

**FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983**

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS**

Central DIVISION

JAN 21 2025

TAMMY H. DOWNS, CLERK
By: [Signature] DEPT. CLERK

CASE NO. 4:24-CV-00740-LRR-BBM

Jury Trial: ☒ Yes ☐ No
(Check One)

I. Parties

In item A below, place your full name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of plaintiff: Jason Matthew Lynch
ADC # 07405-510

Address: P.O. Box 1500, El Reno OK 73036

Name of plaintiff: _____
ADC # _____

Address: _____

Name of plaintiff: _____
ADC # _____

Address: _____

In item B below, place the full name of the defendant in the first blank, his official position in the second blank, his place of employment in the third blank, and his address in the fourth blank.

B. Name of defendant: Edwards

Position: Captain

Place of employment: White County Jail

Address: 1600 E Booth, Searcy AR 72143

Name of defendant: Does

Position: —

Place of employment: WCDC

Address: 1600 Booth Rd, Searcy AR

Name of defendant: Turnkey Medical

Position: Medical Contractor for WCDC

Place of employment: WCDC

Address: 1600 Booth Rd Searcy AR

Name of defendant: Sheriff, and others

Position: Sheriff

Place of employment: WCDC

Address: 1600 Booth Rd, Searcy AR 72143

II. Are you suing the defendants in:

- ☐ official capacity only
☐ personal capacity only
☒ both official and personal capacity

III. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ___ No X

- B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

- ☐ Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

☐ Court (if federal court, name the district; if state court, name the county): _____

☐ Docket Number: _____

☐ Name of judge to whom case was assigned: _____

☐ Disposition: (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

☐ Approximate date of filing lawsuit: _____

☐ Approximate date of disposition: _____

IV. Place of present confinement: El Reno, FCI

V. At the time of the alleged incident(s), were you:
(check appropriate blank)

X in jail and still awaiting trial on pending criminal charges

_____ serving a sentence as a result of a judgment of conviction

_____ in jail for other reasons (e.g., alleged probation violation, etc.)

explain: _____

VI. The Prison Litigation Reform Act (PLRA), 42 U.S.C. § 1997e, requires complete exhaustion of administrative remedies of all claims asserted, prior to the filing of a lawsuit. There is a prisoner grievance procedure in the Arkansas Department of Correction, and in several county jails. Failure to complete the exhaustion process provided as to each of the claims asserted in this complaint may result in the dismissal without prejudice of all the claims raised in this complaint.

A. Did you file a grievance or grievances presenting the facts set forth in this complaint?

Yes X No _____

B. Did you completely exhaust the grievance(s) by appealing to all levels within the grievance procedure? yes

Yes ____ No ____

If not, why? _____

VII. Statement of claim

State here (as briefly as possible) the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

This is a class of one Civil Rights
Complaint againsts liste defendants in
the following pages. I claim REPEATED
denial in clearly established rights. for
discriminatory torture, deliberately indifferent,
denial of medical care, intent to harm, infliction
of wanton pain, Conspiring to harm w/ retaliation
denial of free Exercise of Religion, equal
protection violation, Arbitrary treatment
Conspiracy retaliation with deperation,
Conditions of confinement, and more
along with torts claims. Everything is
outlined in the follow 100 pages,
I bringing over 120 different civil Rights
claims, all are recatated & share links

VIII. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I seek six different damages, Coercive Relief
preliminary injunction, supplemental judgment
Defendants be held responsible by law

I declare under penalty of perjury (18 U.S.C. § 1621) that the foregoing is true and correct.

Executed on this 9th day of Jan, 2025.

Jason Lyman

Signature(s) of plaintiff(s)

This is a "Class of one" Civil Rights Complaint against the staff, contractors, and wcdc repeated denial in clearly established Constitutionally protected rights. for their discriminatory torture, deliberately indifferent serious of medical need, denial of medical care, inadequate medical care, intent to harm, infliction of wanton pain, Conspiring to harm and retaliate, denial of free Exercise of Religion; and a host of other Constitutionally protected rights. The actions and personal involvement of the listed defendants from 6-9-24 to 9-7-24 which have left myself (lynch) with on going medical issues. The staff involved in the torture violated International law, Federal law, State laws and wcdc policies along with my right to equal protection law as wcdc staff unjustifiably targeted me (lynch) for unconstitutional treatment after Christian Alexander called wcdc to try and explain the serious of my medical need & what happens without treatment. Today Edwards continues to unjustly target lynch and his family, all the above is outlined in the following pages

UNITED STATES DISTRICT COURT OF THE
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION.

JASON MATTHEW LYNCH - 07405-SIO

PLAINTIFF

VS.

CASE NO. 4:24-CV-00740-LPR-BBM

DOES; SHERIFF; EDWARDS,

WCDC; TURNKEY, WHITE COUNTY COMM;

WCDC JAIL ADMIN and OTHERS; et al.

" 3rd Amended Complaint "
Jury Demand

1. This action seeks money damages (general damages, irreparable damages; nonpecuniary damages; future damages; prospective damages; + punitive damages) because the county, its Sheriff, captain, Lieutenants, county deputy, jail guards and a contracted medical provider; for participation in, conspiring to, and with intent to harm, while wrongfully depriving Plaintiff (Lynch) of clearly established and Constitutionally protected Rights, with said minds.
2. Plaintiff also prays for Coercive Relief (Interim relief in the form of a cease and desist order to WCDC + EDWARDS.
3. Plaintiff again prays for a preliminary injunction to WCDC, Turnkey, smart communications (jail mail). To stop any disposal of records in any form, any requests, grievances, medical request sent by Lynch; including

responses to them, appeals and anything of the like. To not dispose of and video, audio, body cam footage, and all things alike dealing with Lynch, and this case. Not only stop disposal of but recover, save, catalog, and start/form a chain of custody.

JURISDICTION

- 4 This court has jurisdiction over plaintiff's federal claim under 28. U.S.C/42 U.S.C. 1981, 1983 and 1985. Plaintiff prays for supplemental jurisdiction over the state law claims 28. U.S.C 1367(c) as well. As well as Article 78, and Arkansas claims court claims.

a. Venue in the United States District Court for the Eastern District of Arkansas is proper pursuant to 28 U.S.C 1391.

PARTIES.

- 5 Plaintiff, Jason Matthew "Lynch" who's address is P.O. Box 1300, El Reno, OK 73036. Lynch is at the El Reno FCI
- 6 Defendant(s): Docs are, Sheriff, Mail Room Clerk, HEAD Nurse, Pill nurse 1, 2 and 3; nurse "F", webc ADMIN, white County Comm. Named Defendants are, Edwards, Lt Ross, Lt Hughes Nurse Ashley watts, nurse Kathryn Spence or Smith, Sgt workman, Sgt Rogers, Sgt Sciler, Sgt Swindle, Deputy Long, CO woods, CO martin, CO Goodwin and Medical Contractor Turnkey

All Defendants work at WOCB whos address is 1600 E Booth road, in searay arkansas 72143

7. At all times mentioned herein, All Defendant(s) are employee(s) of white County. At all times relevant hereto All Defendants acted both on their own, and at the direction of Edwards, and in concert with other Defendants.
8. Defendant(s) Sheriff, Edwards, watts, spence, Turnkey, WOCB, & white County comm. At all times relevant hereto acted in concert with other Defendants and under color of state law. They are sued both in their official and individual Capacity.
9. Defendants not named ID at 8 At all times relevant hereto acted in concert with other Defendants and under color of state law. These defendants are sued only in their individual Capacity.
10. Defendant County is the local governmental unit which all Defendant(s) worked at and for at all times hereto
11. Defendant Turnkey is a private owned company in a legal Contract with white County to provide medical care and treatment.

11 All Defendants listed herein, at all times relevant hereto; and acting under color of law; with sound mind; + knowing of the protected rights; a had ultimate legal responsibility and over oversight for the unlawful, excessive and punitive manner in which Lynch was held at WCC; while pre-trial and then committed

b. All Defendants knew or should have reasonably known that Lynch was being subjected to unconstitutionally, unlawful, excessive, and punitive conditions at WCC and by said actions

c. All Defendants, acted intentionally, knowingly with reckless disregard and/or deliberate indifference to the constitutional and legal rights of Lynch to be free from unlawful, excessive and punitive detention conditions and actions

12 In all claims, in all Defendants actions there is no legitimate reason for the discriminatory torture or repeated denial in clearly established and protected Constitutional rights or for the excessive punitive conditions, all in violation of 42 U.S.C 1983 1981 and 1985

13. Lynch alleges a conspiracy between defendants, a Conspiracy aimed at interfering with his constitutional rights, conspiring and discrimination against his quasi-suspect class "a class of one and catholic white native american" - afforded special federal protection of his civil rights
14. Lynch alleges racial animus on the defendants, Sheriff, edwards and watts due to racial slurs and then actions of hate following the slurs
15. Lynch states he has 16 witness to all claims here-in Document #31 page 44 List all the names
16. Lynch states he has 3 expert witnesses
 - a. Dr Amanda Narceck at BHLR who is over infectious disease for the state of arkansas, and his Dr on all claims herein.
 - b. The head Pharmacist at BH med towers
 - c. christian alexander
 - d. Lynch also has 5 guards to call as witness on his behalf, when the time is right I will give the name (I Dont want to get them fired)

Factual Background

- E. Lynch started and lead a daily prayer group at WDC. Edwards did not like this
- F. Lynch was a model inmate, staff even brought Lynch other inmates to look out for and to protect. Sgt ^{greer} brought Inmate Cindy to Lynch and asked Lynch to please help out with keeping this inmate safe, that they had no other actions they could take. Lynch did help staff out..
- G. All staff and guards had body cams on at all times, video and audio recording was in place through out the jail. In all dealing with Lynch, cams were wore and were on per WDC policy.
- H. Lynch in writing to WDC Admin & Edwards asked for all video to be saved for the OIG & DOJ This was on 8-20-24
- I. Edwards and WDC Admin would not allow Lynch a copy of any request he filed, any medical request he filed or any formal complaint or grievances filed. Edwards denied Lynch's written request for a copy of any of these records, also Edwards denied his appeal for these as well

Factual Background

- j. WDC and Edwards refused to respond to 3 different FOIAs for some records and other inmate records. FOIA request were sent by certified mail, USPS, my wife received the signed green card but no other response to date.
- k. a power of Attorney listing my wife was sent with the request for Inmate records
- l. WDC used smart communications and kiosk for all inmate to staff relations and request. These documents in electronic form and responses are the back bone of my proof.
- m. Edward said he would dispose of all video audio, documents that support my claims. Edwards said no one will ever see any of it
- n. WDC and Turnkey policy states chronic care inmates do not have to pay to see medical, The same policy also states chronic care inmates may request to see Dr at any time for there chronic care needs.
- o. Edwards and Sheriff were personally involved in deciding my medical care and treatment, They have no medical background, are not medical staff

factual Background

- p. In all Lynch's claims there is no penological interest or cause for the officials actions
- q. Lynch's medical background or meds or treatment ~~do not~~ create any penological interest or just cause of actions he endured.
- r. All defendants in following Edwards orders knew what they were doing, all had a sound mind, and a culpable mental state, all knew their actions were wanton and causing Lynch harm or denial of his rights, but did not care
- s. Edwards became so overly mad and up set at Lynch, his ^{Edwards} mental mind became "mens rea" Edwards saying to Lynch "I want you to see me, I am untouchable, protected by the 11th" shows his mens rea and his intent to deprive Lynch of his rights
- t. The reprisal by Edwards, Edwards orders to deny Lynch many different things, Edwards conspiring to harm & deprive Lynch of rights, medical care and protection. Form - a series of transactions that have clearly logical relationships and questions of actual law.

BACKGROUND

4 4. On 6-10-24 family of Lynch Dropped off 2 unopened Bottles of "Biktarvy" (bictegravir, emtricitabine, and tenofovir alafenamide) the cost was/is 3,300.⁰⁰ per bottle; at the time Lynch did not have personal Ins. coverage. and Paid the cost

5 5. At the time of Intake Lynch informed unknown COs that he was currently taking "Biktarvy"; had been taking it for years and that his current Dr was Amanda Norack and she was the Dr who prescribed the "LIFE SAVING" meds, and that they were to be taken daily. Lynch also informed staff the meds were for treatment of human immunodeficiency virus; and at that time he was undetectable and had been for years. Lynch informed staff of the medical need for the meds, and the failure to take them would result in further significant injury.

BACKGROUND

on 6-11-24 Lynch went to the pill line. Nurse Melody told Lynch he had no meds to be taken. Lynch informed the nurse of the type of meds, and why he was taking them. She responded with concern told him these must be taken daily. But she did not have his meds. After telling her he knew they were dropped off. She found them in the pill drop off Box. But could not give them to me due to Ashley Watts not approving them yet.

I went days with out my meds. I put in medical request after medical request to only have Ashley Watts blow me off.

I put in Grievances only to be refused back to medical, I put in more medical request just to be blown off again.

on 6-18-24 My counsel Christian Alexander of Alexander law called Captain Clayton Edwards to inform him

Background

of the substantial risk of serious harm to me due to the lack of my meds. I do not know what was said but after the call Mr. Alexander told me to see the arrogant ~~father~~, and I needed to ask for and file a prisoner complaint. I put in more medical request and other request asking for a complaint form. However doing so put me at the center of retaliation. Thus starting my 1983 claims and a myriad of constitutional rights being violated, and outrageously cruel, and sick actions by WDC and its staff

- 6 6. Every following Allegation has at least 4 or more, grievances with appeals. Some have upto 15 administrative complaints, seeking any and all remedies available. Everything available was exhausted, nothing was resolved

Medical Background

At all times and in all claims medical staff knew of my medical needs & Background. HSA -watts said she got my medical chart/records from BHLR - However I also fully advised her of my needs, who my Dr was, my treatment, my pharmacy, my meds, reason for my treatment and what happens with out my treatment; which are as follows

I suffer from human immunodeficiency virus. I have been under treatment by Dr Amanda Navak at BHLR (Baptist Health Little Rock) I'm been taking "Biktarvy" (bictegravir, emtricitabine, and tenofovir alafenamide) tablets 50mg/200mg/5mg. This is the leading medicine ~~is~~ for treatment of human immunodeficiency. It's kept me with no symptoms and undetectable for years. It must be taken daily, at the same time, can not be skipped or missed or stopped and started, doing so allows the virus to grow stronger and to

Medical Background

doing so allows the virus to mutate, doing so brings forth a biochemical change in the genetic make up, a ~~the~~ strain that mutated is untreatable and
 * major risk to the population and my self.

at the very least, not administering Biktarvy let the virus go stronger and allows it to become immune to the current most expensive yet best treatment to date.

the mis handling of my meds caused me grave harm and advanced degeneration of bone & teeth, it also take years off my future life. This is all fact that my "Expert witnesses" Amanda Novack will back up in court. Due to wcoe & turnkey actions and willful mis handling with intent to harm I have lost bone density and advanced tooth decay has set in. and is clearly visible, and my body/bones hurt

Any medical staff should have known this, as was with folating nurses ~~that~~ ^{then} said the captain can't order ~~the~~ to

Medical Background

harm ~~me~~ ^{they} and ~~it~~ won't harm you. These nurses did not mishandle my meds, but were fired or quit over Edwards' orders.

At all times, every night when staff mishandled my meds I started the begging (body cams were on). Even after reminding Watts, Spence, Heatter, pill nurse 1, 2, 3 (Jane Doe) of their medical oath, and this was inflicting wonton injury to myself they still chose to do so... telling me shut up, they did not care or as Edwards said "It's all in my head" (my medical needs). On 8-30 Tumke's own Dr confirmed everything I was saying and said do not crush, but Edwards ordered them to do so still, and they were crushed.

The mishandling my meds went against 2 different Dr orders.

Crushing meds only gave me half a dose due to most sticking to the bag.

Medical Background

and then just thrown away. This happened well over 70 times on different days.

