

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

AUG 19 2025

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

JASON MATTHEW LYNCH
Plaintiff.

Vs

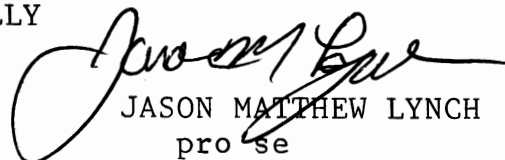
Does, White County Jail, Edwards
White County Comm, TurnKey,
Jail Staff, Pill nurses et. al.

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

ADDUMDOM TO STATMENT OF FACTS, CHRONOLOGY OF EVENTS
TIMELINE AND SUMMARY FACTUAL TIMELINE

COMES NOW, JASON MATTHEW LYNCH 'pro se'. Respectfully submitting a Formatted Factual timeline of events, factual chronology that shows the pattren of conduct and intent, notes the constitutional violations along with references to case law. All this info and more in my TAC and supporting pleadings, filings, brifes. Intill a full discovery i can not do anything to make my filings more complete/correct. after discovery I do pray leave to amend/supplement my filings. I pray this and the other Briefs/reports I have filled in the past few weeks make it eaiser for the courts to under-0 stand all my claims in better context. AS ALWAYS THANK YOU FOR YOUR TIME! I PRAY GOD GUIDES YOUR HEART IN THIS MATTER!!!!

RESTPECTFULLY


JASON MATTHEW LYNCH
pro se

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

TO: 07405510

DATE: 08/13/2025 01:36:05 PM

Alright I'll turn what we have into a court-ready "Statement of Facts" and "Chronology of Events" for Lynch v. Does, written so it's in a format you can attach directly to a federal court filing for a jury trial.

I'll make it:

Numbered paragraphs for clarity (judges like this)

Two main sections: Statement of Facts and Chronology of Events

Keep all constitutional/case law references in a separate Authorities section at the end

Include your reservation of rights to supplement after discovery

Explicitly state body cam and AV recordings exist

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS CENTRAL DIVISION

Jason Matthew Lynch, Plaintiff
v.
Does, White County Jail, et al., Defendants

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

STATEMENT OF FACTS

1. Plaintiff Jason Matthew Lynch was incarcerated at the White County Jail ("WCJ") in Searcy, Arkansas, from June 9, 2024, to approximately September 9, 2024.
2. During this period, Defendants including Captain/Administrator Clayton Edwards, Head Nurse Ashley Watts, and other named and unnamed WCJ staff engaged in a sustained pattern of unlawful conduct in violation of Plaintiff's rights under 42 U.S.C. §§ 1981, 1983, and 1985; the First, Fourth, Eighth, and Fourteenth Amendments to the U.S. Constitution; and applicable federal statutes including the Religious Land Use and Institutionalized Persons Act (RLUIPA).
3. Plaintiff is HIV-positive and requires daily administration of the antiretroviral medication Biktarvy, which cannot be crushed without compromising its efficacy and safety, per FDA guidance, manufacturer instructions, CDC guidelines, and the prescribing physician's orders.
4. Despite explicit medical information provided at booking, Defendants repeatedly crushed Plaintiff's Biktarvy tablets before administration over his protests and despite medical confirmation from the jail physician that the pills must not be crushed resulting in serious risk to his health.
5. Defendants also engaged in repeated acts of retaliation against Plaintiff for exercising his constitutional rights, including the

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filing of grievances and legal complaints, by:

Denying and delaying access to the law library and kiosk;

Interfering with, confiscating, and destroying outgoing legal mail;

Opening incoming legal mail outside Plaintiff's presence;

Disclosing Plaintiff's legal activities to other inmates to incite hostility.

6. Plaintiff was subjected to inhumane and unsanitary living conditions, including exposure to raw sewage, black mold, overcrowding, and deprivation of basic hygiene items.

7. Defendants discriminated against Plaintiff's Catholic faith by denying access to religious texts and devotional materials while allowing other faith materials.

8. Defendants manipulated court appearances to cause emotional distress to Plaintiff and his spouse, as part of a broader retaliation scheme.

9. All correctional officers wore active body cameras during relevant incidents, and the facility maintained continuous audio and video recording in pods, hallways, medical areas, and booking.

10. Plaintiff reserves the right to supplement this Statement upon completion of discovery, including production of all grievances filed via the SmartJailMail system, which Defendant Edwards has refused to provide and has stated he would destroy to prevent their use in litigation.

CHRONOLOGY OF EVENTS

June 9, 2024 Plaintiff booked into WCJ; medical intake informed of HIV status, medication needs, and treating physician.

