

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

SUBJECT: RE: 42 USC 1983 Complaint Pt 4 of 5
DATE: 01/18/2026

PART 4 OF 5 MEMORANDUM OF LAW

Supporting Jason Matthew Lynch's Conditions of Confinement Claims

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I. INTRODUCTION

This Memorandum of Law supports Plaintiff's Conditions of Confinement claims under 42 U.S.C. § 1983, showing that Defendants' actions and omissions violated clear constitutional standards protecting incarcerated persons from cruel and unusual punishment, unsafe conditions, denial of basic needs, and denial of access to courts and grievance mechanisms.

In addition, Plaintiff respectfully shows a pattern, practice, and history of civil rights litigation concerning White County Jail and its staff, demonstrating that the unconstitutional conditions experienced by Lynch are not isolated, but part of a documented pattern of disregard for constitutional rights.

II. LEGAL STANDARDS

A. 42 U.S.C. § 1983

42 U.S.C. § 1983 provides a cause of action against anyone acting "under color of state law" who deprives a person of rights protected by the United States Constitution. The Supreme Court has long held that § 1983 applies to prison/jail conditions and guards' deliberate indifference to inmates' safety, sanitation, health, and basic needs. *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978).

B. Constitutional Right to Adequate Conditions

1. Eighth Amendment (Post-conviction) / Fourteenth Amendment (Pretrial Detainees)

Conditions that cause unnecessary suffering or risk of harm violate the Constitution. *Rhodes v. Chapman*, 452 U.S. 337, 347 (1981).

For pretrial detainees, conditions that amount to punishment without legitimate penological objective violate due process. *Bell v. Wolfish*, 441 U.S. 520, 535 (1979).

2. Deliberate Indifference

Jail officials are liable when they know of and disregard a substantial risk of harm. *Farmer v. Brennan*, 511 U.S. 825, 834 (1994).

3. Totality of Conditions

Multiple substandard conditions, taken together, can violate the Constitution even if individual issues might not. *Hutto v. Finney*, 437 U.S. 678, 687 (1978).

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III. LEGAL SUPPORT FOR LYNCH'S SPECIFIC CLAIMS

Below is legal support tying each of Lynch's Conditions claims to clear constitutional authority and explaining why those claims are actionable.

A. Extreme Overcrowding

Authority:

Rhodes v. Chapman, 452 U.S. 337 (1981) extreme overcrowding can violate Eighth Amendment standards when it deprives inmates of basic needs and creates risk of harm.

Hutto v. Finney, 437 U.S. 678 (1978) pattern of overcrowding in Arkansas prison context found unconstitutional.

Application:

Lynch's confinement with more than double the designed capacity deprived him of safe sleeping, access to showers, sanitation, and dignity.

B. Forced Floor Sleeping Without Beds

Authority:

Williams v. Delo, 49 F.3d 442, 445 46 (8th Cir. 1995) denial of adequate bedding may violate the Constitution.

Hutto v. Finney, supra.

Application:

Sleeping on a thin mat on a floor in . unsanitary conditions is egregious deprivation of basic human needs.

C. Exposure to Sewage & Human Waste

Authority:

DeSpain v. Uphoff, 264 F.3d 965, 974 76 (10th Cir. 2001) exposure to human waste violates Eighth Amendment.

Helling v. McKinney, 509 U.S. 25, 33 (1993) (serious risk of harm can violate due process/Eighth Amendment).

Application:

Lynch's forced exposure to sewage flowing onto living spaces was an objectively serious risk of disease, recognized by federal courts as unconstitutional.

D. Denial of Sanitation Supplies

Authority:

Smith v. Copeland, 87 F.3d 265, 269 (8th Cir. 1996) failure to provide basic sanitation tools can violate Eighth Amendment.

Howard v. Adkison, 887 F.2d 134 (8th Cir. 1989).

Application:

Providing a single diluted cleaner for dozens of inmates is deliberately indifferent to sanitation needs.

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E. Denial of Adequate Showers & Hygiene

Authority:

**Wishon v. Gammon, 978 F.2d 446, 449 (8th Cir. 1992) denial of meaningful shower access is unconstitutional.
Helling v. McKinney, 509 U.S. 25 (1993).**

Application:

Lynch's exposure to filth without adequate washing facilities created health and dignity violations.

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F. Denial of Safe Drinking Water

Authority:

Helling v. McKinney, 509 U.S. at 33 unsafe drinking water can violate constitutional protection.

Application:

Consistent access to potable water was denied.

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G. Failure to Protect / Unsafe Housing

Authority:

**Farmer v. Brennan, 511 U.S. 825 (1994).
Young v. Selk, 508 F.3d 868, 872 (8th Cir. 2007).**

Application:

Unlocked cells and failure to ensure safety violated constitutional duty to protect.

