

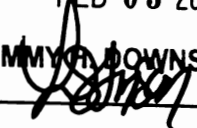
TRULINCS 07405510 - LYNCH, JASON M - Unit: ERE-D-A

SUBJECT: RE: 42 U.S.C 1983 Complaint Pt. 1 of 5
DATE: 01/18/2026

4:26-cv-118-JM-JJV

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

FEB 03 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS CENTRAL DIVISION

Jason Matthew Lynch, Reg. No. 07405-510
FCI El Reno
P.O. Box 1500
El Reno, Oklahoma 73036
Plaintiff, Pro Se

This case assigned to District Judge Moody
and to Magistrate Judge Volpe

v.

WHITE COUNTY JAIL / WHITE COUNTY DETENTION CENTER;
CAPTAIN EDWARDS;
JANE DOES 1 10;
JOHN DOES 1 10;
WHITE COUNTY, ARKANSAS,
in their individual and official capacities,
Defendants.

COMPLAINT FOR DAMAGES AND JURY DEMAND

(42 U.S.C. § 1983 CONDITIONS OF CONFINEMENT)
PART 1 OF 5

I. CASE DETAILS AND VENUE

1. This is a civil action for damages and equitable relief brought under 42 U.S.C. § 1983 to redress the deprivation of rights secured by the Constitution and laws of the United States.
2. Plaintiff Jason Matthew Lynch ("Lynch," "Plaintiff," or "Movant") is a federal prisoner currently confined at FCI El Reno, Oklahoma.
3. This action arises from Lynch's confinement at the White County Detention Center / White County Jail ("WCDC"), located at 1600 E. Booth Avenue, Searcy, Arkansas 72143, from June 9, 2024 through September 9, 2024.
4. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343.
5. Venue is proper in this Court under 28 U.S.C. § 1391(b) because all events giving rise to these claims occurred in White County, Arkansas, within the Eastern District of Arkansas, Central Division.

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6. This Complaint is filed in compliance with the severance order entered in Lynch v. Does, et al., No. 4:24-cv-00740-LPR-BBM (E.D. Ark.), which dismissed Plaintiff's conditions-of-confinement claims without prejudice and instructed that they be brought in a separate action.

II. JURY DEMAND

7. Plaintiff demands a trial by jury on all issues so triable under the Seventh Amendment to the United States Constitution.

III. NATURE OF THE ACTION / RELIEF SOUGHT

8. This action seeks compensatory, general, future, non-pecuniary, punitive, and treble damages for constitutional violations, medical harm, emotional distress, loss of dignity, and long-term injury caused by unlawful conditions of confinement.

9. Plaintiff also seeks costs, fees, and all relief the Court and jury deem just and proper.

10. Plaintiff will file a notarized Affidavit of Indigency and Motion to Proceed In Forma Pauperis ("IFP") and prays for leave to proceed without prepayment of fees.

IV. PARTIES

11. Plaintiff: Jason Matthew Lynch, Reg. No. 07405-510, is a federal prisoner presently housed at FCI El Reno.

12. Defendant White County Jail / White County Detention Center ("WCDC") is the facility where the constitutional violations occurred and is operated by White County, Arkansas.

13. Defendant White County, Arkansas is a local government entity responsible for the policies, customs, and practices governing WCDC.

14. Defendant Captain Edwards was, at all relevant times, the Captain and final decision-maker at WCDC. Edwards exercised supervisory authority over jail staff and grievance appeals.

15. Defendants Jane Does 1 10 and John Does 1 10 are correctional officers, supervisors, and administrative staff employed at WCDC whose identities are presently unknown to Plaintiff and will be substituted upon discovery.

16. At all relevant times, all Defendants acted under color of state law, within the scope of their employment, and with custody and control over Plaintiff.

17. Defendants acted individually and in concert, and at the direction of supervisory staff, with knowledge of the unconstitutional conditions and deliberate indifference to Plaintiff's health and safety.

18. Plaintiff will call at least 16 witnesses and identify five guard-staff witnesses at the appropriate stage, whose identities must be protected at this time due to safety concerns.

