

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

JASON MATTHEW LYNCH,

PLAINTIFF

v.

Case No. 4:26-cv-00118-JM-JJV

**WHITE COUNTY, ARKANSAS; CLAYTON
EDWARDS; HANNAH ROSS; JOSH SWINDLE;
DARIUS WOODY; ZACHARY RODGERS; JEREMY
JONES; MASON WILBORN; COLLIN TUCKER;
CODY BALCH; BRANDON ROBERTSON; SETH
PHILLIPS; DONALD WOOD; JOSEPH MARTIN;
MATTHEW WHITE; HALEY WORKMAN; and
JOHN OR JANE DOE ASSIGNED DSN 1554, all
individual Defendants in their official capacities only,**

DEFENDANTS

PROPOSED THIRD AMENDED COMPLAINT

42 U.S.C. § 1983 - One screened conditions-of-confinement claim - Official capacities only

Naming note. The docket labels Document 58 as the Second Amended Complaint, although Document 58's internal title says Third Amended Complaint. Plaintiff uses the docket's amendment count and submits this as the Proposed Third Amended Complaint. If the Clerk applies a different ordinal label, the substance is unchanged.

PRELIMINARY STATEMENT AND SCREENED SCOPE

1. Plaintiff Jason Matthew Lynch, proceeding pro se, submits this proposed pleading with his separate request for leave to amend and to replace the Doe placeholders with names learned from County discovery. This pleading becomes operative only if the Court grants leave.

2. This proposed Complaint is complete and stands on its own. If accepted, it supersedes Document 58 and does not incorporate any earlier complaint by reference. Earlier pleadings and discovery may serve as evidence, but every claim and material allegation Plaintiff asks the Court to treat as pleaded appears here.

3. Documents 70 and 75 allowed one inhumane-conditions claim under the Fourteenth and Eighth Amendments against White County, Clayton Edwards, Hannah Ross, Sergeant Swindle, and the Doe Defendants, in official capacities only, limited to: (a) exposure to sewage, feces, blood, and black mold; (b) sleeping on concrete; (c) unsafe drinking water and inadequate nutrition; and (d) inadequate exercise and yard call. Document 89 repeated that boundary.

4. This proposed Complaint does not expand that screening order. It asserts one count containing only those four components. It does not assert medical-care, failure-to-protect, privacy or strip-search, excessive-force, retaliation, mail, grievance, kiosk, religious, conspiracy, spoliation, access-to-court, or any other dismissed or severed theory. A fact that also appears in another case is included only when it proves notice, causation, injury, identification, or one of the four surviving conditions.

5. White County Jail/White County Detention Center is not named because it was dismissed with prejudice. Each individual Defendant is sued only in his or her official capacity. Plaintiff does not reassert any personal-capacity claim. Person-specific facts identify the Doe substitutes and show County notice, implementation, custom, and causation; they are not separate personal-capacity counts.

6. The conditions allegations were originally included in Lynch v. Does, Case No. 4:24-cv-00740-LPR-BBM, and were severed and refiled in this action as directed. This procedural history is stated only to explain the record; this Complaint does not import the separate claims that remain in that case.

I. JURISDICTION AND VENUE

7. This civil action arises under 42 U.S.C. § 1983 and the Eighth and Fourteenth Amendments to the United States Constitution. The Court has federal-question and civil-rights jurisdiction under 28 U.S.C. §§ 1331 and 1343(a)(3)-(4).

8. Venue is proper in the Eastern District of Arkansas under 28 U.S.C. § 1391(b) because White County is in this District and all events at issue occurred at the White County Detention Center in Searcy, Arkansas.

9. At all relevant times, Defendants and the employees whose conduct is described below acted under color of Arkansas law.

II. PARTIES

10. Plaintiff Jason Matthew Lynch was confined at White County Detention Center from June 9 through September 9, 2024. The Court's screening order treats the period as including time when he was a pretrial detainee and time when he was a convicted prisoner.

11. Defendant White County, Arkansas operated the detention center and is the governmental entity against which the official-capacity claim is asserted.

12. Defendant Clayton Edwards was a White County detention captain and administrator. He reviewed or answered Plaintiff's conditions grievances and appeals, received reports about overcrowding and floor placement, the shower, sewage, mold, inadequate sanitation supplies, and scalding or unsafe water, and allegedly responded to repeated complaints with 'so' or 'noted' without an effective correction. He is sued in his official capacity only.

13. Defendant Hannah Ross was a White County lieutenant. Plaintiff orally notified Ross about the non-draining, mold-covered shower and sewage condition and observed her view the condition, but no effective correction followed. She is sued in her official capacity only.

14. Defendant Josh Swindle, DSN 1753, is the sergeant identified in earlier filings as 'Swindle' or 'Swindel.' Plaintiff notified him of the shower/mold condition and observed him view it; showed or reported spoiled food to him; had one spoiled tray removed without a replacement meal; and heard him participate in the August 19 outdoor-yard statement. He is sued in his official capacity only.

15. Defendant Darius Woody, DSN 1708, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus direct F-Pod checkpoint records. This Defendant is sued in an official capacity only.

16. Defendant Zachary Rodgers, DSN 1709, was a White County detention employee during the relevant period. The claim-specific identification basis is probable roster mapping for the officer Lynch knew as Rogers; County should confirm. This Defendant is sued in an official capacity only. Plaintiff pleads this as a good-faith probable identification of the officer previously called Rogers and requests correction if County records establish another spelling or person.

17. Defendant Jeremy Jones, DSN 1742, was a White County detention employee during the relevant period. The claim-specific identification basis is probable roster mapping for CO Jones; Jeremy Jones, not Misty Jones, has Lynch F-Pod records; County should confirm. This Defendant is sued in an official capacity only. Plaintiff pleads this as a good-faith probable identification of the officer previously called CO Jones and requests correction if County records establish another Jones.

18. Defendant Mason Wilborn, DSN 1743, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus direct, including overnight, F-Pod checkpoint records. This Defendant is sued in an official capacity only.

