$45.00	\$730.46	05/08/24 Kevin Patrick
2. Kevin Patrick Self Employed 2124 Twinlake Road Morgantown, IN 46160 Contributor's Occupation <i>(if required)</i> _____	Contributions: <input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <i>(describe)</i> <u>Ball Caps/Embroidery</u> Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____	\$57.79	\$788.25	08/07/24 Kevin Patrick
3. Kevin Patrick Self Employed 2124 Twinlake Road Morgantown, IN 46160 Contributor's Occupation <i>(if required)</i> _____	Contributions: <input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <i>(describe)</i> <u>Yard Signs</u> Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____	\$436.30	\$1,224.55	08/20/24 Kevin Patrick
4. Kevin Patrick Self Employed 2124 Twinlake Road Morgantown, IN 46160 Contributor's Occupation <i>(if required)</i> _____	Contributions: <input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <i>(describe)</i> <u>Ball Caps/Embroidery</u> Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____	\$187.31	\$1,411.86	05/22/24 Kevin Patrick
5. Kevin Patrick Self Employed 2124 Twinlake Road Morgantown, IN 46160 Contributor's Occupation <i>(if required)</i> _____	Contributions: <input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <i>(describe)</i> <u>T-Shirts</u> Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____	\$882.75	\$2,294.61	07/01/24 Kevin Patrick
SUBTOTAL THIS PAGE OF SCHEDULE A		\$	1,609.15	
TOTAL OF ALL PAGES OF SCHEDULE A ON THE LAST PAGE ONLY <i>(Enter total on ITEM 15a of the Summary Sheet.)</i>		\$		



**REPORT OF RECEIPTS AND EXPENDITURES
OF A POLITICAL COMMITTEE**

State Form 4606 (R17 / 8-23)
Indiana Election Division (IC 3-9-5-14)

**(CFA-4 SCHEDULE A-5)
CONTRIBUTIONS BY
OTHER ORGANIZATIONS**

Itemized Contributions and Other Receipts

INSTRUCTIONS: LIST ONLY CONTRIBUTIONS BY ORGANIZATIONS OTHER THAN CORPORATIONS, LABOR ORGANIZATIONS, POLITICAL ACTION COMMITTEES AND INDIVIDUALS ON THIS SCHEDULE. Please type or print legibly **IN BLACK INK** all information on this schedule. For assistance in completing this schedule, see instructions on the reverse side. This schedule is used to document contributions and receipts totaled on ITEM 15a of the Summary Sheet. All cumulative contributions from other entities **OVER \$100** per contributor, within a calendar year **MUST** be itemized on this schedule (*over \$200, if regular party committee*). All transfers-in and in-kind contributions regardless of amount from candidate's, legislative caucus, and regular party committees **MUST** be itemized on this schedule. All cumulative receipts, (*such as loan proceeds and repayments, refunds, rebates, returns of deposit, proceeds from sales, interest or other income*) **OVER \$100** per contributor, within a calendar year, **MUST** be itemized on this schedule (*over \$200 if regular party committee*).

FILE NUMBER
Page <u>2</u> of <u>2</u>

CONTRIBUTOR'S FULL NAME AND FULL MAILING ADDRESS <i>(street, number, city, state, ZIP code)</i>	TYPE OF CONTRIBUTION OR OTHER RECEIPT	COLUMN A AMOUNT THIS PERIOD	COLUMN B CUMULATIVE YEAR-TO-DATE	DATE RECEIVED <i>(mm/dd/yy)</i>
				RECEIVED BY
1. Brown County Republican Committee PO 1490 Nashville, IN 47448	Contributions: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> In-Kind <i>(describe)</i> _____ Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____	\$750.00	\$3,044.61	08/16/24
				Kevin Patrick
2.	Contributions: <input type="checkbox"/> Direct <input type="checkbox"/> In-Kind <i>(describe)</i> _____ Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____			
3.	Contributions: <input type="checkbox"/> Direct <input type="checkbox"/> In-Kind <i>(describe)</i> _____ Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____			
4.	Contributions: <input type="checkbox"/> Direct <input type="checkbox"/> In-Kind <i>(describe)</i> _____ Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____			
5.	Contributions: <input type="checkbox"/> Direct <input type="checkbox"/> In-Kind <i>(describe)</i> _____ Other Receipts: <input type="checkbox"/> Interest <input type="checkbox"/> Loan <input type="checkbox"/> Miscellaneous <i>(specify)</i> _____			
SUBTOTAL THIS PAGE OF SCHEDULE A		\$ 750.00		
TOTAL OF ALL PAGES OF SCHEDULE A ON THE LAST PAGE ONLY <i>(Enter total on ITEM 15a of the Summary Sheet.)</i>		\$ 2,359.15		



REPORT OF RECEIPTS AND EXPENDITURES OF A POLITICAL COMMITTEE

State Form 4606 (R17 / 8-23)
Indiana Election Division (IC 3-9-5-14)

(CFA-4 SCHEDULE B) ITEMIZED EXPENDITURES

INSTRUCTIONS: Please type or print legibly **IN BLACK INK** all information on this schedule. For assistance in completing this schedule, see instructions on the reverse side. This schedule is used to document expenditures totaled on ITEM 17a of the Summary Sheet. All cumulative expenses paid to individuals, businesses, labor organizations and other entities **OVER \$100** per recipient, within a calendar year **MUST** be itemized on this schedule (*over \$200, if regular party committee*). All cumulative expenses, including in-kind, regardless of amount paid to political committees, (*such as transfers-out from candidate, legislative caucus, political action, or regular party committees*) **MUST** be itemized on this schedule.

