

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

SEP 19 2024

By: TAMMY H. DOWNS, CLERK

DEP CLERK

2024 SEP 19 A 9:44

TAMMY H. DOWNS

Lynch V Docs

4:24-CV-740-LPR-BBM

add on to complaint

I wish to Add the following to my 1983 complaint. I Believe the lack of response to date is just further reprisal on me for the 1983. I Believe it further shows the reach of capt Edwards into the court room and that we will not get a fair trial in this court room

Jason M Lyn

Jason M Lynch
 1809 N Rockingchair Rd
 Paragould, AR 72450

9.14.24

RE: Jason M Lynch and
Kirsten D Lynch

The Following pages have/were sent to
 1) Toney Braswell, twice; and 2) Arkansas
 State Prosecutor's office at Searcy. Also sent
 twice; once on 8/14 again on 8/28. To Date
 I yet to receive a response from either office.
 Even though a timely response was requested
 within 14 days; twice over.

I Pray the following can be reviewed
 and addressed, or may I be advised on
 what to do next. Time frames have past,
 motions even though requested were not filed.
 No Discovery/Brady Docs/or Giglio Information
 have been given. This directly effects our case...

Respectfully,

Jason M Lynch

C.C.

- 1 Public Defender Commission
- 2 Erin Lewis & Toney Braswell (searcy PD office)
- 3 Arkansas Bar Association
- 4 Prosecutor's office 17th Dist, Searcy AR
- 5 Clerk of Judge Mark Pate 17th District, Div 2
- 6 U.S. District Court - Judge Rudofsky and Moore.
- 7 Kirsten D Lynch

To whom it may concern: 9.14.24

On 8-15-24 I wrote Toney Braswell at the Searcy Arkansas PD office and his office in Little Rock, Arkansas. Asking for the following:

- 1 General Motion of Discovery
- 2 Brady / Giglio information or Discov(s)
- 3, Motions to be Filed w/ reasons why
 - 3a Motion to Suppress
 - 3b motion to change of venue.

I've tried to call Mr Braswell 17 times. My wife & mother have tried to call him over 15 time each; all with no response. My letter to his LR office was RTS, and no response to the Searcy PD office letter.

I also wrote the Prosecutor's office seeking the Discovery information as well. A copy of the letter is inclosed. However I've yet to recieve any response as well. Even though I asked for a response within 14 days. For these reasons

I pray for the courts help by releasing Mr Braswell, and appointing erin lewis.

I pray for continuance for Kirsten O Lynch & myself Jason M Lynch. lastly I pray The court will order the Discovery information for us be released/sent. Per Rule 17, 1 crim.P and if needed a review for Rule 19.7(a)(b) crim.P

Please deliver the following discovery material, Brady / Giglio information and notice(s) within fourteen days of the date of this request:

- 1) The substance of any oral statements made by the defendant in response to interrogation by any person known to the defendant as a law enforcement agent. Fed. R. Crim. P. 16(a)(1)(A).
- 2) Any written or recorded statement of the defendant within the government's possession, custody, or control. Fed. R. Crim. P. 16(a)(1)(B)(i).
- 3) Any written record containing the substance of any oral statement made by the defendant in response to interrogation by a person known to the defendant as a government agent. Fed. R. Crim. P. 16(a)(1)(B)(ii).
- 4) The defendant's recorded testimony relating to the charged offense. Fed. R. Crim. P. 16(a)(1)(B)(iii).

- 5) Any statement described in Fed. R. Crim. P. 16(a)(1)(A) and (B) made on behalf of any organizational defendant by a person legally able to bind the defendant as the defendant's director, officer, employee, or agent. Fed. R. Crim. P. 16(a)(1)(C)(i).
- 6) Any statement described in Fed. R. Crim. P. 16(a)(1)(A) and (B) made on behalf of any organization defendant by a person involved in the alleged offense conduct who was legally able to bind the defendant as the defendant's director, officer, employee, or agent. Fed. R. Crim. P. 16(a)(1)(C)(ii).
- 7) A copy of the defendant's prior criminal record. Fed. R. Crim. P. 16(a)(1)(D).
- 8) Copies of all books, papers, documents, data, photographs and tangible objects material to the defendant's case which the government intends to use in its case-in-chief at trial or which was obtained from or belongs to the defendant. Fed. R. Crim. P. 16(a)(1)(E).
- 9) The results or reports of any physical or mental examination and of any scientific test or experiments which the government intends to use in its case-in-chief at trial. Fed. R. Crim. P. 16(a)(1)(F).

- 10) A written summary of any evidence the government intends to use under Rule 702, 703 and 705 of the Federal Rules of Evidence during its case-in-chief at trial, including the Fed. R. Crim. P. 16(a)(1)(G).
- 11) All Brady/Giglio information in whatever form it may exist.
- 12) Notice of any Rule 404(b) evidence which the government intends to introduce at trial, including the nature of any such evidence and the purpose for its introduction.
- 13) Notice of the existence of any electronic surveillance of the defendant herein, as well as a copy of such surveillance.
- 14) Early disclosure of any Jencks Act materials.

Pursuant to the Pretrial Order in this case, it is understood that the government has instructed its agents to preserve all field notes pertaining to this matter.

Also, please be advised that I invoked my right to counsel and my right to silence.

Thank you for your attention to this matter for your prompt response.