19. Defendant Collin Tucker, DSN 1745, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus direct early-morning F-Pod checkpoint record. This Defendant is sued in an official capacity only.

20. Defendant Cody Balch, DSN 1748, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus direct overnight F-Pod checkpoint records. This Defendant is sued in an official capacity only.

21. Defendant Brandon Robertson, DSN 1750, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus repeated direct F-Pod checkpoint records beginning on the log-supported placement date. This Defendant is sued in an official capacity only.

22. Defendant Seth Phillips, DSN 1756, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus the largest number of direct first-week F-Pod checkpoint records. This Defendant is sued in an official capacity only.

23. Defendant Donald Wood, DSN 1758, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match, direct checkpoint records, and Lynch's firsthand identification. This Defendant is sued in an official capacity only.

24. Defendant Joseph Martin, DSN 1762, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus direct F-Pod checkpoint records. This Defendant is sued in an official capacity only.

25. Defendant Matthew White, DSN 1763, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match plus repeated direct F-Pod checkpoint records; distinct from medical provider Jonathan White. This Defendant is sued in an official capacity only. He is the County detention employee and not medical provider Jonathan White.

26. Defendant Haley Workman, DSN 1734, was a White County detention employee during the relevant period. The claim-specific identification basis is county roster match and Lynch's firsthand August 19 identification; no F-Pod RFID inference is used. This Defendant is sued in an official capacity only.

27. Defendant John or Jane Doe assigned DSN 1554 was a White County detention employee whose name was not disclosed in the produced roster. That account has one direct F-Pod scan on July 24 at 3:17:54 p.m. and Mobile Command entries for cleaning supplies on July 11 and July 24. Plaintiff retains this narrowly identified Doe for the screened sanitation condition, in an official capacity only, and requests substitution of the employee's legal name when disclosed. Plaintiff does not connect this Doe to floor sleeping or spoiled-food service.

28. No other employee listed in Appendix B is made a Defendant on the present record. Appendix B is included for completeness and candor. A direct checkpoint record establishes account attribution and an opportunity to observe; it is not, by itself, an automatic finding of knowledge, authority, causation, or liability. The County roster establishes names and DSNs but generally does not establish rank.

III. COMMON FACTUAL ALLEGATIONS

A. Placement, overcrowding, and the record-based date correction

29. Plaintiff entered WCDC on June 9, 2024. An earlier pleading estimated that he entered F Pod on the evening of June 11. The later-produced Guardian log contains an F-Pod record at 3:44:15 p.m. on June 10 and a first

direct F-Pod scan at 4:35:40 p.m. that day. Plaintiff therefore alleges, based on the more precise County record, that he was assigned to F Pod by June 10. This is a good-faith date clarification, not a new claim.

30. F Pod was designed for approximately sixteen people but routinely held approximately thirty-five or more. The overcrowding left Plaintiff without an assigned cell or bunk and concentrated the pod population around one approximately three-foot-by-three-foot shower and the shared toilet area.

31. From about June 10 through June 28, Plaintiff had only a thin, visibly contaminated mat placed on open dayroom concrete beside the shower/toilet area. He slept there, ate there, and kept the mat there in plain view. On June 28 he paid another inmate for use of a bunk in F-4. This specific period corrects a shorter-form earlier estimate that suggested floor sleeping lasted his whole stay.

B. Sewage, feces, blood, black mold, and cleaning conditions

32. The only F-Pod shower did not drain properly. Shower water and toilet or sewage backups repeatedly entered the dayroom where Plaintiff slept and ate. Raw sewage, fecal contamination, pooled water, residue, odor, and the inmates' jail-jumpsuit barriers were open and apparent. Plaintiff and other inmates used jumpsuits as makeshift barriers to keep the backup from the sleeping area.

33. Approximately thirty-five or more inmates shared one mop and bucket and diluted floor cleaner for the cells, dayroom, tables, shower, toilet area, and sewage. Proper disinfectant, toilet cleaner, brushes, and rags were not reliably supplied. Plaintiff does not allege that the log shows zero supply events: Appendix B discloses twenty entries labeled cleaning supplies and eleven labeled bleach. He alleges those intermittent entries were inadequate for the recurring contamination and population.

34. Soap also was not reliably provided when Plaintiff requested it. This allegation is included only as a circumstance worsening his inability to remove sewage, fecal residue, blood, and mold exposure; it is not pleaded as a separate hygiene-supplies claim.

35. Beginning about June 15 and continuing through Plaintiff's departure from F Pod, the small non-draining shower was visibly covered by black mold. Plaintiff submitted more than ten grievances about the shower and orally notified Wood, Jones, Swindle, and Ross, who viewed it. Staff sometimes said bleach had been sprayed, but the mold and drainage problem returned and remained.

36. On or about August 19, a substantial pipe-chase leak in F-1 flooded the cell/dayroom. Blankets were put into the wet chase to absorb water and were later exchanged after becoming wet or moldy; Plaintiff alleges mold grew in the dark, wet chase. This fact supports the already screened mold and sanitation component. Plaintiff does not add a water-system or maintenance Doe because the production does not responsibly identify one.

37. On or about September 3-4, Plaintiff was moved from F Pod to a medical-placement area. Earlier pleadings used both August 23 and September 3; the produced log continues positive F-Pod records through September 4 and then records MED2. Plaintiff uses the record-supported approximate transition. In that area, walls and the shower allegedly had dried or smeared human waste, blood, black mold, and feces-filled adult diapers left on the shower floor, without adequate cleaning supplies or timely removal.

38. The exposure was prolonged and combined: contaminated floor sleeping lasted about eighteen days; recurring sewage and mold continued for much of the nearly three-month confinement; and the final medical-placement area added blood and fecal contamination. Plaintiff alleges a rash diagnosed or described as scabies or staph/skin infection, pain, headaches, nosebleeds, and breathing difficulty during the exposure. He mentions cleaning chemicals used on his skin only as evidence of injury and desperation caused by the sanitation conditions, not as a medical-care claim. He does not ask the Court to infer a particular lung diagnosis from symptoms alone.