My pharmacy was BH Med Towers, Watts and Edwards said that my Dr & pharmacy approved crushing, but when my wife ask them both they both said no one had contacted ~~her~~ them, that they would never say that. The pharmacy then pointed there was ^{no} medical release on file, so they would not speak of my medical needs to anyone. My wife was listed and had power of atty. that's why they spoke to her. Dr Novack then said any Dr or pharmacy will know not to crush this type of med. Both said Edwards should look at the many different studies on crushing Biktary and why it should not be done. 2 Different Dr(s) said do not crush yet Edwards made staff do so.

Facts

It's WDC policy that all COs have a body cam on while working. In all my claims and interactions with staff, medical, Edwards and all others BODY CAMS WERE ON AND RECORDING

This there is video to back up every claim
docket 23 on 9-30 I filed a motion to preserve any evidence. I did this only cause Edwards told me no one will ever see any of the video, or will anyone get any copies of all my Grievances, Request, medical Request etc. To date Edwards has failed to respond to 3 different FOIA's or request for my Inmate records, 3 were sent cert mail USPS, one to him and one to the jail

Argument:

- 1 Arbitrary, discriminatory treatment without rational basis is prohibited under the Fourteenth.

a Lynch qualifies as a "class of one" in this circumstance because he was arbitrarily singled out by Edwards + WCC staff/officials for abuse. They tortured me due to my respectful & humble request for my right to adequate Medical care, but many others in my pod were also complaining about this right being denied. The fact I was arbitrarily singled out for abuse without rational basis means staff discriminated against me as a "class of one"

-
- 2 The United States became a signatory on the "Convention against Torture & other Cruel, Inhuman or Degrading Treatment or Punishment" in 1988, which means that officials hired by the government are prohibited from intentionally inflicting "severe pain or

or suffering, whether physical or mental" on a person for the purpose of "punishing him for an act he or a third person has committed or is suspected of having committed"

a The named staff in this complaint are public officials of the government, meaning they are constricted by this law. They intentionally inflicted suffering onto myself (Lynch) by assaulting me, unethically locking me down, denying food ^{was} that not rotten or no food at all, medical treatment, medical care and denying toilet paper so I could use the restroom for over 20 hours, also denial of all my other rights. This constitutes torture under international law.

-
- 3 According to the Eight Amendment the US Constitution prohibits "Cruel and unusual punishment" Lynch was tortured and the target of a conspiracy ^{to} harm a "class of one" as a result of insisting he had a right

to take his "life-saving" medicine backed by Dr prescribed orders that we already & clearly established. Lynch's counsel on unrelated matters (who has known Lynch & his family for over 20 years (Christian Alexander) & his father even ~~was~~ contacted w/o about Lynch's life saving meds. The torture inflicted by the inclosed officials and denial of other rights was unlawful punishment for what they perceived to be by Lynch's and Mr Alexander's audacity to insist on his basic rights for medical care and treatment that already established by Dr orders, and orders they knew of. Lynch's family even dropped off new & sealed bottles of the RX meds. but w/o could not and would not even give him the meds that had no penological interest in any form what so ever.

Additionally the 8th prohibition applies more generally to the conditions of Lynch's incarceration, and Lynch

brings forth 8th amendment concerns and claims later on in this claim, Lynch is praying for understanding by the courts on the fact that torture is a component of his punishment, and a furtherance ~~and~~ ^{on} the conspiracy with intent to harm, the conspiracy on retaliation and to further deprive him of protected rights. also these components of his punishment further means that the conditions of his incarceration are cruel. These components also form 4 of the causal links to the actions of wcdc officials

- 4 According to case law established in *Farmar v Brennan*, 511 U.S. 823, 832 (1994), the Eighth Amendment imposes a duty on prison officials to ensure that incarcerated people under their care receive "adequate food, clothing, shelter, sanitation, medical care and/or personal safety

↓

4. ~~a~~ Officials at WCDC violated federal law over 100 different times by:

- a. ^{was} adequate food for over 20 hours; officials served rotten food and Lynch pointed out the food was rotten Swindle took all the food from Lynch and never replaced it. leaving Lynch with no opportunity ~~to~~ ^{to} eat the final meal that day. This happened to Lynch 10 different times throughout his stay at WCDC as both pre-trial & BOP committed

- b. Officials at WCDC violated Federal law by raw sewage in day are, never fixing it or giving adequate cleaning supplies. this over spill was never fixed. this cause harm by infections on Lynch

- c. Black mold in shower and pipe chase of cells that cause Breathing issues and still do. head aches and still occur with nose bleeds (never had those problems till WCDC)

- d. Human waste, blood on walls

while in medical, never given any cleaning supplies and forced to use a Nasty shower with Blood on walls, floor and human waste in dippers Just laying in area I was forced to use

e. Continued Exposure to Environmental hazard as in never cleaning air filters, Black mold, staff out break, body waste

F. ~~repeated~~ repeated denial of medical treatment even though requested for chronic care

g. repeated denial of meds, miss handling meds, throwing them away ect. not following Dr orders and host more further explained in the coming pages...

Additionally, all waco officials are also culpable for failing to guarantee Lynch's safety in the Jail. Edwards & Lt Ross encouraged COs to continue attack Lynch's protected rights. Staff not directly involved in the attacks and torture, including the Sheriff, white county comm are also culpable

for failing to prevent torture through safety measures, training and discipline.

not enough reason
to bring forth in

~~Lynch even had to use floor cleaner to treat a staff infection on his arm cause medical would not provide treatment, this not only caused pain but left him with a hole on his arm and scarring.~~

This is normal for WCE, a records search will show many more complaints like this

All defendants had culpable mental state in all claims.
or, Specifically meant to cause harm,
damage, detriment, hurt or injure plaintiff
with clear intent to do so, inacting
an unjust attack on life, liberty, and
property.

2. Plaintiff alleges that all defendants acted under color of law when the defendants violated Plaintiff's Protected Constitution rights. and Civil Rights; broke state & Fed laws
3. Plaintiff brings this action for the violated rights under:
 - a. First Amendment right to freely exercise religious beliefs and RLUIPA for no Bible, religious service, Priest, and ban on all books, no religious meal for Lent or Holy Friday.
 - b. First Amendment retaliation for blocking 1983 and then acting on the fact one was filed, the deprivation of allowing me

3.b ^{not} allowing contact to the courts to file 1983^{or}, contacting OIG, DOJ, ACCU, media outlets, FBI, State officials and offices. The deprivation to contact these officials and offices was to deter, block, or stop me from doing so, the constitutionally protected action and speech was the motivating factor in the decision to take retaliatory action, and to order retaliatory actions. The motivating factor also forms causal ~~is~~ links. This

- * Claim has 9 different transactions or
- * 9 different occurrences and are further
- * explained later on in this document under
- * allegations, with date, who the actor
- * was and what they did

Thus there are 9 different 1st Amendment claims.

First Amendment: mail, Books

administrators & Edwards refusal to mail correspondence to courts, state and federal offices, media and more of the like, when correspondences had no contraband or plans for illegal activity enclosed. Edwards, mail room clerk and officials censored my mail on 14 different times simply to eliminate unflattering or unwelcome opinions or factual statements. Blocking my outgoing mail to the courts attacks my First Amendment right of "free work" correspondent. Blocking a sworn statement to a court official or the courts its self is criminal as well.

Total ban on all books even faith based or recovery books due to Edwards policy is too vague and overbroad. Courts already established this was unconstitutional

also I was never notified of the rejection as I should have been. Only found out by guards who felt sorry for me

Still under the First Amendment:

3.C C. Legal Mail - legal mail (outgoing) has been thrown away, Blocked.

- Request for formal complaint forms have been denied. 1983 forms denied or taken from and thrown away was told I can not file 1983, had no right to file

3.D D. Incoming legal mail is opened outside of my presence, staff read the mail, saw it 1983 forms but would not give it to me. 8 1983 forms ~~were~~^{were} given to my wife, when she picked up my belongings at WCDC mixed in with everything were the forms and written on large note was "Do not give to Inmate" Lt Ross did this on 8-16-24

3.E E. Edwards and unknow staff would not allow un monitored phone calls with

with my attorney, even when he called the jail and ask for me to contact him and even when I put in a request and asked, Edwards denied the request and also the appel, and monitored the phone calls.

3.F I believe a total of 14 legal mail letters were intercepted by Edwards and throw away, or never mailed.

* This is further explained in the
*allegations, later on in this document

3.G Law Library - The law library not working or being turned off for me on the kiosk over 20 times caused me to be so stymied by inadequacies I lost or had no ability to directly or collaterally attack my court case and

my wife's court case (^{not a} co-defendant).
 due to the stymied inadequacies/or
 just not working I missed filling motions
 became time barred. And I missed other
 technical court rules due to law library
 not working. I grieved this for Edwards
 to respond "so" and "noted"

This killed my ability to litigate effectively
 once in court. and caused injury to my
 state case and my wife's case

4. Fourth Amendment: Excessive Force

Sgt Rogers using excessive force
 to remove me from my cell when
 trying secure all my legal matters,
 I was grabbed by arm, bruised, and forced
 out while page by page all my legal
 logs, legal mail was held up in front
 of his body cam. I was given ~~a~~ no
 direct order and the excessive force
 to remove me was unjust and left me
 hurt and bruised

Fourth Amendment

left me hurt, and exposed all my legal matters to pod and to the body cam. When I asked for Lt Hughes she said it was "shake down" ordered by Edwards and it ~~was~~^{was} "just" cause workman, Hughes, Rogers, all had body cams on, and the entire pod saw this. I posed no threat or softex ~~to~~ to anyone this was further reprisal by Edwards, and a way for him to see what all I was logging and filing a 1983 for. This entire action(s) was unreasonable.

Rogers also said he had qualified immunity and he would do what ever he wanted, and no one could do anything about it. No other Co stopped him or told him his actions were unjust. This happened on or around 8-15-24 all of pod saw this.

Furtherance of Claims against Edwards

Rights to use mail - rejected publications

- * No due process right to have decision to exclude incoming by official other than the one who made the initial exclusion abridge or impair prisoner's right to file and litigate civil actions.

** censor simply by indulging their personal prejudices & opinions

Censorship of Communication with Courts

opened out of presence of prisoner, Lt Ross did this at the orders of Edwards more than once

Communication with Attorney - open and read contents.

Com with news Media and right to contact news media again Edwards, Ross, mail room

* legal matters were specifically damaged *

* Communication with Nonjudicial and Public Agencies

- petition the government for redress of grievances

* Punishing a prisoner for Comm his complaints to

higher administrative levels, Edwards, Ross, Sicks, Jones, all did this by not mailing legal mail

Edwards ~~helped~~ did all the above by his own actions or by his direct orders to staff each one is a different claim but all share a relationship & causal like link

Free exercise of Religion

My mother send to the jail via Amazon ~~a~~ a new Catholic pleather Bible, it was denied by front desk clerk/Edwards cause it was pleather. However WDCB sold a pleather KJV on commasssy. I ~~as~~ also had this delivry approved in writting by Lt hugles but Edwards along with the front desk clerk denied my Bible, and did not even return to Amazon

7-15 Bible was denied by yagger at Edwards order

7-18 Blanket Ban on all Books enforced by edwards even catholic books

Free Access to Ministers.

Even though I ask & requested to see & speak with my church leader Father Warren Harvey or any other Catholic Priest Edwards & WDC officials would not let me. There was no penological reason, I was not a security risk, and this request did not nor would have substantially drain on WDC nor or did it adversely affect security. This again substantially harmed my right of religious exercise. Every Sunday & tue when othe faith Ministers would come in I would ask for a catholic minister. I was told Edwards would not allow it, or had denied my request.

This was both while I Petrial Detainee and when I became Federally committed.

Censorship of Communication w/ Courts

Edwards, Lt Ross, Stiler, Jones, White
 All Blocked my communication with
 this very court. I Believe Ross, Stiler, Goodwin
 Jones, White were just following Edwards
 orders but they knew it was unjust.
 When COs found out I was logging
 these actions Jones & Stiler admitted
 my legal mail was being intercepted
 by Edwards. Clearly marked legal
 mail was opened, read & not given
 to me. It was placed in my
 property with a hand note by Lt Ross
 saying "Do not give to inmate"
 Lt Ross sent an email to All WDC
 not to sign for my outgoing legal
 mail. Mail from government officials
 was RTS even though I was still at
 WDC. My mail was throw away,
 not mailed or just refused. This was
 all legal mail, clearly marked
 Both Pretrial & when committed.

Communication w/ Attorneys

Clearly marked legal mail, that was picked up & signed for by the ~~good~~ Co that was assuming custody with date & time was intercepted and not mailed. Letters to Alexander law firm, Proctor law firm, Kidd & rowen law firm, and ACLU never made it to these offices. I am pro se so I have the right to write any attorney in an attempt to secure legal representation. To get mail out (legal mail) of week I had to find a way to ~~elreomvent~~ elreomvent Edwards, this can be proven by letters in this docket entry without a week stamp.

Both pretrial & committed

Communication w/ nonjudicial Officials & Agencies

Edwards and staff at his orders,
Lt Ross, Stiller, Jones, White, Goodwin
Conspired to and did deprive me
of my right to petition the government
for the redress of grievances by
not mailing or intercepting letters to
OIG, DOJ, FBI, State governor, attorney general,
correctional comm, correctional Health comm,
Arkansas Bar and others, This was done
with incoming & outgoing clearly marked
privileged, special, & legal mail. I was given
no notice of of the censorship officially.

Pre trial & Committed prisoner

Pretrial Detainee Strip-search

As a pretrial Detainee, its generally held that we are entitled to the same rights as other citizens except in assuring appearance at trial and security of the institution.

5 different strip and visual body cavity searches, where I had to strip naked bend over and spread my butt cheeks and then turn & lift my balls. Once when booked into WCCDC on (a) minor offenses by John Doe who had no reasonable suspicion of my self carrying weapons or contraband, (I was delivered by another department who searched me 3 times & cleared me) the body Scanner at WCCDC was working and no other inmate had to get stripped searched, they were put in the body scanner. 4 other time in a shake down I was strip searched, visual cavity, bending over ect by Long, Martin, silver body cams were on body scanner could of been used Edwards, Long, Martin, Swindle, Wood

Fifth and Fourteen Amendments

"Right to be free from an abuse of discretion on the part Prison/Jail Administrators, protection from unconstitutional administrative action, protection of life and health from administrative action —

1

Edwards placing me on medical lock down (Jail administrator) due to my meds that have no psychoactive qualities and no penological interest, other inmates on the same meds were not treated like I was. Medical even stated by word of mouth and in response to my grievance about the unjust lock down that it was Edwards direct order. Medical stated I was not locked down for medical reasons, Edwards locked me down for reprisal of writing Official Gov & State offices. The cells and shower had human waste, blood, black mold everywhere, I was given nothing to clean with, had to eat in these nasty areas and when I ~~exp~~ grieved / filed a formal complaint with the Sheriff, he only approved & condoned it

Fifth & Fourteenth Amendments

So the sheriff knew of Edwards conduct, knew how nasty medical was, knew that Dr orders, both my Dr and WCDC/Turnkey's Dr's orders were not being followed. The Sheriff and Edwards both officials of WCDC, both under color of law knew of and disregarded the/an excessive risk to my health and safety.

Eighth Amendment

- cruel and unusual punishments, isolated confinement & Administrative Segregation, cruelty, inhuman & barbarous punishment is disproportionate, and unjust locking me down in medical, for simply writing unfavorable letters about WDOC or its actions of the staff to the media, DOJ OIG and others is disproportionate to match my actions, the punitive isolation was clearly part of Edwards conspiracy to retaliate against me, and a furtherance of the conspiracy interfere with God given rights, to deprive me of rights speech, due process, to be treated equal, and the right to be free from reprisal for "blowing a whistle" for calling ^{out} unconstitutional actions by sworn law officials. The conditions of ~~Confinement~~ confinement outlined in that section about medical lock down constituted atypical & significant hardship in relation to the ordinary incidents of Jail (all I did was write letters, that needed be wrote). Being placed in Punitive isolation under the guise of a medical need shows the "mens rea" of Edwards, this unjust and reprisal action

Eighth Amendment

Eighth Amendment deliberate indifference against, Watts, Jane Doe (Nurse F) and Turnkey for repeated denial of medical request to see a Dr for clearly establish chronic care. Defendants refused to view or even read my medical request, cited policy of paying for sick call 1st. Watts admitted she was ^{not} reading my request due to this policy and other inmates wasting her time. Chiron body cam was on. also denial for treatment of staph, I had to use ^{fluor} cleaner _{to treat infection}

Eighth & Fourteenth Amendment.

at the on set of the constitutional violations I was still a pretrial detainee from 6-24-24 to 7-23-24. Thus I establish my claim for constitutionally insufficient medical by showing the state actor (Edwards, Watts, and nurses with Turnkey) exhibited a deliberate indifference to my serious medical needs. My serious need is treatment for a condition that may or could/will produce death, degeneration, or extreme pain.