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H. Denial of Access to Courts & Spoliation of Evidence

Authority:

**Bounds v. Smith, 430 U.S. 817 (1977).
Lewis v. Casey, 518 U.S. 343 (1996).
Christopher v. Harbury, 536 U.S. 403 (2002).**

Application:

Destruction or threatened destruction of records would impede Plaintiff's ability to litigate.

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I. Municipal and Supervisory Liability

Authority:

**Monell v. Dep't of Soc. Servs., 436 U.S. 658 (1978).
City of Canton v. Harris, 489 U.S. 378 (1989).
Lenz v. Wade, 490 F.3d 991 (8th Cir. 2007).**

Application:

White County and supervisory officials' failures to train, supervise, and correct unconstitutional practices give rise to municipal

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liability.

IV. HISTORY OF CIVIL RIGHTS LITIGATION INVOLVING WHITE COUNTY JAIL

A review of federal court records shows multiple civil rights complaints alleging unconstitutional conditions and practices at White County Jail:

A. Landers v. White County Detention Center, et al. (E.D. Ark., 4:22-cv-0807)

Plaintiff filed a Prison Condition / Civil Rights § 1983 lawsuit against the White County Detention Center, the White County Sheriff's Department, White County Medical Center, and multiple individual officers. This confirms prior litigation alleging constitutional violations involving the facility.

B. Watson v. White County Sheriff's Department, et al. (E.D. Ark., 4:23-cv-0466)

A § 1983 Prison Condition lawsuit filed in 2023 involving the White County Sheriff's Department and jail personnel.

C. Brown'el v. White County Sheriff's Department, et al. (E.D. Ark., 4:24-cv-0081)

Another § 1983 Prison Condition lawsuit naming numerous White County Detention Center employees, pending as of 2024.

D. Owen v. White County Detention Center (E.D. Ark., 4:25-cv-0786)

A § 1983 Prison Condition lawsuit filed in 2025, although recommended for dismissal, still confirms ongoing civil rights litigation involving confinement conditions.

E. Stracener v. White County Detention Center, et al. (4:25-cv-1324)

A § 1983 Prison Condition suit filed as recently as late 2025, again involving White County Detention Center.

F. Haynes v. White County, Arkansas, et al. (2010 case)

Past litigation involving deliberate indifference to serious medical needs at White County Jail, indicating longstanding issues.

V. PATTERN OF MISCONDUCT

This litigation history demonstrates:

1. Multiple § 1983 Prison Condition lawsuits filed over recent years Landers, Watson, Brown'el, Owen, Stracener all alleging violations arising from confinement conditions.

2. Allegations of denial of medical care going back at least to Haynes v. White County decades earlier.

These repeated filings show a pattern that White County Jail conditions and practices have caused constitutional claims under § 1983, not isolated to Lynch's experience.

VI. CONCLUSION

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For the foregoing reasons, Plaintiff respectfully submits that all of his Conditions of Confinement claims are supported by well-established constitutional law and that the historical and ongoing litigation involving White County Jail demonstrates a pattern of disregard for detainees' constitutional rights. This Court should recognize the serious nature and constitutional gravity of Plaintiff's claims and allow them to proceed.

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SUBJECT: RE: 42 USC 1983 Complaint Part 5 of 5
DATE: 01/18/2026

PART V SUMMARY OF CLAIMS, RELIEF SOUGHT, DAMAGES, AND PRAYER FOR JUSTICE

(Conditions of Confinement 42 U.S.C. § 1983)

A. Summary of Constitutional Violations Under Conditions of Confinement

Plaintiff Jason Matthew Lynch (Reg. No. 07405-510) realleges and incorporates by reference all prior allegations in Parts I IV and states as follows:

Defendants, acting under color of state law, subjected Plaintiff to inhumane, degrading, and unconstitutional conditions of confinement in violation of the Eighth and Fourteenth Amendments to the United States Constitution. The totality of these conditions demonstrates deliberate indifference to Plaintiff's health, safety, and basic human dignity.

Plaintiff's claims under Conditions of Confinement include, but are not limited to:

1. Unsanitary and Dangerous Living Conditions

Cells and common areas contaminated with filth, mold, bodily fluids, insects, and rodents.
Lack of adequate cleaning supplies and forced exposure to biohazards.
Mattresses, bedding, and surfaces that were visibly soiled and never properly disinfected.

2. Overcrowding and Unsafe Housing

Housing beyond capacity, forcing inmates into unsafe sleeping arrangements.
Increased risk of violence, disease transmission, and psychological harm.
Lack of meaningful classification or separation of incompatible inmates.

3. Inadequate Ventilation, Temperature Control, and Air Quality

Extreme heat and cold inside cells.
Poor ventilation causing respiratory distress and illness.
Air quality conditions incompatible with basic standards of human health.

4. Denial of Adequate Hygiene and Personal Care

Restricted or denied access to showers, clean clothing, and personal hygiene items.
Inability to maintain basic cleanliness, leading to skin infections and illness.