C. Unsafe drinking water

39. Before Plaintiff obtained the F-4 bunk, the available dayroom drinking source was a dirty shared sink/toilet fixture that inmates lacked adequate materials to sanitize. From June 28 until approximately August 23, the F-4 fixture supplied no consistently cold or safely drinkable water; the water was scalding hot and burned Plaintiff's hands while washing. Plaintiff previously estimated it near 140 degrees based on its heat and the burns, but he does not represent that he had a contemporaneous calibrated measurement.

40. Plaintiff and cellmates reported the condition to staff and Edwards, but no effective repair or dependable alternative potable-water source was provided during that period. Plaintiff experienced burns, pain, thirst, and the choice of drinking from an allegedly contaminated source, using dangerously hot water, or going without adequate water. No maintenance employee is named because the discovery does not show who controlled or failed to repair the system.

D. Inadequate nutrition and spoiled food

41. On repeated occasions during the WCDC confinement, Plaintiff received food that was visibly spoiled, rotten, contaminated, or otherwise unsafe. When he requested a replacement, staff sometimes told him to eat it, eat around the spoiled portion, or go without. Plaintiff also alleges that on some days a meal was not served. Spoiled meals made him sick, and unreplaced or unserved meals caused hunger.

42. Plaintiff personally showed or reported spoiled food to Donald Wood, Josh Swindle, and the officer he knew as Rogers, probably Zachary Rodgers. Wood and Rogers told him to eat it or eat around it. On one occasion Swindle removed a spoiled tray, but no replacement arrived, and Plaintiff went hungry. These firsthand interactions, not the meal-status table alone, are the basis for the food identifications.

43. The Guardian report contains 250 F-Pod meal-status events - 247 accepted, two offered, and one declined - entered under employee accounts. Most are Mobile Command entries. They do not identify the cook, tray carrier, condition of the food, or person who decided whether to replace a tray. Plaintiff does not treat them as standalone proof that every listed employee served rotten food.

E. Inadequate exercise and outdoor yard

44. Plaintiff went more than five consecutive weeks without outdoor yard while other pods received yard. During a 23-hour-lockdown period, his only hour out was spent handcuffed to a metal bench with less than approximately one foot of movement, which was not meaningful exercise. The extended deprivation caused physical deconditioning, pain, stress, and mental deterioration.

45. On August 19, Workman, Swindle, and Rogers told F-Pod inmates that other pods would receive regular outdoor yard but F Pod would not. Plaintiff includes that statement only to identify the participants and show intentional implementation of the screened yard condition. He does not assert retaliation or rely on the stated reason as an independent constitutional theory in this case.

46. The Guardian report contains generic entries labeled 'Recreation,' including a 21-minute, 45-second movement on August 19 and several other movements or declined/offered entries listed in Appendix B. The entries do not state that the event was outdoor yard or describe whether Plaintiff was restrained to a bench. Plaintiff does not deny the entries. His allegation is that they did not supply regular outdoor yard or meaningful exercise and that there was a consecutive period exceeding five weeks without outdoor access.

F. Notice, persistence, and County practice

47. Plaintiff repeatedly notified detention staff and administrators orally and through the kiosk grievance system. He submitted more than one hundred grievances overall, including repeated complaints about the conditions pleaded here, and pursued available appeals. Edwards reviewed or answered the appeals; the pleaded, specifically

supported notices to Edwards concerned floor/overcrowding, sewage/mold/sanitation, cleaning, and water. Plaintiff also gave oral notice to Wood, Jones, Swindle, Ross, and other staff when the conditions were present.

48. The conditions were not hidden or momentary. The floor mat was in an open dayroom; backups, waste residue, odor, mold, and makeshift barriers were observable; the shower and hot-water problems recurred; food replacement decisions repeated; and yard practices were implemented across shifts. Direct checkpoint records show repeated entry by multiple employees over the same period.

49. Plaintiff alleges WCDC also used more than twenty body-worn-camera-equipped officers and more than thirty fixed cameras with audio. He includes that allegation only as additional context for observation, notice, and preservation of evidence concerning the open conditions, not as a surveillance or spoliation claim. By September 2024, he also had given written and oral notice that litigation and evidence preservation were expected.

50. White County's practices and tolerated customs included operating F Pod above its designed capacity without enough bunks; placing unassigned detainees on the concrete beside the only shower/toilet area; failing to repair or adequately contain recurring drainage, sewage, mold, and potable-water hazards; providing sanitation supplies insufficient for the population and recurrence; failing to ensure replacement of unsafe meals; and failing to provide regular outdoor yard or meaningful exercise.

51. These were pod-wide operational practices, not conditions unique to Plaintiff. Approximately thirty-five or more detainees shared the sole shower/toilet area and limited cleaning materials; inmates collectively used jumpsuits as sewage barriers; Plaintiff observed other inmates receive spoiled meals or become sick after them; and outdoor-yard scheduling was announced and implemented by pod. Multiple employees recorded direct checkpoints, meals, supplies, and brief generic recreation across many shifts.

52. The frequency, duration, repeated grievances, oral reports, direct observations, log pattern, and continuation after notice permitted County policymakers and administrators to know of the practices and their obvious health risks. Yet no timely, effective correction protected Plaintiff. These practices were moving forces behind his exposure and injuries.

IV. DEFENDANT-SPECIFIC IDENTIFICATION AND CONNECTION TO THE SCREENED CONDITIONS

53. The following schedule states why each person is listed, what the person is alleged or recorded to have done, approximately when and where, the surviving condition involved, and the effect on Plaintiff. RFID evidence is described as record-supported presence or opportunity to observe. Firsthand conduct is identified separately.

