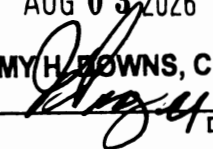


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

RECEIVED
U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION
AUG 03 2026

AUG 03 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

JASON MATTHEW LYNCH,) Case No. 4:24-cv-00740-LPR-BBM
Plaintiff,)
v.)
WHITE COUNTY, ARKANSAS, et al.,)
Defendants.)

**PLAINTIFF'S MOTION TO SUPPLEMENT THE RECORD WITH PHOTOGRAPHIC
EXHIBITS, FOR LIMITED JUDICIAL NOTICE OF OFFICIAL FEDERAL COURT
FORMS AND INSTRUCTIONS, AND FOR CONSIDERATION OF EVIDENCE
SUPPORTING PLAINTIFF'S CLAIMS OF INTERFERENCE WITH LEGAL MAIL
AND DENIAL OF ACCESS TO THE COURTS**

Plaintiff Jason Matthew Lynch, appearing pro se, respectfully moves this Court for an Order: (1) permitting Plaintiff to supplement the record with the attached photographic exhibits; (2) taking judicial notice pursuant to Federal Rule of Evidence 201 of the existence of the official United States District Court prisoner civil-rights complaint forms, applications to proceed in forma pauperis, and filing instructions depicted in the attached photographs; and (3) considering the attached photographs as evidentiary exhibits supporting Plaintiff's claims concerning interference with legal mail and denial of meaningful access to the courts.

In support of this Motion, Plaintiff states as follows:

I. INTRODUCTION

This Motion concerns a package of official United States District Court legal forms mailed to Plaintiff while he was incarcerated in the White County Detention Center.

Plaintiff does not ask the Court to judicially notice disputed factual questions such as who opened the package, why it was withheld, or whether any Defendant acted unlawfully. Those issues remain factual matters to be resolved through evidence.

Instead, Plaintiff asks the Court to:

- a. take judicial notice only of the existence of the official federal court forms contained in the package;
- b. allow the attached photographs to be filed as exhibits; and
- c. consider those photographs together with the remaining evidence in this case.

II. FACTUAL BACKGROUND

While incarcerated at the White County Detention Center, Plaintiff repeatedly attempted to obtain official United States District Court forms necessary to file a federal civil-rights action under 42 U.S.C. § 1983.

Plaintiff requested those forms from jail officials on more than thirty occasions. Despite those repeated requests, Plaintiff was never provided the necessary complaint forms or applications to proceed in forma pauperis.

Because jail personnel would not provide the forms, Plaintiff arranged for a third party to obtain the official forms directly from the United States District Court and mail them to Plaintiff through the United States Postal Service.

The package contained:

- * official United States District Court prisoner civil-rights complaint forms;
- * official applications to proceed in forma pauperis;
- * official court filing instructions; and
- * other federal court documents necessary for initiating a civil-rights action.

The attached photographs depict that package after Plaintiff later recovered it from his stored personal property following his incarceration.

The photographs show:

- * a USPS Priority Mail package;
- * multiple markings identifying the package as LEGAL MAIL;
- * official federal court forms;

- * documents marked DO NOT GIVE TO INMATE; and
- * the condition of the package after Plaintiff recovered it.

Plaintiff alleges that the package had been opened outside his presence and that the enclosed legal materials were never delivered to him during his incarceration.

III. RELEVANCE OF THE PHOTOGRAPHS

Plaintiff offers these photographs as evidence because they corroborate Plaintiff's allegations that legal materials mailed directly to him were not provided during his incarceration.

The photographs are relevant because they depict:

- * the existence of the mailed package;
- * its legal-mail designation;
- * the official federal court forms contained inside; and
- * the condition of the package when Plaintiff recovered it from his stored property.

Plaintiff does not contend that the photographs alone establish who opened the package or who decided to withhold it. Rather, Plaintiff submits the photographs as circumstantial evidence to be considered with the remaining evidence, witness testimony, jail records, discovery responses, and any additional evidence produced during litigation.