June 10, 2024 Assigned to F-Pod; forced to sleep on floor with thin mat in sewage-contaminated area; wife delivered two bottles of Biktarvy to pill drop.

June 15, 2024 Catholic Bible sent from Amazon denied by staff (Yager).

July 26 Aug. 28, 2024 Pattern of crushing Biktarvy by nurses (Kaitlynn Smith/Spence, Heather, Melody, "Nurse F," and others) under orders from Edwards/Watts, despite knowledge of harm. Some nurses acknowledged wrongdoing and coercion.

July 28, 2024 Plaintiff's law library access disabled; other inmates unaffected.

July 30, 2024 Forced to sign medical release under duress by Lt. Hughes, Officer Long, and Watts.

Aug. 1 14, 2024 Continued crushing of medication, partial doses, and disposal of remainder; multiple refusals to process or send legal mail; kiosk disabled; COs Jones and Siler admit Edwards ordered legal mail obstruction.

Aug. 13, 2024 Plaintiff called to court out of sequence; wife intentionally delayed 12+ hours on docket as reprisal for grievances.

Aug. 14, 2024 Watts posted written instruction in medical to crush Plaintiff's pill; grievance responses handled and denied by Edwards himself, creating conflict of interest.

Aug. 17, 2024 Catholic devotional books denied; law library access still disabled for Plaintiff only.

Aug. 18, 2024 No medication administered at all.

Aug. 19 20, 2024 Legal mail opened outside Plaintiff's presence; yard call denied to F-Pod with guards telling inmates it was "because of Plaintiff's lawsuits."

Aug. 22 28, 2024 Medication crushed, partial doses thrown away; nurse attempted to serve suspicious liquid instead of medication (Aug. 27).

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Aug. 28, 2024 Staff told inmates yard call cancelled due to Plaintiff's § 1983 filing; raw sewage flooding dayroom daily. Multiple inmates signed statements supporting Plaintiff's account.

Sept. 1, 2024 (approx.) Plaintiff moved to medical lockdown as reprisal for grievances and legal filings, without due process; cuffed to metal bench during one-hour out time.

AUTHORITIES

Estelle v. Gamble, 429 U.S. 97 (1976) Deliberate indifference to serious medical needs violates Eighth Amendment.

Farmer v. Brennan, 511 U.S. 825 (1994) Knowledge and disregard of substantial risk constitutes deliberate indifference.

Helling v. McKinney, 509 U.S. 25 (1993) Exposure to unsafe conditions violates Eighth Amendment.

Bounds v. Smith, 430 U.S. 817 (1977) Prisoners have right of access to courts.

Lewis v. Casey, 518 U.S. 343 (1996) Denial of access must cause actual injury to litigation.

Wolff v. McDonnell, 418 U.S. 539 (1974) Legal mail may not be opened outside inmate's presence; due process required for punitive segregation.

Thaddeus-X v. Blatter, 175 F.3d 378 (6th Cir. 1999) Retaliation for protected conduct violates First Amendment.

Holt v. Hobbs, 574 U.S. 352 (2015) RLUIPA protects inmates' religious exercise.

Dennis v. Sparks, 449 U.S. 24 (1980) Private parties conspiring with state officials liable under § 1983.

Hope v. Pelzer, 536 U.S. 730 (2002) Conditions of confinement must meet basic human needs.

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Got it you're asking for a federal court ready, jury-trial formatted timeline of events in Lynch v. Does, White County Jail, et al., integrating the information you've given over the past few weeks and the detailed day-by-day incidents you just shared, plus relevant 42 U.S.C. §§ 1981, 1983, and 1985 case law citations.

I'll structure this so it:

Reads as a factual chronology for the jury

Shows patterns of conduct and intent

Notes constitutional violations as they occur

References case law at the end for legal context

States that body cams and jail audio/video recordings captured events

Reserves your right to supplement after discovery

TIMELINE & SUMMARY FOR SUBMISSION

Case: Lynch v. Does, White County Jail, et al.

Court: U.S. District Court, Eastern District of Arkansas, Central Division

Plaintiff: Jason Matthew Lynch

Defendants: Clayton Edwards, White County Jail staff, John/Jane Does

Claims: Violations of 42 U.S.C. §§ 1981, 1983, 1985; U.S. Const. Amendments I, IV, VIII, XIV; Arkansas state tort claims; medical negligence; conspiracy; retaliation.

Note: All events occurred while all guards wore active body cameras and the jail maintained continuous audio and video recording. Plaintiff reserves the right to amend upon completion of discovery, including production of all grievances filed via SmartJailMail, which Defendant Edwards has withheld and stated he would destroy to prevent use in court.