Defendant	Why listed / surviving condition	What, when, and where	Effect on Plaintiff's protected interests
White County	Operating entity; all four screened conditions	Maintained or tolerated the overcrowding, sanitation, water, meal-replacement, and exercise practices described above throughout 6/9-9/9/24 at WCDC.	All combined physical and dignitary injuries; entity liability under § 1983.
Clayton Edwards	Captain / administrator; grievances and reported conditions	Throughout the stay, received written complaints and appeals concerning overcrowding/floor placement, shower/mold, sewage, sanitation supplies, and hot water; allegedly answered repeated complaints with 'so' or 'noted' without an effective correction.	Continued floor, sanitation, and water deprivations after administrative notice.
Hannah Ross	Lieutenant; firsthand sanitation notice	During the F-Pod period, Lynch orally notified Ross of the non-draining, mold-covered shower and observed her view it; no effective correction followed.	Continued sewage/mold exposure and related symptoms.

Defendant	Why listed / surviving condition	What, when, and where	Effect on Plaintiff's protected interests
Josh Swindle / DSN 1753	Sergeant; floor, sanitation, food, and yard firsthand acts	Received mold/shower notice and viewed condition; dealt with spoiled food, including one tray removed without replacement; participated in 8/19 yard statement. Direct scans during the floor period: 6/21 23:56:16, 6/22 06:00:51, and 6/24 01:29:50; 22 direct scans through 9/1.	Floor/sanitation exposure, missed meal/hunger, and inadequate outdoor exercise.
John/Jane Doe / DSN 1554	Unresolved roster identity; sanitation only	One direct F-Pod scan 7/24 at 15:17:54; cleaning-supply account entries 7/11 and 7/24. Retained only for the screened sanitation condition and subject to name disclosure.	Continued sanitation exposure; record presence is not automatic liability.
Darius Woody / DSN 1708	County roster match plus direct F-Pod checkpoint records. Conditions: floor; sewage / mold	Five direct first-week scans on June 12 and 17, 2024, while Lynch's mat and sleeping place remained openly visible on the dayroom concrete; 31 direct scans from June 12 through September 4 during the recurring shower/toilet-backup and mold period. Lynch alleges the mat, pooled contamination or its residue, odor, and makeshift barriers were open and apparent during the checks. No safe bunk or effective sanitation remedy followed.	Continued exposure to contaminated concrete, sewage, and mold; skin injury, pain, headaches, and breathing symptoms.
Zachary Rodgers / DSN 1709	Probable roster mapping for the officer Lynch knew as Rogers; County should confirm. Conditions: floor; sewage / mold; food; yard	One direct first-week scan on June 11 and 49 direct scans through September 4. Lynch personally identifies Rogers as the officer who placed him in overcrowded F Pod; Lynch later showed Rogers spoiled food and was told to eat it or eat around it; on August 19 Rogers participated in telling F Pod that it would not receive its regular outdoor yard call. The Rodgers/Rogers spelling remains subject to confirmation.	Exposure to unsafe floor and sanitation conditions, hunger or unsafe food, sickness, and deprivation of meaningful outdoor exercise.
Jeremy Jones / DSN 1742	Probable roster mapping for CO Jones; Jeremy Jones, not Misty Jones, has Lynch F-Pod records; County should confirm. Conditions: floor; sewage / mold	Six direct first-week scans on June 12 and 17 and 66 direct scans through September 4. Lynch orally told CO Jones about the non-draining, mold-covered shower and observed Jones view it. First-week checks occurred while the floor mat was openly visible. The Jeremy Jones/CO Jones mapping remains subject to confirmation.	Continued sewage, mold, contaminated-floor exposure, and associated skin and respiratory symptoms.
Mason Wilborn / DSN 1743	County roster match plus direct, including overnight, F-Pod checkpoint records. Conditions: floor; sewage / mold	Five first-week direct checks on June 12, 14, 16, and 17, including checks after midnight when Lynch alleges he was sleeping on the open dayroom mat; 103 direct scans through September 3 during the recurring sanitation period. Wilborn's account also entered Lynch's approximately 22-minute generic recreation movement on August 19, a record that does not identify outdoor yard.	Continued exposure to contaminated concrete and recurring sewage/mold conditions.
Collin Tucker / DSN 1745	County roster match plus direct early-morning F-Pod checkpoint record. Conditions: floor; sewage / mold	A direct check at 5:03 a.m. on June 11 while Lynch alleges he was sleeping on the open dayroom mat, followed by four additional direct checks through June 28 during the recurring backup period. No safe placement or effective protection followed.	Continued sleeping on contaminated concrete and exposure to sewage/mold hazards.
Cody Balch / DSN 1748	County roster match plus direct overnight F-Pod checkpoint records. Conditions: floor; sewage / mold	Direct checks at 2:53 a.m. June 13 and 1:28 a.m. June 14 while Lynch alleges he was sleeping on the open dayroom mat; 33 direct scans through September 1 during the recurring sewage, shower-backup, and mold period.	Continued exposure to contaminated floor, sewage, and mold, with skin and respiratory symptoms.