V. FACTUAL BACKGROUND CONDITIONS OF CONFINEMENT

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A. Preservation of Evidence and Notice

19. At all times, WCDC utilized body cameras, fixed video surveillance, and audio recording throughout the jail.

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20. On August 20, 2024, Plaintiff notified Defendants in writing via the Smart Communications kiosk that all video, audio, body-cam footage, grievances, and communications must be preserved for the Office of Inspector General and future litigation.

21. Defendants were thus placed on actual notice of a duty to preserve evidence and intentionally failed to comply.

22. All grievance records, inmate-to-staff communications, and staff-to-inmate communications are in Defendants' sole control.

23. Plaintiff was told that records supporting his claims would be destroyed.

24. Plaintiff has submitted PA requests and State and Federal FOIA requests via certified mail to WDCD and Smart Communications. As of this filing, no response has been provided.

25. Plaintiff believes Defendants prefer to face spoliation sanctions rather than allow the public or a jury to view the evidence.

B. Exhaustion of Administrative Remedies

26. Plaintiff exhausted all available remedies by filing grievances and appeals using the Smart Communications kiosk system.

27. All appeals were answered by the same individual (Captain Edwards), rendering the process meaningless and non-independent.

C. Overcrowding, Sleeping on the Floor, and Unsafe Housing

28. Plaintiff arrived at WDCD on June 9, 2024 and was moved to Pod F on the evening of June 11, 2024.

29. Plaintiff was never assigned a cell. He was issued only a thin mat and ordered to sleep on the floor.

30. No inmate in Pod F was assigned to an actual cell during Plaintiff's stay.

31. Pod F was designed to house 16 inmates but routinely housed 35 or more.

32. Defendants knew of this overcrowding through daily rounds and direct observation.

D. Sanitation, Sewage, and Exposure to Human Waste

33. Pod F contained only one shower, approximately 3x3 feet, for 35+ inmates.

34. Throughout Plaintiff's entire confinement, sewage and shower backups routinely flowed into the day area.

35. Plaintiff was forced to live and sleep in an area contaminated with human waste.

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36. Plaintiff was never given adequate cleaning supplies to sanitize contaminated living areas.

37. Only one diluted floor cleaner was issued for 35 inmates, with no toilet cleaner, no brushes, and no rags.

38. Defendants knowingly subjected Plaintiff to unsanitary, dangerous, and degrading conditions.

E. Lack of Basic Hygiene and Medical Safety

39. Plaintiff was never issued proper toenail clippers only small fingernail clippers creating risk of infection.

40. Plaintiff was denied adequate hygiene tools despite prolonged confinement.

41. Plaintiff was forced to remain in a cell area with a camera recording 24/7 while being exposed to sewage and filth.

42. Plaintiff was not given materials to clean his sleeping area even after exposure to waste.

F. Water, Utilities, and Living Conditions

43. During Plaintiff's entire stay, Cell F-4 was never locked, creating safety risks.

44. Plaintiff was not provided consistent access to cold, drinkable water.

G. Communication and Access Limitations

45. Pod F had:

Only one phone near the pod door,

Only one kiosk, located in open view of all inmates,

Only four tablets for 35+ inmates.

46. Smart Communications charged excessive fees to use tablets and kiosk services.

47. Plaintiff's communications were routinely delayed, obstructed, or ignored.

48. Despite Plaintiff's wife holding Power of Attorney, Defendants failed to respond to FOIA requests regarding Plaintiff's

H. Knowledge, Deliberate Indifference, and Supervisory Liability

49. Guards made rounds at least twice daily, giving them actual knowledge of all conditions.

50. Plaintiff repeatedly informed staff, administration, and Captain Edwards of these conditions through written communications.

51. Sheriff and administrative staff were aware of these conditions and did nothing.

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52. Defendants had no chronic care policy, or failed to follow it.

