

ATTACHMENT 1
IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

JASON MATTHEW LYNCH
Reg. No. 07405-510

Plaintiff,

v.

CLAYTON EDWARDS, originally pleaded as Claynton Edwards; ASHLEY WATT, LPN, pleaded and docketed as Ashley Watts; KAITLYN SMITH, LPN, also identified as Katynn Smith and possibly as "Spence"; DOE NURSE SPENCE, only if different from Kaitlyn Smith; DOES, PILL NURSES 1-3, pleaded in the alternative pending substitution; TURN KEY HEALTH CLINICS, LLC d/b/a TK HEALTH; HANNAH ROSS; CODY SILER, originally pleaded as Sciler; CONNER GOODWIN; ZACHARY RODGERS, originally pleaded as Rogers; JOSH SWINDLE; DONALD WOOD; HALEY WORKMAN; Y'KEBIYA SPINKS, LPN; SAVANNAH HENDERSON, LPN; JAMIE ANDERSEN, LPN; HEATHER JONES, LPN; HEATHER HOBBS, LPN; KATLYN LADD, LPN; JONATHAN WHITE, medical provider; MATTHEW WHITE; MASON WILBORN, previously identified as Wilburn; CORRECTIONAL OFFICER JONES, first name unknown; JOHN LONG; PHILLIP MILLER, Sheriff; and JOSEPH MARTIN

Defendants.

Case No.
4:24-cv-00740-LPR-BBM

**PROPOSED FOURTH
AMENDED COMPLAINT
AND JURY DEMAND**

PROPOSED FOURTH AMENDED COMPLAINT AND JURY DEMAND

I. NATURE, COMPLETENESS, AND SCOPE OF THIS PLEADING

- 1.** Plaintiff Jason Matthew Lynch brings this civil-rights action under 42 U.S.C. Section 1983 for violations of the First, Eighth, and Fourteenth Amendments while he was confined at the White County Detention Center (WCDC) in 2024.
- 2.** This proposed Fourth Amended Complaint is complete in itself. If leave to amend is granted, it will supersede the Third Amended Complaint at Document 45 and will not incorporate any earlier pleading by reference.
- 3.** Within its own four corners, this pleading includes, restates, and preserves every claim identified as surviving in the Court's screening recommendation at Document 71 and adopting Order at Document 80, together with every material factual allegation from Plaintiff's Third Amended Complaint that supports those claims. Plaintiff does not intentionally abandon any surviving claim or supporting TAC fact.
- 4.** This pleading also proposes additional names and personal-participation details learned through discovery and described in Plaintiff's motion for leave, including

medication-pass nurses, a medical provider, mail and shakedown officers, the July 30 waiver participants, Sheriff Miller, and the August 13 transport officer. No additional person is alleged to have been substituted or added unless and until the Court grants leave.

5. Consistent with the Court's later direction, this pleading does not reassert the dismissed access-to-courts, HIPAA, lost-property, procedural-due-process, unrelated conditions-of-confinement, or religious claims. Facts that overlap those dismissed theories are included only when they form part of a surviving medical, mail, failure-to-protect, excessive-force, equal-protection, retaliation, conspiracy, or policy claim.

II. JURISDICTION AND VENUE

6. This Court has subject-matter jurisdiction under 28 U.S.C. Sections 1331 and 1343 because this action arises under the Constitution and 42 U.S.C. Section 1983.

7. Venue is proper in this District under 28 U.S.C. Section 1391(b) because the events occurred at WDCD in White County, Arkansas, within the Eastern District of Arkansas.

8. At all relevant times, each individual Defendant acted under color of Arkansas law. The medical Defendants performed the government's constitutionally required jail-medical function under WDCD's contract with Turn Key Health.

III. PARTIES AND CAPACITIES

9. Plaintiff Jason Matthew Lynch was confined at WDCD from June 9 through September 9, 2024, as reflected in the later-produced Guardian and Turn Key records. He now receives mail at 261 Wilson Loop, Ward, Arkansas 72176.

10. At all relevant times, Plaintiff was detained on local charges after he had pleaded guilty in *United States v. Lynch*, No. 4:22-cr-00151-LPR, and while he awaited federal sentencing. The Court therefore screened the surviving medical, force, and safety claims under the standards applicable to convicted prisoners.

11. Defendant Clayton Edwards, originally pleaded as Claynton Edwards, was the WDCD Captain or jail-command official. He is sued individually for his own conduct and in his official capacity only as to the medication-crushing policy claim.

12. Defendant Ashley Watt, LPN, was pleaded and docketed as Ashley Watts. Watt was a Turn Key nurse and medical supervisor with authority over approval and administration of Plaintiff's medication. She is sued individually.

