

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

JASON MATTHEW LYNCH,	)	Case No. 4:24-cv-00740-LPR-BBM
Plaintiff,	)	
v.	)	
DOES 2-3, CAPT. CLAYNTON EDWARDS,	)	
LT. ROSS,	)	
SGT. SWINDLE, SGT. WORKMAN, SGT.	)	
ROGERS,	)	
CO. WOOD, SGT. SCILER, CO. GOODWIN,	)	
ASHLEY WATTS, KATYNN SMITH,	)	
TURNKEY, DOE 1,	)	
Defendants.	)	

**PLAINTIFF’S NOTICE OF DISPUTED AUTHENTICITY, APPARENT ALTERATION
OF RECORDS, FORGED OR NON-AUTHENTIC SIGNATURE, AND REQUEST THAT
EXHIBITS BE ENTERED INTO THE RECORD**

COMES NOW Plaintiff Jason Matthew Lynch, proceeding pro se, and respectfully files this Notice to place the Court and all parties on notice that Plaintiff disputes the authenticity, accuracy, and reliability of several medical and jail records produced by Defendants and/or TK Health. Plaintiff further states that at least one document contains a signature that is not Plaintiff’s signature and does not match Plaintiff’s known handwriting or known signatures. Plaintiff requests that the attached exhibits be entered into the record because the exhibits show that the facts do not add up, the records contain material inconsistencies, and the documents appear to have been altered, created after the fact, or submitted in a form that is unreliable.

I. PURPOSE OF THIS NOTICE

Plaintiff files this Notice because Defendants are relying on medical records, intake forms, medication records, task records, scanned documents, and grievance responses to defend against Plaintiff’s claims.

Plaintiff disputes those records because the documents contain contradictions, date changes,

repeated questions, inconsistent timestamps, disputed signatures, and facts that do not match what actually occurred.

Plaintiff is not asking the Court to decide all factual issues through this Notice. Plaintiff is asking the Court to preserve the issue, enter the exhibits into the record, require Defendants to produce the originals and audit trails, and not rely on disputed records without allowing Plaintiff to challenge their authenticity.

These records are material because they relate directly to Plaintiff's claims concerning denial of medical care, delay of HIV medication, improper medication administration, altered medication, grievance exhaustion, Doe-defendant identification, and Defendants' knowledge of Plaintiff's serious medical needs.

II. PLAINTIFF DISPUTES THE SIGNATURE ON TKH 0045

Plaintiff specifically disputes the signature on the document identified as TKH 0045, titled General Consent for Care and Treatment.

Plaintiff states under penalty of perjury that the signature on TKH 0045 is not Plaintiff's true signature.

The printed name on TKH 0045 is not Plaintiff's handwriting.

The signature on TKH 0045 does not match Plaintiff's known signatures in this case, including Plaintiff's signatures on his court filings and other documents.

The formation of the letters, including the "J," the "L," and the way Plaintiff's last name is written, does not match Plaintiff's true handwriting.

Plaintiff therefore gives notice that TKH 0045 is disputed as forged, non-authentic, or altered.

Plaintiff requests that the Court compare TKH 0045 with Plaintiff's known signatures attached as exhibits and require Defendants to produce the original document, the scanned file, the scanner information, the metadata, the audit trail, the person who scanned the document, the person who witnessed the signature, and the chain of custody for the document.

III. TKH 0073 IS DIFFERENT BECAUSE PLAINTIFF STATES HE SIGNED IT UNDER

DURESS

Plaintiff also identifies TKH 0073, titled Waiver of Treatment / Evaluation, as a separate document.

Plaintiff states that TKH 0073 contains a signature Plaintiff recognizes as his own, but Plaintiff states that the document was signed under duress and coercion because Plaintiff was threatened with medical lockdown, punitive lockdown, or continued deprivation if he did not sign.

The difference between TKH 0045 and TKH 0073 is important. Plaintiff is not denying every signature. Plaintiff is specifically stating that TKH 0045 does not match his true signature, while TKH 0073 may be used as one comparison example because Plaintiff recognizes that signature as his own, even though he disputes the voluntariness of that document.

This comparison should be entered into the record because it supports Plaintiff's claim that the signature on TKH 0045 is not authentic.

IV. THE RECORDS CONTAIN MATERIAL INCONSISTENCIES SHOWING APPARENT ALTERATION OR AFTER-THE-FACT CREATION

Plaintiff gives notice that the medical records produced by Defendants contain numerous inconsistencies showing that the documents appear to have been altered, edited, or created after the fact.