53. Edwards and the Sheriff were directly involved in directing staff and approving conditions.

54. There was no legitimate penological interest for maintaining these conditions.

55. Defendants knew the conditions were unconstitutional and disregarded that knowledge.

I. Plaintiff's Conduct and Retaliation Context

56. Plaintiff was a model inmate with no disciplinary infractions.

57. Plaintiff obeyed all orders and treated staff with respect.

58. Staff trusted Plaintiff enough to ask him to intervene in disputes and protect vulnerable inmates.

59. Plaintiff complied when asked.

60. Plaintiff's credibility and cooperation were exploited while he was subjected to unconstitutional conditions.

J. Harm and Injured

61. As a direct result of Defendants' actions and omissions, Plaintiff suffered:

Physical illness and risk of infection,

Emotional and psychological distress,

Loss of dignity,

Lasting harm from prolonged exposure to filth and deprivation.

62. These conditions violated Plaintiff's rights under the Eighth and Fourteenth Amendments and clearly established law.

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SUBJECT: RE: 42 USC 1983 Complaint Pt 2
DATE: 01/18/2026

PART 2 OF 5

CONSTITUTIONAL VIOLATIONS & CONDITIONS OF CONFINEMENT CLAIMS

(42 U.S.C. § 1983 Eighth & Fourteenth Amendments)

VI. LEGAL FRAMEWORK

63. At all times relevant, Plaintiff was a _____ /or prisoner entitled to protection under the Fourteenth Amendment's Due Process Clause and the Eighth Amendment's Cruel and Unusual Punishments Clause, as incorporated through the Fourteenth Amendment.

64. Jail officials violate the Constitution when they knowingly subject an inmate to conditions posing a substantial risk of serious harm and act with deliberate indifference to that risk.

65. Conditions of confinement need not be individually unconstitutional; the totality of conditions may violate the Constitution.

66. Defendants' conduct also violated clearly established law under Farmer v. Brennan, 511 U.S. 825 (1994); Helling v. McKinney, 509 U.S. 25 (1993); Bell v. Wolfish, 441 U.S. 520 (1979); and Eighth Circuit precedent governing jail sanitation, overcrowding, and safety.

VII. CONDITIONS OF CONFINEMENT CLAIMS

COUNT I EXTREME OVERCROWDING

67. Plaintiff was confined in Pod F, designed for 16 inmates, but routinely housed 35 or more.

68. Overcrowding resulted in:

Sleeping on floors,

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Lack of sanitation,

Increased disease risk,

Lack of access to showers, phones, and medical care.

69. Overcrowding that deprives inmates of basic human needs violates the Constitution.

70. Defendants knew of this overcrowding through daily rounds and grievances.

71. Plaintiff brings this claim because overcrowding directly caused unsafe, unsanitary, and degrading conditions.

COUNT II FORCED SLEEPING ON THE FLOOR WITHOUT A BED

72. Plaintiff was never assigned a cell or bunk and was forced to sleep on the floor on a thin mat

73. Sleeping on the floor in an overcrowded, unsanitary jail violates the Eighth Amendment.

74. Defendants knew Plaintiff was sleeping on the floor and did nothing.

75. Plaintiff brings this claim because he was denied a basic human need: a bed and safe sleeping area.

COUNT III EXPOSURE TO SEWAGE AND HUMAN WASTE

76. Sewage and shower water routinely backed up into the day area of Pod F.

77. Plaintiff was forced to live, eat, and sleep in areas contaminated with human waste.

78. Exposure to sewage constitutes a serious health risk and violates clearly established law.

79. Defendants knowingly subjected Plaintiff to these conditions.

80. Plaintiff brings this claim because deliberate exposure to human waste is cruel and unusual punishment.

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COUNT IV UNSANITARY LIVING CONDITIONS / LACK OF CLEANING SUPPLIES

- 81. Defendants provided only one diluted floor cleaner for 35+ inmates.**
- 82. No toilet brushes, disinfectants, rags, or sanitation tools were issued.**
- 83. Defendants forced inmates to clean sewage with bare hands or not at all.**
- 84. Unsanitary conditions and lack of hygiene supplies violate the Constitution.**
- 85. Plaintiff brings this claim because Defendants denied him basic sanitation.**

