

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’ REPLY TO DEFENDANT BROWN COUNTY ELECTION BOARD’S  
RESPONSE IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION**

The Brown County Election Board has failed to address the merits of Plaintiff’s Motion for Preliminary Injunction (Doc. # 29) and has instead chosen to feign confusion. Thus, like Plaintiff’s pending Summary Judgment Motion (Doc. # 25-26), Plaintiff’s representations of the law and facts stand un rebutted.

And yet, The Brown County Election Board has no reason to be confused about Plaintiff’s present motion when the entire record of the case is considered. With respect to Mr. Stanley’s announced plans to be a 2026 Republican candidate, the facts are surprisingly simple, un rebutted and egregious. The Indiana Republican Party lied about Mr. Stanley by claiming that he made a financial “contribution to independent candidate Greg Taggart”. (Doc. # 1-7; Doc. # 1-9; Doc. # 1 ¶ 9; Doc. # 26 at 13-16; Doc. # 11-1). The Indiana Republican Party then punished Mr. Stanley using that lie by finding “Mr. Stanley to not be in good standing with the Republican Party for a period of five years”. (Doc. # 1-7; Doc. # 1-9). One does not need to be a Constitutional law professor or

even an attorney to know that this is wrong. Every average Joe walking down the street intuitively knows that it is wrong to lie about someone, and that it is even more wrong to punish someone based upon a lie. It is shameful that the Brown County Election Board is still confused about something that every ordinary person already knows in their heart.

The Brown County Election Board also has no reason to be confused about what Plaintiffs are seeking in this case. Six months ago, Plaintiffs contacted the Brown County Election Board before filing this lawsuit and requested that the Board “issue a written statement . . . clearly stating that the Election Board will not enforce the decision of the Indiana Republican Party against myself and Mr. Clark by preventing myself and Mr. Clark from running for elected office as Republicans.” (Doc. # 1-12). This lawsuit could have easily been avoided by the Brown County Election Board, but instead, the members of the Brown County Election Board voted unanimously to defend against this lawsuit even before being served with the summons.<sup>1</sup> Plaintiffs requested relief is also clearly stated in their Complaint where it is stated that “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.” (Doc. # 1 ¶ 18). Plaintiffs requested relief was also reiterated in their currently pending Summary Judgment Motion, where Plaintiffs once again stated that “Plaintiffs request that the Court issue a decision enjoining the Brown County Election Board from enforcing the Indiana Republican Party’s May 14, 2025 (Plaintiffs’ Exhibit 7) decision against Mr. Stanley and Mr. Clark by preventing Mr. Stanley and Mr.

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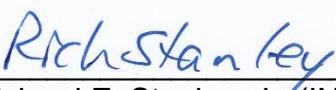
<sup>1</sup> This can be seen on the Brown County Indiana Government Meetings channel on YouTube in the August 12, 2025 Election Board Meeting at 17:50-19:50.

Clark from running for any elected position in Indiana as Republicans.” (Doc. # 26 at 30).

The Brown County Election Board also mischaracterizes the relief sought by Plaintiffs by asserting that “this Court doesn’t have the authority to arbitrarily mandate candidates must appear on a ballot and blindly bar a local election board from acting under *any or every* circumstance known or unknown to the Court.” (Doc. # 33 at 1). Plaintiffs have never sought a “mandate” from the Court that Plaintiffs “must appear on a ballot”. Instead, Plaintiffs clearly stated in the present motion that they are only seeking an order that the Brown County Election Board “allow Mr. Stanley to be on 2026 Republican primary ballot as long as he satisfies all other requirements.” (Doc. # 29 at 6 (emphasis added)).

Respectfully, Plaintiffs do not believe that the Brown County Election Board is actually confused about the present motion or the relief sought by Plaintiffs. What the Brown County Election Board is really doing is “asking the Court to give it a free pass to deprive Mr. Stanley and Mr. Clark of their Constitutional rights without any intervention by the Court”. (Doc. # 28 at 1). However, Plaintiffs have clearly established that they are entitled to a preliminary injunction prior to February 6, 2026 preventing the Brown County Election Board from removing Mr. Stanley from the 2026 Republican primary ballot based on the Indiana Republican Party’s May 14, 2025 decision against Mr. Stanley and Mr. Clark as long as Mr. Stanley satisfies all other requirements.

Dated: January 7, 2026

By:   
Richard E. Stanley, Jr. (IN Atty No. 31838-49)  
Attorney for Plaintiffs  
4356 Lanam Ridge Rd.

Nashville, IN 47448  
312-310-4279

**CERTIFICATE OF SERVICE**

I certify that on January 7, 2026, 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  
Richard E. Stanley, Jr. (IN Atty No. 31838-49)  
*Attorney for Plaintiffs*  
4356 Lanam Ridge Rd.  
Nashville, IN 47448  
312-310-4279