Defendant	Why listed / surviving condition	What, when, and where	Effect on Plaintiff's protected interests
Brandon Robertson / DSN 1750	County roster match plus repeated direct F-Pod checkpoint records beginning on the log-supported placement date. Conditions: floor; sewage / mold	Fourteen direct scans on June 10, 11, and 14-16 while Lynch had no bunk and the dayroom mat remained openly visible; 48 direct scans through August 30 during the recurring sewage and mold period. Robertson made the first direct F-Pod scan after the first F-Pod record, at 4:35 p.m. June 10.	Continued unsafe sleeping placement and exposure to contaminated living areas.
Seth Phillips / DSN 1756	County roster match plus the largest number of direct first-week F-Pod checkpoint records. Conditions: floor; sewage / mold	Eighteen direct first-week scans on June 10, 11, and 14-16 while Lynch's unassigned sleeping mat remained in the open dayroom; 116 direct scans through August 30 during the recurring sewage/mold period. Later MED2 records show Phillips made checks during the September medical-placement period, but Plaintiff relies only on record-supported proximity and does not treat the log alone as proof of a separate act.	Continued floor, sewage, and mold exposure with physical pain, skin injury, and respiratory symptoms.
Donald Wood / DSN 1758	County roster match, direct checkpoint records, and Lynch's firsthand identification. Conditions: floor; sewage / mold; food	Six direct first-week scans on June 12-13 and 65 through September 3. Lynch orally told CO Wood about the non-draining, mold-covered shower and observed Wood view it. Lynch also showed Wood spoiled food and was told to eat it or eat around it. Wood's account entered one declined-meal status on June 24; Plaintiff treats that as a record of account activity, not independent proof of spoilage or service.	Continued sanitation exposure and the choice between hunger and unsafe food, causing hunger and sickness.
Joseph Martin / DSN 1762	County roster match plus direct F-Pod checkpoint records. Conditions: floor; sewage / mold	Direct checks on June 11 and 13 while Lynch's sleeping mat remained in the open dayroom; 26 direct scans through August 31 during the recurring shower/toilet-backup and mold period.	Continued exposure to contaminated concrete, sewage, and mold.
Matthew White / DSN 1763	County roster match plus repeated direct F-Pod checkpoint records; distinct from medical provider Jonathan White. Conditions: floor; sewage / mold	Four direct first-week scans on June 11, 13, and 14 while the dayroom mat remained openly visible; 53 direct scans through September 1 during the recurring backup and mold period. The June 10 3:44 p.m. entry is a pod/run record, not a direct scan.	Continued exposure to unsafe sleeping and sanitation conditions.
Haley Workman / DSN 1734	County roster match and Lynch's firsthand August 19 identification; no F-Pod RFID inference is used. Conditions: yard / exercise only	On August 19, 2024, Lynch personally heard Workman, Swindle, and the officer known as Rogers tell F-Pod inmates that the pod would not receive its regular outdoor yard call while other pods did. A separate Guardian entry shows a 21-minute, 45-second movement labeled only 'Recreation' later that day; it does not identify outdoor yard. Plaintiff does not deny that entry and alleges the recorded movement was not the regular outdoor yard call described in his pleading.	Continued lack of meaningful outdoor exercise, with physical and mental deterioration.

V. COUNT I - INHUMANE CONDITIONS OF CONFINEMENT

Eighth and Fourteenth Amendments; 42 U.S.C. § 1983; official capacities only

54. Plaintiff incorporates Paragraphs 1 through 53. This is one count with four factual components matching Documents 70, 75, and 89.

55. For the pretrial-detention portion, the Fourteenth Amendment prohibits a condition imposed for punishment or a condition not reasonably related to a legitimate governmental objective. *Bell v. Wolfish*, 441 U.S. 520, 535-39 (1979); *Stearns v. Inmate Services Corp.*, 957 F.3d 902, 906-09 (8th Cir. 2020). A conditions pleading should identify the specific condition, duration, frequency, and effect rather than rely on generalized labels. *Dalen v. Harpstead*, 123 F.4th 900, 905-06 (8th Cir. 2024).

56. For the post-conviction portion, the Eighth Amendment requires humane conditions and reasonable measures to secure basic needs. A sufficiently serious deprivation violates the Amendment when officials know of and disregard a substantial risk. *Farmer v. Brennan*, 511 U.S. 825, 832-37 (1994); *Rhodes v. Chapman*, 452 U.S. 337, 346-47 (1981). Exposure to an unreasonable risk of future health injury also may violate the Amendment. *Helling v. McKinney*, 509 U.S. 25, 33-36 (1993).

57. Duration and the combined effect of conditions matter. Conditions that may be tolerable briefly can become unconstitutional when prolonged or when they reinforce the denial of a basic human need. *Hutto v. Finney*, 437 U.S. 678, 685-87 (1978); *Wilson v. Seiter*, 501 U.S. 294, 304-05 (1991).

58. Prolonged exposure to human waste and severe filth can support a conditions claim. *Owens v. Scott County Jail*, 328 F.3d 1026, 1027-28 (8th Cir. 2003); *Howard v. Adkison*, 887 F.2d 134, 137 (8th Cir. 1989); *Fruit v. Norris*, 905 F.2d 1147, 1150-51 (8th Cir. 1990). Plaintiff's allegations involve recurring contamination over weeks, combined with overcrowding, floor sleeping, mold, and inadequate cleaning - not a single short, promptly resolved overflow.

59. Prisoners are entitled to nutritionally adequate food, and meaningful opportunities for exercise are evaluated by duration, available alternatives, and resulting harm. *Wishon v. Gammon*, 978 F.2d 446, 449 (8th Cir. 1992); *Ingrassia v. Schafer*, 825 F.3d 891, 897 (8th Cir. 2016). Plaintiff alleges repeated spoiled-food replacement failures, physical sickness and hunger, more than five consecutive weeks without outdoor access, restrictive bench confinement instead of meaningful movement, and physical and mental deterioration.

60. The concrete-floor placement cannot be separated from its setting: overcrowding denied a bunk, the thin mat lay beside the sole backing-up shower/toilet, and Plaintiff alleges contamination and resulting skin injury. He challenges the combined, prolonged deprivation, not concrete sleeping in a clean area for a brief emergency.

61. Taken individually and together, the pleaded sewage, feces, blood, mold, contaminated concrete sleeping, unsafe water, inadequate nutrition, and exercise deprivation denied basic sanitation, safe shelter, food, water, and movement; posed obvious and substantial health risks; lacked a reasonable relationship to a legitimate objective or were excessive in relation to any such objective; and continued after repeated notice.

62. An official-capacity claim is a claim against the governmental entity. *Kentucky v. Graham*, 473 U.S. 159, 165-66 (1985). White County is liable under 42 U.S.C. § 1983 when an official policy, a widespread and persistent custom, or a deliberately indifferent failure attributable to the County is the moving force behind the constitutional injury. *Monell v. Department of Social Services*, 436 U.S. 658, 690-94 (1978); *Hall v. Higgins*, 77 F.4th 1171, 1176-78 (8th Cir. 2023). Plaintiff alleges repeated, visible practices across many shifts, notice through grievances and observation, deliberate continuation, and direct causation.

