

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.)	
)	

AMENDED COMPLAINT

1. On December 20, 2024, Plaintiff Mr. Clark filed a complaint with the Indiana Republican Party claiming that the Chairman of the local Republican Party violated GOP Rule 1-25. (Plaintiffs' Exhibits 1-4). In Mr. Clark's complaint, Mr. Clark requested that the Indiana Republican Party remove the local Republican Chairman from his office and ban him from running for elected office for five years as a Republican. Mr. Clark was represented by Plaintiff Mr. Stanley in his complaint before the Indiana Republican Party.

2. On January 23, 2025, the District 9 Officers of the Indiana Republican Party held a hearing on Mr. Clark's complaint. At the end of the hearing, the District 9 Officers issued a written decision dismissing Mr. Clark's complaint against the local Republican Chairman. (Plaintiffs' Exhibit 5). Additionally, the District 9 Officers' decision determined that Mr. Stanley and Mr. Clark are not Republicans in good standing for a period of five years.

3. On February 5, 2025, Mr. Stanley and Mr. Clark filed an appeal with the state GOP arguing that the District 9 Officers' decision should be overturned. (Plaintiffs' Exhibit 6).

4. On May 14, 2025, the state GOP issued an unappealable written decision upholding the District 9 Officers' decision in its entirety. (Plaintiffs' Exhibit 7).

5. In view of the legal precedent of *Hero v. Lake County Election Board*, 42 F.4th 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.

6. Mr. Stanley has become concerned about dysfunction in his local government and corruption in the local Republican party. For these and other reasons, Mr. Stanley intended to run for elected office in Brown County as a Republican as of at least July 25, 2025. (Plaintiff's Exhibit 8). On October 20, 2025, Mr. Stanley acted upon his intention by announcing his plans in a public forum to run for the elected office of County Commissioner in Brown County Indiana in the 2026 election cycle. (Plaintiff's Exhibit 14).

7. Mr. Clark ran for election in 2024 as a Republican for County Commissioner and won both the Republican primary and the general election and currently holds that office. Mr. Clark intends to run again for the same elected position he currently holds as a Republican in the 2028 election. (Plaintiff's Exhibit 9).

8. On July 2, 2025, Mr. Stanley sent a copy of a draft complaint to the Brown County Election Board and requested that the Brown County Election Board issue a written statement refusing to enforce the decision of the Indiana Republican Party against Mr. Stanley and Mr. Clark. (Plaintiffs' Exhibit 10). On that same day, the

Chairman of the Brown County Election Board responded to Mr. Stanley's notice but refused to state whether or not the Brown County Election Board intends to enforce the Indiana Republican Party's decision against Mr. Stanley and Mr. Clark. (Plaintiffs' Exhibit 10). On July 16, 2025, Mr. Stanley sent a follow-up reminder to the Brown County Election Board about the potential lawsuit. (Plaintiffs' Exhibit 10). However, the Brown County Election Board refused to provide any further response to Mr. Stanley.

9. Mr. Stanley and Mr. Clark assert that the decision of the Indiana Republican Party against Mr. Stanley is based on false evidence and they knew it.

10. Mr. Stanley and Mr. Clark assert that the decision of the Indiana Republican Party against Mr. Clark is too vague for judicial review.

11. Mr. Stanley and Mr. Clark assert that the decision of the Indiana Republican Party against Mr. Stanley and Mr. Clark would violate the U.S. Constitutional protection of due process if enforced by the Brown County Election Board.

12. Mr. Stanley and Mr. Clark assert that the decision of the Indiana Republican Party against Mr. Stanley and Mr. Clark would violate the U.S. Constitutional protection of equal protection if enforced by the Brown County Election Board.

13. Mr. Stanley and Mr. Clark assert that the decision of the Indiana Republican Party against Mr. Stanley and Mr. Clark would violate the U.S. Constitutional protection of freedom of speech if enforced by the Brown County Election Board.

14. Mr. Stanley and Mr. Clark assert that the Court has jurisdiction of this case pursuant to 28 U.S.C. § 1331.

15. Mr. Stanley and Mr. Clark assert that venue is proper in this district pursuant to 28 U.S.C. § 1391.

16. Mr. Stanley and Mr. Clark assert that declaratory relief is authorized by Rule 57 of the Federal Rules of Civil Procedure and 28 U.S.C. §§ 2201 and 2202.

17. Mr. Stanley and Mr. Clark have brought this action pursuant to 42 U.S.C. § 1983 to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States.

18. Mr. Stanley and Mr. Clark request that the Court issue a permanent injunction enjoining the Brown County Election Board from enforcing the Indiana Republican Party's decision against Mr. Stanley and Mr. Clark.

19. Mr. Stanley and Mr. Clark request that the Court award Mr. Stanley and Mr. Clark their costs and attorneys' fees pursuant to 42 U.S.C. § 1988.

Dated: October 23, 2025

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