

## **Plaintiffs' Exhibit 6**

**INDIANA GOP  
RULES COMMITTEE**

Tim Clark, Brown County	)
Commissioner Elect, District 3	)
Complainant,	)
	)
vs.	)
	)
Mark Bowman, Brown County Precinct	)
Committeeman, Hamblen 2 and	)
Chair of the Brown County	)
Republican Party,	)
Respondent.	)
	)

**APPEAL OF THE DECISION OF THE DISTRICT 9 OFFICERS**

**I. INTRODUCTION**

Tim Clark filed a Complaint with the District 9 Officers against Mark Bowman on December 20, 2024 arguing that Mr. Bowman violated Rule 1-25 during the 2024 election campaign by supporting Independent candidate Greg Taggart against Mr. Clark in the election race for Brown County Commissioner. Although it should be of limited legal relevance, it is notable that Mr. Bowman was and is the Chairman of the Brown County Republican Party. On January 23, 2024, the District 9 Officers held a hearing on Mr. Clark’s Complaint and issued a Decision that same day after the hearing. (Exhibit A). In the Decision, the District 9 Officers dismissed Mr. Clark’s Complaint and punished Mr. Clark and Richard Stanley, Jr. (Mr. Clark’s representative) with five year bans on seeking elected office as a Republican. Because Mr. Clark and Mr. Stanley believe this Decision fails to follow the Indiana GOP Rules and violates fundamental

principles that the Republican Party should protect and uphold, Mr. Clark and Mr. Stanley jointly appeal the Decision of the District 9 Officers.

## **II. MR. CLARK'S COMPLAINT WAS IGNORED**

The Decision of the District 9 Officers is deeply flawed in multiple ways, and the first flaw is that the District 9 Officers completely ignored the allegations that Mr. Clark raised in his Complaint. In Mr. Clark's Complaint, he raised nine different allegations that Mr. Bowman violated Rule 1-25 by supporting Mr. Taggart's Independent campaign against Mr. Clark. And yet, the District 9 Officers failed to make findings on any of the allegations raised by Mr. Clark. (Exhibit A). Instead, the Decision of the District 9 Officers dismissed Mr. Clark's entire Complaint without making any determinations of whether Mr. Bowman actually violated Rule 1-25 or not. (Exhibit A).

What this really means is that the District 9 Officers are of the belief that none of the allegations raised by Mr. Clark constitute a violation of Rule 1-25. For reference, those allegations which the District 9 Officers believe are permitted under the GOP Rules are:

- A. Mr. Bowman Had Improper Motives In Challenging Mr. Clark's Candidacy With The Election Board;
- B. Mr. Bowman Offered Absolutely No Support Whatsoever To Mr. Clark's Campaign;
- C. Mr. Bowman Tried To Exclude Mr. Clark From The Brown County Republican Women's Club Meet & Greet for Republican Candidates;
- D. Mr. Bowman Refused To Allow Mr. Clark To Post His Campaign Sign At The Republican Party Booth At The Brown County Fair;
- E. Mr. Bowman Allowed Pictures Of Prominent Brown County Republicans Wearing Campaign T-shirts Promoting Mr. Clark's Opponent (Mr. Taggart) To Be Published On The Brown County Republican Facebook Page;

- F. Mr. Bowman Openly Announced His Opposition To Mr. Clark's Campaign At An Official Brown County Republican Party Meeting During The General Election;
- G. Mr. Bowman Appointed A Republican Who Was Openly Supporting Mr. Clark's Opponent (Mr. Taggart) To An Official Republican Position;
- H. Mr. Bowman Excluded Mr. Clark And An Elected Republican Precinct Committeeman From An Official Republican Campaign Event (The Lincoln Day Dinner) And Allowed Mr. Clark's Opponent (Mr. Taggart) To Attend The Event; and
- I. Mr. Bowman's Wife And Son Arranged A Campaign Photo Op Of A Favored Republican Candidate Associating With Mr. Clark's Opponent.

It is important to emphasize that Mr. Bowman never rebutted any of Mr. Clark's allegations. (Exhibit B). In other words, these allegations stand undisputed, and therefore, are admitted to be factually true. But despite being factually true, the District 9 Officers do not believe any of these allegations violate the GOP Rules—or they don't care whether the allegations violate the rules. This is an incredibly dangerous Decision for the credibility of the Indiana Republican Party because, if other county chairmen are not already engaging in the types of activities that Mr. Bowman admittedly engaged in, these tactics will become widespread throughout Indiana as a result of this Decision.