Medical Treatment claims

willfully mishandeling my meds by

- 1 throwing them away x3
- 2 giving them to other inmates by mistake x4
- 3 giving them to other inmates who ran out x30
4. Crushing my meds after 2 Dr's said don't x90
5. full bottles of my meds lost; cost 3,300.⁰⁰ per
- 6 Crushing & then dislaying me meds not following Dr RX
7. No medical intake, but wrote down they did
8. refusal to let me see a Dr for over 70 days
- 9 wonton infection of pain on denial of medical
- help for ingrown toe nail, had to
rip off/out toe nail/denial for staff treatment
- 10 unofficial policy of having to pay to see a Dr
- even though I was chronic care, and
even though after 7-23 I was committed
to the B.O.P cause me further harm
and unjust delay in treatment and care
11. Forcing me to sign medical release
when staff relized what they were doing
was unjust, and wonton

Inadequate Medical Care

- A. On 6-9-24 I was booked into WCDC at 10pm. I was given no health intake or screening. I'm on life saving meds and I'm chronic care. So I ~~in~~ⁱⁿ-formed the intake CO John Doe 2 that I was taking "Biktarvy" that I had to have it daily. I told them my pharmacy was BH med towers in CA. I also told them my Dr was Amanda Novack, and that I did not have health ins... I also told them what the meds were for. But as far as I could tell no notes or chart entries were made. Family dropped off my medicine the following day. they tried to inform the front desk clerk the seriousness of my health risk with out my meds, but they ^{were} blown off off, told to drop the meds off.

Inadequate medical care

in box by the entry door and someone would get to it Monday... The front desk clerk was aware of disregarded the excessive risk to my health and safety.

Monday came and went still with no meds being given to me. I put in a medical request only for nurse "F" or ashley wants to say I had no meds. but nurse melody already confirmed my meds were dropped off, just not approved by Ashley yet. I put in more medical request stating this, for her to respond inmates can not or do not get to choose what meds they take. That I needed to put in a sick call wait to see a Dr and go from there. I then advised her of my meds, who my Dr was, why I'm on the meds, how long I've been on the meds, she responded

Inadequate Medical Care

I needed to put in a sick call, pay the fee and wait to be seen. Ashley watts was clearly not even reading what I was saying. the following day I spoke to Pill nurse Heather Spence, she told me at pill call I still had no meds, that my medical chart said nothing and there was nothing she could do. The following day still no meds at pill call. I put in Grievance (~~There was no way to put emergency grievance or I would have~~) But I put one in only for the caption to tell me stop bugging his staff. I then appelled that same grievance, explained in that appell, what my meds were, who my Dr was, where the meds came from, when they were dropped of

Inadequate Medical care:

why I took them, what would happen if I did not take them, even when I was diagnosed, and how long I had been on my life saving meds. Edwards the same person who denied my grievance, then responded to my appeal "So" noted". Over a week later only one bottle showed up on the pill cart. Cost per Bottle is 3,300.⁰⁰

The lost bottle was never found/given to me

B Starting in early July and until my exit from WDC Edwards instated a policies and practices of crushing all meds, Edwards has no Medical Background and is not part of medical. The medical provider then adopted these policies as the norm. Even meds that say do not crush were crushed. I grieved this action and Edwards stated all medical care was done by medical staff

Inadequate Medical Care

Continued. however when I put in medical request and grievance. Medical respond its per Edwards orders to crush everything. I put in another grievance informed Edwards and medical of what my meds were (Biktarvy). why I was taking them; human immunodeficiency virus, ~~to~~ who my Dr was (Amanda Novack) at Baptist health LR, what her orders were, and what happens if I don't take this med Daily at the same time, also that it was not to be crushed. Edwards then responded my meds will be crushed, that he did not care. I then appealed this response to the Sheriff with all the info stated above only for Sheriff to open, read the appeal, but send it back Edwards, who then responded "so" "noted"...

Inadequate Medical Care

B I put in more request to see a Dr for continued My Chronic Care, as in all of them I stated why, what med^{was} the Dr orders, and my Pharmacy^{ect,}. But the nurse responded put in a sick call, pay the fee and wait to be seen, that this was Turnkey policy.. I responded; that responses I'm getting do not even address the grievances and request that I submitted. I waited a day each time or till staff responded, I never was rude, hate full, or anything of the like. The following day I put in another grievance stating that my meds could not be crushed, stated that I'm puking or throwing up the crushed meds that it burning my mouth and insides by being crushed. Edwards responed "So I noted. I appelled this

Inadequate Medical Care

continued Edwards; the same person who denied my grievance, then responded my medical needs and care are "all in my head" that I don't need them daily, also that crushing my meds was not making me sick. At this point my attorney Christian Alexander of Alexander Law in Jacksonville AR called the jail to inform staff & Edwards about my medical needs, my meds, and what happens if I don't take it daily. My wife also sent my medical chart from BHCR mychart. But these actions just made it worse on me. Following this my meds were thrown away, given to other inmates who run out of the same meds, I was told this was normal practice of Turnkey. of my 2 bottles that were dropped off

Inadequate Medical Care

60 pills lasted only 28 days. And
 continued Turnkey/^{As she should}ashley watkins did not order me
 more ^{or} My wife had to go get them
 and pay for them, then drop them off.
 each time, when wendy/Turnkey should have been refilling

C. Over 20 different grievances and 30 medical
 request I explained, how and why ~~the~~ crushing
 my meds was making me sick, burning me,
 causing me to puke them up, thus I was
 not getting them, I explained how
 mishandled meds was not following
 my Dr's orders, and taking years off my
 life, causing me grave harm, Edwards
 with no medical background still
 ordered my meds to be crushed,
~~But~~ responding to my formal complaints
 that "my needs and harm on me
 becoming sick from crushing was
 all in my head" I appelled this
 response for Edwards, the same person
 denied the original complaint, then
 denied the appell saying "So a noted"

Inadequate Medical Care

- D. My medication was given to inmate ~~Tomkey~~ Lamb, J by mistake more than once, Lamb, J even took my meds. once given to him by H. Speer (my meds were never replaced)
-
- E. My medication, that I paid for was given to other inmates that run out of theirs, never replaced, I was told this was a normal action of Tomkey staff at WDC, this was a normal custom and or policy
-
- F. I put in over 15 medical request to see WDC medical provider (Tomkey) for chronic care, I included, why, and my condition of urgency, that this indifference now becoming wonton, was and would cause extreme degeneration of my health, and future life, leading to an early death - and I ^{was} told to pay money and then see if I need to see

Inadequate Medical Care

cont. a Dr. This happen over and over as
 as pre-trial detainee, and even more
 after I was committed to the BOP.
 Watts and other medical staff
 refused to even view my request
 or hear about my already established
 Dr orders, this is after Watts said
 she had my medical records from
 Baptist Health in Little Rock, Watts
 said her actions were backed up
 by policy of WDC & Turnkey, however
 when I asked to be shown this
 policy I was told they did not have
 to show me anything and would not.
 By her own words and written responses
 to my request. Turnkey's & WDC policies
 and practices led to the deliberate
 indifference I experienced, here again
 the defendants denied me care due
 over 15 times due to a policy or practice
 of Turnkey with the approval of WDC
 and Sheriff, Edwards, and Jail Admin

Inadequate Medical Care

6. At some unknown point my medical records at WDC were altered to say I did not come in taking Biktarvy. This can be proven to be false by my wife dropping of meds in view of cams, she also took a video of her dropping me in the box, my chart at BHLR will also show I been on this med for years

4. Defendants refused to view my medical requests, or grant them, or let me see a Dr till 8-30, at that time the Dr told them do not crush, ~~at~~ only dissolve in orange juice, but they never did follow his orders, still crushed my meds did not ever dissolve in orange juice like there own Dr said to.

Inadequate Medical Care

I from 6-11-24 to my exit from WDC my medication was, mishandled, throw away, administered improperly or not administered over 90 times on different dates (see attached log for more detail) each of these 90; or series of occurrences in the 90 transactions from 6-11 to 9-7 I protested the mishandling, or improper administration of my meds, ^{at} times informing medical of what my meds were for, of Dr Amanda Novack's orders (Her own Dr's orders from 8:30 & on) the harm they were causing to myself, there medical oath to do the Right thing in the face of Edwards orders and stated they were choosing to inflict wonton harm with sound mind knowing the risk to my health "MY EXACT WORDS" and at all these 90 different occurrences COs had body cams on and I ask for it to be saved. Video backs me up.

Inadequate Medical care

Due to the raw surge back up in the day area a staff cut break occurred I was denied any medical treatment, I had to pour floor cleaner over my wound for over 15 days for the infection to go away

Some for the ingrown toe nail due to no toe nail clippers ever given at work, this caused a ingrown toe nail, that I had to self remove or rip off, even at request I was given no care or treatment for this I had to use floor cleaner to keep the wound clean, this burned, hurt and slowed the healing process but I had no choice,

ALLEGATIONS:

A

A. Conditions of Confinement

On 6-10-24 Sgt Rogers placed me in "F" pod. However at the time the pod was overly full forcing me to sleep on the floor, not even in a cell. The day area was (where myself and others) had to sleep was flooded with shower and toilet back up. We (Inmates and myself) used jumpsuits to make waterlogged barriers to try and mitigate the raw sewage to area close to shower and toilet. Request and complaints were filled; Captain Edwards only responded "so" and "noted" from 6-10-24 till 8-27 the over flow was never fixed. Due to being forced to sleep on the floor, a skin rash or sores soon occurred. Edwards, Rogers, Medical staff all knew I was forced to sleep on the floor and of skin infection, but just responded "so", "noted", and no treatment given. I had to use floor cleaner to treat infection.

Conditions of Confinement:

B. over 35 inmates had to share 1 shower that was 3 feet by 3 feet, the shower did not drain right, and was engrossed with Black ~~mold~~^{mold}. From 6-15 to upon my exit from WDC over 10 Grievances were filed with Captain Edwards only responding "so ^{it} noted". During this time myself and others had headaches and developed Breathing issues. I ~~know~~^{now} have fungus in my lungs that can be seen by a normal body scan. Still have breathing issues. Co Wood, Co Jones Sgt Swindle, and Lt Ross all knew of the shower by means of my own mouth and by means of seeing it for them self. yet nothing was done. They said they sprayed Bleach. However this seldom ever happened

C. from 8-23 till 9-7 while in lock down the shower was also full of black mold but also blood and human waste, the cell in medical also had Blood and human waste on the walls. This was reported & grieved; yet unresolved

Conditions of Confinement:

0. On 6-28 I had to pay an inmate to sell me his bunk, so I would no longer have to sleep on the floor. However this cell did not lock at night like it should have. Co WOOD, Sgt Swindle, Co Goodwin, Co Jones, Captain Edwards and Lt Ross knew this cell did not lock. All the named staff above logged the cell did not lock, but nothing was ever done, leaving me to fight to keep my things from being stolen. Sgt Swindle saw me fighting for my own safety and security but just went on and did nothing. The fighting left myself hurt at times but when the Captain was informed nothing was done. My entire stay in this cell "F-4" 6-28 to 8-23 it never locked, was never fixed or even looked at. 8-23 I was moved to lock down

Conditions of Confinement:

E. 6-28 to 8-23 while in F-4 I had no drinkable water, no cold water. only water hot enough to burn, and at times I was burned while washing my hands in my cell sink, this to was reported to caption edwards by his staff and ~~also~~ ^{also} by the other inmates in my cell. Yet nothing was ever done, never fixed

F. While at WCOE I was given rotten food to eat ~~8~~ ^{8 or 10} different times. I showed the food to CO Wood, Sgt Swindle, and Sgt Rogers for them to respond "eat around it" or "eat it" one of the times the rotten food was taken by Sgt Swindle, and no other food was ever brought back, I did not eat that meal, no food was ever given back to me. I went hungry that day other time the rotten food made us sick as hell

Conditions of Confinement:

G. On 8-14-24 Wood refused to give or let us "Pod F" use the nail clippers. This was 4th week in a row with no nail clippers. The following week I endured ingrown toe nail, I showed CO Wood who then yelled at me in front of the entire pod that it's not his job to let us use the clippers. However at the same time he was allowing other pods to use them. I put in a medical request about the ingrown nail and nurse F responded, "Guards pass them out". I then put in request/complaint to Lt Ross. She said Guards pass them out, yet they did not. To stop the pain I had to rip off the toe nail, and it's still not fully grown back 6 mo later. No clippers for 60 days on 8-11 also would not let me use clippers. CO Woods came was on. Said it was not his job

Conditions of Confinement

H. 8-14-24 at 1 pm. I was out of toilet paper and needed to use the bathroom, when I saw CO Wood, and asked for some. at WDC when you need toilet paper you just ask, however he responded due to my complaint and naming him in Grievances I could just use my hand to wipe my A**.

I. 8-20 water pipe in chase of cell "F" started to have a major leak, flooding cell & Day area. CO John Doe 3 and 309s throw blankets in the chase to soak up water. On 8-20 the 309 swapped out molded blankets, with black mold. The dark chase with wet blankets made the headaches, nose bleeding, and breathing worse, I grieved this but never got a response.

Conditions of Confinement

J T my entire stay at WDC^B we were never given a way to clean our sinks and toilets, when we asked for Bowl Brush or rags Co Rogers, Co Wood, & Co Swindle would laugh and tell us its not their job. Only supplies we were ever given was a mop with cleaner. Just 1 for 30 or more inmates to use. This caused a staff out break. When grived Lt Ross did not respond only FWD to Edwards who responded "So" "noted". This was from 6-10 till I moved to lock down on or about 8-23, was never treated for staff I had to dump/suck it with floor cleaner

K 8-19 Pod F was denied yard call, Co workman, Co Swindle, Co Rogers told the pod it was due to my 1983 and they were mad at me, is why we got no yard call, but other pods did. They were trying to get me hurt, making me fight for my safety - and did get me jumped hurt

Conditions of Confinement:

L. Only one phone and one kiosk in the pod with 30 inmates. This caused a fight on 8-19, Sgt Swindle looked in window and watched the fight in cell in F3 but did nothing. I was hurt for days. I could not seek medical cause then I would be a snitch and get hurt worse, This happens almost daily and staff does nothing. I grived the issue of only one phone, my self and 10 other inmates did, we spoke about the fighting it was causing only for Edwards to respond SO noted..

Retaliation

A Soon after a phone call from Christon Alexander to Edwards where Mr Alexander tried to inform Edwards of my medical needs and already in place Dr orders. Edwards became so waxed or pissed off and upset at me, that I became the center of his reprisal. He directed staff in a closed door meeting to make my life hell, ~~shave~~ shake me down, and give me nothing. His own staff & COs informed me of this meeting and his words.

They can be called for Testimony

B On or about the same time, he enacted a policy over his own to crush all meds,

C On 7-30-24 he took part in forcing me to sign a medical release releasing all ~~part~~^{them} of any wrong doing

Retaliation

D. when Edwards saw I was asking for an official/formal complaint "F" pod was shook down 5 times ~~on the way~~ and Sgt Rogers & Sgt Swidle told the Pod it was my fault, then turned their back and walk out knowing they caused me to get jumped and have to fight and that fight left me hurt.

E On 8-13-24 Edwards had Co's pull me 1st for court ahead of the rest of the jail who went by pod starting with "A", I was in "F". Court staff told others not knowing I have family that is law enforcement, As Edwards bragged about pulling me 1st and having my wife called last very last making her sit there for over 12 hours, we were on docket together Jason Lynch, Kirsten Lynch. Edwards did this to show his power and try to get one of to act out.

