

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 TO AMEND COMPLAINT

In accord with the Court’s Order Directing Further Action (Doc. # 21), Fed. R. Civ. P. 15(a)(2), and S.D. Ind. L.R. 15-1, Plaintiffs request leave to amend their Complaint, which the Amended Complaint attached hereto. The basis for the present request is that an underlying fact recited in Plaintiffs’ original Complaint has changed. That is, Plaintiff Mr. Stanley formally announced his plans to run for Brown County Commissioner, District 2 in the upcoming 2026 Republican primary election at a public Brown County Council meeting on October 20, 2025. In view of this change in an underlying fact, Plaintiffs are proposing to amended paragraph 6 in the original Complaint as follows: “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 intendeded 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)." Plaintiffs also propose to include the Second Witness Statement of Richard Stanley, Jr. in support of the underlying factual change in the case.

Dated: October 23, 2025

By: Rich Stanley
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CERTIFICATE OF SERVICE

I certify that on October 23, 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.

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