### **III. THE DISTRICT 9 OFFICERS SECRETLY PUT MR. CLARK AND MR. STANLEY ON TRIAL**

What Mr. Clark and Mr. Stanley didn't realize, and were never told, is that the District 9 Officers decided to put Mr. Clark and Mr. Stanley on trial at the January 23 hearing which was supposed to be about Mr. Clark's Complaint against Mr. Bowman. This is a blatant violation of the due process principle enshrined in our Constitution and also incorporated into the Indiana GOP Rules. Since it is obvious that the District 9 Officers do not understand what due process is, a very brief summary may be helpful.

Due process is a principle of judicial fairness. Specifically, due process does not allow a person to be convicted without first providing the individual with notice of the allegations being made against them, and then holding a hearing where the individual is allowed to defend themselves against the allegation.

But that didn't happen here. As noted, the Indiana GOP Rules rightfully incorporate the principal of due process, since the rules establish a process for handling complaints, which includes notice and hearing provisions, in Rules 1-29 through 1-34 (entitled Complaint Proceedings). But this process was not followed in convicting Mr. Clark and Mr. Stanley. That is, simply put, no complaint was ever filed against Mr. Clark or Mr. Stanley, and therefore, Mr. Clark and Mr. Stanley never received notice of a charge against them, and they were never told that the January 23 hearing had been converted into a trial of them instead of Mr. Bowman.

#### **IV. MR. STANLEY'S CONVICTION RESTS ON FALSE EVIDENCE**

Mr. Stanley's conviction illustrates how thoughtless the District 9 Officers' Decision really is. According to the Decision, Mr. Stanley has been banned from the Republican Party "because of his contribution to independent candidate Greg Taggart." However, this assertion is untrue and the District 9 Officers actually had evidence before them disputing this assertion.

This issue came up because Mr. Stanley's name shows up on Mr. Taggart's campaign finance report as having contributed \$105 to Mr. Taggart's campaign. Mr. Stanley first received a copy of this report about 24 hours before the January 23 hearing as Exhibit 32 in Mr. Bowman's discovery disclosure. At some point during those 24 hours, Mr. Stanley did notice this entry in Mr. Taggart's campaign finance report, but Mr.

Stanley never investigated it because he deemed it irrelevant to the Complaint against Mr. Bowman.

During the hearing, Mr. Stanley handed an analysis of Mr. Bowman's exhibits to the District 9 Officers, which indicated that Mr. Bowman's exhibits were largely irrelevant to the Complaint against Mr. Bowman. (Exhibit B). And, of particular note, Mr. Stanley's comment with regard to Exhibit 32, which was provided to the District 9 Officers, stated "Mr. Stanley did not contribute to Mr. Taggart's campaign (his wife may have)". (Exhibit B). Additionally, the Chairwoman specifically asked Mr. Stanley during the hearing if he had contributed money to Mr. Taggart's campaign and Mr. Stanley answered "No".

And, this is the sort of unfairness that results when those in a judicial role fail to follow the principle of due process. Even with the limited information that Mr. Stanley had about this issue during the January 23 hearing, he could have easily put it to rest if he had known that he should have been defending himself. But, again, Mr. Stanley had no reason to believe that he was on trial, and therefore, he never followed up on the Chairwoman's question other than to deny that he had contributed to Mr. Taggart's campaign.

It was only later after the hearing and the Decision banning him that Mr. Stanley spent the time to investigate this issue and his suspicion was confirmed. What actually happened was that Mr. Stanley's wife wrote two checks to Mr. Taggart's campaign from their joint checking account, which has Mr. Stanley's name at the top and his wife's name underneath his name. Thus, whoever wrote Mr. Stanley's name on Mr. Taggart's

campaign finance report made a mistake and should have written down Mr. Stanley's wife's name.

Thus, it is completely untrue that Mr. Stanley contributed money to Mr. Taggart's campaign, and the District 9 Officers should have known this from the evidence that they had before them. But worse, Mr. Stanley did not have a sufficient opportunity to defend himself against this charge which he could have easily defeated if the District 9 Officers had provided him with due process.