13. Defendant Kaitlyn Smith, LPN, was originally identified as Katynn Smith and possibly as Nurse Spence. Smith is sued individually. Because the present record does not conclusively establish whether the TAC's 'Spence' is Smith or a different nurse, Doe Nurse Spence remains pleaded in the alternative solely to preserve the surviving crushed-medication claim until the identity is resolved.

14. Defendant Turn Key Health Clinics, LLC, doing business as TK Health, contracted to provide medical care at WCDC. It is sued as an entity for the challenged medication policy or custom, not merely because it employed individual nurses.

15. Defendants Hannah Ross, Cody Siler, Conner Goodwin, Zachary Rodgers, Josh Swindle, Donald Wood, and Haley Workman were WCDC correctional or command employees. Ross was a lieutenant; Siler, originally pleaded as Sciler, was a sergeant; Goodwin was an officer; Rodgers, originally pleaded as Rogers, was a sergeant; Swindle was a sergeant; Wood was an officer; and Workman was a sergeant. Each is sued individually.

16. Defendants Y'Kebiya Spinks, LPN, Savannah Henderson, LPN, and Jamie Andersen, LPN, are later-identified nurses who performed challenged medication passes. Plaintiff proposes that they be added and, as the Court deems appropriate, substituted collectively for Pill Nurses 1, 2, and 3. Plaintiff cannot truthfully assign a fixed Doe number to a specific nurse. Doe Pill Nurses 1-3 therefore remain pleaded in the alternative until the Court confirms the substitutions. Each named nurse is proposed in her individual capacity.

17. Defendants Heather Jones, LPN, Heather Hobbs, LPN, and Katlyn Ladd, LPN, are proposed individual-capacity defendants. Plaintiff alleges that each personally administered or participated in challenged Biktarvy administration after receiving notice of his symptoms and dose loss. Nurse Heather Jones is not Correctional Officer Jones.

18. Defendant Jonathan White is the proposed medical provider identified in the produced chronic-care record. His precise professional credential is not yet

confirmed. Plaintiff seeks to hold White individually only for his own examination, direct notice, treatment decision, and alleged failure to prevent first-crushing and material dose loss—not merely because White signed a chart.

19. Proposed Defendants Matthew White and Mason Wilborn were WCDC officers. Wilborn was previously identified as Wilburn. Plaintiff seeks to hold Matthew White individually for specific mail interference and retaliatory shakedowns he alleges he personally observed, and Wilborn individually for the outgoing-mail acts Plaintiff alleges he personally observed. Their appearance on the County roster alone is not the basis for liability.

20. Proposed Defendant Correctional Officer Jones is a WCDC employee whose first name remains unknown. The County's annual labor-distribution list identifies Misty Jones and Jeremy Jones, but does not identify which person participated in the July 30 event. Plaintiff will not guess. CO Jones is pleaded individually under this temporary designation pending narrow identification.

21. Proposed Defendants John Long and Joseph Martin were alleged WCDC correctional employees; Martin appears on the County list, while Long's identity rests on Plaintiff's firsthand identification and the TAC rather than that list. Plaintiff seeks to hold Long individually for his alleged personal role in the July 30 coercive-waiver and medical-housing retaliation episode. Plaintiff seeks to hold Martin individually for personally implementing the August 13 court-movement instruction with the retaliatory knowledge alleged below.

22. Proposed Defendant Phillip Miller was the White County Sheriff. Plaintiff seeks to hold him individually only for his own notice, investigation, written response, and alleged decision to continue Plaintiff's medical placement. Plaintiff does not rely on Miller's title, respondeat superior, or the crushed-medication theory previously dismissed against the Doe Sheriff.

IV. CHRONOLOGICAL FACTUAL ALLEGATIONS

A. HIV medication and the initial delay

23. Plaintiff has diagnosed HIV, and Biktarvy was prescribed to treat and control it. April 2024 infectious-disease records documented a substantial viral load after an earlier interruption and expressly warned that inconsistent antiretroviral treatment could cause viral resistance. The need for a consistent daily course was an objectively serious medical need.

24. When Plaintiff was booked into WCDC on June 9, 2024, he told intake staff that he had HIV, took Biktarvy every day, and could suffer serious harm if treatment was interrupted. He observed no adequate medical intake documentation at that time.

25. On June 10, Plaintiff's family delivered unopened Biktarvy for him and explained the medical importance of prompt delivery, but the front-desk response was to leave it without action. Later records document repeated thirty-count outside-medication receipts during the confinement.

26. On June 11, nonparty Nurse Melody located Plaintiff's prescription in the medication drop box but said she could not administer it until Watt approved it. Plaintiff then sent medical requests and grievances to Watt about the missing daily medication.

27. On June 12, Smith or Nurse Spence told Plaintiff at pill call that no medication was available and that there was nothing she could do. Plaintiff alleges that he again complained at pill call and to Edwards on June 13. Edwards told him to stop bugging staff and answered the appeal only with 'Noted.'