The intake screening records state that Plaintiff had not previously been incarcerated at White County Detention Center. Plaintiff states this is false because he had been incarcerated there before.

The records also show HIV information and medication information, including Biktarvy, which contradicts any claim that Defendants did not know Plaintiff had HIV or did not know he required daily HIV medication.

The records contain changing dates and times within the same series of intake, housing, transfer, or medical questions.

Plaintiff has identified pages where questions appear to repeat, where the timestamps change

from June to September, and where the same or similar questions are repeated again in later “custom flow” sections.

Plaintiff contends that normal intake or medical documentation would not contain these kinds of repeated questions, shifting timestamps, and inconsistent dates unless the record was later modified, copied, pasted, recreated, or otherwise altered.

Plaintiff requests that the Court enter the relevant pages into the record because the date changes and repeated questions show that the facts do not add up.

V. THE RECORDS CONFLICT WITH PLAINTIFF’S MEDICATION CLAIMS

Plaintiff’s core claim is that he was denied, delayed, and improperly administered HIV medication.

Plaintiff states that he was arrested and booked into White County custody on or about June 10, 2024.

Plaintiff states that his wife brought his HIV medication to the facility shortly after his arrest.

Plaintiff submitted a medical request on June 11, 2024 stating that he needed his HIV medication because it is medication that must be taken daily.

That medical request was received and answered by “F. Nurse,” but Defendants have not clearly identified who “F. Nurse” was.

The records and responses contain inconsistent information about when medication was available, who approved it, who administered it, who crushed it, who dissolved it, and whether Plaintiff supposedly received or refused it.

Plaintiff disputes any record stating that he refused properly administered medication. Plaintiff did not refuse his prescribed medication. Plaintiff objected to medication being crushed, dissolved, floated, contaminated, wasted, or altered from the form in which it was prescribed.

Plaintiff also disputes any record stating medication was properly administered when the medication was crushed, dissolved, floated, left in the cup or bag, wasted, vomited, or otherwise not received as prescribed.

Plaintiff requests that the MARs, medication task records, grievance responses, medical requests, and chart notes be entered into the record to show the inconsistencies.

VI. RECORDS SAY MEDICATION WAS SENT TO GREENE COUNTY, BUT PLAINTIFF STATES IT WAS NOT

Plaintiff also disputes records suggesting that his medication was sent with him to Greene County.

Plaintiff states that when he arrived at Greene County, he did not arrive with the medication that White County records suggest was sent.

Plaintiff states that Greene County medical personnel were concerned that he arrived without his necessary HIV medication and worked to obtain medication for him.

Plaintiff requests that the Court allow Plaintiff to subpoena or obtain Greene County intake and medical records to confirm whether any medication was actually sent with Plaintiff.

This issue is material because if White County records state medication was sent, but Greene County records show no medication arrived, then the White County records are unreliable and should be subject to authentication and audit-trail discovery.

VII. TASK RECORDS AND APPOINTMENT RECORDS APPEAR INCONSISTENT

Plaintiff further gives notice that the task records and appointment records contain apparent inconsistencies.

Plaintiff disputes records showing intake screening tasks, rescheduled appointments, deleted appointments, completed appointments, and appointment changes that do not match the actual timeline of his custody, transfer, medical care, or release.

Some entries appear to have been created or changed on dates that do not make sense in relation to Plaintiff's custody status or the actual events.

Some entries appear to reference future appointments, rescheduled appointments, or deleted appointments based on inconsistent release dates.

Plaintiff requests production of the native electronic medical record, all audit logs, metadata,

revision history, user-access history, and any system logs showing who created, modified, deleted, printed, scanned, or changed each disputed entry.

VIII. GRIEVANCE RESPONSES AND MEDICAL RECORDS CONTRADICT DEFENDANTS' DENIALS

Plaintiff gives notice that Defendants have denied altering or improperly administering Plaintiff's medication, but records and grievance responses show medication was being crushed, floated, or dissolved.

Plaintiff states that the records show a policy or practice that "all medications" were to be crushed, floated, or dissolved.

Plaintiff disputes the medical correctness and legality of that practice as applied to his HIV medication.

Plaintiff also disputes any claim that a correctional officer or captain had medical authority to decide how Plaintiff's HIV medication should be administered.

These exhibits are important because they show that Defendants' denials do not match the written grievance responses and medical records.