FILE NUMBER

Page 1 of 1

RECIPIENT'S NAME AND MAILING ADDRESS <i>(street, number, city, state, ZIP code)</i>	RECIPIENT'S OCCUPATION	TYPE OF EXPENDITURE and PURPOSE <i>(be specific)</i>	COLUMN A AMOUNT THIS PERIOD	COLUMN B CUMULATIVE YEAR-TO-DATE	DATE OF EXPENDITURE <i>(mm/dd/yy)</i>
	OFFICE SOUGHT <i>(if applicable)</i>				
Code <u>A</u> Kevin Patrick 2124 Twinlake Road Morgantown, IN 46160	Self Employed Brown County Commissioner District 1	<input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose: Advertising	\$45.00	\$630.46	05/08/24
Code <u>A</u> Kevin Patrick 2124 Twinlake Road Morgantown, IN 46160	Self Employed Brown County Commissioner District 1	<input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose: Advertising	\$57.79	\$688.25	08/07/24
Code <u>A</u> Kevin Patrick 2124 Twinlake Road Morgantown, IN 46160	Self Employed Brown County Commissioner District 1	<input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose: Advertising	\$436.30	\$1,124.55	08/20/24
Code <u>A</u> Kevin Patrick 2124 Twinlake Road Morgantown, IN 46160	Self Employed Brown County Commissioner District 1	<input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose: Advertising	\$187.31	\$1,311.86	05/22/24
Code <u>A</u> Kevin Patrick 2124 Twinlake Road Morgantown, IN 46160	Self Employed Brown County Commissioner District 1	<input type="checkbox"/> Direct <input checked="" type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose: Advertising	\$882.75	\$2,194.61	07/01/24
Code _____		<input type="checkbox"/> Direct <input type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose:			
Code _____		<input type="checkbox"/> Direct <input type="checkbox"/> In-Kind <input type="checkbox"/> Payment of Debt <input type="checkbox"/> Returned Contribution <input type="checkbox"/> Other _____ Purpose:			
SUBTOTAL THIS PAGE OF SCHEDULE B			\$ 1,609.15		
TOTAL OF ALL PAGES OF SCHEDULE B ON THE LAST PAGE ONLY <i>(Enter total on ITEM 17a of the Summary Sheet.)</i>			\$ 1,609.15		

Exhibit 14

TIM J.



CLARK

COMMISSIONER

Paid for by Clark for Commissioner

Exhibit 15

**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.)	
)	

SUPPLEMENTAL WITNESS STATEMENT OF TIM CLARK

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

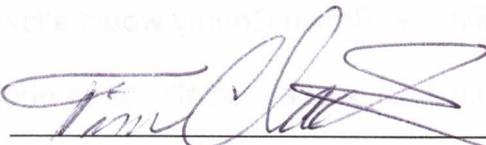
8. On June 24, 2024, I attended a joint Commissioner / Council meeting at the Brown County Annex Building. During the meeting, I noticed that Blake Wolpert was wearing a campaign T-shirt for Mr. Taggart. At the time, Mr. Wolpert was a County Commissioner and was at the meeting in his official capacity as County Commissioner. During a break, I was in the hallway outside the meeting room, and I saw Mr. Wolpert in the hallway with me. I then asked Mr. Wolpert if I could take a picture of him wearing Mr. Taggart’s campaign T-shirt. In response, Mr. Wolpert proudly posed for me and reached his hands up to stretch out his T-shirt so that Mr. Taggart’s campaign slogan on the T-shirt could be seen clearly.

9. I realize that it might be somewhat surprising to outsiders that a prominent Republican official in Brown County would allow himself to be photographed in open violation of Rule 1-25, and especially, to be photographed by the very victim of the

violation. However, the type of Rule 1-25 violation that is depicted in Exhibit 16 was actually rampant during the 2024 general election. I believe there are probably two main reasons for why Brown County Republicans like Mr. Wolpert felt no embarrassment in advertising their support for Mr. Taggart against me in the 2024 general election. The first reason, and most important, is that Mr. Bowman was actively engaged in trying to “shut down” my campaign (Exhibit 6 ¶ 3), and as such, Mr. Bowman was either directly or implicitly encouraging prominent Republicans like Mr. Wolpert to openly support my opponent. The second reason is that it is likely that many, if not most, of the prominent Republicans in Brown County who violated Rule 1-25 by supporting Mr. Taggart against me in the general election campaign were ignorant of the requirements of Rule 1-25. While ignorance is not a defense to Rule 1-25, my view is that this widespread ignorance of Rule 1-25 in Brown County is the fault of Mr. Bowman since he could have easily put a stop to all of this since he was the Chair of the Brown County Republican Party. Although Mr. Bowman had numerous tools available to him as the Chair of the Brown County Republican Party to stop prominent Republicans in Brown County from improperly supporting a non-Republican against a Republican, he did absolutely nothing to stop it, and most likely was actively encouraging others to advertise their support for Mr. Taggart’s Independent campaign against me.

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

Dated: January 20, 2025

By:  _____

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

Exhibit 16

