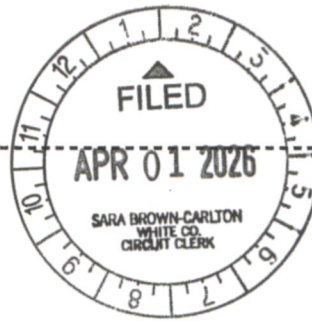




CLOSING STATEMENT

This case is not about a single mistake, an isolated lapse in judgment, or a difference of opinion in medical care. It is about power exercised without accountability, rights ignored as inconveniences, and a human being treated as disposable while under the complete control of the State.

Jason Matthew Lynch entered the custody of White County Jail with known, documented medical needs, constitutionally protected religious beliefs, and clearly established legal rights. He did not forfeit those rights at the jail door. Yet over the course of approximately one hundred days from June 9, 2024 through September 9, 2024 those rights were systematically violated by policies, practices, and deliberate choices made by jail officials, medical contractors, and supervising authorities who knew better and chose indifference instead.

Mr. Lynch was denied consistent access to life-sustaining HIV medication. He was ignored when he reported worsening symptoms. He was forced to endure physical decline, pain, fear, and uncertainty not because care was unavailable, but because care was withheld. This was not a question of resources. It was a question of will. And the will to act constitutionally was absent.

At the same time, Mr. Lynch was denied the free exercise of his Catholic faith, treated with hostility because of it, and stripped of the basic dignity afforded by the First Amendment. His legal mail was interfered with. His access to the courts was obstructed. When he attempted to advocate for himself, he was met not with correction, but with retaliation. The message was unmistakable: compliance would be rewarded, resistance punished, and silence enforced.

The evidence demonstrates a pattern not an accident. A pattern of ignoring medical orders. A pattern of deflecting responsibility between White County and Turn Key Health. A pattern of unconstitutional policies that predictably produced unconstitutional outcomes. A pattern of supervision failures so severe that they rise to deliberate indifference. And a pattern of conduct that placed Mr. Lynch at substantial risk of serious harm, some of which has already occurred and some of which will follow him for the rest of his life.

This Court is not asked to create new law. It is asked to apply settled law that has long held that pretrial detainees and incarcerated persons are entitled to adequate medical care, to religious freedom, to access the courts, and to be free from punishment without due process. These principles are not aspirational. They are mandatory. And when they are violated, remedies must follow.

Accountability in this case is not about punishment for its own sake. It is about affirming that constitutional rights do not depend on popularity, health status, or incarceration. It is about ensuring that counties cannot outsource their constitutional duties and then disclaim responsibility when harm occurs. It is about making clear that medical contractors do not operate in a constitutional vacuum. And it is about ensuring that what happened to Jason Matthew Lynch does not happen again to the next person who has no voice, no leverage, and no protection other than the law.

Mr. Lynch has carried the physical consequences of these violations. He has carried the emotional and psychological toll. He has carried the burden of fighting a system designed to wear him down. He now asks this Court to do what the Constitution requires: to recognize the violations, to declare them unlawful, to award appropriate relief, and to order changes that protect others from the same fate.

Justice in this case will not undo the harm already done. But it will affirm a fundamental truth: the Constitution does not stop at the jailhouse door, and neither does this Court's duty to enforce it.

For these reasons, Plaintiff Jason Matthew Lynch respectfully requests that judgment be entered in his favor, that declaratory and injunctive relief be granted, that compensatory and punitive damages be awarded where appropriate, and that this Court send a clear message that deliberate indifference, retaliation, and systemic constitutional violations will not be tolerated no matter where they occur or who commits them.