COUNT V DENIAL OF ADEQUATE SHOWERS & HYGIENE

- 86. Pod F had only one 3x3 shower for over 35 inmates.**
- 87. Access to showers was inadequate, unsanitary, and dangerous.**
- 88. Defendants knowingly restricted hygiene access.**
- 89. Plaintiff brings this claim because hygiene is a basic human necessity.**

COUNT VI DENIAL OF SAFE DRINKING WATER

- 90. Plaintiff lacked consistent access to cold, drinkable water.**
- 91. Safe water is a basic human need.**
- 92. Defendants knowingly failed to provide adequate water.**
- 93. Plaintiff brings this claim because deprivation of potable water violates the Eighth Amendment.**

COUNT VII UNSAFE AND UNLOCKED CELLS / FAILURE TO PROTECT

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94. Cell F-4 was never locked.

95. Defendants failed to protect Plaintiff from harm from other inmates.

96. Jail officials have a duty to protect inmates from violence.

97. Plaintiff brings this claim because Defendants exposed him to unreasonable risk.

COUNT VIII LACK OF PRIVACY / 24-HOUR CAMERA SURVEILLANCE IN FILTH

98. Plaintiff was forced to live under constant camera surveillance while exposed to sewage.

99. Constant surveillance combined with degrading conditions violates human dignity.

100. Plaintiff brings this claim because Defendants subjected him to humiliation and degradation.

COUNT IX DENIAL OF ADEQUATE MEDICAL & CHRONIC CARE POLICIES

101. WCDC had no chronic care policy or failed to follow one.

102. Defendants were deliberately indifferent to Plaintiff's health risks from unsanitary conditions.

103. Plaintiff brings this claim because Defendants knowingly ignored medical dangers.

COUNT X DENIAL OF ACCESS TO COMMUNICATION & GRIEVANCE SYSTEM

104. Only one kiosk, one phone, and four tablets served 35+ inmates.

105. Communication was obstructed and delayed.

106. Defendants controlled the grievance process and appeals were meaningless.

107. Plaintiff brings this claim because interference with grievances violates due process.

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COUNT XI SPOILIATION OF EVIDENCE / DENIAL OF ACCESS TO COURTS

108. Defendants destroyed or threatened to destroy grievances, video, and communications.

109. Plaintiff notified Defendants to preserve evidence on August 20, 2024.

110. Spoliation violated Plaintiff's right of access to courts.

111. Plaintiff brings this claim because Defendants obstructed his ability to litigate.

COUNT XII RETALIATION THROUGH CONDITIONS

112. Plaintiff was a model inmate.

113. Defendants maintained punitive conditions without penological purpose.

114. Plaintiff brings this claim because punishment without adjudication violates due process.

COUNT XIII TOTALITY OF CONDITIONS

115. The combined conditions overcrowding, sewage, filth, denial of beds, water, hygiene, and safety violated the Constitution under the totality of circumstances.

116. Plaintiff brings this claim because no legitimate governmental interest justified these conditions.

COUNT XIV MONELL LIABILITY (POLICY, CUSTOM, FAILURE TO TRAIN)

117. White County maintained customs of overcrowding, underfunding sanitation, and ignoring grievances.

118. Edwards and the Sheriff failed to train and supervise staff.

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119. Plaintiff brings this claim because municipal liability attaches under Monell v. Dep't of Soc. Servs., 436 U.S. 658 (1978).

COUNT XV SUPERVISORY LIABILITY

120. Edwards and Sheriff knew of the conditions and approved them.

121. Plaintiff brings this claim because supervisors caused or acquiesced in the violations.

COUNT XVI DELIBERATE INDIFFERENCE

122. Defendants knew of and disregarded a substantial risk of serious harm.

123. Plaintiff brings this claim because deliberate indifference is actionable under §1983.

COUNT XVII VIOLATION OF CLEARLY ESTABLISHED LAW

124. Defendants violated law clearly established in the Eighth Circuit and Supreme Court.

125. Qualified immunity does not apply.

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SUBJECT: RE: 42 USC 1983 Complaint Pt 2(b)
DATE: 01/18/2026 06:36:03 PM

[Part 2(b)] Additional Conditions of Confinement Claims (Supplement to Part 2)

(Claims XVII and continuing, using lettered subparts a, b, c, etc.)