Retaliation

My wife sat in the court room from 7:45 am till 8:30 pm that day. She left in tears, scared of Edwards who has no right to interfere or meddle with court proceedings. A simple court records check will confirm this, and I don't expect any valid reason to be given... Except that Edwards asked for this to be done. Bailiff said Edwards was the one who asked for this

F The more I tried to pursue administrative remedies via the approved grievance procedure, the more staff caused me to get hurt. e.g. They would skip us for yard call up to 6 or 7 times then tell the pod it was due to me & my grievances or the letters I was writing again this caused me get harmed again Swindle looked the other way

Retaliation

6 I wrote the ACLU, OIG, DOJ, 7 on your side, and was told my mail was being thrown away. The same guard who told me this also told me Edwards had Lt Ross send out a staff email to all to no longer accept my legal mail or sign for it saying they picked it up. All staff got this email, and when I put in a grievance on the matter I was told it did not happen yet COs would no longer accept & sign for my out going legal mail when I appealed the response Edwards responded "SO" "Noted"

CO white & Sgt Siler, Sgt Woody told me all this around 8-14-24

Co Wilburn would not take my mail either on the same day, ALL HAD BODY CAMS ON, Co Wilburn informed me of the email

Retaliation

- H. On or about 9-3-24 at the direct order of Edwards, Co Woods, John Doe, Lt Hughes, and Sgt Swindle pulled me from the pod and placed me in medical lockdown, without cause, or due process. Edwards told me that I was sick and needed medical help, However medical staff did not check on me for anything, I was ignored when I pressed the button for assistance, which also helps show I was not there for medical purposes, Watts, Workman, Chism, Woody, Spence, Lt Hughes, Phillips all tried to have me moved back to general pop but they told me Edwards would not allow it, that it was Edwards orders, and only his orders could move me, I put in request and grievances that Edwards denied, I then appealed

Retaliation

his denial and he also answered my appeals "so" & "noted". I did the same for the Sheriff who responded it was Edwards who placed me in medical lockdown and only Edwards could move me.

In Both formal complaints I said this was reprisal for contacting this my court, that I did not need special medical care, did not ask for anything special, and while I was in medical lock down my pill was still crushed, even after there own Dr said don't. to dissolve it in orange juice, which they never did. Edwards had staff still crush my meds then dissolve it in water, only giving me maybe half of a dose, never did I get a full dose. still making me sick

Retaliation

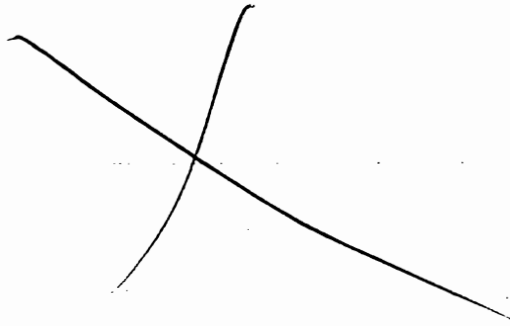
I

It got so bad in medical, that my mother contacted Judge Lee P Rudofsky, informed him of everything, said we were in fear of what Edwards ~~would~~ would do next and ask the Judge to help. The next day I was moved to Green County, with protest from Edwards. Green County told me Edwards did not want to let me go, and tried to stop the move but no one he knew could stop Rudofsky's order. I Believe Rudofsky saved my life, with all my heart I do.

*at one point I was given Antifreeze to drink *

J

The Retaliation of Edwards and staff at his direct orders, caused me 5 different fight where I was attacked cause staff were hurting the entire ~~pop~~ pod, to harm me. the ~~pop~~ ^{pop} in this is staff telling the pod the shake downs



Retaliation

The proff of this is staff telling the pod the stock downs (\$ in total) were due to my legal mail and my 1983. and formal complaints

K. I was the center of Edwards reprisal for filing a 1983. This was openly told to all of "F" pod & his staff

L. Edwards own staff confirmed the retaliation orders, and said if made to ~~testify~~ testify, the truth and more I don't know about would come out.

M. Edwards reach into the court room starts the Arkansas claims court claim, Article 78 claim. and the request that he leave my wife alone.

Retaliation

N. medical request sent by me were refused, not answered, in retaliation for writing formal complaints and state offices about the lack of care by watts/Turkey. Watts who was ^{aware} ~~aware~~ of the grievances about her and Turkey's policies came to flat out refused to see me or treat me. My formal complaints and writing correctional health comm were the motivating factor in the denial of care, by her own words

Retaliation & conspiracy

7. §1983 Edwards conspiracies to interfere with my civil rights, to deprive me of the equal protection laws and equal privileges. being an inmate in county jail, Edwards stated ^{our} that class of people were scum of earth, that he hated us, slurs were made

Retaliation, § 1981, & 1985 Conspiracy

about religion, and by Edwards own words motivated. saying inmates were stupid, ~~and~~ uneducated when he told me "I want you saw me, I have Immunity" so by Edwards own words (Body cam was on in medical 9-1) by his words before me he placed me "class of people" and conspired to harm me and make life hell on me by telling staff to do so in a meeting.

Edwards knowing my cell did not lock, knowing I had to fight for security of my property and safety; deprivation of equal protection rights. The act of & by conspirators, Sgt Swindle, Sgt Rogers, Co ~~Wood~~ wood, Edwards him self having the pad shock down 5 times in 5 weeks then openly openly telling the pad it was my fault so I would get dumped is furtherance of the conspiracy directed to harm and ^{cause} injury to my self, animus is the reason behind Edwards actions and orders. . .

Retaliation, 1985 + 1981 Conspiracy

The Conspiracy to deprive me of and interfere with my constitutional rights. Edwards placed me in quasi-suspect class of people doing so to invidiously and discriminatory animus of hate lay behind his actions w/ intent to harm /and shut me up

Free Exercise of Religion

no catholic Bibles were given or sold,
yet KJV, and other religions were given
away and sold.

no catholic Bible on the tablets
yet 7 other different religions were or
had a Bible on the tablet.

Edwards had sole controle of what
was or was not allowed on the
tablets

Edwards denied meals that comport
with my religious diet for lent/Good on
Holy Friday. NO catholic diet exist at work
at all, even when requested

I put in 7 request with ~~and~~ Chaplen
to see a Priest, Edwards denied all of
them, I was denied Holy communion,
and catholic service. Edwards stated via
chaplen I could go to non catholic service
or nothing at all

HIPPA

Medical staff watts + spence gave non medical staff confidential medical information about me. This gratuitous disclosure of confidential information with no reason to disclosure was done at pill call with watts and spence informing guard staff and other inmates of my medical status with no legitimate penological interests, But to cause me harm and ~~grief~~ grief.

The forced use of the kiosk system in view of the entire pod, resulted in the dissemination of confidential medical information to non medical staff & inmates alike.

Municipal Liability / + official Cap.

A. on July 20th Edwards (who has no medical background and is not medical staff) started an official municipal policy of crushing all medicines; even if they say do not crush or even if the Dr said do not crush. This official policy was printed and posted on the walls, the pill cart, on the medical laptop used by medicals. They all stated per captain Edwards. this practices ~~was~~ so persistent and widespread as to practically have the force of law, that even after WDC own contracted Dr said do not crush, the Captain made all pill nurses still crush all meds, mine to even when I

Municipal Liability / Edwards official cap

reminded all pill nurses about
there own Dr saying do not
crush my meds. This was done
 over 60 time by All pill nurses
 Spence, watts, Jane Doe 1, Jane Doe 2
 Melody, heather, all stated the
Capitan would fire them if they
did not. This was grieked by
 myself ~~and~~ and 22 other inmates
 that I know of. Edwards responded
 to my grievance that informed
 him of my meds, my Dr orders,
 Tomkey's Dr orders, ~~and~~ how it was
 harming me, how it took years off
 my life and he denied all my
 grievances, he also ruled on my
 appeals which he also denied.
 Only responding "so" and "noted"

Municipal Liability & Official Cap.

I spoke to Lt Hughes, asked her for help. she told me to write the sheriff, so I did. Again I did the who, the what, the how, and why.

I informed the sheriff of my meds, my Dr. orders by Amanda Nevada at Baptist Health Little Rock, my pharmacy, why I was ~~on~~^{on} the meds, how long I was on the med, and how this new official policy was directly harming me and taking years off my life.

The sheriff said he would speak ^{with the} ~~with the~~ Captain. a day ^{following his} ~~later~~ response he ^{ed} ~~responding~~ the Captain spoke with my Dr and crushing my meds caused me no harm.

(THIS WAS A LIE) my wife then called my pharmacy Baptist Health & Dr.

Municipal Liability / official cap.

at med towers in LA, who told her no one called them about me or my meds. They also told my wife that no medical release was on file for anyone but her, so the only one; anyone at the pharm would speak to was my wife. Same for my Dr too

Thus this starts the official capacity against Sheriff; Edwards, Tunkay, and Watts -

This official policy and/or custom caused me to be subjected to the denial of a right protected by the Constitution, this policy official or not caused me harm and they knew it was, did nothing in light of the harm

Turnkey + watts official capacity

- A. Head nurse Ashley watts of Turnkey denied over 30 medical request, notes to staff and medical Grievances from 6-15-24 to 8-30 all requesting to see a Dr for my cronic care. Watts stated that it was policy I pay a sick ^{call} fee then she would see if I need to see a Dr. in a face to face meeting ^{on 7-24 or about that date} with watts anathe medical Jane Doe (a ~~large~~ bigger woman with glasses) watts told me she knew of my medical needs, had seen my medical chart from my Dr Amond Novack at BHCR, my meds, but due to the policy of paying for a sick call first; she was just over looking or ignored all my medical request. This policy caused a huge delay in seeing the

Turnkey & Watts official cap.

Dr, even though watts said she was aware of my chronic medical needs, I was the forced to sign a medical release, releasing turnkey and wade of all cause or I was going to be locked down with out cause of the process.

Dep. Long, Lt Hughes, watts, and larger Jane Doe in medical are the ones who did this.. I was scared and under duress and fear of being locked down

when I was FORCED to sign sign a releas of any care or wrong doing on a official Turnkey form

This was on 7-31-24. This happed right after I asked for copy of my filed ~~and~~ medical request and grievances... I did sign the form but I was forced to out of fear

Turnkey & Watts official cap

body cams were on and there were 3 cams in medical ~~that~~ ^{that I} had view.

- B. All turnkey medical staff acted upon with indifference to any medical Dr orders or medic need to the policy started by Edwards. In fact turnkey adopted and enforced this policy as law, with ~~no~~ no regards to the out come of any notice of harm it was causing. I filed over 20 grievances and appeals. stating this was harming me, burning my insides and mouth, that I was not getting my full dose, and it was making me puke only to have Edwards say in response on my grievance that "it was all in my head" "my medical needs are all in my head"

Offical Capacity / Municipal Liability

- A Sheriff - knew of and approved the new policy of crushing all meds, the Sheriff knew of the harm to myself the burning of my insides, mouth, The Sheriff knew of my Dr orders and just did not care, he still knew of and approved Edwards actions and policy. Sheriff knew of everything by means of my request & grievances, by means of Lt Hughes, by means of my inmate records and by means of my handwritten notes. Sheriff knew of my medical need and disregard them with no care to the clear risk to health and safety.. He actually knew of everything but deliberately disregarded all care & needs, Approving the actions and policies that were a deprivation of constitutional rights and deliberately indifferent failure to train or supervise

Official Capacity - Edwards

A Edwards became so waxed with me over Mr Christian Alexander of Alexander Law Firm in Jacksonville Arkansas calling him about my medical needs that

1. He started policy that was a direct harm to myself and others.

This policy was printed and posted through out the jail in over 5 places I saw

2. Edwards called a special meeting with myself being the only thing discussed. He ordered his staff to "make my life hell" to shake me down daily - omitted by COs - unnamed ^{this} at time

3. Not to mail my mail or give me anything

4. He became so personally involved he asked to court room clerks to make my wife sit 12 hours before calling her name - as said by court room staff

Edwards - causal link x 5 and more

- A Edwards personal involvement, and direct responsibility of my constitutional rights deprivation by his direct orders, directed at only me, with intent to harm and intent to cause me harm is the causal link to most all of
-
- B my claims. ^BTurnkey and ashley watts enforcing and adopting his policy is
-
- C ~~the other link.~~ ^CThe final link is Edwards holding a special meeting about me is the 3rd.

These three actions link all my claims.

- D The Retaliation, and order of Retaliation and the actions of retaliation creates the 4th causal & direct link
-
- E The official written, printed, posted and enforced policy of crushing all needs links over half of my claims as well.

WCDC, white county comm
official-Capacity Claims

- 1 The official municipal policy or unofficial custom of allowing Edwards an unchecked rule and power over the jail, and allowing Edwards to create a policy, then print it and post it in the jail, on pill carts, on laptops, with no care or deliberately indifferent to any harm it caused or even if it was against medical or orders or pharmacy orders. (as they did with me & mine)

This policy that was written, printed & posted was a constitutional violation, that gravely harmed me, took years off my life. Edwards actions & policies, have gone unchecked for years, simple records check will show hundreds of cases filed matching my claims some even in this very court. This continuing, widespread, persistent pattern of unconstitutional misconduct did not stop but only got worse when I sent officials & policymakers notice

WCDC/white county comm official Cap

of Edwards actions. I sent written notice (The same letter that ^{was} ~~some~~ sent to this court; The stamp on the outside of the letter will show it did not come from WCDC) I sent notice of Edwards actions to the WCDC Admin, Judge Pate, Mayors office, The white county Prosecutor office, The US Prosecutor - Ross, The white county sheriff, and the Gov's office of ~~State~~ - Arkansas. I only got a response from the sheriff by means of the "smart communications system in the jail and tacit approval of Edwards actions, even though his misconduct was clearly stated & listed in my notice. This indifference caused me further harm with my medical needs, and now the deprivation of medical care and my supplied medicines has not only taken years off my life by advancing the virus, I now have advanced tooth decay thats pain ful. Edwards policy

wcde/white county Official Capacity

official and/or unofficial customs, together with and without his personal actions was the moving force behind the constitutional violations. His/The pattern of unconstitutional conduct was so overwhelming, so forced, and so widespread, that Edwards told his staff he ~~would~~ would fire them if they did not comply in his own statement to me on 8-23-24 while in medical with staff who had body cams on was "I will fire anyone who dose not follow my orders and cost your meds, medical staff included" this, his own words on record has such an effect to make his actions & policy force of law... with the deliberately ~~indifferent~~ indifferent and tacit authorization and confirmed approval of the sheriff and policymaking officials I also claim failure to train & failure to supervise.

Qualified Immunity

on 8-24 in medical in view of
3 cams with audio, and CO Jane Doe
who had body cam on. Edwards
stated "I want you ~~see~~ ^{to} see me, I
have Immunity

1. Its clear there is myriad
of constitutional violations occurred

— 2. The Constitutional rights are so
"clearly established" other COs

knew his action were unbecoming

3. by Edwards own words he
knew his actions were unlawful,
but his unchecked power, and him
beliving I was "stupid" makes
Edwards feel untouchable

4. Other COs, at time told me
sorry for Edwards actions, thus
reasonable OFFICERS clearly knew his
conduct was unlawful. when the time
comes I have 3 COs to call as

Defendants individual actions

- Sheriff -

A. Sheriff - John Doe, the sheriff of White County and over all inmates and staff at WCC. ~~as~~ both official & personal Capacity. Official Capacity for not training or supervise Edwards and the other guards, including medical & Turnley. Sheriff gave tacit authorization ~~and~~ on the policy of crushing all med, Sheriff gave tacit authorization to Edwards when he approved the reprisal & unjust lockdown in medical. Sheriff made and approved direct medical choices about my treatment. With the policy that harmed me, The lockdown and turning a blind eye to my letter (exhibit A, attached) The Sheriff with culpable mind, knowing all facts, & knowing of clearly established constitutionally protected rights were being harmed/deprived/denied and of the conspiracy to deprive with intent to harm did nothing to stop it, but more over approved the actions, was wonton & deliberate indifference

Respondent Superior

1. All through out my pleading are causal ~~the~~ links to my claims. Edwards (who has no medical background) made direct orders to not follow my already prescribed and established Dr orders, and gave more direct orders not to follow Turnkey's Dr orders as well. Edwards also made an official policy & custom; printed it and posted in through out the jail, and enforced the policy for 90 day while I was WDC. This policy caused me grave harm, Edwards used this policy as reasons not to follow medical orders of 2 different Dr's. even knowing the harm to myself and others. This policy and Edwards direct orders are directly responsibility for the harm to myself and the deprivation of constitutional rights. I grieved the above to the Sheriff, however approved the actions & policy. I wrote the county Judge, county comm we prosecutor, mayor's office, Gov office, OIG, DOJ

Respondent Superior +

1. unwired ACW, Correctional Health comm, and more, The letter I wrote is also the same found on docket entry 1 and 3. also enclosed in this claim.

