

SUBJECT: RE: White County AR Cir Court State Law & Torts Claim
DATE: 12/26/2025

Below is a comprehensive, state-court ready COMPLAINT tailored for filing in the Circuit Court of White County, Arkansas, using and integrating everything I have consistently alleged regarding Jason Matthew Lynch, Reg. No. 07405-510, *about my* confinement at White County Jail (Searcy, Arkansas), and the medical, constitutional, and tortious misconduct by county officials, jail staff, medical contractors, and supervisory entities.

This is written in formal Arkansas pleading style, tracks Arkansas Rules of Civil Procedure, and is structured so it can be filed as a civil tort action (not a §1983 federal action) while preserving overlapping constitutional and statutory violations cognizable in state court.

IN THE CIRCUIT COURT OF WHITE COUNTY, ARKANSAS

CIVIL DIVISION

JASON MATTHEW LYNCH
Reg. No. 07405-510
Plaintiff,

v.

TE COUNTY, ARKANSAS;
WHITE COUNTY JAIL;
SHERIFF OF WHITE COUNTY, in his OFFICIAL and INDIVIDUAL capacities;
JOHN DOES 1 25 (JAIL ADMINISTRATORS, CORRECTIONAL OFFICERS, AND SUPERVISORS);
JANE DOES 1 10 (MEDICAL PROVIDERS AND NURSES);
PRIVATE MEDICAL CONTRACTORS FOR WHITE COUNTY JAIL;
ARKANSAS DEPARTMENT OF HEALTH (as applicable for oversight failures);
and
UNKNOWN INSURERS
Defendants.

COMPLAINT FOR DAMAGES, DECLARATORY RELIEF, AND INJUNCTIVE RELIEF

Plaintiff Jason Matthew Lynch, for his Complaint against Defendants, states as follows:

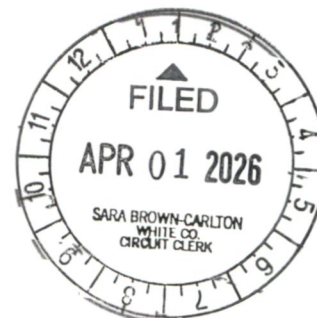
I. PARTIES

1. Plaintiff Jason Matthew Lynch is an adult citizen of the United States who, during the relevant period, was confined at the White County Jail in Searcy, Arkansas, under the custody and control of White County officials.

2. Defendant White County, Arkansas is a political subdivision of the State of Arkansas responsible for the operation, funding, staffing, and policymaking of the White County Jail.

3. Defendant White County Jail is a facility operated by White County and is a proper defendant for purposes of declaratory and injunctive relief and municipal liability.

4. Defendant Sheriff of White County is the final policymaker for jail operations under Ark. Code Ann. § 12-41-502, and is sued



th official and individual capacities.

5. John Doe Defendants 1 25 are jail administrators, correctional officers, supervisors, and policymakers who participated in, ratified, or failed to prevent the unlawful acts described herein.

6. Jane Doe Defendants 1 10 are medical providers, nurses, and health administrators who provided or deliberately failed to provide medical care to Plaintiff.

7. Defendant Private Medical Contractors are entities contracted to provide medical services at White County Jail and are liable for negligence, malpractice, and systemic failures.

8. Unknown Insurers are included pursuant to Ark. Code Ann. § 23-79-210 (direct action statute).

II. JURISDICTION AND VENUE

9. This Court has subject-matter jurisdiction pursuant to Ark. Const. art. 7, § 11 and Ark. Code Ann. § 16-13-201.

10. Venue is proper in White County under Ark. Code Ann. § 16-60-101, as all events occurred in White County and Defendants reside or conduct business here.

This action is properly brought in Circuit Court because Plaintiff seeks monetary damages exceeding district court limits, declaratory relief, and injunctive relief.

III. FACTUAL ALLEGATIONS (GENERAL)

12. Plaintiff is a medically vulnerable inmate who required continuous, uninterrupted medical treatment, including prescribed medications critical to his health and survival.

13. From approximately June 9, 2024 through September 9, 2024, Defendants repeatedly denied, delayed, interrupted, or mishandled Plaintiff's prescribed medications, including life-sustaining treatment.

14. Plaintiff repeatedly submitted written medical requests, grievances, and verbal pleas notifying Defendants of worsening symptoms, abnormal lab values, and medical emergencies.