Claim (XVII) Deliberate Indifference to Basic Human Needs, Health, and Safety

a. Rotten and Contaminated Food.

Defendants routinely served Plaintiff and other inmates food trays containing spoiled, rotten, and contaminated food. When Plaintiff complained and requested replacement trays, staff refused to swap or replace them, forcing him to either go hungry or consume unsafe food. This violated the Eighth and Fourteenth Amendments' prohibition on cruel and unusual punishment and denial of due process.

b. Black Mold in Showers Failure to Sanitize.

Showers in Pod F and Medical Lockdown were visibly contaminated with black mold. Defendants only sprayed bleach monthly or every other week, despite knowing black mold can regrow within 24 hours. This created a persistent, known health hazard and shows deliberate indifference.

c. Black Mold in Pipe Chases and Walls.

Trustees ("309s") were instructed to stuff leaks with blankets, which were left in pipe chases and never removed. These damp materials fostered black mold growth inside the walls and chases, exposing Plaintiff to toxic conditions without remediation.

d. Inadequate and Dangerous Kiosk Access.

Only one kiosk was provided in the day area for the entire pod. Staff knew this caused constant conflict, threats, and physical fights between inmates, yet refused to fix the problem. Defendants failed to protect Plaintiff from known risks of harm.

e. Exposure of Personal Information via Kiosk Placement.

The single kiosk was placed in a way that allowed other inmates to view Plaintiff's personal information, legal communications, and account data, violating privacy and creating risk of retaliation, extortion, and assault.

f. Extended Deprivation of Yard/Exercise.

Plaintiff was subjected to extended periods with no yard call or outdoor recreation. This caused physical and mental deterioration and violates clearly established law requiring reasonable opportunities for exercise.

g. No Safe Drinking Water.

The only available drinking water came from a filthy sink and toilet fixture in the day area that was never cleaned. No cleaning supplies were provided to inmates to sanitize it. Defendants knowingly forced Plaintiff to drink contaminated water or go without.

h. Sewage Flooding and Inhumane Cleanup Practices.

When sewage backed up into cells and common areas, staff forced inmates to use jail-issued jumpsuits as barriers to stop sewage flow. Only one mop, one bucket, and one non-chemical floor cleaner were provided to clean cells, showers, tables, and sewage spills, showing reckless disregard for health and safety.

i. Denial of Hygiene Shaving and Haircuts for Pay Only.

Plaintiff was not allowed to shave his face or cut his hair unless he paid the jail. There were no emergency grievance systems

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and no way to file grievances after 10:00 p.m., effectively denying redress for urgent conditions.

j. Infectious Disease Outbreaks with No Proper Disinfectants.

Despite staff being aware of infections spreading due to sewage and unsanitary conditions, no bleach or proper disinfectants were issued to inmates. This facilitated disease transmission and shows deliberate indifference.

k. Failure to Treat Scabies and Skin Infections.

Plaintiff and others developed scabies and infections from sleeping on filthy floors and contaminated mats. Staff refused treatment, forcing Plaintiff to suffer untreated medical conditions.

l. Forced Self-Treatment with Non-Medical Cleaners.

Plaintiff had to self-treat infections and an ingrown toenail using non-chemical floor cleaner because medical staff refused care. This is a denial of necessary medical treatment under the Eighth Amendment.

m. Charging Fees for Medical Care Despite Chronic Care Status.

Plaintiff was required to pay fees to see medical staff even though he was designated as chronic care. This unlawfully burdened access to necessary medical treatment.

n. Extreme Heat and No Air Flow.

In mid-July 2024, Pod F and Medical Lockdown had no air conditioning or ventilation. Temperatures exceeded 82°F and approached or exceeded 90°F for days. Defendants knew of the risk of heat illness and did nothing.

o. Psychological Torture via Housing Near Mentally Ill Detainee.