Deliberately Indifferent Failure To Train or Supervise

1. Even after a formal complaint, stating everything in this entire claim, and the letters to Sheriff (docket 1 and 3 and enclosed) request for the Sheriff to ~~send~~ ^{speak} with me for ongoing reasons, and he did not but only Approved Edwards orders, policy, and actions in a written response to me on the "Smartdail communications" system. The Sheriff with sound mind and capable knowledge of everything going ~~on~~ ^{on} gave tacit authorization of said/such conduct, indifference to The harm of life it was causing. Allowing Edwards to enforce it as law ...

Ashley watts:

watts is a turnkey contractor - also
The Hsa at WDC. Watts delayed my
medical care and denied all my request
to see a Dr stating it was policy
to pay the sick call fee even though
she knew I chronic care, watts did
not read my request, blew me off,
and is one of the ~~praries~~ defendants
who conspired with Edwards to
deprive me of my rights. watts also
delayed my meds for over a week,
did not refill my med, and lost a
full bottle of my meds. watts is
brought forth in her personal and
official cap. watts also denied me
my own medical request, threw away
one of my 1983 forms that was
hand~~del~~ delivered by CO Goodwin
watts handled all medical request, refills
at WDC. Violated WDC policy by not letting
me see a Dr for chronic care, chronic care
inmate do not have to pay to see Dr
for chronic care needs

nurse "F"

nurse "F" is a Jane Doe, 7 different times I asked who she was, and she or he responded I did not need to know their name. Even when I stated I needed for my 1983 they said I had no right to know their name.

nurse F denied 7 different request to see a Dr. even when I said I needed to see a Dr for chronic care. nurse F denied care for ingrown toe nail, staff infection, sabbies infection both due to the raw sewage flowing in the pod. I had to pour floor cleaner on the open wounds as that was the only way I could treat the infection. I did this in front of staff who did not care or help and pod cams as well.

nurse f knew that failing to provide medical treatment would cause further harm but did not care the failure significantly affects my daily activities and inflicted chronic and substantial pain, and left me scared on my arm, nurse knew omitted medical treatment would pose a great risk to my health

Both when I was pre-trial and committed

Melody was a pill nurse who quit when Edwards made crash all meds - not side in this.

Katynn Spence or Smith - is a turnkey contractor pill nurse, Katynn is the main nurse who mishandled my meds countless times, and the one who gave me drink that looked like antifreeze. Mishandled over 90 times

Lt Ross - Lt at work over all inmates, she opened my legal mail with out me present, did not give me my legal mail, sent email to all staff not to sign for my legal mail or accept it

Lt Hughes - Lt over all Guard staff, named in claim for failure to supervise, train or prevent harm to me by the guards

Sgt workman - no yard call as reprisal conspired with Edwards to harm me

Sgt Swindle - looked the other way after causing me to get jumped on 3 different days - conspired with Edwards to harm me

Sgt Rogers - read all my legal mail to the
pod or in front of it, held all my legal mail
up to his body cam, and used unjust force
to harm me. Conspired with Edwards to harm
me

CO Wood - told inmates about my legal matters
then told the pod it was my legal matters
that was causing no yard call for weeks on
end, denied toe & finger nail clippers for
weeks on end, denied toilet paper, said
use hand to wipe ass

Co Jones - would not mail my legal mail
said Lt Ross said don't x3

Sgt Seiler - would not mail my legal mail
said Lt Ross sent email not to, x3

Co Goodwin - would not mail any of my mail
did not say why x3

Yaggar - Front desk clerk, denied a soft leather
Bible that Lt Hughes approved, denied book on

my religion and enforced Blanket ban on
all books

Does ore : Sheriff, mail room clerk, nurse F
intake co 1, pill nurse 1,2,3, white county
Admin, and white county commission.

Irreparable Harm & Injury or other
harms to myself

- A Bone and Tooth decay now evident
- B Body & Health degeneration (from no meds)
- C Years off my life I cant get back (from no meds)
- D Breathing issues (Black mold)
- E fungi ~~growth~~ in my lung (Black mold)
- F skin infection (scabbies) scarring
- G Physical damage to toe nail still w/pain
- H Physical harm to Arm (Rogers excessive force)
- I Physical harm to back from being dumped
- J Physical Head trauma from being dumped
- K Lasting Head Ach still
- L Burned by the only drinking water access in my cell
- M Become ill by eating rotten food served by wscoc
- N nose bleeding from black mold
- O Scarring on Arm from Staff outbreak (untreated)

Grave lasting Mental anguish and emotional
& stress, psychological trauma

Redress sought:

1. **Coercive Relief:** The Interim relief of a cease and desist letter with order for Edwards to leave My wife alone, Edwards asked the court to call me very 1st and my wife 12 hours later or very last. Edwards interfering with court room proceedings for reprisal on me is not fair. Edwards continued reprisal on me by telling BOP that my wife is a defendant against me on a court case so her visit to see me could not be approved. This was a right lie my wife and I have never been on a case together or a co Defendants or anything even close. Edwards said this a sole reprisal for my letters of 1993. Edwards has been speaking of my wife's legal issues to other people outside of WNCB and to court officials when Edwards is not court or judicial staff and should not be doing so. Edwards hate of Lynch Family is clear and I pray cease and desist order or even a TRO, Edwards even got officials to rewrite reports 30 days after arrest.

Redress Sought:

2. injunction - a preliminary injunction that WCOB and Turnkey not ~~disseminate~~ dispose of my request to staff, grievances, both normal & medical; Do not dispose of Video from all body cams from 6-9 to 9-8 or video & audio from other ^{cams} ~~cameras~~ in the jail. That no Physical Evidence or Documents, e-mails or meeting minutes any thing of the like or anything pertaining to these claims be saved and logged with a chain of custody on all. and a list of what has been disposed of ~~where~~ it was disposed of and when...

3. A full DOJ, OIG, and state investigation be conducted to include the claims ~~in my~~ in all my Amended Complaints. Afterwards I request that the Sheriff, and all defendants involved in my torture be disciplined to the fullest extent. Torts claims, Arit 78 and claims court cases filed where needed after this case is disposed of. And a class action case started as well.

Redress sought:

4. Lynch need to be medically assessed by his Drs and 3rd party Drs at BHLR for degeneration of health due to mishandling his meds and denial of medical care, and psychological trauma I am still suffering from as well.

5. Lynch is also requesting WCCB and Turnkey compensate him for: Class of one discrimination, torture, deliberate Indifference, denial of medical care & treatment, Conditions of Confinement, Retaliation, Conspiracy to deny 1st, 4th, 8th, and 14th Amendments REPEATEDLY over a 90 day span; in the ~~minimum~~ minimum amount of 5 million dollars. Lynch should also be awarded punitive damages in the ~~amount~~ ^{amount} of 5 million dollars

Lynch will donate 3.2 million back to white county comm to train all staff on constitutional rights, mold prevention, cleaning supplies, update medical care policies make religion services available to all,

~~Respect~~ sought
and to form an oversight committee
to prevent this from happening to
others. My claim are what happened
to me.. wococ does this to almost
all inmates. Thus a class action needs
to be researched & started

- 6 wococ & turnkey ~~paid~~ pay all cost,
fees, and all my cost of postage &
supplies to get this filed and the
cost of all letters & copies to the
amount of 875.⁰⁰ (for copies, letters, postage
and fees)

Cover Sheet

The savagely brutal, outrageously cruel and wicked things you are about to read ARE TRUE. They are sick, sad, and atrocious, deliberately purposely done to us. Gross negligence is a complete understatement.

In the following pages you are about to read, you see there is no care to human life, liberty or constitutional care. There is a complete nonobservance to the ADA, state or Federal law. Even the constitution itself is totally disregarded.

You're about to read how inmates are forced to defecate in a grated hole in the floor and then must push it through with their hands or feet then not allowed to wash for days at a time. Or inmates are forced to defecate in food trays then send it back out due to no toilets in cell.

The unconstitutional treatment continues with Bibles not being allowed or bans on things like "Daily Bread" or books about the "Holy Ghost". Legal mail is thrown away. 1983 forms are denied even adequate and constitutionally required medical and life saving care is denied.

There is no regard to 1st Amendment, the 8th 14th or any Rule of law.

Christian publications are stripped from us medication is mishandled, even administered to the wrong inmates, improper administration is a daily occurrence.

- Drinking water is withheld from us
- No emergency grievance system
- No "due process" with legal mail
- Legal mail, incoming & outgoing thrown away
- Administrative grievances are ignored or the appeal is answered by the same person

The tragic list is long and sick, please copy and forward this to:

- OIG (Office of Inspector General)
- Constituent Services
- The Federal Courts
- Correction Professional Standards
- ACLU
- DOT OIG or

anyone that can help expose the gross negligence & unconstitutional treatment

①

This is a plea for help! I pray the person reading this can help launch an investigation or get this into the hands of someone that can. Inmates are dying, some have made the news, some have not. And I am now in fear of my life. All attempts of contacting any REVIEW committee have been blocked by the staff (outgoing mail) is just (thrown away) I have been told/or can't file 1983, officials laugh at me and deny the many requests for 1983 forms after asking for them, the staff retaliated against me and forced me to sign a release or I would have been locked down losing all contact with my family.

②

Please help, I've exhausted all unit approved administrative remedies, more over every attempt to file 1983 has been denied or blocked by staff here at White County Detention Center in Searcy, Arkansas.

③

The repeated gross negligence in non adherence of any rule of laws has made the unconstitutional treatment pattern of persistent and widespread practices that have become permanent well settled pattern and now normal constitutional violations. Officials are doing this to all inmates not just me. When an inspector comes, the staff does not allow us to speak if we do, we are locked down and everything is taken from us when he leaves.

④

To whom it may concern: 8-3-24

This is a plea for help! I pray the person reading this will help the letter get to the right hands.

Inmates are dying! Some have made the news, some have not. God given constitutional rights are deliberately being withheld. If we say anything, or file a complaint via the unit grievance procedure we are often at times retaliated against or simply ignored. Some inmates (more specifically) those who are placed on suicide watch and (administrative segregation) are forced to use the bathroom in a grated hole in the middle of floor (day cell) both urination & defecation because toilet/waste disposal facilities and no water supply. Drinking is withheld as a way to handle infractions...

Old men are forced to sleep on the rusty floor. Just yesterday, I saw a handicapped man crying for help getting up & they would not allow me to help him up or call his wife cause he would or could not reach the phone. These are just some of the unconstitutional treatment conditions here at White County Detention Center in Searcy Arkansas.

⑤

I've started a log of all sufficiently and gross negligence to law, ADA and PLRA denials and its growing daily.

These are serious instances of gross negligence and deliberately indifference towards basic humane and constitutional rights and these accusations are 100%

⑤

Case: 4:24-cv-00740-LPR-BBM Document #: 31-0 Filed: 10/31/2024 Page 2 of 55

Inmates are dying, some have made the news, some have not. God given constitutional rights are deliberately being withheld. If we say anything or file a complaint via the unit grievance procedure we are often times retaliated against or simply ignored. Some inmates, (more specially those who are placed on suicide watch and administrative segregation) are forced to use the bathroom in a grated hole in the floor (both urination and defecation) because they are placed in a "dry cell" that has no toilet and no waste disposal facilities and no water supply. Drinking is withheld as a way to handle infractions.

Old men are forced to sleep on a nasty floor... Just yesterday, I saw a handicapped man left on the floor crying out for help getting up and they would not allow me to help him up or call his wife because he could not reach the phone... These are just some of the unconstitutional treatment conditions here at White County Detention Center in Searcy, Arkansas. I've started a log of all sufficiently serious and gross negligence to law, rights ADA and PLRA denials and is growing daily. These are serious instances of gross negligence and deliberate indifference towards basic humane and constitutional rights and there is plenty of proof. This all started for me personally when my 1st amendment right deprived by staff not allowing me a bible. I am also on a

③

C

The security and medical staff here are deliberately indifferent to the seriousness of my own medical needs, saying things "like" your medical need is all in your head and "you don't have to have to take meds daily", or even that my dr. / provider orders are fake and that they will "do what they want". Security and medical staff here have denied myself and others adequate medical treatment on so many different levels. They have purposely and continuously ignored medical doctors/providers orders that were already established. Medical staff ie (unit pill nurses) here have thrown away my medications which cost several thousands of dollars per bottle, they have even administered my prescribed medications to other inmates on purpose and by mistake. They knowingly mishandled my meds administering them improperly, making them ineffective by crushing my pills, breaking the special coating & exposing them to light. This also lessens the dose given due to particulates left in the bag and the cup, thus I receive less medication than has been prescribed by my doctor/provider in addition, security staff retaliates when I try to pursue administrative remedies via the approved unit grievance procedure (staff refuses to allow me a paper copy of my grievances and the same staff member who answers, makes a ruling on merits of my grievance is the

⑥

This all started for me personally when my 1st amendment right deprived by staff not allowing me a bible. I am also on a "Life" saving med. that I have to take daily. The security and medical staff here are deliberately indifferent of the seriousness of my medical needs, saying things "Like" your medical needs are all in your head and "You don't have to take meds daily." or even that my doctor/provider orders are fake and they will do what they want.

Security and medical staff here have denied myself and others adequate medical treatment on so many levels. They are purposely & continuously ignored even medical doctors/providers orders that have already been established. Medical staff ie (Unit pill nurses) here have thrown away my medications which cost several thousands of dollars per bottle. They have knowingly mishandled my meds administering them improperly making them ineffective by crushing them and exposing them to light. This also lessens the dosage given, due to particulates left in the bag or in the cup. Thus I receive less medication that has been prescribed by my doctor/provider, in addition security staff retaliates when I try to pursue administrative remedies via the unit approved grievance procedure (Staff refuses to allow me a paper copy of my grievances, and the same staff member who answers/makes a ruling on merits of my grievances procedure is the same staff who responds

⑥

law. Security and medical staff gross negligence and deliberate indifferent towards me, via the wrongful and improper administrative of my doctor/provider prescribed "Life" saving medication is harmful and a threat to my physical well being and life. I lose days and/or even years of my life if I don't take these meds properly. I have a wife and three kids and only one year to serve in the federal B.O.P. but I fear I'm going to die before I get there. The deprivation of our rights. The officials & staff and medical staff are deliberately indifferent to medical care and needs, the gross negligence is sad and tragic. Please help! or get this to the right person that can help. I wrote the federal courts and asked for PRB only to have staff here block my outgoing mail. They forced me to sign a medical release forms or they would/were going to lock me down for 23 hours a day which violates federal law. Inmates are not safe here and there is non adherence to federal & state laws. Once again, I pray for help in exposing this unconstitutional treatment. Give a copy to anyone that can help or has the power to look into this matter. We need help in here, people are dying due to direct misconduct of officials here, ADA is being violated, the PLRA is being violated, state & federal laws are being violated.

(4)

violation of the PLRA and federal laws. Security & medical staffs gross negligence and deliberate indifference towards me, via the wrongful and improper administration of my prescribed "Life" saving medications is harmful and a threat to my physical well being and life. I lose days and or years off my life, if I don't take these medications properly. I have a wife and three kids and only one year to serve in the federal BOP but I fear im going to die before I make it there. The deprivation of our rights... The officials, staff and medical staff are deliberately indifferent to medical care & needs, the gross negligence is sad and tragic...

Please help, or get this to the right person that can help. I wrote the federal courts and asked for PO's only to have staff here block my out going mail...