63. The County's policies or customs, implemented through the officially sued Defendants and other staff, caused the one screened conditions-of-confinement claim and Plaintiff's physical and emotional injuries. Plaintiff seeks no personal-capacity judgment and no punitive damages against the County or official-capacity Defendants.

VI. INJURY AND CAUSATION

64. As a direct and foreseeable result of the combined conditions, Plaintiff suffered a skin rash and scabies/staph or other skin infection, burns to his hands, pain, headaches, nosebleeds, breathing difficulty, sickness after spoiled food, hunger from an unreplaced meal, thirst and unsafe-water exposure, physical deconditioning, sleep disruption, anxiety, distress, humiliation, and loss of dignity. He also faced a substantial risk of disease and future health injury from sewage, feces, blood, mold, and inadequate sanitation.

65. The physical symptoms are pleaded as harm from the four screened conditions only. Plaintiff does not assert a separate diagnosis, medical-negligence, or deliberate-indifference-to-medical-care claim in this action.

VII. EXHAUSTION

66. Plaintiff used the available kiosk grievance and appeal process for the challenged conditions, repeatedly complained orally and in writing, and pursued appeals that Edwards reviewed or answered. To the extent an emergency condition arose after the kiosk closed at approximately 10:00 p.m., Plaintiff alleges no emergency grievance channel was then available. This paragraph addresses exhaustion and notice only; it is not a grievance-access or due-process claim.

VIII. PRAYER FOR RELIEF

67. WHEREFORE, Plaintiff asks the Court to enter judgment in his favor on the single official-capacity conditions-of-confinement claim and award:

- A.** A declaration, to the extent permitted by Article III and applicable law, that the challenged conditions violated Plaintiff's Eighth and/or Fourteenth Amendment rights;
- B.** Compensatory damages in an amount determined by the jury for proven physical injury, pain, hunger, sickness, emotional distress, and other compensable harm;
- C.** Nominal damages if a constitutional violation is proved but compensatory damages are not;
- D.** Taxable costs and any other relief authorized by law; and
- E.** A jury trial on all issues triable to a jury.

IX. JURY DEMAND

68. Plaintiff demands a trial by jury under Federal Rule of Civil Procedure 38.

VERIFICATION UNDER 28 U.S.C. § 1746

I declare under penalty of perjury that the factual allegations in this Proposed Third Amended Complaint are true and correct based on my personal knowledge and the records produced in discovery, and that allegations expressly stated on information and belief are believed to be true. I have reviewed the disclosed record limits and do not rely on an RFID or account entry as automatic proof of liability.

Executed on _____, 2026, at _____.

Jason Matthew Lynch, Plaintiff pro se
261 Wilson Loop

Ward, Arkansas 72176
Telephone: 501-605-4481

CERTIFICATE OF SERVICE

I certify that on _____, 2026, I served a true and correct copy of this Proposed Third Amended Complaint and its appendices with the related motion by email on Kaylen S. Lewis, counsel for the County Defendants, at lewis@jowenslawfirm.com.

Jason Matthew Lynch

APPENDIX A - DOE-SUBSTITUTE IDENTIFICATION SCHEDULE

Purpose and limits. This Appendix supplies the exact name/DSN, time and location basis, why each person is listed, and the screened condition involved. The first-week window is the rolling 168 hours from the first F-Pod record at June 10, 2024, 3:44:15 p.m. through June 17 at 3:44:15 p.m. A direct '*' record means a cell or out-of-cell tag scan at PODF. It supports physical checkpoint entry; it does not by itself prove what the employee saw, knew, controlled, or decided. Plaintiff's allegation that the mat and recurring contamination were openly visible is a separate factual allegation.

Name / DSN	Screened condition(s)	First-week or event basis	Full-window basis	Identification note
Darius Woody DSN 1708	floor; sewage / mold	6/12 09:24:35, 14:06:04; 6/17 10:27:15, 13:23:22, 14:53:42	31 direct scans, 6/12-9/4	County roster match plus direct F-Pod checkpoint records.
Zachary Rodgers DSN 1709	floor; sewage / mold; food; yard	6/11 11:13:44 direct; pod/run entries 6/11 and 6/15	49 direct scans, 6/11-9/4	Probable roster mapping for the officer Lynch knew as Rogers; County should confirm.
Jeremy Jones DSN 1742	floor; sewage / mold	6/12 10:36:15, 14:44:52, 17:30:28; 6/17 06:34:38, 08:45:38, 12:28:10	66 direct scans, 6/12-9/4	Probable roster mapping for CO Jones; Jeremy Jones, not Misty Jones, has Lynch F-Pod records; County should confirm.
Mason Wilborn DSN 1743	floor; sewage / mold	6/12 01:16:13; 6/14 23:27:34; 6/16 01:08:28; 6/17 00:18:37, 02:39:07	103 direct scans, 6/12-9/3	County roster match plus direct, including overnight, F-Pod checkpoint records.
Collin Tucker DSN 1745	floor; sewage / mold	6/11 05:03:54 direct; pod/run entries 6/11 and 6/15	5 direct scans, 6/11-6/28	County roster match plus direct early-morning F-Pod checkpoint record.
Cody Balch DSN 1748	floor; sewage / mold	6/13 02:53:02; 6/14 01:28:48	33 direct scans, 6/13-9/1	County roster match plus direct overnight F-Pod checkpoint records.
Brandon Robertson DSN 1750	floor; sewage / mold	6/10 16:35:40; 6/11 06:15:45, 08:02:27, 08:52:33, 17:13:10; 6/14 09:26:01, 12:59:09; 6/15 13:14:28, 14:43:27, 17:37:19; 6/16 07:53:25, 12:20:52, 13:52:42, 17:10:13	48 direct scans, 6/10-8/30	County roster match plus repeated direct F-Pod checkpoint records beginning on the log-supported placement date.
Seth Phillips DSN 1756	floor; sewage / mold	6/10 16:58:08; 6/11 09:55:48, 12:08:55, 12:57:26, 14:30:36, 17:16:46; 6/14 06:47:56, 08:44:58, 11:14:05, 12:31:15, 17:01:46; 6/15 06:24:11, 08:13:40, 08:53:53, 12:28:03; 6/16 06:45:30, 10:42:47, 15:34:11	116 direct scans, 6/10-8/30	County roster match plus the largest number of direct first-week F-Pod checkpoint records.
Donald Wood DSN 1758	floor; sewage / mold; food	6/12 06:28:25, 08:46:33, 12:40:38; 6/13 06:33:46, 08:36:23, 12:31:24	65 direct scans, 6/12-9/3	County roster match, direct checkpoint records, and Lynch's firsthand identification.
Joseph Martin DSN 1762	floor; sewage / mold	6/11 10:08:40; 6/13 10:49:42	26 direct scans, 6/11-8/31	County roster match plus direct F-Pod checkpoint records.
Matthew White DSN 1763	floor; sewage / mold	6/11 10:08:37, 16:05:45; 6/13 09:14:32; 6/14 14:36:32	53 direct scans, 6/11-9/1	County roster match plus repeated direct F-Pod checkpoint records; distinct from medical provider Jonathan White.
Haley Workman DSN 1734	yard / exercise only	No direct F-Pod tag scan; firsthand event on 8/19	Roster identity; date-specific personal identification	County roster match and Lynch's firsthand August 19 identification; no F-Pod RFID inference is used.
John/Jane Doe DSN 1554	sewage / mold / sanitation only	No first-week direct scan	1 direct scan 7/24 15:17:54; cleaning entries 7/11 and 7/24	Name missing from roster; retained as narrowly identified Doe pending disclosure