#### **V. THE PROBLEMS WITH MR. STANLEY'S CONVICTION GO EVEN DEEPER**

There is an initial question that the Rules Committee should consider with regard to Mr. Stanley's conviction. Is it permissible, and prudent, for the Republican Party to make findings that ordinary voters are not Republicans in Good-Standing? This question is directly applicable to Mr. Stanley's conviction because he has never run for an elected position and holds no position in the Republican Party. And, the District 9 Officers knew this because the Chairwoman asked Mr. Stanley if he holds any such positions and he replied "I'm just a practicing lawyer."

It seems questionable that this is a good practice to follow, even if the rules allow it, because the GOP could easily be flooded with frivolous complaints that have nothing to do with the functioning of the Indiana Republican Party. This is further complicated by the fact that voters in Indiana do not register as Republicans or Democrats, and thus, when the Indiana Republican Party bans an ordinary voter like the District 9 Officers did, there would be nothing to prevent such findings against any person in the state even if they have no affiliation whatsoever with the Republican Party. This would be completely wasteful, and raise serious questions with voters of whether they want to

have anything to do with a political party like this that bans ordinary voters from being Republicans.

Mr. Stanley's case easily demonstrates how problematic the District 9 Officers' logic is. If the District 9 Officers really cared about punishing ordinary voters who had contributed money to Mr. Taggart's campaign, then why didn't the District 9 Officers ban everyone listed on Mr. Taggart's campaign finance report? (Bowman Exhibit 32).

Normally, the easy answer to that question would be because no complaint has been filed against any of those individuals, but it has already been established that the District 9 Officers didn't care about due process so nothing should have prevented the District 9 Officers from banning everyone on Mr. Taggart's campaign finance report. Even more interesting is the fact that the name that appears directly below Mr. Stanley's name on Mr. Taggart's campaign finance report is Duane Parsons who contributed \$200.

(Bowman Exhibit 32). It turns out that Duane Parsons was at the time, and remains, a Republican Precinct Committeeman in Brown County. Thus, unlike Mr. Stanley, Rule 1-25 clearly did apply to Duane Parsons, but the District 9 Officers did not ban him.<sup>1</sup>

And here is where it gets really strange. Mr. Bowman chose to bring Mr. Taggart himself to the hearing in an effort to defend Mr. Bowman. During the hearing, Mr. Taggart told the Chairwoman that he is a Republican despite having run an Independent campaign against Mr. Clark. But as far as Mr. Clark and Mr. Stanley know, Mr. Taggart does not currently hold any elected office or official position in the Republican Party. Thus, Mr. Stanley and Mr. Taggart are both merely ordinary voters.

---

<sup>1</sup> It is not being suggested here that the District 9 Officers knew that Duane Parsons is a Republican Precinct Committeeman. This is only being presented to demonstrate how ludicrous the District 9 Officers' Decision is.

In light of this, what justification is there for banning Mr. Stanley who allegedly contributed money to Mr. Taggart but not banning Mr. Taggart who allegedly received Mr. Stanley's money and was campaigning against Mr. Clark? Mr. Stanley and Mr. Taggart were both at the hearing sitting immediately across the aisle from each other and are both ordinary voters. One of those individuals (Mr. Stanley) allegedly contributed money to the other individual (Mr. Taggart) and that individual (Mr. Taggart) used whatever money he received to campaign against the Republican candidate (Mr. Clark). So logically, who is more guilty in that situation—Mr. Stanley or Mr. Taggart? It is an unavoidable conclusion that this disparate treatment is a result of bias by the District 9 Officers against Mr. Stanley, which is violation of the fundamental Constitutional principle of equal protection.

Now, since it is obviously untenable to argue that Mr. Stanley was actually banned for contributing to Mr. Taggart's campaign, what could possibly be the real reason for the punishment meted out against Mr. Stanley? There is only one conclusion that an objective observer could arrive at because the only other thing that Mr. Stanley has ever done related to this affair is that he wrote two public letters critical of Mr. Bowman's management of the Brown County Republican Party (Exhibits 1 and 3) and he represented Mr. Clark in the present Complaint. The unavoidable conclusion is that the District 9 Officers banned Mr. Stanley because he was critical of Mr. Bowman, not because of the alleged contribution to Mr. Taggart. And, this is where the District 9 Officers violated another fundamental Constitutional principle—free speech, which will be discussed in more detail below with respect to Mr. Clark's conviction. (Infra sec. VII. pgs. 10-11)

## **VI. IT IS UNCLEAR WHAT MR. CLARK HAS BEEN CONVICTED OF**

As argued above (supra sec. III. pgs. 3-4), Mr. Clark never received formal notice of a charge against him and was never told that he should be defending himself at the January 23 hearing. But not only that, the District 9 Officers' Decision fails to clearly identify what Mr. Clark has even been convicted of. Thus, Mr. Clark is left to scratch his head wondering what this is all about even after the District 9 Officers have issued their Decision convicting him.

