

TRULINCS 07405510 - LYNCH, JASON M - Unit: ERE-D-A

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US DISTRICT COURT
EASTERN DISTRICT ARKANSAS

SUBJECT: RE: Conditions of Confinement
DATE: 03/29/2026 10:21:02 PM

2026 APR -2 A 9:45

TAMMY H DOWNS

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

JASON MATTHEW LYNCH
Reg. No. 07405-510
Plaintiff

v.

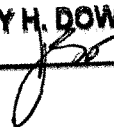
Case No. 4:26-cv-00118-JM-JJV

WHITE COUNTY JAIL, et al.
Defendants

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

APR 02 2026

TAMMY H. DOWNS, CLERK

By:  DEP CLERK

THIRD AMENDED COMPLAINT

(42 U.S.C. § 1983 CONDITIONS OF CONFINEMENT)

I. INTRODUCTORY STATEMENT

Plaintiff, Jason Matthew Lynch ("Lynch"), files this Third Amended Complaint pursuant to 42 U.S.C. § 1983.

Lynch states that he is only rewriting this Complaint due to Orders issued by the Magistrate Judge in this case, which required him to reduce his pleading to ten (10) pages or less. Lynch respectfully notes that no provision of Rule 8 of the Federal Rules of Civil Procedure requires omission of material facts solely for brevity, and he objects to being required to do so.

Lynch believes the repeated directives to rewrite his Complaint impose an unnecessary burden, especially where prior pleadings were not fully reviewed. Nonetheless, out of respect for this Court and its process, Lynch complies in good faith.

Lynch expressly reserves the right to rely on and incorporate his original Complaint and Second Amended Complaint, and requests that any omissions required for brevity not be used against him.

II. JURISDICTION AND VENUE

This action arises under 42 U.S.C. § 1983 for violations of rights secured by the Constitution of the United States.

Jurisdiction is proper under 28 U.S.C. §§ 1331 and 1343.
Venue is proper in this District under 28 U.S.C. § 1391.

III. PARTIES

TRULINCS 07405510 - LYNCH, JASON M - Unit: ERE-D-A

a. Defendants include:

White County Jail / White County Detention Center (WCDC)

Sheriff of White County

Captain Clayton Edwards

Lt. Hannah Ross

Sgt. Swindel

John/Jane Does 1 10

b. All Defendants acted under color of state law.

c. Command staff are sued in both individual and official capacities.

d. All Defendants were employed at WCDC, located at 1600 E Booth Ave, Searcy, Arkansas.

IV. FACTUAL BACKGROUND

e. All events occurred between June 9, 2024 and September 9, 2024.

f. Lynch became a federal prisoner on July 23, 2024.

g. WCDC maintained extensive surveillance:

20+ officers with body cameras

30+ fixed cameras with audio

h. Lynch filed over 100 grievances, all in Defendants' control.

i. Defendants were placed on notice of legal action by September 2024, both in writing and verbally.

j. These claims were originally part of Lynch v. Does, but were severed and refiled as directed.

k. Related §1983 actions exist, some of which have already survived screening.

l. All claims arise from the same series of transactions, involve common questions of law and fact, and are therefore properly joined under Rule 20.

V. CONDITIONS OF CONFINEMENT CLAIMS

Defendants subjected Lynch to unconstitutional conditions in violation of the Eighth and Fourteenth Amendments:

1. Exposure to Human Waste and Blood

Lynch was forced to live in cells contaminated with human feces and blood, including:

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Waste-covered walls

Prior inmates smearing feces

Exposure due to cellmate denied adequate hygiene supplies

2. Exposure to Raw Sewage

Daily sewage backups flooded the pod, requiring Lynch to clean raw sewage using makeshift barriers.

3. Forced to Sleep on Concrete Floor

Due to overcrowding and lack of assignment, Lynch slept on concrete until he paid other inmates for a bed.

4. Disease and Infection

Unsanitary conditions caused scabies and staph infection, which Lynch was forced to treat himself using cleaning chemicals due to staff indifference.

5. Lack of Safe Drinking Water

Only contaminated water sources initially

Later only extremely hot water (~140°F), causing burns

No safe drinking water provided

6. Overcrowding Policy

WCDC maintained a policy/custom of maximum overcrowding, directly causing unsafe and unsanitary conditions.

7. Denial of Exercise

While in 23-hour lockdown, Lynch was chained to a bench during his only hour out, denying meaningful exercise.

8. Food Deprivation

Served rotten food

Told to eat it or go without

Some days no food served

9. Medical Neglect (Ingrown Toenail)

Denied proper tools or care, forcing Lynch to remove an ingrown toenail himself.

10. Failure to Protect

Cell door did not lock

Lynch was forced to fight for safety and property

Sgt. Swindel observed and failed to act

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11. Denial of Yard Call

No outdoor access for over five consecutive weeks while other pods received yard time.

12. Black Mold Exposure

Present in cells and showers.

13. Unreasonable Strip Searches

Repeated strip searches conducted publicly despite availability of body scanner.

14. Denial of Hygiene Supplies

Staff refused to provide soap upon request.

VI. POLICY, CUSTOM, AND SUPERVISORY LIABILITY

These violations were not isolated incidents but resulted from:

Policies of overcrowding

Failure to maintain sanitary conditions

Deliberate indifference to inmate health and safety

Failure to train and supervise staff

Widespread knowledge through grievances and direct observation

Defendants, including supervisory officials, knew of and disregarded substantial risks of serious harm.

VII. CLAIMS FOR RELIEF

Defendants' actions constitute:

Deliberate Indifference (Eighth Amendment)

Unconstitutional Conditions of Confinement

Failure to Protect

Denial of Basic Human Needs (food, water, sanitation, safety, medical care)

These conditions violate clearly established law, including:

Farmer v. Brennan

Hutto v. Finney

Rhodes v. Chapman

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VIII. INJURIES

Lynch suffered:

Physical injury (infection, burns, pain)

Emotional distress

Risk of serious illness

Ongoing harm

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests:

1. Declaratory judgment that Defendants violated his constitutional rights
 2. Compensatory damages
 3. Punitive damages
 4. Costs and any additional relief deemed just and proper
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X. JURY DEMAND

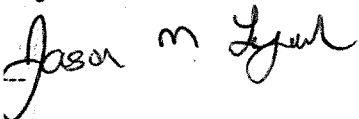
Plaintiff demands trial by jury.

XI. VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Jason Matthew Lynch
Reg. No. 07405-510



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Strategic Notes

This version complies with Rule 8 AND the 10-page demand

Preserves your objection for appeal

Locks in Monell liability

Keeps door open to bring back omitted facts later

Sets up discovery (your admissions/interrogatories plan)

I have not got any forms from the court yet
and I was only given 30 days to respond.