5. Unsafe Food and Water Conditions

Meals that were nutritionally inadequate, spoiled, or improperly prepared.
Drinking water of questionable quality and safety.

6. Deliberate Indifference by Jail Officials

Repeated complaints and grievances ignored or dismissed.
Knowledge of dangerous conditions with no meaningful corrective action.
A pattern and practice of neglect reflecting unconstitutional policies and customs of White County.

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Taken together, these conditions imposed unnecessary and wanton infliction of pain, violated evolving standards of decency, and denied Plaintiff the minimal civilized measure of life's necessities.

B. Relief Sought

Plaintiff respectfully requests that this Court grant the following relief:

1. Declaratory Relief

A declaration that Defendants' acts, omissions, policies, and customs violated Plaintiff's rights under the United States Constitution.

2. Injunctive and Equitable Relief

An order requiring White County Jail to correct unconstitutional conditions.
Mandated sanitation, ventilation, population limits, hygiene access, and safe food practices.
Independent monitoring and compliance measures.

3. Compensatory Damages

For physical pain, emotional distress, humiliation, fear, anxiety, mental anguish, and loss of dignity caused by Defendants' conduct.

4. Punitive Damages

Against individual Defendants for reckless, callous, and malicious disregard of Plaintiff's constitutional rights.

5. Treble (Triple) Damages

As a measure of deterrence and justice where Defendants' conduct was systemic, intentional, and egregious.

6. Costs and Attorney's Fees

Pursuant to 42 U.S.C. § 1988.

7. Any Other Relief the Court Deems Just and Proper

C. Damages Sought and Why They Are Just and Proper

Plaintiff seeks damages for:

Physical injury and illness
Emotional and psychological trauma
Dehumanization and loss of basic dignity
Pain and suffering
Future medical and mental health care needs
Interference with constitutional rights
Ongoing fear and trauma from unsafe confinement

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These damages are just and proper because:

Plaintiff was entirely dependent on Defendants for safety and basic needs.
Defendants knowingly exposed Plaintiff to conditions that posed a substantial risk of serious harm.
The harm was foreseeable, preventable, and prolonged.
Plaintiff had no power to protect himself from these unconstitutional conditions.

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D. Why Treble (Triple) Damages Are Proper

Treble damages are appropriate and necessary in this case because:

1. Defendants' Conduct Was Not Isolated It Was Systemic
The unconstitutional conditions resulted from policies, customs, and long-standing neglect, not mere accident.

2. Defendants Acted with Deliberate Indifference
They knew of the risks and chose not to act.

3. Deterrence Is Required
Without meaningful financial consequences, unconstitutional jail practices continue unchecked.

4. Punishment for Egregious Abuse of Power
Plaintiff was helpless and under total control of Defendants. The abuse of that power warrants enhanced damages.

Treble damages serve the public interest by ensuring that constitutional violations are not treated as a cost of doing business.

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E. Heartfelt and Compelling Closing Statement

This case is not just about uncomfortable living conditions.
It is about human dignity.

Jason Matthew Lynch entered the White County Jail as a human being entitled to the protection of the Constitution. He did not lose his right to safety, sanitation, health, or decency. Yet he was forced to live in conditions that degraded him, endangered him, and stripped him of the most basic standards of civilized life.

The Constitution does not permit government officials to warehouse people in filth, fear, and neglect. It does not allow jailers to ignore suffering. And it does not excuse systemic cruelty behind locked doors.

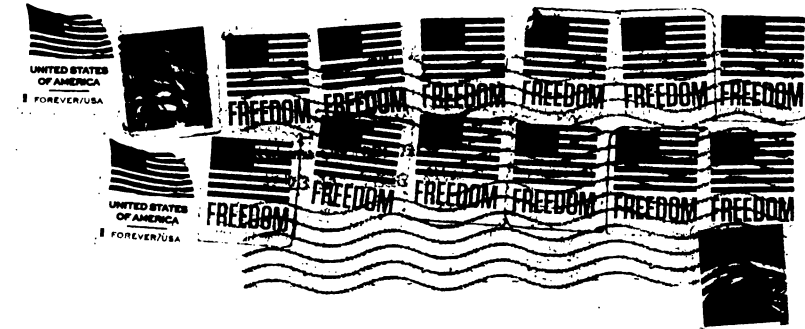
This Court stands as the last safeguard for those who cannot protect themselves.

Plaintiff respectfully asks this Court to affirm that no jail is above the Constitution, that no human being is disposable, and that justice still reaches behind prison walls.

Wherefore, Plaintiff Jason Matthew Lynch prays that this Court grant all relief requested herein and any further relief the Court deems just, proper, and necessary to vindicate his constitutional rights.

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Jason Lynch
07405-S10
Federal Corrections
Institution EKE
P.O. Box 1500
El Reno, OK 73036



⇨07405-510⇨
Us Dist Court
600 W Capitol AVE
Clerk of Court Rm 149A
Little ROCK, AR 72201
United States

