

**State of Indiana
Clay County Circuit Court**

Jeffrey P. Gallant,

Petitioner,

v.

Indiana Election Commission

Respondent.

Civil Cause No. 11C01-2603-RA-000185

Joint Motion for Stipulation Accepting an Agency Record

Petitioner, Jeffrey Gallant (“**Petitioner**”), by counsel, and Respondent, Indiana Election Commission (“**Respondent**”), by counsel, and for their Joint Motion for Stipulation Accepting an Agency Record, states as follows:

1. On February 25, 2026, the Indiana Election Commission denied Petitioner’s Challenge (“**CAN-1**”) to the Declaration of Candidacy (“**CAN-2**”) of Alexandra Wilson (“**Mrs. Wilson**”) for the 2026 Republican primary for Senate District 38 (“**Challenge**”). Petitioner filed his Petition before the Court seeking reversal of the Indiana Election Commission (“**Commission**”) decision denying the Challenge and remand to the Commission to immediately uphold the Challenge, disqualify Mrs. Wilson from being a candidate and prohibit her name appearing on the ballot for the 2026 Republican primary for Indiana Senate District 38, and so order the respective election boards of Vigo, Clay, and Sullivan Counties.
2. Petitioner and Respondent now jointly move for Stipulation Accepting an Agency Record.
3. An agency is required by Indiana Code § 4-21.5-3-33 to maintain an official record of

each proceeding. Judicial review of disputed issues of fact must be confined to the agency record supplemented by additional evidence where permitted by the Administrative Orders and Procedures Act. Ind. Code § 4-21.5-5-11.

4. Additionally, “[b]y stipulation of all parties to the review proceedings, the record may be shortened, summarized, or organized.” Ind. Code § 4-21.5-5-13(f).

5. The transcript of the Commission proceeding has been shared with all parties via email. The documents available to the Commission at the proceeding have also been shared with all parties via email. All documents that comprise the agency record are described below.

Document	Page Count
Candidate Filing Challenge, dated February 13, 2026	5
Supplement to February 13, 2026, Candidate Filing Challenge and Exhibits, dated February 18, 2026	36
Excerpt of Transcript of February 25, 2026, Indiana Election Commission Public Session	45
Declaration of Candidacy for Primary Nomination, dated February 5, 2026	4
Notice of February 25, 2026, Hearing, dated February 13, 2026	7
Appearance of Samantha E. DeWester, dated February 23, 2026	1
Indiana Election Commission February 25, 2026, Public Session Notice	2
Candidate exhibits A-G	14

WHEREFORE, Petitioner, by counsel, and Respondent, by counsel, stipulate that the aforementioned documents constitute a true, accurate, and complete agency record and that the Court may issue a ruling based on the facts contained therein.

Dated: March 6, 2026

Respectfully submitted,

/s/ James Bopp, Jr.
James Bopp, Jr., Ind. Bar No. 2838-84
THE BOPP LAW FIRM, PC
The National Building
1 South Sixth Street
Terre Haute, IN 47807
jboppjr@aol.com
Phone: 812/232-2434
Fax: 812/235-3685
Attorneys for Petitioner

THEODORE E. ROKITA
Attorney General of Indiana
Attorney No. 18857-49

/s/ John Oberdorf
John Oberdorf
Deputy Attorney General
Attorney No. 37951-49

Drew W. Green
Deputy Attorney General
Attorney No. 39704-53

Jefferson S. Garn
Deputy Attorney General
Attorney No. 29921-49

OFFICE OF ATTORNEY GENERAL
TODD ROKITA
Indiana Government Center South, 5th Floor
302 West Washington Street
Indianapolis, IN 46204-2770
Telephone: (317) 323-6217 (Oberdorf)
Telephone: (317) 233-9901 (Green)
Telephone: (317) 232-5933 (Garn)