In this regard, Mr. Clark's conviction is distinguishable from Mr. Stanley's conviction because in Mr. Stanley's case we can at least see clearly what he was convicted of. That is, Mr. Stanley was convicted because he allegedly made a "contribution to independent candidate Greg Taggart." (Exhibit A). But, in Mr. Clark's case, it is not nearly as clear what he has been convicted of. The District 9 Officers' Decision states that Mr. Clark was convicted "because of his long and well-documented history of opposition to Republican candidates, financial support for candidates opposing Republican nominees, and frequent public self-declarations of being an independent". (Exhibit A). What GOP Rule did Mr. Clark violate? We don't know because the District 9 Officers have never told us. What specific evidence supports the District 9 Officers findings? We can't be sure because the Decision of the District 9 Officers cites no exhibits or other evidence. What do the District 9 Officers' findings even mean or refer to? All Mr. Clark can do at this point is speculate about what the District 9 Officers may be referring to, which is another due process violation.

**VII. “HIS LONG AND WELL-DOCUMENTED HISTORY OF OPPOSITION TO REPUBLICAN CANDIDATES”**

Before we start to speculate about what the District 9 Officers may be referring to in their charge against Mr. Clark regarding his alleged “long and well-documented history of opposition to Republican candidates”, the Rules Committee should consider whether this is even a legitimate charge to make on its face. Mr. Clark is unaware of any GOP Rule that prohibits one Republican from criticizing another Republican. Rule 1-25 does not address this situation because Rule 1-25 is directed to prohibiting Republicans from supporting non-Republicans against other Republicans. So what rule did the District 9 Officers rely upon in issuing this finding? Mr. Clark submits that there is no rule that prevents Republicans from criticizing other Republicans. And there’s a couple of reasons for this. First, a rule prohibiting a Republican from criticizing another Republican would violate the fundamental Constitutional principle of free speech. Second, such a rule would be completely impractical because it would prevent Republicans from having effective primaries, since you could not even have Republican debates where Republican candidates try to distinguish themselves from each other. It is readily apparent that the District 9 Officers did not think through the logic of this finding.

Not only do we not know what rule the District 9 Officers based this finding on, but we also don’t know for sure what facts they were basing this finding on. However, it is most likely that the District 9 Officers were basing this finding on the fact that Mr. Clark has been critical of Mr. Bowman. It is true that Mr. Clark has been critical of Mr. Bowman’s management of the Brown County Republican Party. However, there is nothing in the rules that prohibits such criticism. In other words, nothing in the rules

abrogates Mr. Clark's free speech rights to speak out on matters of public concern. And the management of the local Republican Party is a matter of great public concern in Brown County, as it should be in all counties in Indiana. Indeed, in Brown County the majority of voters usually vote for Republicans, so naturally the majority of voters in Brown County are going to have an interest in how the Republican Party in Brown County is managed.

The District 9 Officers' Decision essentially creates a special new rule that prohibits anyone from criticizing Republican Party leadership. This is a hugely problematic rule, not least of which because the official GOP Rules do not recite such a rule. But if Republican candidates like Mr. Clark, and even ordinary voters like Mr. Stanley, are not allowed to voice their concerns about their own political party, how can the Republican Party expect weak leaders to be weeded out? The District 9 Officers have effectively put a wall around Mr. Bowman so that it will be incredibly difficult to replace him with a better leader because anyone who criticizes his leadership using their First Amendment rights is at risk of being banned from the Republican Party. It is hard to characterize this as anything other than a recipe for the perpetuation of corruption.<sup>2</sup>

#### **VIII. "FINANCIAL SUPPORT FOR CANDIDATES OPPOSING REPUBLICAN NOMINEES"**

Like the other reasons cited by the District 9 Officers for banning Mr. Clark, the District 9 Officers failed to identify in their Decision what evidence they were relying upon for this claim. But from the discussion that occurred at the hearing, Mr. Clark can

