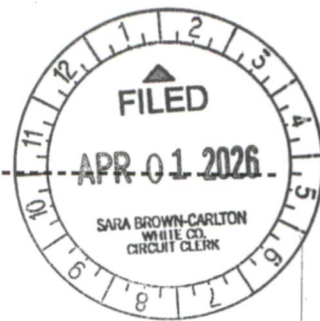




**PART 18

COMPREHENSIVE TIMELINE OF EVENTS, ACTORS, AND KNOWN CONDUCT
(Jason Matthew Lynch, Reg. No. 07405-510)**

Purpose of This Timeline

This Part provides a chronological, actor-specific timeline of the events giving rise to Plaintiff Jason Matthew Lynch's federal and state claims. The timeline demonstrates continuity of misconduct, deliberate indifference, retaliatory motive, systemic policy failures, and willful disregard for constitutional, statutory, and common-law duties by White County, White County Jail officials, Turn Key Health Clinics, LLC, and associated actors.

This timeline is offered to assist the Court in understanding:

1. Causation
2. Knowledge and notice
3. Pattern and practice
4. Conspiracy and joint action
5. Escalation of harm over time
6. Why injunctive and declaratory relief are necessary

I. PRE-INCARCERATION & KNOWN MEDICAL STATUS

Before June 9, 2024

Plaintiff: Jason Matthew Lynch

Known Medical Conditions:

HIV-positive, stable on antiretroviral therapy (ART), specifically Biktarvy

Legal Status:

Pretrial detainee protections apply upon incarceration

Key Legal Duty Triggered:

Jail and medical contractor duty to continue prescribed life-sustaining medication without interruption

II. INITIAL INCARCERATION & IMMEDIATE FAILURES

June 9, 2024 Intake at White County Jail (Searcy, Arkansas)

Actors Involved:

White County Jail intake staff

Turn Key Health Clinics medical intake personnel

Supervisory officials (through policy and custom)

Events:

Lynch is booked into White County Jail.

Lynch reports HIV diagnosis and existing ART prescription.

Lynch informs staff of critical need for uninterrupted medication.

Failures & Violations:

Failure to immediately verify and continue ART

Failure to treat HIV medication as non-discretionary

Failure to follow nationally accepted correctional medical standards

Legal Significance:

Deliberate indifference begins Day One

Knowledge is established at intake

Duty to act is triggered immediately

III. PROLONGED DENIAL OF HIV MEDICATION (CORE FACT PERIOD)

June 9, 2024 September 9, 2024 (Approx. 100 Days)

Actors Involved:

Turn Key Health Clinics, LLC

On-site nurses and medical staff

Jail administrators responsible for oversight

White County policymakers (through custom and policy)

Events:

Lynch is deprived of Biktarvy for approximately 100 days.

Repeated verbal and written requests for medication.

Lynch experiences:

Physical decline

Immune system compromise

Extreme stress and fear of permanent harm

No legitimate medical justification is provided.

Aggravating Factors:

HIV medication interruption is universally recognized as dangerous

Defendants had actual knowledge of risk

No emergency exception applies

Delay was not incidental it was sustained

Legal Significance:

Eighth Amendment / Fourteenth Amendment violation

ADA and Rehabilitation Act implications

Gross negligence and medical battery

Negligence per se under Arkansas law

Evidence of punitive culpability

IV. RELIGIOUS DISCRIMINATION & FREE EXERCISE VIOLATIONS

Summer 2024 (Concurrent with Medical Deprivation)

Actors Involved:

Jail staff

Supervisory officials

Policy enforcers

Events:

Lynch, a Catholic, is denied access to religious accommodations.

Denial includes:

Religious materials

Religious observance opportunities

Requests are ignored or dismissed.

Legal Significance:

First Amendment Free Exercise violation

Fourteenth Amendment Equal Protection violation

Evidence of discriminatory animus

Reinforces pattern of targeting and retaliation

V. INTERFERENCE WITH LEGAL MAIL & ACCESS TO COURTS

Mid Late Summer 2024

Actors Involved:

Jail mailroom staff

Supervisory officials

Policy-level actors

Events:

Legal mail is delayed, withheld, or interfered with.

Lynch's ability to communicate with courts and counsel is impaired.

Interference occurs while Lynch is attempting to:

Address medical neglect

Assert constitutional rights

Legal Significance:

First Amendment violation

Access-to-courts violation

Evidence of retaliatory motive

Supports §1983 conspiracy allegations

VI. RETALIATION & ESCALATION AFTER COMPLAINTS

After Lynch Begins Complaining & Filing Grievances

Actors Involved:

Jail staff

Medical staff

Supervisory officials

Events:

Lynch's conditions worsen rather than improve after complaints.

Requests are met with:

Delay

Dismissiveness

Hostility

Retaliatory atmosphere becomes apparent.

Legal Significance:

Retaliation for protected conduct

Strengthens punitive damages claim

Establishes chilling effect on constitutional rights

VII. EVENTUAL RESUMPTION OF MEDICATION

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Actors Involved:

Turn Key Health Clinics

Jail administration

Events:

ART medication is finally resumed.

No explanation is given for the prolonged delay.

Critical Note:

Harm has already occurred.

Resumption does not cure prior violations.

Legal Significance:

Confirms medication was always available

Confirms delay was not medically justified

Supports inference of deliberate indifference

VIII. POST-DEPRIVATION CONSEQUENCES

After September 2024

Ongoing Harm:

Long-term health consequences

Heightened medical risk

Emotional distress

Loss of trust in medical systems

Legal Impact:

Permanent injury element satisfied

Supports future medical monitoring

Supports declaratory and injunctive relief

IX. SYSTEMIC AND POLICY-LEVEL IMPLICATIONS

Key Institutional Actors:

White County

White County Sheriff

Jail administration

Turn Key Health Clinics, LLC

Supervisory policymakers (including Clayton Edwards, as alleged)

Demonstrated Through Timeline:

Failure to train

Failure to supervise

Unconstitutional policies/customs

Joint action between county and contractor

Indifference to known medical standards

X. SUMMARY OF TIMELINE SIGNIFICANCE

This timeline establishes:

1. Knowledge Defendants knew from intake onward
2. Duration Harm persisted for ~100 days
3. Escalation Complaints led to retaliation, not correction
4. Pattern Multiple rights violated simultaneously

5. Policy Failure Not isolated negligence

6. Causation Clear link between actions and injury

Transition to Part 19

Part 19 will build directly on this timeline to:

Tie specific events to each legal cause of action

Map actors to liability

Demonstrate why qualified immunity does not apply

Establish entitlement to damages, declaratory relief, and permanent injunctive relief