While in Medical Lockdown, Plaintiff was housed next to a mentally ill woman who screamed continuously day and night and engaged in self-harm. Plaintiff was deprived of sleep for extended periods, causing mental and physical harm.

p. Prolonged Restraint in Medical Lockdown.

Plaintiff was handcuffed to a metal bench during his time out of the cell in Medical Lockdown, with less than one foot of movement in any direction. This constituted excessive and punitive restraint.

q. Forced Exposure to Human Waste and Blood.

In Medical Lockdown, Plaintiff was exposed to blood, human waste on cell walls, and used adult diapers full of feces left on shower floors. Staff failed to clean or remove these hazards.

r. Contaminated Sleeping Mats.

Sleeping mats issued to Plaintiff had visible human waste on them and were never cleaned. Plaintiff was forced to sleep on contaminated surfaces, risking infection and disease.

s. Failure to Provide Adequate Grievance Access.

There was no emergency grievance system and no way to submit grievances after 10:00 p.m., denying Plaintiff access to administrative remedies and redress for urgent health and safety violations.

t. Cumulative Conditions Amounting to Cruel and Unusual Punishment.

Taken together, these conditions constituted a systemic pattern of abuse, neglect, and punishment without penological justification, violating the Eighth and Fourteenth Amendments and 42 U.S.C. § 1983.

Additional Legal Theories Supported by These Facts

Based on the above, Defendants are liable under §1983 for:

Deliberate indifference to serious medical needs (*Estelle v. Gamble*)
Unconstitutional conditions of confinement (*Farmer v. Brennan*)
Failure to protect from known risks of harm
Denial of sanitation, hygiene, and potable water
Excessive restraint and punishment of a pretrial detainee
Denial of access to grievance procedures and redress

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Supervisory and municipal liability (policy, custom, and practice)

A handwritten signature in black ink, reading "Jason M. Lynch". The signature is written in a cursive style, with the first name "Jason" being the most prominent, followed by a small "M" and a stylized "Lynch" that ends in a long horizontal flourish.

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SUBJECT: RE: 42 USC 1983 Complaint Pt 3 of 5
DATE: 01/18/2026

PART 3 OF 5

SUPPORTING LEGAL BRIEF & AUTHORITIES

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

VIII. GOVERNING CONSTITUTIONAL STANDARDS

1. 42 U.S.C. § 1983 provides a federal cause of action against any person who, under color of state law, deprives another of rights secured by the Constitution.

2. Jail officials violate the Constitution when they subject prisoners or pretrial detainees to conditions posing a substantial risk of serious harm and act with deliberate indifference to that risk.
Farmer v. Brennan, 511 U.S. 825, 834 37 (1994).

3. For pretrial detainees, unconstitutional conditions arise when the conditions amount to punishment without a legitimate governmental objective.
Bell v. Wolfish, 441 U.S. 520, 535 39 (1979).

4. The Constitution requires that inmates be provided with basic human needs: shelter, sanitation, safety, hygiene, water, and medical care.
Helling v. McKinney, 509 U.S. 25, 31 33 (1993).
Rhodes v. Chapman, 452 U.S. 337, 347 (1981).

5. The Eighth Circuit holds that the totality of conditions may establish a constitutional violation.
Williams v. Delo, 49 F.3d 442, 444 (8th Cir. 1995).
Owens v. Scott County Jail, 328 F.3d 1026, 1027 (8th Cir. 2003).

IX. CLAIMS AND SUPPORTING AUTHORITY

CLAIM 1 EXTREME OVERCROWDING

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Legal Standard:

Overcrowding that deprives inmates of basic needs or increases the risk of disease and violence violates the Constitution.

Rhodes v. Chapman, 452 U.S. 337, 347 50 (1981).

Hutto v. Finney, 437 U.S. 678, 685 87 (1978).

Owens v. Scott County Jail, 328 F.3d 1026 (8th Cir. 2003).

Application to Lynch:

Lynch was confined in a pod built for 16 but housing 35+ inmates, forcing floor-sleeping, sewage exposure, and denial of sanitation and hygiene. This deprived Lynch of basic human needs.