---

<sup>2</sup> We are not suggesting here that there is evidence in the record of corruption by Mr. Bowman or the District 9 Officers. We are only stating that corruption is the logical outcome of the District 9 Officers' Decision.

confidently piece together what the District 9 Officers are referring to here. However, contrary to the District 9 Officers' assertion that Mr. Clark financially supported "candidates" (plural), there is only one non-Republican candidate that Mr. Clark was accused of contributing to, i.e., Sherry Mitchell. (Bowman Exhibit 18).

The discussion about this issue became somewhat contentious at the January 23 hearing because Mr. Clark's representative (Mr. Stanley) and Mr. Clark felt that the Chairwoman was taking this out of proportion. Specifically, Mr. Stanley objected to the raising of this issue because it occurred 6 years ago well before Mr. Clark chose to run as a Republican for Brown County Commissioner. During that discussion, Mr. Stanley asked the Chairwoman if it was a violation of the rules for someone to contribute to a Democrat when they were 18 years old and then when they were 60 years old they decided to run for office as a Republican. In response, the Chairwoman became animated and waved her hands and exclaimed "IT'S FOREVER". Mr. Stanley then responded that President Trump used to be a Democrat but he's now the Republican President. However, at this point the Chairwoman ignored Mr. Stanley's rebuttal and moved on.

The Chairwoman's logic that a financial contribution to a non-Republican at any point in a person's lifetime justifies banning that person from the Republican Party does not stand up to scrutiny and is another very dangerous precedent for the Indiana Republican Party. Think about it, if the Chairwoman's logic were consistently applied to everyone who has ever contributed money to a non-Republican (including ordinary voters like Mr. Stanley), how many Republicans would still be left in Indiana? It is safe

to assume that the Indiana Republican Party would be left with a small minority after the Chairwoman's bloodbath.

But let's also be honest. It's clear from the record that the District 9 Chairwoman's primary concern was not about financial contributions to non-Republicans. If that was her primary concern, she would have banned everyone listed on Mr. Taggart's 2024 campaign finance report and everyone listed on Ms. Mitchell's 2018 campaign finance report. However, the only two people listed in those reports that the District 9 Officers banned were Mr. Clark and Mr. Stanley. And, as previously noted, a Republican who chose to run as an Independent against a Republican was in the room at the hearing (Mr. Taggart), but the District 9 Officers saw no fault at all in what Mr. Taggart did. Thus, it is not believable that the District 9 Officers really cared about a financial contribution to a Democrat from 6 years ago. Instead, what is painfully obvious is that the District 9 Officers were desperate to ban Mr. Clark due to their bias against him and were searching for any possible evidence to accomplish their goal, which is another equal protection violation.

**IX. "FREQUENT PUBLIC SELF-DECLARATIONS OF BEING AN INDEPENDENT"**

There is little doubt what the District 9 Officers are referring to in their claim that Mr. Clark has made "frequent public self-declarations of being an independent". Mr. Clark is a citizen reporter and has been following local government for years and publicly reporting on what he sees. This is his First Amendment right and incredibly important for the proper functioning of our local government. It is true that Mr. Clark has consistently described himself as having an independent mind on political issues. But there is nothing in the GOP Rules that prohibits this.

It does seem, however, that the District 9 Officers are mischaracterizing Mr. Clark's "frequent public self-declarations". Presumably, what the District 9 Officers are claiming is that Mr. Clark has somehow formally associated himself with an Independent political party (i.e., with a capital "I"). But, Mr. Clark unequivocally disavowed this during the January 23 hearing when asked about his declarations of being independent. In response to a question on this issue, Mr. Clark told the District 9 Officers that he only saw himself as a Republican and that he never had any plans to run as anything other than a Republican.

But once again, it doesn't seem that it really mattered how Mr. Clark answered that question because the District 9 Officers were set on convicting him no matter what. If the District 9 Officers really cared about pronouncements of being independent, then why didn't they ban the person who actually ran as an Independent against Mr. Clark? Mr. Taggart was right there at the hearing, and the District 9 Officers did nothing about Mr. Taggart running an Independent campaign against Mr. Clark, nor did they do anything about Mr. Bowman's active and open support of Mr. Taggart's Independent campaign.