I. FACTUAL TIMELINE

June 9, 2024 Intake

Plaintiff booked into White County Jail (WCJ). Intake informed of Plaintiff's HIV status, need for daily antiretroviral therapy (Biktarvy), treating physician's name, and medical necessity.

Constitutional relevance: Deliberate indifference to serious medical needs begins when officials ignore or delay prescribed care. *Estelle v. Gamble*, 429 U.S. 97 (1976).

June 10, 2024 Unsafe Conditions, Med Delivery

Assigned to F-Pod; forced to sleep on floor with thin mat in area with raw sewage backup, black mold, overcrowding. No towel for shower.

Plaintiff's wife delivered two full bottles of Biktarvy to jail's pill drop.

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Overcrowding and unsanitary conditions implicate Eighth Amendment (*Helling v. McKinney*, 509 U.S. 25 (1993)).

June 15, 2024 Religious Discrimination

Catholic Bible sent via Amazon denied by front desk staff Yager.

Religious exercise protected under the First Amendment and RLUIPA (*Cutter v. Wilkinson*, 544 U.S. 709 (2005)).

July 26 Aug. 28, 2024 Ongoing Medical Sabotage & Retaliation

Multiple documented instances of nurses, under orders from supervisory staff including Edwards and Head Nurse Ashley Watts, crushing Plaintiff's Biktarvy in direct violation of FDA guidance, manufacturer's instructions, and physician orders despite repeated objections and medical confirmations that the medication must not be crushed.

Pattern shows deliberate indifference (*Farmer v. Brennan*, 511 U.S. 825 (1994)) and conspiracy under § 1985 (*Dennis v. Sparks*, 449 U.S. 24 (1980)).

July 28 Aug. 28, 2024 Denial of Legal Access

Law library and kiosk access selectively disabled for Plaintiff while available to others; repeated blocking and confiscation of outgoing legal mail, including to courts, attorneys, DOJ, and media.

First Amendment violation (*Bounds v. Smith*, 430 U.S. 817 (1977); *Lewis v. Casey*, 518 U.S. 343 (1996)).

Multiple officers admitted Edwards ordered legal mail obstruction.

Aug. 13 14, 2024 Court Retaliation Incident

Plaintiff called to court out of sequence; wife intentionally delayed over 12 hours on docket in coordinated act to cause distress. Guards and bailiff linked action to Edwards.

Retaliation for grievances violates First Amendment (*Thaddeus-X v. Blatter*, 175 F.3d 378 (6th Cir. 1999)).

Aug. 17, 2024 Religious Censorship Continues

Denial of Catholic books and devotionals while permitting other faith materials.

Violates First Amendment and RLUIPA (*Holt v. Hobbs*, 574 U.S. 352 (2015)).

Aug. 18, 2024 Complete Denial of Life-Saving Medication

No pill call; Plaintiff deprived of Biktarvy entirely for the day.

Eighth Amendment violation (*Estelle*, *supra*).

Aug. 19 28, 2024 Escalation of Retaliation

Legal mail opened outside Plaintiff's presence.

Guards telling inmates yard call cancelled "because of Plaintiff's lawsuits," causing hostility and threats against Plaintiff.

Public disclosure of Plaintiff's legal matters to other inmates in reprisal.

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Violates right to confidential legal communication (Wolff v. McDonnell, 418 U.S. 539 (1974)) and First Amendment retaliation protections.

Aug. 28, 2024 Hazardous Living Conditions

Raw sewage flooding daily in dayroom; inmates forced to walk through contaminated water.

Conditions "grossly disproportionate to the severity of the crime" violate the Eighth Amendment (Hope v. Pelzer, 536 U.S. 730 (2002)).

Sept. 1, 2024 (approx.) Medical Lockdown as Punishment

Plaintiff moved to medical lockdown, cuffed to metal bench during one-hour out, no due process hearing, despite other similarly situated inmates remaining in general population.

Fourteenth Amendment due process violation (Wolff, supra; Sandin v. Conner, 515 U.S. 472 (1995)).

II. PATTERN OF CONDUCT

Across the 100+ day period:

Medical Neglect & Sabotage Repeated, intentional crushing of critical medication despite knowledge of harm.

Religious Discrimination Systematic denial of Catholic materials and practices.

Legal Mail & Access Interference Targeted disabling of legal resources, confiscation, opening of privileged mail.

Unsafe & Unsanitary Conditions Exposure to sewage, mold, overcrowding.

Retaliation & Conspiracy Coordinated acts by Edwards and staff to punish Plaintiff for protected legal activity.