They forced me to sign medical release forms or they would/were going to lock me down for 23 hours a day all which violates federal law. Inmates are dying and not safe here and there is no adherence to state or federal law. Once again, I pray for help in exposing this unconstitutional treatment. Give a copy to anyone that can help or has the power to look into this matter. We need help, due to direct misconduct of officials here, ADA is being violated, the PLRA is being violated, state & federal laws are being violated

over ✓

I declare under the penalty of perjury (18 USC 1621) that the foregoing is true & correct.

- 1 Mike Weatherly 10792 Mike Weatherly
- 2 ~~Elmer~~ Nichols 154037 Elmer Nichols
- 3 Jason M Grier 651548 Jason M Grier
- 4 Pat Cates 450327 Pat Cates
- 5 Hunter Crowder 565710 Hunter Crowder
- 6 Jason Harrison 154131 Jason Harrison
- 7 Robert Pector 919887 Robert Pector
- 8 Billy Sporkman 266913 Billy Sporkman
- 9 William Baker 14411 William Baker
- 10 James Quattlebaum 648124 James Quattlebaum
- 11 Aaron McClure 665810 Aaron McClure
- 12 Arthur Foust 14545 Arthur Foust
- 13 Elmer Nichols 154037 Elmer Nichols
- 14 Keith Ballard 519158 Keith Ballard
- 15 Terrell Foreman 71105 Terrell Foreman
- 16 Jonathan Lamb 651848 Jonathan Lamb

Every name above can be a testimony to all/everything you read here. And there is as much more.

OVER

(1)

A

denied Biele 6-15-24

7-26-24 8:46 pm Nurse Kattlyn administering medication

7-27-24 8:55 pm Nurse Kattlyn administering my medication

7-28-24 9:19 pm Nurse Kattlyn administering my medication

7-28-24 LGW Library turned off/not working

7-28-24 8:35 pm Nurse Heather administering my medication

7-29-24 9:52 pm Nurse Kattlyn administering my medication

7-30-24 Forced to sign medical release form to return to head nurse Ashley Watts

7-31-24 Floating nurse melody said my pill cannot be crushed, nurse Heather said something and did not crush.

8-2-24 Nurse Kattlyn crushed my meds, said she did not care about my medical needs

8-3-24 8:15 pm nurse Kattlyn crushed my meds, once again said she did not care about my health

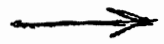
8-4-24 11:00 pm nurse Kattlyn crushed my meds, only giving me half a dose of life saving meds.

8-5-24 nurse Kattlyn crushed my meds, only giving me half a dose of life saving meds.

~~7-6-24~~ 10 pm - Captain Edwards responded to me saying I don't need my meds daily that was all in my head.

3-6-24 9:50 pm nurse melody did not crush my pill but told me if they asked to say she did. Staff made her promise to crush my pill

3-7-24 nurse Kattlyn Smith crushed my meds



(10)

(10)

- 8-14 • Edwards/John Doe/Lt. Ross - blocking outgoing mail (legal mail) and incoming mail & legal mail with "no due process"
- The same official who blocked and censored my mail is the same one who answered my administrative challenge is the same who answered my appeal.
- 8-19 • Opening my incoming legal mail without me being present. Then bring it to me and reopening it, clearly marked as legal mail. Reading it, seeing it was 1983 (8 copies) and Informa Pauper's papers, yet still blocking me from getting it. Blocking me from legal paper work blank 1983 forms. This was done by Captain Edwards & Lt. Ross along with John Doe (mail room) front desk clerk.
- 6-23 • Expectation of privacy violated, denial of unmonitored attorney calls - even after my request and even after the request of my attorney more over still monitoring my attorney calls by Captain Edwards and unknown staff.
- 7-83 • Force to sign medical release or he locked me down without due process or reason, was clearly reprisal for grievances on medical, medical had no established right to do so, locking me down in medical would remove access to courts/law library, all contact

→

8-16-24 8:25pm Katelyn Smith CRushed my meds again. She said the head nurse was Ashley Watts.

9

8-17-24 4:11pm Law Library not working while searching 1983 & how to

8-17-24 Mrs Yeager would not let my wife donate a large box of books (paper books) Yeager stated the jail banned all books she was donating books left behind Pelea Pan, never ending story "Failed the Turner Test" H. Hughes, and Ross and Yeager would not allow any of the Catholic books, but are allowing others by Baptist writers.

8-17-24 Law Library not working

8-17-24 ~~6:15pm~~ 8pm nurse Katelyn Smith crushed my meds, over half of my pill was left in bag but she threw it away.

8-17-24 Law Library not working

5

8-14-24 @ 2pm I ask CO Wilbuen again to get a Sgt. OR LT. OR ANY Admin. STAFF to send my legal mail letters as of now

8-14-24 8:30pm NURSE Ratlyn crushed my meds and then told ~~me~~ another inmate about my health and why i have to take my meds a clear HIPPA violation CO phillips was there, body cam on

8-14-24 I was out of toilet paper and asked CO woods for some, he told me to use my hand and Refused to give me any. I had buy some off another inmate This is "normal" for Woods

8-14-24 2pm. Kiosk not working tried to use Law Library but it would never load for me. tried 7 more times and could not get it to work

8-14-24 3pm. NURSE F. would not tell me her NAME to be added to my 1983 and she told me to do a 1983 when i was Released and Refused again. Would not tell any other nurse that has been mishandling my Meds. She would not tell me the doctors NAME OR the PHARMACY that said it was OK to crush my meds. I told her it was for my 1983 and she told me to do a 1983 when i was Released and Refused again blocking my 1983 form being filed

6

8-15-24 1:47pm LAW LIBRARY not working will not load

8-14-24 10 am NURSE F responded to my request

for CORRECT NAMES to be listed in my 1983. She again denied me information

saying i would have to do a F.O.I.A

upon my release. I did inform them it

was for my 1983 I also sent forms

sent to me by the US courts however

they were thrown away and not

returned to me.

8-15-24 NURSE Ralyn Smith told me her

NAME ~~was~~ WAS Ralyn Spence on more

than one occasion. However when

i handed her the 1983 to complete

she wrote down a different name

willingly misleading

8-8-24 9pm nurse Katlyn Smith crushed my
Meds, I did not get all my dose

8-9-24 10:15pm nurse Katlyn Smith crushed my meds
she made the new nurse crush them and she
would not, Katlyn did it herself

8-10-24 9pm Melody did not crush my Meds but told
me they are making her promise to crush my Meds
Just me being singled out.

8-11-24 @ 4:16pm Law Library was turned off on me
- Searching 1983 and white county 3rd time they had
done this to me. Right when i log on another inmate
could log on & use it but i could not.

8-11-24 @ 3:50pm CO Wood not allowing me to trim
my nails, and week in a row when i asked for them
he yelled at me and said it was not his job. Body cam was
on.

8-11-24 Law Library access still off 5pm
inmate Renford Williams saw this himself

8-11-24 8:23pm. Katlyn Smith crushed my meds
Ashley Watts is the head nurse

8-12-24 @ 2:43 3rd letter sent to L.R. Federal Court
house - gave to CO MARTIN by hand.

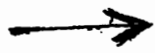
8-12-24 @ 2:45 Kiosk not working could not access
Law Library or legal Mail

8-12-24 @ 9:45pm nurse Katlyn crushed my meds

(3)

A

- 3-13-24 9:00 pm NURSE KATHY CRUSHED MY MEDS
- 3-13-24 CO/JONES would not sign for my outgoing mail
- ① Alexander Law Firm - MPRAE, AR
 - ② Office of Inspector General in DC
 - ③ Alexander Law Firm Jacksonville, AR
 - ④ I on your Side News
 - ⑤ Arkansas Professional Standards Unit
 - ⑥ Dept. of Justice Office of Inspector General LR
- CO/Jones would not sign sheet/receipt for these outgoing mail for reason he did not want his name on paper - he admitted adm. staff is watching my mail
- 8-13-24 12:00 am CO/Jones nor Sgt. Siler would take my outgoing legal mail - I Mike Weatherly witnessed this
- 8-13-24 8:40 pm was the 1st one called out to court however my wife who was next under my name on court docket was not called up for 12 hours clearly further reprisal for 1983 Form Inmate we brought to court room by PODS I'm in F POD CO/Martin informed me this was what he was told & he was only doing his job.
- 8-14-24 I again learned / was told Captain Edwards & Nurse Ashley Watts printed & placed a notice in medical with only my name that my pills were to be crushed - now showing intent to harm



8-14-24 After 6 attempts to send outgoing legal mail, all have been denied or blocked

11:45 - I informed Captain Edwards of this his response was it was policy not to reject inmate mail. Yet he has still come to get mail outgoing legal mail.

8-14-24 10:30am I put in official mail request on Kiosh for a Sgt. or Lt. to come get my legal mail & to however my outgoing legal mail as of 12:15 pm no staff has accepted my legal mail has been refused by CO/Jones Sgt. Siler was asked 3 times via the speaker in PAD but NEVER came and got it CO/Wilbur was asked twice to have a Sgt. or Lt. but still no one has come to get mail.

8-14-24 20, 22, 1033 & 20, 246, 288 medical staff will not give me their name to complete my 1983 even after telling them I need the info. to complete my 1983 thus staff is still blocking my 1983.

8-14-24 1pm staff is refusing to complete their part of Informa Rosper's papers, further Repraisal of 1983

8-14-24 to date no mail clippers have been handed out, I have in grown toe nails due to Lt. Ross and CO/Wood are well aware they just don't care.

⑤

A

8-14-24 3pm Nurse F would not tell me her name to be added to my 1983 or any other nurse that has been mishandling my meds. She would not tell me the doctors name (names) that said or told her I was

I told her

when

8.16.24 getting 1 copy from Federal court that
threw away 9 copies my wife sent
marked legal mail.

8.16.24 8:25 pm Ratiya Smith crushed my neck
again. She said the head nurse was
Ashley Watts.

8-23 Saw Dr here for my very 1st cronic ~~care~~ care, which is/was over due. The Dr here confirmed ~~every~~ thing I have been saying about crushing my pill. His words were "It can not be crushed" he told the nurse to "dislase it in orange juice" how ever nurse "F" chose to put her own words in my chart saying put it in water

8-24 New black nurse (larger woman) very nice did not crush my pill "This med can not be crushed" is what she told me

8-25 Same Black nurse, did not crush my pill, again she said it was not to be crushed, that this was common knowledge

8-26 nurse smith tried to crush my pill she said there were no note from the Dr in my chart

8-27 nurse smith tried to give me a Drink that looked like antifreez and smelt like piss without even getting close to my mouth/nose the smell was over welming

8-28 * I have placed 5 request over the past 5 days asking to see the Dr about my cronic care. "nurse F" keeps closing out my request saying I have to put in a sick call, ~~in~~ ~~for~~ ~~1~~ ~~to~~ that it takes 35 off my back. I'm BOP and cronic care. I don't have to pay to see a dr.

B-28 Staff is not allowing us to go to yard call. Saying its due to me and my 1983, kts, 78. Staff is trying to get me hurt & the entire pod was told by CO Wood & Co Swindle its my fault we are not getting any yard call this week when every other pod did. How can staff treat us based off their personal feelings. How can staff tell other people about my legal matters. Clear reprisal.

B-28 How sense still black ~~us~~ ups in day are flooding it. How can we be forced to live in a flooded Pod Daily

B-28 Co Woods is informing ~~at~~ other inmates about my legal info

B-28 medical is still not allowing me to see a Dr for my cronic care also nurse Smith threw away another pill of mine last night crushed my pills with our half still in the bag.

B-28 9 other inmates put in a grievance about Co wood speaking of my legal stuff. We have asked for Sgt Greer 7 times but wood will not radio him as we have asked

3-15-24 10:30 pm nurse melody did not crush
 my meds. She also stated, nurse Ashely
 was not going to give me any
 info to complete my 1983. I
 gave medical the actual form from
 the federal courts. She is still
 blocking me from completing the
 1983. Even After 4 Request for it
 now. The form was delivered by Col Wilborn
 8-16-24 Medical is refusing to return my 1983
 or the already completed informa papers
 papers. The Ft (Hos) and the caption sided
 with Medical. Saying they did not have to
 provide my correct name or any names at all
 for my 1983, they replied "when I am released
 I can do an FOIA, or find another way.
 They did not return ~~at~~ any of my already
 completed 1983 or other legal paper work
 8-16-24 11 am Ft Hos came to my Pct with my
 legal mail already open, she pulled the
 tab to open the top was already cut open
 she did really fast then threw the envelope
 away with out me seeing it. See looked at
 the mail and she could clearly see it was
 8 copies of 1983, but still told me
 I could not take it, she did not ~~care~~
 what I had to say. This not 9 different
 1983 forms ~~that~~ work has prevented me from

8-16-24 getting 1 copy from the federal court that
they away. 9 copies my wife sent mark
a legal mail.

8-16-24 8:25pm katlyn smith asked my meds
again. She said the med nurse was Ashley
watts.

9

8.17.24 @ 4:11 pm LAW LIBRARY not working
while searching 1983 & how to

8.17.24 Ms. Yaggeer would not let my wife donate
a large box of books (paperback)

YAGGER stated the jail banned all books

She WAS donating books like left behind

Peter Pan Never ending Story Fail the Turner Test

L.T. Hughes Ross and Yaggeer would not
allow any of the catholic books, but one
allowing others by baptist writers

Yaggeer would not allow any new Catholic
book called my daily bread or another
called the Holy Spirit. both were new and from

8-17-24 Law Library not working 4:58 pm

8.17.24 6 pm. LAW LIBRARY not working 504 HTTP ERROR

8.17.24 @ 8 pm. NURSE Katlyn Smith crushed my
meds. over 1/2 my pill was left in bag
but she threw it away

8.19 LAW LIBRARY not working

8.19 @ 3:19 pm could not get on Ripsk
only 1 in a pod of 24 inmates

this is causing fights guards look the
other way or just don't care

8.19 @ 3:30 no yard call it been over a week

8.19 NURSE ~~Katlyn~~ Katlyn crushed my Meds 1/2 of pill
was still in bag I told her about it, she
Replied what do you want me to do about it

8-20 1pm. Kiosk not working no access
to Law Library, Mail, Grievances,
OR Medical

8-20 2pm. Kiosk not working, no Law
Library or anything, no medical
grievances

8-22 @ 1 or 30 pm Nurse Smith crushed
my pill. 1/2 left in bag & was thrown
away 1763 can was on

(5)

A.

- 8-14-24 2pm I ask co/Wilbur again to get a Sgt. or Lt. or any adm. staff to send of my G mail letters as of now
- 8-14-24 10:45 pm Sgt. Greer picked up my
- 8-14-24 8:30pm nurse Kottun crushed my meds and then told ~~me~~ another inmate about my health and why I have to take my meds a clear HIPAA violation. co/Phillips was there and body cam was on.
- 8-14-24 1pm was out of toilet paper and asked co/wood for some. He told me to use my hand, it was not his job. Refused to give me any. I had to buy some off another inmate, this is normal for woods.
- 8-14-24 2pm kiosk not working, tried to use law library but it would never load form, tried 4 more time and could not get it to work.
- 8-14-24 3pm nurse F would not tell me her name to be added to my 1983 form or any other nurse that has been mishandling my meds. She would not tell me doctor's name or the pharmacy that said it was OK to crush my meds. I told her it was for 1983 when I was released and Refused again blocking 1983 form being filed.

→ over →

8-15-24 1:47pm Law Library not working, will not load

8-15-24 10pm NURSE F responded to my request for correct names to be listed in my 1983. She again denied the info. saying I would have to do a FOIA up on my release. I did inform them I was for my 1983. I also sent forms sent to me by the US courts. However they were thrown away and not returned to me.

8-15-24 nurse Kathryn Smith told me her name was Kathryn Spence on more than one occasion. However when I handed her the 1983 to complete she wrote down a different name willing miss leading.

(7) 8-15-24 10:30pm nurse melody did not crush A my meds. She also stated nurse Ashley was not going to give me any info to complete my 1983. I gave medical the actual form from the federal courts. She is still blocking me from completing the 1983. Even after 4 requests for it now. The form was delivered by CO/ Witburn

8-16-24 11am Lt. Ross came to my POD with my legal mail already open, she pulled the tab to open the top was already open she did it real fast then threw the envelope away without me seeing it. She looked at the mail and she could clearly see it was 8 copies of 1983, but still told me I could not have it. She did not care what I had to say. A This not 9 different 1983 forms has prevented me from getting one copy from Federal Court that threw away. 9 copies my wife sent marked as legal mail

4

8-14-24 After 6 Attempts to send out going legal mail all have been denied or blocked.