28. The TAC described the initial delay as lasting from at least June 10 through June 15. The later-produced MAR records a dose as 'Received' from Heather Hobbs on June 13, then records Plaintiff as 'Absent' for June 14, 15, and 16, and records receipt again on June 17. Plaintiff disputes that he was absent—he remained in WCDC custody—and alleges he did not receive the uninterrupted daily course he had reported as medically necessary.

29. Watt had approval authority, received Plaintiff's requests, and did not timely assure uninterrupted access to the prescription. Edwards knew through Plaintiff's grievances that the daily HIV medication had been delayed or interrupted and

deliberately refused to intervene. This pleading states the TAC account and the later MAR rather than treating either one as silently controlling the disputed facts.

30. The MAR separately records doses as received from June 17 through June 23, no administration from June 24 through July 8 after CorEMR prematurely canceled the order as though Plaintiff had been released, and resumed administration on July 9. Plaintiff remained confined. He alleges these gaps and inaccurate absence or release coding further show that Watt and Edwards failed to assure the consistent course after notice.

B. Protected complaints and the medication-crushing course

31. On June 15, an attorney representing Plaintiff in another matter called Edwards about the withheld Biktarvy. The attorney then advised Plaintiff to request a Section 1983 complaint form and pursue a civil-rights case. Plaintiff requested the form, continued filing medical requests and grievances, and stated his intent to sue.

32. Soon after that call, Edwards allegedly held a closed-door staff meeting and directed staff, in substance, to make Plaintiff's life difficult, shake him down, and give him nothing. The later coordinated actions described below followed that directive.

33. The TAC alleges that on or about June 20 Edwards instituted or enforced a WDCD practice requiring medications to be crushed or floated before administration, including Plaintiff's Biktarvy. Medical personnel told Plaintiff that jail administration required it. A later Watt chart note records that on July 25 jail administrative staff told Medical that all medications had to be crushed and floated.

34. Plaintiff repeatedly told Edwards, Watt, Smith or Nurse Spence, and the nurses administering his medication that crushing Biktarvy caused burning in his mouth and insides, nausea, vomiting, and loss of part of each dose. He explained that powder and fragments stayed in the crushing bag or cup and were discarded.

35. Edwards responded to grievances with statements including 'so,' 'noted,' that he did not care and the medication would continue to be crushed, and that the symptoms were all in Plaintiff's head. When the Sheriff initially asked, Edwards represented that a doctor had approved the method and it was not harming Plaintiff. Plaintiff alleges that representation was false or materially incomplete. Plaintiff also alleges that

Edwards later told him face-to-face to sue, that Edwards was 'untouchable,' and that the evidence would not reach public view or a courtroom.

36. Plaintiff's July 24-29 medication requests and grievances contemporaneously described crushing, burning, vomiting, medication loss, incomplete doses, and the nurses identified as 'Katlynn' and 'nurse heather.' These records gave notice before many later medication passes.

37. On July 25 and 26, the MAR identifies Kaitlyn Smith on the Biktarvy entries. Plaintiff's contemporaneous request used the name 'Katlynn.' Plaintiff alleges that Smith crushed the tablet after he described the burning, vomiting, and dose loss. The July nickname is not used to identify Katlyn Ladd, who is a separate nurse.

38. On July 27 at about 9:17 p.m., the MAR identifies Heather Jones on the Biktarvy entry. Plaintiff personally watched Jones crush the tablet and told her that the method caused burning, vomiting, and an incomplete dose. A request entered minutes later referred to 'nurse heather' and the same event.

39. Plaintiff also alleges from personal observation that Katlyn Ladd crushed Biktarvy after he described the symptoms and dose loss. The produced records separately identify Ladd on the June intake and MAR and on September 6 and 7 dissolve-task entries; Plaintiff does not rely on the July 'Katlynn' reference to identify her.

40. On July 30, a Turn Key form labeled Waiver of Treatment/Evaluation, TKH 0073, documented refusal of medical observation or housing related to reported health concerns and identified Heather Hobbs as the healthcare professional. The form itself names no correctional officer and does not document coercion. Plaintiff recognizes his signature but alleges from firsthand recollection that CO Jones and John Long pressured him to sign by threatening medical or punitive lockdown. Plaintiff does not claim that Hobbs made the threat or assert a freestanding signature claim; he pleads the event only as proposed evidence of the later medical-housing retaliation course.

41. Watt's later chart note asserts that medical personnel tried to move Plaintiff for closer observation, that he refused and signed a refusal, and that he denied vomiting or diarrhea at that time. Plaintiff disputes that account, maintains that he consistently

reported vomiting and other symptoms, and alleges that any refusal was obtained through the threat just described.

42. During the medication course, medication was sometimes discarded or provided to other inmates, one delivered bottle went missing, and the supply lasted only about twenty-eight days. Watt and Turn Key did not assure a timely replacement, so Plaintiff's family repeatedly obtained and delivered additional medication. These facts support the medical-treatment course only; Plaintiff does not reassert a lost-property claim.