It's just really not possible to take the District 9 Officers at their word because there were people in the hearing room (Mr. Taggart and Mr. Bowman) who actually participated in an Independent campaign, whereas Mr. Clark merely stated that he thinks for himself. This sends a terrible message. The District 9 Officers have effectively established another new rule that you are not allowed to be a Republican if you think for yourself. Ostensibly what the District 9 Officers are saying is that you are only allowed to be a Republican in Brown County if you shut off your brain and blindly

follow the leader of the Brown County Republican Party (i.e., Mr. Bowman). But again, that raises a serious question of whether anyone would want to be associated with a political party like this that employs vindictive rules that do not allow individuals to think for themselves. And, the vindictive application of rules in this manner is another equal protection violation.

**X. “PERSONAL GRIEVANCES OR THE SETTLING OF POLICY DISPUTES”**

It is important to set the record straight regarding the District 9 Officers’ assertion that Mr. Clark’s Complaint merely relates to “personal grievances or the settling of policy disputes”. This is most certainly not the case with regard to Mr. Clark. Mr. Clark admittedly has various policy disputes with Mr. Bowman, but Mr. Clark disavowed that policy disputes have anything to do with his Complaint against Mr. Bowman in the Background section of his original Memorandum on pages 3-4. Moreover, none of the allegations raised by Mr. Clark on pages 9-20 of his original Memorandum or in his Supplemental Memorandum have anything to do with policy disputes. Likewise, there is nothing in the record involving a personal grievance by Mr. Clark against Mr. Bowman. Indeed, Mr. Clark denied such a suggestion during the January 23 hearing when the Chairwoman asserted that Mr. Clark “hates” Mr. Bowman. Mr. Clark’s unequivocal response was, “I don’t hate the Bowmans.” Therefore, the District 9 Officers’ assertion that this dispute involves “personal grievances or the settling of policy disputes” is a fabrication with no evidentiary support, and like every other assertion made in the Decision, the District 9 Officers failed to cite anything in the record as allegedly establishing this.

Mr. Clark's Complaint only involved the GOP Rules and Mr. Bowman's violations of the rules and nothing else. That is all Mr. Clark's Complaint was about. It is undisputed that Mr. Bowman tried to "shut down" Mr. Clark's 2024 Republican campaign (original Memorandum at pg. 14), but ultimately, Mr. Bowman failed in his various attempts to sideline Mr. Clark in favor of his preferred Independent candidate, Mr. Taggart. But now, the District 9 Officers have belatedly fulfilled Mr. Bowman's wishes by finishing what Mr. Bowman started by banning Mr. Clark from the Republican Party, which will prevent him from running as a Republican when his current term runs out. It is hard to see how there is anything objective about the District 9 Officers' Decision.

And, this is where Mr. Clark and Mr. Stanley have a sincere request for the Rules Committee. If the Rules Committee believes that Mr. Bowman did not violate any GOP Rules during the 2024 election campaign, and if the Rules Committee also believes that the District 9 Officers appropriately punished Mr. Clark and Mr. Stanley with bans from the Republican Party, then Mr. Clark and Mr. Stanley jointly make this plea to the Indiana Republican Party. Please remove Rule 1-25 from the Indiana GOP Rules. On its face, Rule 1-25 seems to be a good and appropriate rule to have. But the way that it is being treated by the county and district committees has become a trap for the unwary like Mr. Clark and Mr. Stanley. And traps of this nature are detrimental to the future of the Indiana Republican Party.

**XI. CONCLUSION**

For the foregoing reasons, Mr. Clark submits that his Complaint should be reconsidered by the Rules Committee because the District 9 Officers completely ignored his Complaint. Further, Mr. Clark and Mr. Stanley submit that there is no basis for the bans issued against them by the District 9 Officers, and thus, the Rules Committee should reverse these bans. Finally, Mr. Clark and Mr. Stanley request that the Indiana Republican Party consider removing Rule 1-25 from the GOP Rules since it appears as though it has become a trap for the unwary.

The Complainant and his Representative have read this Appeal and the attached Exhibits and verify that all statements herein are factually accurate.