11:45 AM I informed Captain Edwards of this, his response was it was policy not to reject inmate mail, yet he has still come to get mail out going legal mail

8-14-24 @ 10:30 AM I put in official mail request on the kiosk for a SGT. OR LT. to come get my legal mail has ~~not~~ been refused by CO Jones, Sgt. Slier was asked 3 times on the speaker in pod, Slier but never came and got it CO Willburn was asked twice to have a SGT OR LT. but still no one has come to get mail

8-14-24 20.828.033 & 20.846.088 medical staff will not give me their name to complete my 1983 even after telling them i need the info to complete my 1983 thus staff is still blocking my 1983

8-14-24 1pm staff is refusing to complete their part of Informa Paperis papers further blocking of my 1983

8-14-24 to date no nail clippers have been handed out i have ingrown toe nails due to 60 days with out any and CO Wood & LT Ross are well aware, they just dont care

3

8-13-24 @ 9pm nurse Katlyn Smith crushed my meds

8-13-24 CO Jones would not sign for my outgoing mail to:

- 1 Alexander Law Firm - McRAE
- 2 Office of Inspector General in DC
- 3 Alexander Law Firm - Jacksonville
- 4 7 on your side news
- 5 ARKANSAS Professional Standards Unit

6 Dept. of Justice, Office of Inspector General - L.R.

- CO Jones would not sign a sheet/receipt for those outgoing letters, for the reason he did not want his name on paper he admitted staff was watching my mail

8-13-24 12am CO Jones nor Sgt Siles would take my outgoing legal mail

8-13-24 8:40 AM was the first one called out to court however my wife who was next under my name on court docket was not called up for over 12 hrs. later. I was very last she was very last one clearly further reprisal for my 1983. Inmate was brought to the court room by PODS. Im in F pod CO MARTIAN informed me this is what he was told and he was only doing his job

8-14-24 I again learned/ was told Captain Edwards & nurse Ashley pointed and placed a notice in medical with only my name that my pills were to be crushed - now showing intent to harm.

6

8-14-24 ~~Go~~ after ~~8~~ attempts to send out going legal mail all have been ~~denied~~ or blocked

11:45am I informed Captain Edwards of this his response was it was ~~not~~ policy not to reject inmate mail. Yet ~~as~~ he has still come to get mail out going legal mail

8-14-24 @ 10:30 am I put in official mail request on the book for a Sgt or Lt. to come get my legal mail x 6. however ~~at~~ as of 12:15 pm no ~~staff~~ staff has accepted my out going legal mail has now been refused by Co Jones, Sgt Slicer was asked 3 times via the speaker in pod but never came to get it. Co Willborn was asked twice to have a Sgt. or Lt. but still no one has come to get mail.

8-14-24 20,828,633 & 20,846,088 Medical staff will not give me their name to complete my 1983 even after telling them I need the info to complete my 1983 thus, staff is still blocking my 1983

8-14-24 1pm staff is refusing to complete those then part of Informa Poperis papers, further ~~refused~~ and further blocking of my 1983

8-14-24 to date no ~~the~~ mail clippers have been handed out, I have to grow the nails due to GO plus Sgt Ross and Co Wood are well aware they just come care

(3)

8-13-24 @ 9pm nurse ~~bar~~ Lynn Spete crushed my meds

8-13-24 Co Jones would not ~~sign~~ ^{sign} for my out going legal mail to

1 Alexander law firm - Miami

2 office of Inspector General in DC

3 Alexander Law Firm Jacksonville

4 7 on your side News

5 Arkansas Professional Standards unit

6 Department of Justice Office of Inspector General RA

- Co Jones would not sign a sheet/receipt for these out going letters, for the reason

he did not want his name on paper - he admitted Admin staff is watching my mail

8-13-24 12am Co Jones nor Sgt Siles would take my out going legal mail

8-13-24 8:40 am was the 1st one called out to court however my wife who was next under my name on court docket was not called up for over 12 hours later. I was very ~~42~~ she was the very first one. clearly further reprisal for my 1983. Inmate we brought to the court room by Pate I'm in E Pod. Co Martian informed me this was what he was told and he was only doing his job.

8-14-24 I again learned/was told Captain Edwards & nurse Ashley Watts pointed and placed a notice in medical with only my name that my pills were to be crushed - now showing intent to harm

3

- The continued mis handling of my meds has caused me psychological issues. One of the side effects of crushing meds say do not crush. Dr even called and said do not crush The Bittel says do not crush, Dr orders say so too
- Going out of the way to block my 1983, throwing away the completed forms. 9 times over
- Prison officials are acting "Maliciously and sadistically" towards me for trying to file 1983 and letters like this one sent out
- Eighth Amendment claims on official and medical staff due to the deliberate indifference to conditions of care and knowingly depriving us of basic human needs
 - Black mold in shower - lots (even after grooved)
 - No cold running water in my cell only hot that is over 130° can't not drink
 - Forced to defecate & urination in a grooved hole in middle of cell floor in 150 - no running water in this cell either

Medical

~~ADA~~ ~~American~~ Americans Disabilities Act
willfully mishandling, Throwing away my
med, Giving my meds to other inmates

Forced to sign medical release or be
locked down, reprisal over medical
grievances & request

~~Denied~~ Denied my life saving meds, meds
that cost thousands, and one day
can make all the difference in the
world and staff knows this

Been over 70 days and yet to see
Dr for chronic care. for my health

Medical staff informing non medic
staff and inmates of my medical status
and openly speaking of medical status

Concurred intent to harm, by crushing
my meds that can not be crushed, crushing
caused me to puke on up, causing
further harm, crushing wasted about
20% of my meds due to me not getting
it all. Crushing caused/is causing me
suicidal thoughts, but I could not tell
staff for fear of fear & reprisal, left to

- My entire stay at WDC little under half the day area was stayed, Flood^{ed} by shower & toilet back up. Was never fixed, we were forced to live in this daily. We had to clean it up everyday but officials would not fix the back up.
- Entire stay for no drinking water, cold water in my cell F-4 only hot water at a temp. of 139° not drinkable or useable to wash hands. I have to fill a cup and place it on the floor next to toilet by vent using the air to cool the water to a drinkable temp.
- Entire stay my cell with not locks, guard staff knows this but has done nothing. They turn their back when another inmate enters my cell at will, leaving me to fight for my own security or to keep my things from being stolen. Sgt. Wood, CO/WOOD/Captain White CO/Jones all know and have reported my cell does not lock to Captain Edwards

with my family-medical lock down is 24 hours not even an hour out. This was done by Captain Edwards & head nurse Ashley Watts-Jane Doe. She would not tell me her name.

7-15 • Pleathers (fake leather) bible was not allowed by Jane Doe (front desk) my wife tried to bring me bible (new) but was told no-however the same bible is sold by Jail for added cost.

7-18 • Ban all books, more ever catholic books and books are books on my religion. Mrs. Yeager blocked me from having a soft bound / paper back book by "Scott Hawn" Catechism of the Catholic Church and catholic our daily bread also a paper back small book about the Holy Spirit. She & I was told all books are banned per Captain Edwards.

7-18 • My wife tried to donate paper back books for me need a box full like "Peter Pan" "Harry Potter" and "Left Behind" book about the coming of "Jesus Christ". All new-all paperback-all denied per Captain Edwards.

(7)

Forced to sleep on cold wet concrete floors for anyone over 7 days - Jason Harrison - March 31 2024 by guard John Doe & Captain Edwards

15-23 James Quattrobaum was placed in "ISO 2" with no toilet, no running water. Forced to urinate in a cup to keep from splashes on self. Forced to defecate in a grated hole in the floor having to push own feces through the grate with his feet afterwards no running water to clean himself with no shower allowed. Captain Edwards, co/Rainwater & Sgt. Codd's (also no drinking water was allowed even after asking guards & staff.

14-24 Edwards / John Doe / Lt. Ross blocking outgoing mail (legal mail) and incoming mail (legal mail) with "no due process" The same official who blocked and censored my mail is the same one who answered my administrative challenge is the same who answered my appeal.

19-24 Opening my incoming legal mail without my being present. Then bring it to me and reopening it, clearly marked as legal mail. But still not allowing me to have it. Even after seeing it 1988 Rems - Legal mail

⑧

⑧

- NO Emergency Grievances or system in Place
- Denied copy of grievances / Requests
- Force to sleep on floor, some even with no matt
- Clay Edwards (Captain) Responded to my grievances about medical only giving half of my life saving meds. Each time they CRUSH my meds close to half is stuck to bag, body cam footage 10/17/21 8:21pm pill call footage will show half the pill left in bag and then thrown away with half my pill still in the bag. This med cost thousands and is life saving for me. I put in a grievance about this and Captain Clay Edwards responded to me saying "So Noted" Further proof of any concern for safety and deliberate indifferent to our right of unconstitutionally adequate medical care and health, Tragic gross negligence. This is the 36th grievance he has ignored. He is also the same person to answer my appeal.

8-14-24 @ 2pm I ask Co Wilborn again to get a Sgt or Lt. or any Admin staff to send of my 6 Legal mail letters, as of now

8-14-24 2:45pm Sgt Greer picked up my

8-14-24 8:30pm nurse karyn crushed my meds and then told another inmate about my health and why I have have to take my meds, a clear HIPPA violation. Co phillips was there and body cam was on

8-14-24 1pm was out of toilet paper and asked Co woods for some, He told me to use my hand, and refused to give me any I had to buy some off another inmate this is normal for woods.

8-14-24 2pm Keirsk not working, tried to use Law Lib. but it would never load for me. tried 7 more time and could not get it to work.

8-14-24 3pm Nurse P would not tell me her name to be added to my 1983, or any other nurse that has been mishandeling my meds. She would not tell me the Dr's name or the Pharm that said it was ok to crush my meds. I told her it was for my 1983 and she told me to do a 1983 when I was released and refused again Blocking my 1983 from being filed

8-15-24 149 pm - Saw Lib not working, will not
lead

8-15-24 10 am - nurse F responded to my request
for correct names to be listed in my
1983. She again denied the information
saying I would have to do a FOIA
up on my release. I did inform them
was for my 1983, I also sent forms
sent to me by the us courts, however
they were thrown away and not
returned to me

8-15-24 Nurse Kaitlyn Smith, told me her
name was Kaitlyn Spence on more
than one occasion. However when
I handed her the 1983 to complete
she wrote down a different name
quilling miss leading

8.

- 8-18-24 @ 4:11 pm Law Library not working while searching 1983 & how to.
- 8-17-24 Ms Yaggar would not my wife donate a large box of books, (Paper Back) Yaggar stated the Jail Banned All books She was donating Books like Left Behind, Peter Pan, never ending story, "Fail the Turner Test" Jim Huges, Ross and Yaggar would not allow any some catholic books, but are allowing others by Baptist writers. Yaggar would not all a new catholic book called my daily Bread or another called the Holy Spirit both were new & from Amazon
- 8-18-24 Law Library not working 4:58 pm
- 8-17-24 6:11 PM Law Library not working, got HTTP Error
- 8-17-24 @ 8 pm nurse Kathryn Smith crushed my meds, over half my pill was left in bag but she threw it away
- 3-17 Law Library not working
- 3-19 @ 3:19 pm could not get on Keight only one in a pod of 24 inmates. this is causing fights. Guards look the other way or just don't care.
- 3-19 @ 3:30 no yard call, its been over a week
- 8- Nurse Kathryn crushed my meds, half of the pill was still in bag. I told her about it & she replied "What do you want me to do about it?"

8:20 1pm Keisler not working, no access to Law Lib,
mail, gloveboxes or medical

8:20 2pm Keisler not working, no mail, Law Lib, or
anything no medical or gloveboxes

8:22 @ 10:30 pm Nurse Smith crushed
my pill. I left in bag & was thrown
away 1763 CAM WAS ON

7

8.15.24 10:30 pm nurse Melody did not crush my Meds. She also stated nurse Ashley was not going to give me any info to complete my 1983. I

gave medical the actual form from the Federal courts. She is still blocking me from completing the 1983 even after 4 request for it. now

The form was delivered by CO Wilburn

8.16.24 Medical is Refusing to Return my 1983 or already completed informa pauperis papers The LT (Ross) and the captain sided with medical staff they did not have to provide me correct name or any names at all for my 1983. They replied when i am Released i can do a F.O.I.A. or find another way. They did not Return any of my already completed 1983 or other legal paper work

8.16.24 11am LT Ross came to my pod with legal mail already opened, she pulled the tab to open the top was already open she did it Really fast then threw the envelope down without me seeing it was. She looked at the mail and she could clearly see it was 8 copies of 1983 but still told me what i had to say. This not a different 1983 forms WDC has prevented me from

denied hardbound bible 6-15-24 1

Fri July 26 2024 8:46 pm nurse KatLynn, Mishandled Medication
 Sat. July 27 2024 8:55 pm nurse KatLynn, Mishandled Medication
 Sat July 27 2024 9:19 pm nurse KatLynn, Mishandled Medication
 Sun 28th Law lib turned off/not working, Mishandled Medication
 Sun 28th 8:25 pm nurse Heather, Mishandled Medication
 Mon 29th 9:32 pm nurse KatLynn, Mishandled Medication
 Tues 30 Forced to sign medical release, Mishandle Medication
 to Return to nursing head nurse Ashley
 Wed 31st July: Floating nurse Melody said my pill cannot be
 crushed. Nurse Heather said something and did not crush
 Friday 8-2-24 Katlyn crushed my meds, said she did not care
 about my medical needs
 Sat 8-3-24 8:15 pm, nurse Katlyn crushed my meds
 once again said she did not care about my health
 Sunday 8-4-24 11 pm nurse Katlyn crushed my meds only
 giving me 1/2 my life saving Meds
 Monday 8-5-24 Nurse Katlyn crushed my meds only giving
 me 1/2 a dose 10 pm Captain Responded to me saying
 i dont need my meds daily that was all in my head
 Tue 8-6-24 9 pm Nurse Melody did not crush my pill
 but told me that if asked say she did. Staff
 made her promise to say she did crush my pill
 wed 8-7-24 Katlyn Smith crushed my meds 8:30 pm

ONE 1

1st Amendment • Blocking out going mail incoming (legal mail Blocked) with no "due process" The same official who Blocked the mail is the same one who Censored the mail and my Administrative challenge to the censorship also answer my Appeal

• Opening my incoming legal mail and then still Blocking me from getting it even after seeing it was 1993 form

• expectation of privacy violated, denial of unmonitored legal call. Moreover still Monitoring Attorney calls.

• Ban on all Books, moreover catholic Books not allowing book on my religion. My father Blocked me from having catechism of catholic church or catholic Daily Bread. My wife also tried donate a large Books like Peter Pan, Harry Potter, Reverend's story, Captain Jack, Moby Dick, and left Rhine Books about the coming of Jesus all denied

• were willingly erecting barriers and willingly trying to impede the constitutional and rights actions. Blocking my access to the courts as well

⑨

⑨

Forced to sleep on cold wet concrete floor for over 7 days - Jason Harrison March 31 2004 by guard John Doe 3 & Captain Edwards

4-15-23 James Quattlebaum was placed in "iso 2" with no toilet, no running water. Forced to urinate in cup to keep from splashing on self. Forced to defecate in grated hole in floor, having to push own feces through the grate with his feet, afterwards no running water or not allowed to shower. Captain Edwards, CO/Rainwater & Sgt. Codd's (also no drinking water was allowed even after asking guards and staff.

8-23-24 I finally saw a Dr, who told medical staff everything

I've been saying about how my meds can not be crushed. Their own Dr told medical staff they are killing me, and the damage done can not be fixed. Co stripes had her body cam on... The Dr told them to stop crushing it, and flush it 10 min prior... This proved the staff never spoke to a Dr ~~that~~ like they said they did... Over 60 Days of mistreating my med, throwing ~~them~~ them away. eat...