IX. THE EXHIBITS SHOULD BE ENTERED INTO THE RECORD

Plaintiff respectfully requests that the following exhibits be entered into the record and considered by the Court:

- * Exhibit A: TKH 0045, General Consent for Care and Treatment, containing the disputed signature Plaintiff states is not his.
- * Exhibit B: Plaintiff's known signature samples from filed court documents for comparison.
- * Exhibit C: TKH 0073 or other document containing a signature Plaintiff recognizes as his own, while disputing the voluntariness of the signature.
- * Exhibit D: Intake screening records showing answers Plaintiff disputes, including

prior incarceration, HIV status, current medication, military service, and related intake questions.

- * Exhibit E: Medical Questions and Answers form showing HIV and medication information.
- * Exhibit F: Medical Request #20,062,020, dated June 11, 2024, stating Plaintiff needed HIV medication daily and showing response by “F. Nurse.”
- * Exhibit G: Transfer or release records stating medication was sent, which Plaintiff disputes.
- * Exhibit H: Custom-flow records showing repeated questions, changed dates, and inconsistent timestamps.
- * Exhibit I: MAR records showing “absent,” “refused,” “received,” or “not given” entries that Plaintiff disputes.
- * Exhibit J: Task records and appointment records showing rescheduled, deleted, completed, or inconsistent appointment entries.
- * Exhibit K: Chart notes concerning pharmacy calls, medication approval, or dissolving/crushing medication.
- * Exhibit L: Grievances and responses concerning crushing, floating, dissolving, or altering Plaintiff’s HIV medication.
- * Exhibit M: Any Greene County intake or medical records showing whether Plaintiff arrived with or without medication.
- * Exhibit N: Any additional records showing contradictions between Defendants’ discovery responses and the produced medical records.

These exhibits should be entered into the record because they show that the facts do not line up and that the produced records cannot be accepted at face value without authentication.

X. REQUEST FOR PRESERVATION AND PRODUCTION OF ORIGINALS,

METADATA, AND AUDIT TRAILS

Plaintiff requests that the Court order Defendants and TK Health to preserve all original records, electronic medical records, scanned files, metadata, audit trails, revision histories, user-access logs, print logs, scan logs, transmission logs, and chain-of-custody records for all disputed documents.

Plaintiff also requests production of:

- a. the original TKH 0045 document;
- b. the original TKH 0073 document;
- c. all scanned versions of those documents;
- d. the identity of every person who witnessed, scanned, uploaded, modified, printed, or handled those documents;
- e. the audit trail for each disputed medical record;
- f. the native electronic medical record entries;
- g. the user ID connected to each entry;
- h. the creation date and last-modified date for each disputed record;
- i. all deleted or changed entries;
- j. all medication administration audit logs;
- k. all pharmacy communications concerning whether Biktarvy could be crushed, dissolved, floated, or altered; and
- l. all records showing whether Plaintiff's medication was sent to Greene County.

Plaintiff requests this relief because the authenticity of the records is now directly disputed.

XI. REQUESTED RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. accept and enter the attached exhibits into the record;

- b. take notice that Plaintiff disputes the authenticity and accuracy of the records identified in this Notice;
- c. take notice that Plaintiff states under penalty of perjury that the signature on TKH 0045 is not his signature;
- d. order Defendants and TK Health to preserve all originals, metadata, audit trails, electronic records, and chain-of-custody evidence;
- e. order Defendants and TK Health to produce the originals and audit trails for the disputed records;
- f. allow Plaintiff to supplement the record after receiving the originals and metadata;
- g. allow Plaintiff to subpoena Greene County records concerning whether medication arrived with Plaintiff;
- h. prohibit Defendants from relying on disputed records without proper authentication;
- i. permit further limited discovery into the disputed documents and signatures; and
- j. grant all other relief the Court deems just and proper.

Respectfully submitted,
Jason Matthew Lynch
Plaintiff, Pro Se
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Ward, AR 72176
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Date: 7.15.26

DECLARATION UNDER 28 U.S.C. § 1746

I, Jason Matthew Lynch, declare under penalty of perjury that the facts stated in this Notice are true and correct to the best of my personal knowledge. I further declare that the signature on TKH 0045 is not my signature, the printed name is not my handwriting, and the document does not match my known signatures. I submit this Notice in good faith to preserve the issue of altered, forged, disputed, and unreliable records.

Executed on: 7.15..26