Why §1983 Applies:

Defendants, acting under color of law, knowingly maintained overcrowding without penological justification, violating clearly established law.

CLAIM 2 FORCED FLOOR SLEEPING WITHOUT A BED

Legal Standard:

Forcing inmates to sleep on the floor without proper bedding for extended periods violates the Eighth Amendment.

Hutto v. Finney, 437 U.S. at 685 87.

Williams v. Delo, 49 F.3d 442, 445 46 (8th Cir. 1995).

Application to Lynch:

Lynch slept on a thin mat on the floor in unsanitary conditions.

Why §1983 Applies:

This denial of shelter and sleep safety is an objective deprivation and was known to Defendants.

CLAIM 3 EXPOSURE TO SEWAGE & HUMAN WASTE

Legal Standard:

Exposure to human waste violates the Eighth Amendment.

DeSpain v. Uphoff, 264 F.3d 965, 974 76 (10th Cir. 2001).

Fruit v. Norris, 905 F.2d 1147, 1151 (8th Cir. 1990).

Helling v. McKinney, 509 U.S. at 33.

Application to Lynch:

Sewage and shower backups flowed into Pod F's living area. Lynch was forced to live, eat, and sleep in contaminated areas.

Why §1983 Applies:

Defendants knowingly subjected Lynch to a serious health risk with deliberate indifference.

CLAIM 4 UNSANITARY CONDITIONS / DENIAL OF CLEANING SUPPLIES

Legal Standard:

Denial of basic sanitation violates the Constitution.

Howard v. Adkison, 887 F.2d 134, 137 (8th Cir. 1989).

Smith v. Copeland, 87 F.3d 265, 269 (8th Cir. 1996).

Application to Lynch:

Only diluted cleaner was provided. No brushes, disinfectants, or rags were issued to clean sewage contamination.

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Why §1983 Applies:

Defendants denied Lynch the ability to maintain minimal sanitation.

CLAIM 5 DENIAL OF ADEQUATE SHOWERS & HYGIENE

Legal Standard:

Hygiene is a basic human need protected by the Eighth Amendment.

Wishon v. Gammon, 978 F.2d 446, 449 (8th Cir. 1992).

Howard v. Adkison, 887 F.2d at 137.

Application to Lynch:

One small shower for 35+ inmates deprived Lynch of meaningful hygiene access.

CLAIM 6 DENIAL OF SAFE DRINKING WATER

Legal Standard:

Access to potable water is a basic human necessity.

Helling v. McKinney, 509 U.S. at 33.

Johnson v. Lewis, 217 F.3d 726, 731 (9th Cir. 2000).

Application to Lynch:

Lynch lacked consistent access to cold, drinkable water.

CLAIM 7 FAILURE TO PROTECT / UNSAFE HOUSING

Legal Standard:

Officials must protect inmates from unreasonable risk of harm.

Farmer v. Brennan, 511 U.S. at 833.

Young v. Selk, 508 F.3d 868, 872 (8th Cir. 2007).

Application to Lynch:

Unlocked cells and overcrowding exposed Lynch to violence and danger.

CLAIM 8 24-HOUR SURVEILLANCE + DEGRADING CONDITIONS

Legal Standard:

Conditions that humiliate and degrade inmates violate the Constitution.

Hope v. Pelzer, 536 U.S. 730, 738 (2002).

Williams v. Delo, 49 F.3d at 445.

Application to Lynch:

Constant camera surveillance while exposed to sewage and filth violated human dignity.

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CLAIM 9 DENIAL OF MEDICAL SAFETY / CHRONIC CARE POLICY

Legal Standard:

Deliberate indifference to serious medical needs violates the Eighth Amendment.

Estelle v. Gamble, 429 U.S. 97, 104 05 (1976).

Langford v. Norris, 614 F.3d 445, 460 (8th Cir. 2010).

Application to Lynch:

No chronic care policy existed or was followed; Defendants ignored health risks from filth and sewage.

CLAIM 10 INTERFERENCE WITH GRIEVANCES & COMMUNICATION

Legal Standard:

Prisoners have a right of access to courts and meaningful grievance procedures.