I declare under the penalty of perjury (18 USC 1621)
that the foregoing is true & correct.

- 1 Mike Weatherly 10797 Mike Weatherly
- 2 Elmer Nichols 154037 Elmer Nichols
- 3 Jason M Grier 651848 Jason M Grier
- 4 Rod Cates 450327 Rod Cates
- 5 Hunter Crowder 565710 Hunter Crowder
- 6 Jason Harrison 154131 Jason Harrison
- 7 Robert Pector 914887 Robert Pector
- 8 Billy Sporkman 266913 Billy Sporkman
- 9 William Baker 14411 William Baker
- 10 James Quattlebaum 648124 James Quattlebaum
- 11 Aaron McClure 665810 Aaron McClure
- 12 Arthur Foust 14545 Arthur Foust
- 13 Elmer Nichols 154037 Elmer Nichols
- 14 Keith Ballard 519158 Keith Ballard
- 15 Terrell Fournier 71105 Terrell Fournier
- 16 Jonathan Lamb 651848 Jonathan Lamb

Every name above can be a testimony
to all/everything you read here. And
there is as much more.

OVER

FILED

U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

SEP 12 2024

TAMMY H. DOWNS, CLERK

BW

DEP CLERK

Lynch v Does

p. 14

4:24-CV-00740-LPR-BBM

Amend to the forgoing...

7-7

I have no postage, I did order some however none was given to me, but they took money of my books for it. I even asked St. Hughes if they could run it through the postage machine and take the money off my books, but will not. Clayton Edwards and his staff at Wene are really doing everything they can to block my 1983 or anything to do with. Including responding to your order for amicus brief. I'm going to try and have my wife mail letter and ask for more time to respond. I also pray my 3rd complete 1983 packet makes it to you, allowin me further more time to respond.

Also its past 72 hours or 3 days so clearly medical is not observance me.

Clayton Edwards orderd me to medical saying that I needed to be watched, but I'm not. I have filled 2 appeals on this move, 3 request, and 3 grievances none have been answered. Just more proof his personal hate for me is growing.

Lynch v Does 4:24-cv-00740-LPR-BBM

I want to add in I'm meds for keeping HIV undetectable, meds that can not be stopped and started over over. A medical staff here have over and over. Each time they do this it allows the HIV virus to go grow stronger and stronger. It will become AIDS ~~only~~ because of this. For years I've been on this med and kept the HIV undetectable. This mis handling by medical ~~ette~~ at the direct order of Clayton Edwards is harm to my present self its tangible residual injury that can never be fixed. The vengeful and intent to harm my present and future life is sick and ~~sad~~ sad. I've put in over 60 grievances, request, and medical request for the caption to respond "so" and "noted" over and over, showing his dose not care. proving his deliberate indifference to serious of my own medical needs. I ~~et~~ exhausted all administrative ~~et~~ remedies, I've spent hours upon hours writting Edwards, Watts, Smith, telling them about my medical needs, begging them for my meds

Lynch v Does

4:24-cv-00740-LPR-BBM

Everything I sent is on my account at smartcommunications. And the hand log it is so important that everything on my smart communications be saved by order of the court. The 60 plus request and the staff responses are the "meat and potatoes" of my claim. Edwards has stated that he is protected and thus immune to a 1983 under the 11th Amendment. I will need all these documents to prove this case.

* I want to add I'm locked down in medical for contacting your court. For contacting OIG & DOJ OIG and blowing the whistle on all their gross & sick actions. I'm in fear of my life here at WDC, I've even tried to speak with the ~~prof~~ sheriff but he don't care, he backs up the ~~re~~ reported by Edwards and medical.

also Edwards said medical nevered me but medical says the capron did, and sadly even after all this my pill is still crushed

p.2

Lynch v Does

4:24-cv-00740 LPR-BBM

Only giving my mail to night shift.
On use Guards that know admin is
doing this and are willing to help a just
cause... I've sent you 2 hand letters,
3 full 1983 packets with in forma pauperis
papers (however the last packet; staff here
refused to fill out or sign my in forma
pauperis paper work) The Jt here Lt. Ross
sent out an email to all staff not to
sign for my legal mail or accept any
paper work from me. 5 different Guards
confirmed this with me. I also had my
wife fax and mail an 8 page letter
as a plea for help. It seems this is
the only documents to make it to you.

The most recent or 3rd 1983 packet
was mailed to you on 9-1 (while C Edwards
was off work) If it makes it to you our
letters past each other while in transit.

If it does not let it show further
foul play by staff and W.C.B.C..

As of today I've been placed in

p3

Lynell R Does
4:24-cv-00740-LPR-BBM

lock down for writing DOJ OIG and a number of state offices to try and get my letter out to someone of power. TO someone that can help.

I in direct reprisal for "Blowing the whistle to the DOJ OIG by the person named in my complaints. Clayton Edwards. Even the Sheriff knows I've contacted the DOJ OIG yet he allows mr Edwards to order me on medical lock down. He said I was sick and need medical's help. But he has no medical Back ground.

I Fear I am in "imminent danger"
At the order of Edwards my pod was shook down 8 times in 8 weeks, with staff ~~att~~ telling inmates it was my fault due to letters to OIG ~~at~~ Little Rock & DC DOJ OIG Little Rock and in DC and others. Edwards tried to get inmates to jump me, but when they would not he ordered my lock down - removing me from my

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Lynch v Does

4:24-cv-00740-LPR-BBM

family, news, access to the courts. Edwards even tried to give me a drink that looked ^{like} antifreeze and smelt like piss (others saw this). His actions are very unbecoming and all are listed in my complaints. I've been hurt by physical means, my mental well being is fast coming to be in question as well. The damage on my future life can never be ~~fixed~~ undone. I've started a daily log of all the sick atrocious and brutal things done to myself and others.. Every few days I send this log to Alexander law firm.. The staff here will not allow me to contact him with out being ~~monitored~~ recorded. I don't want them knowing what I'm sending or they will intercept it or block it from getting out. If any of your clerks contact him he will surely get it to you right away.

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Lynch v Does.
4:24-cv-00740-LPR-BBM

Now with that said, back to the Amicus Brief... As stated I don't know what this is, but I know what Brief is and if recall from ~~the~~ school I think this means from a law education person or party. I may be way off here I'm not sure and I have no access to law library as ~~I am~~ I am on medical lock down. How ever I will do my best to give you a brief of everything.

first of Edwards and medical staff have no duty of care to any inmate. The Sheriff & Captain Both have said we are all scum of the earth and should die. The Entire pop pod I has been witness to this. Security & medical are deliberately indifferent to the seriousness of my medical need and that of others. Daily and repeatedly we are denied adequate medical treatment... If we say anything there is direct and over weling reprisal, till we stop or shut up.

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Lynch & Does
4:24-cv-00740-LPR-BBM

There is blanket ban on all books.
I was not allowed christian publications
like "our daily bread" or the "Holy Ghost"
I was denied a soft leather ~~BE~~ Catholic
Bible, but a soft leather KJV is sold
here. There is no Catholic Bible on
the kiosk but every other religion is...

* Drinking water is withheld as a
way to deal with infractions.
I've been locked down for a week w/ no ^{change of} ~~clothes~~
week/4 or more with no yard call.

Legal mail is thrown away -
no Due process with legal mail.
no chain of custody with outgoing
legal mail.

NO emergency grievance system,
no grievance system after 10 pm.
No copy of grievances filed none
given at request. I was told to
do an FOIA then when I did I
was told that law did not apply to me

p.7

Lynch v Does

4:24-cv-00740-LPR-BBM

My medication was given to the wrong inmate. My medication was thrown away, even not given to me or improperly given to me for an extended time frame; 60 plus days. My Dr orders not followed, told they did not exist or were not real.

They even said my Dr was fake...

The COITS ^{was} calling me very late at 8pm and my wife very late at 8pm even when ~~we~~ we were on the docket side by side. The cops in COIT ~~food~~ room said the Sheriff told them to do this; to get to me. They abuse their power here daily, with out even blinking...

Staff willing & knowingly blocking my prisoner complaints - responding to my many grievances saying no ~~the~~ such complaint exist, or no, or I don't know what I'm asking for

Staff not allowing me to call the Old Old inmate Hotline saying it does not exist, yet is posted all over the Federal court house.

p. 8

Lynch v Doe 4:24-cv-00740-LPR-BBM

- Inmates forced to both urinate and defecate in a grated hole in floor the push it through the grate themselves.
- Inmates forced to urinate & defecate in food trays to be sent back out
- Inmates on admin seg, suicide, or medical go bars 3 or more with no one checking on them or given water
- Inmates left in holding cells for week at a time, cells only meant to hold a few hours
- Confined inmates not allowed to shower for week at a time
- mental inmate massed and teased then laughed at - I saw this 1st hand
- Inmates not allowed to call Attorneys Unrecorded, even after asking or requesting to do so
- Inmates have to pay to call public defenders office, ..
- Inmates not allowed to write media outlets like CNN or Fox news
- No toe nail or finger nail clippers for week on end 3 or more weeks 10 week no toe clippers
- Forced to wipe our rear ends with Jumbo Swiffer, more than once

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Lynch & Does
4:24-cv-00740-LPR-BBM

- reprisal for exhaustion of administrative remedies, medical lock down used to reprisal
- Legal mail read and recorded on Co Body come so it can be read at a latter time
- Having to pay to see medical even though I B.O.P and Chronic care
- Not allowed to see the PR for over 80 days even ~~after~~ after over 20 requests
- No intake medical done but chart was post ~~at~~ dated to look as it was done
- 1983 form throw away
- 1983 forms not given back
- 1983 form not given/ or placed in my property where I could not get it
- Appeals are answered by some person who gave the 1st ruling.
- forced to sign medical release or be locked down
- repeated gross negligence, intent to harm
- Guards looking the other way when inmates are being hurt, fighting or raping others

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Lynch v. Docs 4:24-cv-00740-LPR-BBM

Mr. Rudofsky as you read in the forgoing
there ^{are} really serious issues of constitutional
law. ^{Violations} What's really sad is Clayton Edwards
and WDC have been civil cases before
for the same things I am claiming.

Before I lost access to the courts
I was reading some complaints you
yourself even presided over. Clayton
Edwards and WDC have ^{no} respect
to the rule of law or even your
prior cases and prior rulings...

The denial of constitutionally sound
and fair treatment is joke to Edwards
and most of the admin staff at WDC
Their recen into the courts here in the
same building is a grave concern as
well. Edwards and most of the
staff here say they have total immunity
and are acting under "Color of law"
but their nonobedience to state and
federal law, ADA and more is sick.

There is no duty of care, or responsibility
for safety. It's so bad I question their
own morals.. They are deliberately
indifferent to serious, of all the forgoing

p. 11

Edwards ~~was~~ saying things like I want you sue me: shows this... The deprivation of basic human care, resulting in direct harm to me and others is sad and tragic... The intent to harm and reprisal is way past gross negligence. This sick, brutal, cruel and wicked treatment has become normal. The atrocious pattern of persistent and widespread practices have gone on so long that they have now become permanent and well settled. There is a pattern of constitutional violations. This is just one of many complaints, some you have heard before and presided over in the past. Only this time I was able to get past ^{the} Block^{ing} complaints, I had help in preventing the interception of my out going legal mail. Only this time I had basic knowledge and will to stand up for others and myself. Its 2 AM... I'm locked down in medical... It's dark... and when the moment was at its darkest for me, my well being, my psychologically well being

Lynch v Does p.12
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on the verge of giving up.. In my last hour of hope. Your letter found me in time. Your response gives me hope of Justice. Last time I was in your court I told you I was amazed by your fairness, and since of duty.. I praise God for you this morning. Thank you so much...

The only preliminary relief I seek is to moved to Forest City so I start RDAP.. Or some place safe. I do have enemies at green county. Every other ~~place~~ location is ok and its what ever you deem..

Sorry this is so rough. I'm writting in ~~the~~ the dark, the only ~~the~~ light I have is from the hall.. I have no table or desk to write on I'm on cold concrete floor, in the dark I don't have the necessary ~~knowledge~~ ~~knowledge~~ legal law know how. I don't have any extra resources. I have no experience doing this, But I do have a will and I do have a heart..

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Lynch v Does
4:24-cv-00740-LPR-BBM

I hope and pray this meets
your order on Amicus Briefs. I
Pray and hope this was right

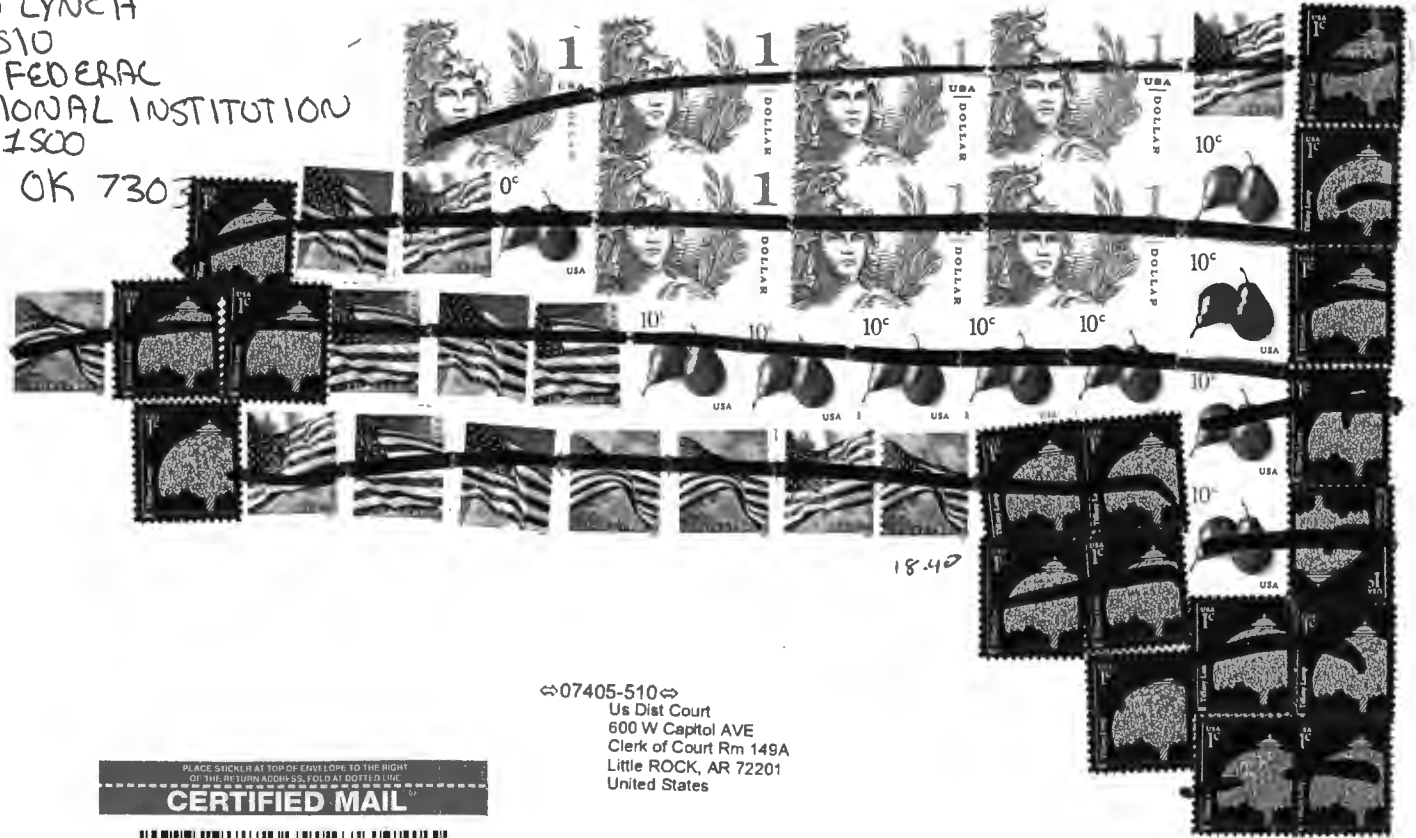
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Clerk of Court Rm 149A
Little ROCK, AR 72201
United States

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CERTIFIED MAIL



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