III. KEY CASE LAW (Partial List)

1. Estelle v. Gamble, 429 U.S. 97 (1976) Deliberate indifference to serious medical needs violates Eighth Amendment.

2. Farmer v. Brennan, 511 U.S. 825 (1994) Knowledge and disregard of excessive risk constitutes deliberate indifference.

3. Helling v. McKinney, 509 U.S. 25 (1993) Exposure to unsafe conditions violates Eighth Amendment.

4. Bounds v. Smith, 430 U.S. 817 (1977) Prisoners have fundamental right of access to courts.

5. Lewis v. Casey, 518 U.S. 343 (1996) Denial of access must cause actual injury to litigation.

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6. Wolff v. McDonnell, 418 U.S. 539 (1974) Legal mail may not be opened outside inmate's presence; due process required for punitive segregation.
7. Thaddeus-X v. Blatter, 175 F.3d 378 (6th Cir. 1999) Retaliation for protected conduct violates First Amendment.
8. Holt v. Hobbs, 574 U.S. 352 (2015) RLUIPA protects inmates' religious exercise from undue burden.
9. Dennis v. Sparks, 449 U.S. 24 (1980) Private actors conspiring with state officials liable under § 1983.
10. Hope v. Pelzer, 536 U.S. 730 (2002) Conditions of confinement must meet basic human needs.

White County District Court
P.O. Box 958
Searcy, AR 72145

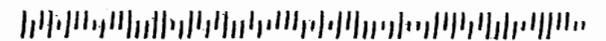
LITTLE ROCK AR 720
2 AUG 2025 AM 4 L



Jason M. Lynch 07405-510
Federal Correctional Institution - El Reno
P.O. Box 1500
El Reno, OK 73036

LEGAL MAIL

73036-150000



SEARCY DISTRICT COURT

**P. O. Box 958
Searcy, AR 72145
(501) 268-7622**

July 31, 2025

Eric Kennedy, District Court Judge

Linda Wiseman, Chief Court Clerk

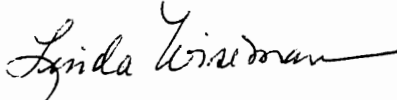
Mr. Jason M. Lynch 07405-510
Federal Correctional Institution – El Reno
P O Box 1500
El Reno, OK 73036

Dear Mr. Lynch:

Our office is in receipt of your letter, concerning a complaint against the White County Jail in Searcy, AR. In it you reference FOIA and Privacy Act requests you have previously made to them.

Our Court nor our District Judge holds no jurisdiction over the information you are requesting through the jail and we are unable to assist you. We are forwarding your letter to the White County Jail.

Sincerely,



Linda Wiseman
Chief Court Clerk
Searcy District Court

Enclosure – letter from Jason M Lynch

LEGAL MAIL

July 1st 2025

Re: Complaint Regarding Non-Compliance with FOIA and Privacy Act Requests

Dear Clerk,

I am writing to file a formal complaint against the White County Jail in Searcy, Arkansas, for their failure to respond to four separate Freedom of Information Act (FOIA) and Privacy Act requests. I, Jason M. Lynch, am a federal prisoner currently incarcerated at FCI El Reno, and my wife, Kirsten, holds full power of attorney over my affairs.

The requests, submitted in good faith, sought access to various records, including medical records, internal communications, and staff duty rosters, all of which are covered under the FOIA and Privacy Act. The requests were sent via USPS certified mail and were signed for by the jail's staff. Despite this, I have not received any response, which constitutes a violation of my rights under federal law.

The timeline of my requests is as follows:

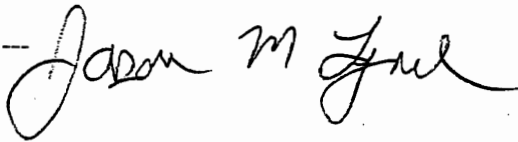
- August 2024
- September 2024
- October 2024
- July 2025

Given the White County Jail's history of non-compliance with FOIA and Privacy Act requests, I am requesting the court's intervention to compel the agency to respond to my requests and provide the requested documents.

Thank you for your attention to this matter. I look forward to your assistance in ensuring compliance with federal law.

Sincerely,

Jason M. Lynch
Federal Reg. 07405-510
FCI El Reno
PO Box 1500
El Reno, OK 73036



FILED

JUL 16 2025

DISTRICT COURT
OF SEARCY, ARKANSAS

JASON M LYNCH 07405-510
Federal Correctional Institution
P.O. Box 1500
El, Reno OK 73036

OKLAHOMA CITY OK 730

11 JUL 2025 PM 7 L



SS
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DISTRICT COURT
OF SEARCY, ARKANSAS

JUL 16 2025

FILED

⇌07405-510⇌

White Co Dist Court
300 N Spruce ST
Attn: Clerk / Records
Searcy, AR 72143
United States

72143-771900