Dated: February 5, 2025

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

Dated: February 5, 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 A

The rules of the Indiana Republican Party exist for the proper functioning and good of the Party as it operates to fulfill its mission. The rules do not exist for use as a bludgeon by individuals with a record of attacking the Republican Party to attack those who do the hard and often thankless work of maintaining a properly functioning and successful Republican Party. The rules do not exist as a mechanism for the public airing of personal grievances or the settling of policy disputes. Well-intentioned Republicans can disagree about local policy issues like zoning, sewers, development, and many others while still being good Republicans.

This hearing dismisses the complaint against Chairman Bowman with prejudice. We find Mr. Clark to not be in good standing with the Republican Party for a period of five years because of his long and well-documented history of opposition to Republican candidates, financial support for candidates opposing Republican nominees, and frequent public self-declarations of being an independent. We find Mr. Stanley to not be in good standing with the Republican Party for a period of five years because of his contribution to independent candidate Greg Taggart. We request Chairman Bowman review the conduct of Brown County Republican precinct committee chairs and vice chairs in the recent general election as it pertains to Rule 1-25 and in compliance with Rule 4-7. Any further dispute within the Brown County Republican Party over Chairman Bowman's performance in his position can be resolved through the quadrennial reorganization process coming in 37 days' time.

Passed this 23rd day of January by the Indiana 9th District Executive Committee by a vote of 4-0.

## **Exhibit B**

Bowman Exhibit #	Description	Clark Response
1	Hazelwood Letter	Irrelevant: it was never alleged that Mr. Bowman directed Mr. Taggart's campaign.
2	Clark Post	Irrelevant: not overtly derogatory towards Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
3	Clark Post	Irrelevant: outside of the relevant time period, not overtly derogatory towards Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
4	Clark Post	Irrelevant: no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
5	Clark Post	Irrelevant: outside of the relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
6	Clark Post	Irrelevant: outside of the relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
7	Clark Post	Irrelevant: outside of the relevant time period, not overtly derogatory towards Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
8	Clark Post	Irrelevant: outside of the relevant time period, Mr. Clark retains his First Amendment rights to report on public matters.
9	Clark Post	Irrelevant: outside of the relevant time period, administrative in nature.
10	Clark Post	Irrelevant: outside of the relevant time period, Mr. Clark retains his First Amendment rights to report on public matters.
11	Clark Post	Irrelevant: time period not cited, Mr. Clark retains his First Amendment rights to report on public matters.
12	Clark Post	Irrelevant: outside of the relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
13	Clark Post	Irrelevant: time period not cited, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
14	Clark Post	Irrelevant: outside of the relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
15	Clark Post	Irrelevant: outside relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
16	Clark Post	Irrelevant: outside relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
17	Clark Post	Irrelevant: no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
18	Clark Post	Irrelevant: outside relevant time period, no mention of Mr. Bowman.
19	Clark Post	Irrelevant: outside relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
20	Reid Email	Irrelevant: Mr. Clark satisfied the two most recent primary elections test, and therefore, the factors to consider under (B) don't apply.
21	Clark Post	Irrelevant: outside relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
22	Clark Post	Irrelevant: outside relevant time period, no mention of Mr. Bowman, Mr. Clark retains his First Amendment rights to report on public matters.
23	Painter Post	Irrelevant: a negative view that some in Brown County have of Mr. Bowman; does not directly involve Mr. Clark.
24	Painter Email	Irrelevant: a negative view that some in Brown County have of Mr. Bowman; does not directly involve Mr. Clark.
25	BC Democrat Article	Irrelevant: article was not written by Mr. Clark; Mr. Clark is entitled by the GOP rules to file the present complaint.
26	Clark Post	Irrelevant: Mr. Clark retains his First Amendment rights to report on public matters.

27	Cynthia Rose (Cindy Wolpert) Statement	Irrelevant: Unspecific; Mr. Clark retains his First Amendment rights to report on public matters.
28	Taggart Voting History	Irrelevant: Unspecific.
29	Clark Voting History	Irrelevant: Unspecific.
30	Stanley Voting History	Irrelevant: Unspecific.
31	Patrick Photo	Possibly relevant: Why was this picture taken under Mr. Taggart's tent?
32	Taggart Campaign Finance Report	Irrelevant: Mr. Stanley did not contribute to Mr. Taggart's campaign (his wife may have); does not involve Mr. Bowman or Mr. Clark.
33	Harden-Bowman Emails	Irrelevant: Outside of the relevant time period; does not involve Mr. Clark.