C. August 2024 retaliation, mail interference, shakedowns, and force

43. By August, Plaintiff was writing to his attorney, the ACLU, OIG, DOJ, FBI, the Governor, the Attorney General, law firms, and news organizations concerning jail conduct. He also continued grievances and preparation of this civil-rights action. These were protected First Amendment activities.

44. On August 13, Plaintiff and his wife had matters on the same local-court docket. Edwards directed or arranged for Plaintiff to be called first while his wife was left until the end of the day, approximately 7:45 a.m. to 8:30 p.m. She waited more than twelve hours and left in tears, causing Plaintiff the distress Edwards allegedly intended. Edwards later bragged about the event. Plaintiff seeks relief only for retaliation directed at and intended to chill him, not for a separate injury belonging to his wife.

45. The Guardian Inmate Log records Plaintiff's local-court movement from 8:52 a.m. to 10:25 a.m.; its movement entry is under Josh Swindle's DSN and corroborates timing, not the identity of the physical escort. Plaintiff identifies Joseph Martin from firsthand observation as the officer who retrieved him first and recalls Martin saying he was 'only doing what he was told.' On information and belief, based on that statement and the deliberate sequence, Plaintiff alleges Martin understood that the special instruction singled Plaintiff out to implement Edwards's retaliatory plan.

46. Edwards caused Ross to send a directive to WCDC staff not to accept or sign for Plaintiff's outgoing mail. Plaintiff alleges a systematic course affecting attorney correspondence and general outgoing mail on approximately fourteen occasions, not an isolated mistake. Siler told Plaintiff mail was being refused because of Ross's

directive, and Goodwin personally refused mail or refused to explain why it would not be accepted.

47. Plaintiff alleges from personal observation that Matthew White enforced the mail restriction by refusing an outgoing item after acknowledging the Ross directive. Plaintiff also alleges from personal observation that Mason Wilborn refused an outgoing court-related item under the directive and took completed or partially completed Section 1983 papers that were not returned. The County list corroborates their identities, not these acts. CO Jones was involved in discussions concerning interception, but Plaintiff seeks to fix that officer's full identity before assigning additional mail liability.

48. A third party mailed Plaintiff a package containing official civil-rights and in-forma-pauperis forms. Plaintiff alleges the package was not delivered during his WCDC confinement and that he later recovered it from stored property, opened outside his presence and marked 'LEGAL MAIL' and 'DO NOT GIVE TO INMATE.' Photographs, grievances, and his authentication declaration corroborate the alleged continuing mail course but do not identify who opened or withheld it. The surviving count remains limited to the screened systematic attorney-correspondence and outgoing-mail claim; no access-to-courts claim is reasserted.

49. On August 14, Plaintiff asked Wood for toilet paper. Wood said Plaintiff could use his hand because of Plaintiff's complaint and grievances, and Plaintiff went more than twenty hours without toilet paper. This fact is pleaded only as retaliation, not as a separate conditions-of-confinement claim.

50. During approximately six weeks, Edwards ordered or caused about five shakedowns in F Pod. Rodgers, Swindle, and Wood participated as alleged in the TAC. Plaintiff further alleges from personal observation that Matthew White participated in multiple searches after learning about Plaintiff's protected complaints. Rodgers and Swindle told other prisoners that the searches were Plaintiff's fault, exposing him to a known risk. Plaintiff was then jumped and injured.

51. During four of the retaliatory shakedowns, Plaintiff alone was subjected to strip or visual-cavity searches while other inmates were not. The searches are pleaded as

adverse acts within the surviving retaliation claim, not as a freestanding Fourth Amendment search claim.

52. During the August 15 shakedown, Plaintiff tried to secure his legal papers. Without first giving Plaintiff a direct order or warning, Rodgers grabbed him by the arm and removed him from the cell, causing pain and bruising. Rodgers then examined Plaintiff's legal pages in front of a body camera. Workman was present, but Plaintiff attributes the arm-grab only to Rodgers. The arm-grab is pleaded as excessive force, not as a separate retaliation theory.

53. On August 19, Plaintiff alleges that F Pod did not receive its scheduled yard call. The later Guardian log records about twenty-two minutes of 'Recreation'; Plaintiff disputes that this entry reflects the yard call described in the TAC. Rodgers, Swindle, and Workman told the other prisoners that the lost yard time was Plaintiff's fault because they were angry with him. The surviving retaliation claim rests on those blame statements and resulting hostility, not on a standalone conditions claim or an allegation that each of the three made the scheduling decision.

D. Identified medication personnel and continued altered doses

54. CorEMR records show that Watt created a 'CRUSH MEDICATION' alert on August 15. Her chart note records the July 25 jail-administration directive, Plaintiff's reported negative symptoms, a Healthway pharmacist's statement that crushing would not alter the medication's effects, and notice to the facility provider. Plaintiff alleges that the reported opinion did not address powder and fragments discarded in the bag, the materially incomplete dose, or his continuing symptoms. Smith removed and immediately recreated the crush alert on September 6.