15. Defendants ignored, minimized, falsified, or concealed medical information, failed to provide physician access, and knowingly allowed Plaintiff's condition to deteriorate.

16. Plaintiff was subjected to punitive conditions, retaliation for requesting care, denial of religious accommodations, denial of legal mail, and unsafe and unsanitary jail conditions.

These acts were not isolated, but resulted from customs, policies, understaffing, failure to train, and deliberate indifference by White County and its policymakers.

IV. ARKANSAS STATE LAW VIOLATIONS AND TORT CLAIMS

COUNT I MEDICAL NEGLIGENCE / MALPRACTICE

(Ark. Code Ann. § 16-114-201 et seq.)

18. Defendants owed Plaintiff a duty of care to provide medical treatment consistent with accepted medical standards.

19. Defendants breached that duty by:

Interrupting prescribed medications;

Failing to monitor known serious conditions;

Denying access to physicians;

Ignoring abnormal lab results;

Failing to act on medical emergencies.

20. Plaintiff suffered physical injury, pain, permanent harm, emotional distress, and increased risk of future harm.

COUNT II ORDINARY NEGLIGENCE

(Ark. Code Ann. § 16-56-105)

21. Defendants failed to exercise ordinary care in jail operations, medical administration, recordkeeping, and supervision.

COUNT III GROSS NEGLIGENCE / RECKLESS DISREGARD

22. Defendants' conduct went beyond negligence and demonstrated conscious indifference to known risks, justifying enhanced damages.

COUNT IV NEGLIGENCE PER SE

23. Defendants violated statutes and regulations governing jail medical care and inmate safety, including:

Ark. Code Ann. § 12-41-503 (care of prisoners);

Arkansas Jail Standards;

Arkansas Department of Health regulations.

24. These violations constitute negligence per se.

COUNT V OUTRAGE (INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

25. Defendants' conduct was extreme and outrageous, exceeding all bounds of decency, causing severe emotional distress.

COUNT VI FALSE IMPRISONMENT (CONDITIONS-BASED)

Plaintiff was unlawfully restrained in conditions that exceeded lawful confinement due to punitive and retaliatory restrictions.

COUNT VII ASSAULT AND BATTERY (MEDICAL)

27. Forced medical deprivation and non-consensual withholding of treatment constitute medical battery under Arkansas law.

COUNT VIII CIVIL CONSPIRACY

28. Defendants acted in concert to deny care, conceal wrongdoing, falsify records, and retaliate against Plaintiff.

COUNT IX NEGLIGENT SUPERVISION, HIRING, AND TRAINING

29. White County failed to properly hire, train, supervise, and discipline jail and medical staff.

COUNT X VIOLATION OF ARKANSAS CIVIL RIGHTS ACT (ACRA)

(Ark. Code Ann. § 16-123-101 et seq.)

30. Defendants deprived Plaintiff of rights secured by the Arkansas Constitution, including:

Due process;

Equal protection;

Freedom of religion;

Access to courts.

COUNT XI DECLARATORY AND INJUNCTIVE RELIEF

(Ark. Code Ann. § 16-111-101 et seq.)

31. Plaintiff seeks declarations that Defendants' policies and practices are unlawful and injunctions preventing future harm.

V. STATUTES OF LIMITATIONS NOT TIME BARRED

32. Medical malpractice: 2 years from date of injury or discovery (Ark. Code Ann. § 16-114-203).

33. Negligence and tort claims: 3 years (Ark. Code Ann. § 16-56-105).

34. ACRA claims: 3 years (applied by Arkansas courts).

35. Plaintiff's claims are timely due to:

Continuing violations;

Delayed discovery;

Tolling during incarceration;

duleat concealment by Defendants.

VI. DAMAGES

Plaintiff seeks:

Compensatory damages;

Pain and suffering;

Medical expenses (past and future);

Emotional distress;

Loss of life expectancy and quality of life;

Punitive damages (where permitted);

Costs and fees;

Declaratory and injunctive relief.

VII. JURY DEMAND

Plaintiff demands trial by jury pursuant to Ark. R. Civ. P. 38.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court:

- A. Enter judgment in Plaintiff's favor;
- B. Award all damages allowed by law;
- C. Declare Defendants' actions unlawful;
- D. Enjoin unconstitutional and tortious practices;
- E. Grant all further relief deemed just and proper.

Respectfully submitted,

Jason Matthew Lynch
Plaintiff, Pro Se
Reg. No. 07405-510