Already named: White County, Clayton Edwards, Hannah Ross, and Sergeant Josh Swindle (DSN 1753).

Not reasserted: White County Jail/White County Detention Center, dismissed with prejudice; every personal-capacity claim and every claim outside the four screened conditions.

No manufactured identification: No water-system or maintenance Doe is named because the August 19 production does not identify one. No meal-status entry alone is treated as proof that the employee cooked, carried, or knowingly refused to replace spoiled food.

APPENDIX B - COMPLETE F-POD RFID AND STATUS AUDIT

Source: County Defendants' August 19, 2026 supplemental response, Guardian Inmate Log Archive, and 2024 Detention Employees roster. Record window: June 10, 2024 at 3:44:15 p.m. through September 4, 2024 at 6:42:26 a.m. The window contains 1,517 fixed-tag records: 714 direct '*' records, 791 pod/run '**' records, and 12 wristband '***' records. Counts are account attributions, not automatic findings of liability.

B-1. Every account with at least one direct '*' PODF scan

DSN	Roster name	Direct *	First	Last	Treatment in this pleading
1554	Unidentified in roster	1	7/24	7/24	Retained as narrow Doe; legal name unresolved
1613	Dakota Phillips	3	7/17	7/17	Later direct scans; not named on presence alone
1693	Matthew Rainwater	5	7/9	7/14	Later direct scans; not named on presence alone
1708	Darius Woody	31	6/12	9/4	Proposed Doe substitute
1709	Zachary Rodgers	49	6/11	9/4	Proposed Doe substitute; Rogers mapping to confirm
1711	Cody Siler	13	7/10	9/1	Later direct scans; not named on presence alone
1720	Dakota Greer	7	7/19	8/28	Later direct scans; not named on presence alone
1722	Anthony Becker	14	8/20	9/3	Later direct scans; not named on presence alone
1727	Gayelyn Hargrove	8	7/9	9/3	Later direct scans; not named on presence alone
1740	Canton Dunn	1	6/21	6/21	Later direct scan; not named on presence alone
1742	Jeremy Jones	66	6/12	9/4	Proposed Doe substitute; CO Jones mapping to confirm
1743	Mason Wilborn	103	6/12	9/3	Proposed Doe substitute
1745	Collin Tucker	5	6/11	6/28	Proposed Doe substitute
1748	Cody Balch	33	6/13	9/1	Proposed Doe substitute
1750	Brandon Robertson	48	6/10	8/30	Proposed Doe substitute
1753	Josh Swindle	22	6/21	9/1	Already named
1756	Seth Phillips	116	6/10	8/30	Proposed Doe substitute
1758	Donald Wood	65	6/12	9/3	Proposed Doe substitute
1761	Rylin Gambetta	3	6/21	8/19	Later direct scans; not named on presence alone
1762	Joseph Martin	26	6/11	8/31	Proposed Doe substitute

DSN	Roster name	Direct *	First	Last	Treatment in this pleading
1763	Matthew White	53	6/11	9/1	Proposed Doe substitute
1765	Conner Goodwin	27	6/20	8/31	Later direct scans; not named on presence alone
1766	Jackson Woody	15	7/9	8/31	Later direct scans; not named on presence alone

B-2. Pod/run or tower records but no direct '*' PDF scan

DSN	Roster name	Pod/run **	Dates	Record limit
1079	Chelsi Monsivais-Gerardo	2	6/17	Not evidence of physical F-Pod entry; not named on this record
1713	Ami Lee	71	6/12-7/3	Not evidence of physical F-Pod entry; not named on this record
1730	Stevie Hughes	106	7/17-8/7	Not evidence of physical F-Pod entry; not named on this record
1738	Amber Rodgers	12	7/4-7/9	Not evidence of physical F-Pod entry; not named on this record
1747	Savannah Chisum	7	7/8-9/3	Not evidence of physical F-Pod entry; not named on this record
1754	Amanda Adams	1	6/29	Not evidence of physical F-Pod entry; not named on this record
1755	Nicole Stipes	3	7/27-8/20	Not evidence of physical F-Pod entry; not named on this record
1759	Ralph Iweriebor	7	6/11-6/18	Not evidence of physical F-Pod entry; not named on this record