55. The MAR attributes Biktarvy entries to nonparty nurse Melanie Comandini on August 1, 6, 10, 14, 15, and 19. Plaintiff recalls that on several of those dates she said Biktarvy should not be crushed and declined to crush it. Comandini is pleaded only as a material witness whose conduct contrasted with the challenged practice, not as a Defendant.

56. The MAR attributes Biktarvy entries to Hobbs on August 21 and September 4. Plaintiff alleges from personal observation that at a challenged pass Hobbs crushed

or altered the tablet after he explained that the practice made him ill and left a material part of the medication in the bag.

57. A produced chronic-care record identifies Jonathan White as the Biktarvy prescriber and as the provider at an August 23 examination. Plaintiff alleges that he personally told White in the examination room that staff were crushing Biktarvy, that it caused burning, nausea, vomiting, and lost doses, and that medication remained in the bag. The written record describes Plaintiff as stable and directs staff to allow Biktarvy to dissolve in water for ten minutes before administration.

58. The TAC, based on Plaintiff's then-current recollection, placed a provider visit on August 30 and summarized the provider as saying Biktarvy should not be crushed and should instead be dissolved in orange juice. Plaintiff separately recalls White's oral words as permitting dissolution and possibly crushing. The later-produced record instead dates the encounter August 23 and specifies water. Plaintiff pleads the written record and his differing recollections transparently and in the alternative. Under every version, no provider instruction authorized first crushing the tablet, discarding residue, or administering an incomplete dose.

59. Plaintiff alleges White had direct notice of the symptoms and lost medication, knew that staff were first crushing the tablet, and nevertheless failed to give or enforce an instruction that stopped first-crushing and assured delivery of the whole prescribed dose. This proposed claim rests on that alleged direct encounter and knowledge, not on the remedial wording of the written dissolve instruction alone.

60. The MAR identifies Spinks on August 23, 24, and 25. At each challenged pass that Plaintiff personally received, he alleges he protested the first-crushing or alteration, described his symptoms and dose loss to Spinks, asked her to stop, and she nevertheless delivered the materially incomplete preparation.

61. The MAR identifies Watt on an early August 30 entry and Henderson on a later August 30 entry and on August 31 and September 1. Plaintiff alleges he personally told each administering nurse at a challenged pass that first-crushing caused burning, vomiting, and dose loss; each nevertheless administered the altered preparation.

62. The MAR identifies Andersen on September 2, 3, 6, 7, and 8, dates the later custody and medical records show Plaintiff remained at WCDC. Plaintiff alleges he

objected directly to Andersen at the challenged passes and that she continued the altered method. The produced task history separately associates Andersen with completed dissolve tasks; a task entry is not itself pleaded as proof of a medication pass.

63. Plaintiff alleges from personal observation that Katlyn Ladd physically crushed Biktarvy after he warned her about burning, vomiting, and dose loss. No Biktarvy MAR pass is attributed to Ladd. The records instead identify her at intake and on completed September 6 and 7 dissolve-task entries. Plaintiff relies on his firsthand identification for the proposed claim and on the records only to confirm her identity and related task involvement.

64. Plaintiff alleges that he personally watched Watt, Smith, Heather Jones, Hobbs, and Ladd physically crush Biktarvy. He also alleges that he personally received and objected during the identified challenged passes by Spinks, Henderson, and Andersen. The MAR establishes the recorded dates and users; Plaintiff's firsthand allegations supply the asserted method, warnings, and responses.

65. On the limited occasions when staff purported to dissolve the medication, Plaintiff observed that staff first crushed the tablet in a bag and then placed the material in water. In the TAC he estimated that approximately half of a crushed dose was lost. He now states conservatively that at least approximately twenty to thirty percent routinely remained on the bag or container and that approximately half or more was lost on some passes. Both estimates describe recurring loss of a material part of the dose.

66. The task history shows exactly five completed dissolve-task entries: Ladd and Smith on September 6, Ladd and Andersen on September 7, and Andersen on September 8. Other tasks were rescheduled or deleted. Plaintiff alleges that even on the completed occasions the tablet was first crushed and the full dose was not delivered. The tasks were not created until September 6 although White's written instruction was entered August 23 and Watt repeated it on August 28.

67. The TAC estimated that Biktarvy was altered more than ninety times. Plaintiff clarifies that this was an estimate of the overall altered-medication events; Biktarvy itself was ordered once daily, and the later production reflects fewer than ninety

offered Biktarvy doses. The present allegation is that Biktarvy was crushed or materially altered on numerous daily passes—nearly every pass during the challenged period—not that the MAR proves more than ninety separate Biktarvy days.