Bounds v. Smith, 430 U.S. 817, 828 (1977).

Lewis v. Casey, 518 U.S. 343, 350 53 (1996).

Application to Lynch:

One kiosk, one phone, and four tablets for 35+ inmates obstructed Lynch's ability to file grievances and communicate.

CLAIM 11 SPOILIATION & DENIAL OF ACCESS TO COURTS

Legal Standard:

Destruction of evidence supporting inmate claims violates access to courts.

Christopher v. Harbury, 536 U.S. 403, 413 15 (2002).

Bounds v. Smith, 430 U.S. at 828.

Application to Lynch:

Defendants were on notice (8/20/24) to preserve evidence and failed.

CLAIM 12 PUNISHMENT WITHOUT PENLOGICAL JUSTIFICATION

Legal Standard:

Pretrial detainees cannot be punished without due process.

Bell v. Wolfish, 441 U.S. at 535 39.

Kingsley v. Hendrickson, 576 U.S. 389 (2015).

Application to Lynch:

These conditions served no legitimate governmental objective.

CLAIM 13 TOTALITY OF CONDITIONS

Legal Standard:

Multiple conditions may combine to violate the Constitution.

Hutto v. Finney, 437 U.S. at 687.

Williams v. Delo, 49 F.3d at 444.

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Application to Lynch:

Overcrowding + sewage + floor sleeping + hygiene denial + water denial = unconstitutional.

CLAIM 14 MONELL LIABILITY (WHITE COUNTY)

Legal Standard:

Municipal liability exists for unconstitutional policies/customs.

Monell v. Dep't of Soc. Servs., 436 U.S. 658, 694 (1978).

City of Canton v. Harris, 489 U.S. 378, 388 (1989).

Application to Lynch:

White County maintained customs of overcrowding, underfunding, and ignoring grievances.

CLAIM 15 SUPERVISORY LIABILITY (EDWARDS & SHERIFF)

Legal Standard:

Supervisors are liable when they know of and fail to correct unconstitutional conduct.

Lenz v. Wade, 490 F.3d 991, 995 (8th Cir. 2007).

Jackson v. Nixon, 747 F.3d 537, 543 (8th Cir. 2014).

Application to Lynch:

Edwards and Sheriff knew of the conditions and approved them.

CLAIM 16 DELIBERATE INDIFFERENCE

Legal Standard:

Knowledge + disregard = deliberate indifference.

Farmer v. Brennan, 511 U.S. at 837.

Application to Lynch:

Defendants were repeatedly notified and did nothing.

CLAIM 17 QUALIFIED IMMUNITY DOES NOT APPLY

Legal Standard:

Officials are not immune when law is clearly established.

Hope v. Pelzer, 536 U.S. at 739.

Anderson v. Creighton, 483 U.S. 635, 640 (1987).

Application to Lynch:

Every condition violated long-settled law.

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SUBJECT: RE: 42 USC 1983 Complaint Pt 4 of 5
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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.

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.

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.

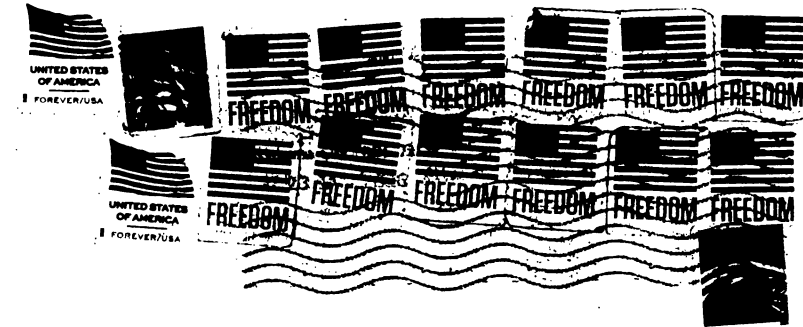
The Constitution does not permit government officials to warehouse people in filth, fear, and neglect. It does not allow jailers to ignore suffering. And it does not excuse systemic cruelty behind locked doors.

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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