B-3. Every account associated with an F-Pod meal-status record

DSN	Roster name	Accepted	Offered	Declined	Total	Evidentiary use
1554	Unidentified	2	0	0	2	Status recorder only unless supported by firsthand facts
1613	Dakota Phillips	3	0	0	3	Status recorder only unless supported by firsthand facts
1693	Matthew Rainwater	1	0	0	1	Status recorder only unless supported by firsthand facts
1708	Darius Woody	4	0	0	4	Status recorder only unless supported by firsthand facts
1709	Zachary Rodgers	19	0	0	19	Status recorder only unless supported by firsthand facts

DSN	Roster name	Accepted	Offered	Declined	Total	Evidentiary use
1720	Dakota Greer	2	0	0	2	Status recorder only unless supported by firsthand facts
1722	Anthony Becker	3	0	0	3	Status recorder only unless supported by firsthand facts
1727	Gayelyn Hargrove	1	0	0	1	Status recorder only unless supported by firsthand facts
1742	Jeremy Jones	16	1	0	17	Status recorder only unless supported by firsthand facts
1743	Mason Wilborn	34	0	0	34	Status recorder only unless supported by firsthand facts
1748	Cody Balch	14	0	0	14	Status recorder only unless supported by firsthand facts
1750	Brandon Robertson	6	0	0	6	Status recorder only unless supported by firsthand facts
1753	Josh Swindle	6	0	0	6	Status recorder only unless supported by firsthand facts
1756	Seth Phillips	38	0	0	38	Status recorder only unless supported by firsthand facts
1758	Donald Wood	51	0	1	52	Status recorder only unless supported by firsthand facts
1762	Joseph Martin	10	0	0	10	Status recorder only unless supported by firsthand facts
1763	Matthew White	11	0	0	11	Status recorder only unless supported by firsthand facts
1765	Conner Goodwin	9	1	0	10	Status recorder only unless supported by firsthand facts
1766	Jackson Woody	17	0	0	17	Status recorder only unless supported by firsthand facts

Audit check: 247 accepted + 2 offered + 1 declined = 250 total meal-status events. Most were NS# Mobile Command entries.

B-4. Cleaning-supply and bleach status entries

DSN	Roster name	Cleaning	Bleach	Total	Evidentiary limit
1554	Unidentified	2	0	2	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1709	Zachary Rodgers	0	1	1	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1742	Jeremy Jones	4	5	9	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry

DSN	Roster name	Cleaning	Bleach	Total	Evidentiary limit
1748	Cody Balch	1	0	1	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1754	Amanda Adams	1	0	1	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1756	Seth Phillips	0	1	1	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1758	Donald Wood	11	2	13	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1761	Rylin Gambetta	1	0	1	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry
1765	Conner Goodwin	0	2	2	Account/status entry; not proof of quantity, adequacy, delivery, use, or physical entry

Audit check: 20 cleaning-supply + 11 bleach entries = 31 status events. Only the June 21 Wood entry is a direct '' record; the remaining 30 are NS# entries. The records therefore do not refute Plaintiff's allegation that supplies were intermittent and inadequate for the population and recurring sewage/mold.*

B-5. Every recreation-related entry in the produced window

Date	Guardian description / time	Paired duration	Recorder account
6/12	Accepted 09:05:15; From 09:14:11	00:08:56	1742 / Jeremy Jones
6/17	Declined 09:31:46	-	1742 / Jeremy Jones
6/19	Accepted 12:11:19; From 12:38:52	00:27:33	1750 / Brandon Robertson
6/24	Offered 15:26:10	-	1756 / Seth Phillips
6/26	Accepted 06:33:24; From 06:36:43	00:03:19	1758 / Donald Wood
7/1	Declined 09:29:13	-	1742 / Jeremy Jones
7/3	Declined 11:06:43	-	1709 / Zachary Rodgers
7/15	Declined 09:34:37	-	1742 / Jeremy Jones
7/22	Accepted 13:50:08; From 14:07:13	00:17:05	1742 / Jeremy Jones
7/29	Declined 10:35:53	-	1758 / Donald Wood
7/31	Accepted 12:59:49; From 13:22:24	00:22:35	1709 / Zachary Rodgers
8/7	To 13:46:45; From 14:01:46	00:15:01	1762 / Joseph Martin
8/12	Accepted 10:56:00; From 11:08:06	00:12:06	1753 / Josh Swindle
8/19	To 15:37:49; From 15:59:34	00:21:45	1743 / Mason Wilborn
8/21	Declined 09:02:18	-	1766 / Jackson Woody
9/2	Accepted 14:25:23; From 14:55:16	00:29:53	1758 / Donald Wood

Record limit: the report labels events 'Recreation' but does not identify indoor versus outdoor location, regular yard call, exercise type, available movement, restraints, or reason for a declined entry. Plaintiff therefore discloses every entry and pleads that these records did not provide regular outdoor yard or meaningful exercise.

B-6. Global record-use limits

1. A direct '*' PODF entry supports that the identified account reached a cell/out-of-cell checkpoint. It does not automatically prove that the employee saw an active backup at that exact second, had authority to repair it, or acted with a particular mental state.
2. A pod/run '**' or tower record is not represented as physical F-Pod entry. An NS# record is a Mobile Command status entry and is not represented as physical entry.
3. Plaintiff's allegations that his mat, sleeping location, residue, odor, mold, and makeshift barriers were open and visible come from his firsthand account; the log corroborates who made direct checks and when.
4. Meal-status records identify the account entering a status, not necessarily the cook, tray carrier, condition of the food, or replacement-meal decisionmaker. Food allegations against Wood, Swindle, and probable Rodgers rest on firsthand interactions.
5. The unexplained DSN 1554 has one direct record on July 24, two meal-status entries, and two cleaning-status entries. Because the roster does not identify that account, Plaintiff retains only a narrow John/Jane Doe sanitation allegation pending disclosure and does not connect that Doe to floor sleeping or food service.
6. Employees with only later direct scans are disclosed in B-1 but are not added solely from proximity. This preserves the Court's demand for person-specific facts and avoids manufacturing liability from a database entry.