E. Medical placement and appeals

68. Plaintiff's September 3 Emergency Appeal stated that Edwards had placed him in medical housing because of the medication dispute. The later Guardian log first records Plaintiff in MED2 on September 4 at about 9:24 a.m. Plaintiff alleges that Edwards announced or began implementing the decision by September 3 and that the physical move was recorded on September 4.

69. Plaintiff was not ill in a manner requiring isolation, did not request the placement, and was not given clinically meaningful monitoring or treatment for the Biktarvy problem there. The logs record routine custody checks, restrictive-housing rounds, and limited medical-bench visits; Plaintiff does not deny those security entries. Other similarly situated prisoners taking the same medication were not placed in medical housing.

70. Watt later signed a statement acknowledging that facility medications were crushed or dissolved because medication had been found in cells and that Plaintiff was moved to medical after reporting that his medication made him sick. Watt denied that he was singled out. Plaintiff alleges the stated facility practice confirms the policy, while the different treatment and retaliatory purpose are shown by the comparator facts, earlier threats, timing, and statements described here.

71. The July 30 threat alleged against CO Jones and Long foreshadowed the placement. Plaintiff alleges the placement was punishment for his complaints, grievances, letters, and threatened litigation and was intentionally different treatment without a rational basis. When he sought release, he was told that only Edwards could remove him because Edwards had ordered the placement. Plaintiff does not reassert a procedural-due-process or standalone conditions claim concerning the unit.

72. On September 3, Plaintiff submitted an Emergency Appeal and a Classification Appeal directly to Sheriff Miller. He reported the medication dispute, unequal treatment, and retaliatory purpose. On September 6, Miller personally responded that

he had been made aware of Plaintiff's claims, had spoken with staff and medical services, that the medical unit was not disciplinary lockdown, and that housing units were used as needed.

73. Plaintiff's September 7 appeal contemporaneously reported that medical staff said his housing remained by the Sheriff's order. On September 9 Ross responded, in substance, that the prior answer was the Sheriff's response and Plaintiff would stay in medical for the time being. Plaintiff alleges that Miller, after direct notice and investigation, personally decided to continue the different placement.

74. Although the screening recommendation recited a September 7 transfer, the later Guardian and Turn Key records show Plaintiff remained at WCDC through September 9 and account for the September 8 medication and housing entries. This date clarification supports the chronology only; Plaintiff asserts no separate alteration, forgery, or spoliation claim.

V. EXHAUSTION AND INJURY

75. Plaintiff repeatedly used the WCDC request, grievance, emergency-appeal, and classification-appeal processes, submitting more than one hundred tracked requests, grievances, and appeals concerning the relevant course. He gave direct notice to medical personnel, Edwards, Ross, and Miller and appealed adverse responses. The served Medical and County Defendants later notified the Court, after reviewing relevant or complete jail records, that it appeared Plaintiff exhausted the remedies related to the claims in this action.

76. Plaintiff pursued every step made available to him. To the extent any additional step was blocked by mail interception, nonresponse, or retaliation, it was not practically available. The exhaustion allegation concerning a proposed additional Defendant is based on the same contemporaneous grievances and appeals described in the factual sections and is not intended to enlarge any served Defendant's notice beyond the record.

77. Plaintiff experienced burning, nausea, vomiting, lost or incomplete HIV-medication doses, pain, bruising, physical injury after other prisoners were encouraged to blame him, fear, humiliation, and emotional distress. The medication

interruption and alteration exposed him to risks including viral rebound, drug resistance, immune harm, and progression of HIV.

78. Plaintiff further alleges that the treatment course caused or contributed to degeneration of his bones and teeth, body and bone pain, and a reduced life expectancy. The precise diagnosis, causation, and extent of those injuries are matters for medical evidence and trial.

VI. CLAIMS FOR RELIEF

COUNT I - DELAY OR INTERRUPTION IN RECEIVING BIKTARVY (WATT AND EDWARDS)

79. Plaintiff incorporates the party allegations and Sections IV.A and V only to the extent relevant to this count. Watt knew Biktarvy required approval, had authority to approve it, received Plaintiff's requests, and nevertheless failed to assure the prescribed daily course during the initial delay and recorded gaps. Edwards received grievances describing the same serious need and consciously refused to act.

80. Watt and Edwards knew of and deliberately disregarded Plaintiff's serious medical need, violating the Eighth Amendment. This count preserves the delay claim that survived screening against the person previously pleaded as Ashley Watts and against Edwards.

COUNT II - CRUSHED OR MATERIALLY ALTERED BIKTARVY (INDIVIDUAL MEDICAL DEFENDANTS AND EDWARDS)

81. Plaintiff incorporates the party allegations and Sections IV.B, IV.D, and V only to the extent relevant to this count. Edwards imposed or enforced the crush-or-float practice and continued it after detailed notice of burning, vomiting, and dose loss. Watt and Smith personally crushed the medication; Watt created and Smith recreated electronic crushing alerts; and each continued the course after Plaintiff's objections and pharmacist or provider contacts.

82. Plaintiff alleges that Heather Jones, Hobbs, and Ladd personally crushed or altered Biktarvy after he told each of the physical effects and incomplete doses. He alleges that Spinks, Henderson, and Andersen administered the challenged medication on their identified dates, heard his objections at the passes, and continued the method. The records corroborate identities and dates; the method, warnings, and responses rest on Plaintiff's firsthand allegations.

83. Plaintiff alleges that Jonathan White received direct face-to-face notice of the symptoms and lost dose, participated in deciding the administration method, and failed to issue or enforce an instruction that stopped first-crushing and assured delivery of the full prescribed dose. The proposed claim is not based merely on White's written dissolve instruction.

84. By knowingly continuing a materially incomplete or harmful administration method instead of taking reasonable steps to deliver the prescribed treatment, Edwards, Watt, Smith, Doe Nurse Spence if different, Doe Pill Nurses 1-3, and the proposed named medical Defendants identified above deliberately disregarded Plaintiff's serious medical need in violation of the Eighth Amendment. The Doe designations remain only in the alternative until the Court determines substitution.

COUNT III - FIRST AMENDMENT MAIL INTERFERENCE

85. Plaintiff incorporates the party allegations and the mail paragraphs in Section IV.C only to the extent relevant to this count. Edwards directed a systematic restriction; Ross transmitted it; and Siler and Goodwin personally implemented or enforced it. Those are the Defendants against whom this count survived screening. Plaintiff further proposes Matthew White and Wilborn based on the personal acts alleged above, not their roster entries.

86. The approximately fourteen incidents affecting attorney correspondence and general outgoing mail were intentional and continuing, not isolated negligence. Edwards, Ross, Siler, Goodwin, and, if leave is granted, Matthew White and Wilborn violated Plaintiff's First Amendment outgoing-mail rights. The incoming package is corroborative background, not a renewed access-to-courts claim or a separate incoming-mail count.

COUNT IV - FAILURE TO PROTECT (RODGERS AND SWINDLE)

87. Plaintiff incorporates the party allegations, the shakedown and blame allegations in Section IV.C, and the related injury allegations in Section V. Rodgers and Swindle deliberately told prisoners that repeated shakedowns were Plaintiff's fault. They knew that identifying Plaintiff as the cause of collective punishment created a substantial risk that other prisoners would assault him, but disregarded the risk. Plaintiff was then jumped and injured.

88. Rodgers and Swindle were deliberately indifferent to a substantial risk of serious harm from other prisoners, violating the Eighth Amendment.

COUNT V - EXCESSIVE FORCE (RODGERS)

89. Plaintiff incorporates the party allegations, the August 15 allegations in Section IV.C, and the related injury allegations in Section V. Rodgers grabbed Plaintiff's arm and forcibly removed him without a direct order, warning, resistance, or reasonably perceived need for that amount of force. Plaintiff suffered pain and bruising.

90. Rodgers used force maliciously or wantonly rather than in a good-faith effort to maintain discipline, violating the Eighth Amendment.

COUNT VI - EQUAL PROTECTION IN MEDICAL HOUSING (EDWARDS AND MILLER)

91. Plaintiff incorporates the party allegations and Section IV.E only to the extent relevant to this count. Edwards intentionally placed Plaintiff in medical housing while other similarly situated prisoners taking the same medication were not placed there. Plaintiff alleges the different treatment lacked a rational medical or security basis.

92. The equal-protection claim survived screening against Edwards. Plaintiff proposes Miller only as to continuation: after receiving Plaintiff's direct comparator allegations, investigating, and consulting staff and medical services, Miller allegedly decided to keep Plaintiff in the different placement. Plaintiff alleges Edwards and, if leave is granted, Miller denied him equal protection under the Fourteenth Amendment.

COUNT VII - FIRST AMENDMENT RETALIATION

93. Plaintiff incorporates the protected-activity and retaliatory-course allegations in Sections IV.B, IV.C, and IV.E only to the extent relevant to this count. Requesting a civil-rights form, consulting counsel, filing grievances, reporting misconduct, writing to attorneys and government bodies, and pursuing this case were protected activities. The following adverse acts would chill a person of ordinary firmness, and Plaintiff alleges each occurred because of those activities.

94. Courthouse event: The surviving theory is that Edwards ordered or arranged the August 13 sequence to punish Plaintiff through the treatment of his wife and later bragged about it. Plaintiff proposes Martin based on his firsthand identification and statement that he was only doing what he was told and alleges on information and

belief that Martin understood the retaliatory purpose when he implemented the special instruction.

95. Mail course: The surviving theory is that Edwards, Ross, Siler, and Goodwin restricted Plaintiff's outgoing mail after and because he used it to report misconduct and pursue relief. Plaintiff proposes Matthew White and Wilborn based on the personally observed acts alleged above. The directive, statements, timing, and repeated enforcement support retaliatory causation.

96. Toilet paper: Wood expressly linked his August 14 refusal to Plaintiff's complaint and grievances.

97. Yard-call blame: Rodgers, Swindle, and Workman told other prisoners that the lost yard time was Plaintiff's fault because they were angry with him, exposing him to hostility to punish and chill his protected activity. This subpart does not allege that each made the scheduling decision.

98. Shakedowns and searches: The surviving theory is that Edwards directed repeated shakedowns after his closed-door retaliation instruction; Rodgers, Swindle, and Wood carried them out; Rodgers and Swindle blamed Plaintiff; and Plaintiff alone was subjected to repeated strip or visual-cavity searches. Plaintiff proposes Matthew White based on the multiple searches he alleges he personally observed White perform as part of that course.

99. Medical housing: The surviving theory is that Edwards ordered the adverse placement because of Plaintiff's medication complaints and protected reports. Plaintiff proposes CO Jones and Long based on the firsthand allegation that they earlier threatened medical or punitive housing to obtain the July 30 signature. Plaintiff proposes Miller based on the allegation that, after an appeal expressly identifying retaliation, Miller knowingly continued the placement because of Plaintiff's protected activity.

100. The conduct of the Defendants identified in each preceding subpart violated Plaintiff's First Amendment right to be free from retaliation.

COUNT VIII - CIVIL-RIGHTS CONSPIRACY

101. Plaintiff incorporates only the closed-door-meeting, mail, toilet-paper, shakedown, blame, yard-call, and medical-placement allegations in Sections IV.B, IV.C, and IV.E. After Plaintiff threatened suit, Edwards convened the meeting and communicated the retaliatory objective. Ross transmitted the mail directive; Siler and Goodwin enforced it; Rodgers and Swindle conducted shakedowns and blamed Plaintiff; Wood joined shakedowns and expressly linked the toilet-paper refusal to Plaintiff's complaints; and Workman joined the yard-blame statement and was present during the August 15 course.

102. The timing, Edwards's directive, repeated statements linking adverse acts to Plaintiff, and coordinated conduct support a mutual understanding to violate Plaintiff's First Amendment rights. This surviving Section 1983 conspiracy count is limited to Edwards, Rodgers, Ross, Siler, Goodwin, Wood, Swindle, and Workman in their individual capacities.

COUNT IX - CRUSHED-MEDICATION POLICY OR CUSTOM (EDWARDS IN HIS OFFICIAL CAPACITY AND TURN KEY)

103. Plaintiff incorporates only the medication-practice allegations in Sections IV.B and IV.D. Edwards adopted or enforced an official WCDC crush-or-float directive. Turn Key allegedly accepted and repeatedly implemented the same practice through its personnel, records, alerts, medication passes, and belated dissolve tasks despite documented symptoms and incomplete doses. This theory is based on policy or custom and decisionmaker acceptance, not respondeat superior.

104. The practice was widespread and repeated on numerous daily administrations, was known to command and medical decisionmakers, and was the moving force behind the alleged Eighth Amendment deprivation. White County, through the official-capacity claim against Edwards, and Turn Key are liable for the policy or custom. No other official-capacity claim is asserted.

VII. REQUEST FOR RELIEF

105. Plaintiff respectfully asks the Court to:

- enter judgment declaring that the conduct proved at trial violated Plaintiff's constitutional rights;

- award compensatory damages in an amount determined by the jury;
- award nominal damages for each constitutional violation where compensatory damages are not proved;
- award punitive damages against the individual Defendants whose conduct is shown to be malicious, reckless, or callously indifferent;
- award allowable costs and any other fees authorized by law;
- direct service, after leave and screening, on each Defendant the Court authorizes to be served; and
- grant any additional relief the Court deems just and proper.

VIII. JURY DEMAND

106. Plaintiff demands a trial by jury on all issues so triable under Federal Rule of Civil Procedure 38.

Respectfully submitted,

Jason Matthew Lynch, Plaintiff pro se
261 Wilson Loop
Ward, Arkansas 72176
Telephone: 812-405-5532

Date: _____

VERIFICATION UNDER 28 U.S.C. SECTION 1746

I, Jason Matthew Lynch, declare under penalty of perjury that I am the Plaintiff; that I have read this proposed Fourth Amended Complaint; and that its factual allegations are true and correct to the best of my personal knowledge. Where an allegation expressly relies on produced records or information and belief, I declare that it is true and correct to the best of my knowledge and belief. I further declare that this pleading includes every claim identified as surviving in Documents 71 and 80 and every material TAC fact supporting those claims, together with the later-discovered identities and details stated here.

Executed on: _____, 2026

Jason Matthew Lynch