IV. ACTUAL INJURY

The legal claim Plaintiff sought to pursue was neither speculative nor frivolous.

During Plaintiff's incarceration, Plaintiff was attempting to pursue claims concerning the denial, interruption, crushing, dissolving, and improper administration of prescribed HIV medication and other constitutionally inadequate medical care.

Those alleged medical violations form a substantial portion of the claims presently before this Court.

Plaintiff alleges that the denial and alteration of his HIV medication caused serious physical injury and continuing medical complications that remain under treatment and evaluation today.

The official federal court forms contained in the package were necessary for Plaintiff to prepare and file a civil-rights action seeking judicial relief concerning those ongoing constitutional violations.

Plaintiff alleges that withholding those forms delayed his ability to:

- * prepare and file a federal civil-rights complaint;
- * seek timely judicial intervention concerning ongoing medical treatment;
- * seek preservation of evidence while events were occurring; and
- * identify responsible parties while records and witnesses were readily available.

Plaintiff submits that this delay hindered his pursuit of a concrete, nonfrivolous legal claim concerning serious medical needs and therefore constitutes evidence relevant to his access-to-the-courts claim under *Lewis v. Casey*, 518 U.S. 343 (1996).

V. PATTERN OF INTERFERENCE WITH LEGAL MAIL

The photographs are also relevant because Plaintiff alleges elsewhere in this litigation that Defendant Lt. Ross directed jail personnel not to process Plaintiff's outgoing legal mail.

Plaintiff does not contend that the photographs alone establish that allegation.

Instead, Plaintiff submits that the photographs constitute additional evidence that should be considered together with Plaintiff's remaining legal-mail evidence.

Taken together with the other evidence in this case, Plaintiff contends that these exhibits support Plaintiff's allegation that interference with legal correspondence was not an isolated incident.

VI. AUTHENTICATION

Plaintiff is prepared to authenticate these photographs through a declaration pursuant to 28 U.S.C. § 1746 stating that:

- * the photographs fairly and accurately depict the package recovered from Plaintiff's stored property;
- * the package shown is the same package mailed to Plaintiff while incarcerated;

- * the enclosed documents are the official federal court forms recovered from that package; and
- * the photographs accurately depict the condition of the package when Plaintiff recovered it.

VII. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Permit Plaintiff to supplement the record with the attached photographic exhibits.
- b. Take judicial notice pursuant to Fed. R. Evid. 201 of the existence of the official United States District Court prisoner civil-rights complaint forms, applications to proceed in forma pauperis, and filing instructions depicted in the attached photographs.
- c. Accept the attached photographs as evidentiary exhibits for consideration in connection with Plaintiff's claims concerning legal-mail interference and denial of meaningful access to the courts.
- d. Permit Plaintiff to rely upon these exhibits during summary judgment, trial, or any evidentiary hearing.
- e. Grant such additional relief as the Court deems just and proper.

Respectfully submitted,
Jason Matthew Lynch
Plaintiff, Pro Se

A large, stylized handwritten signature in black ink, reading "Jason M. Lynch".

EXHIBIT LIST

- * Exhibit A – USPS Priority Mail envelope addressed to Plaintiff and marked "LEGAL MAIL."
- * Exhibit B – Photographs of the package after recovery from Plaintiff's stored property.

- * Exhibit C – Official United States District Court Instructions for Filing Complaint by Prisoners Under 42 U.S.C. § 1983.
- * Exhibit D – Official United States District Court Prisoner Civil Rights Complaint forms.
- * Exhibit E – Official United States District Court Application to Proceed In Forma Pauperis.
- * Exhibit F – Photographs showing documents marked "DO NOT GIVE TO INMATE."
- * Exhibit G – Photographs showing the package contents as recovered.
- * Exhibit H – Plaintiff's Declaration under 28 U.S.C. § 1746 authenticating the photographs.

**DO NOT GIVE TO
INMATE**

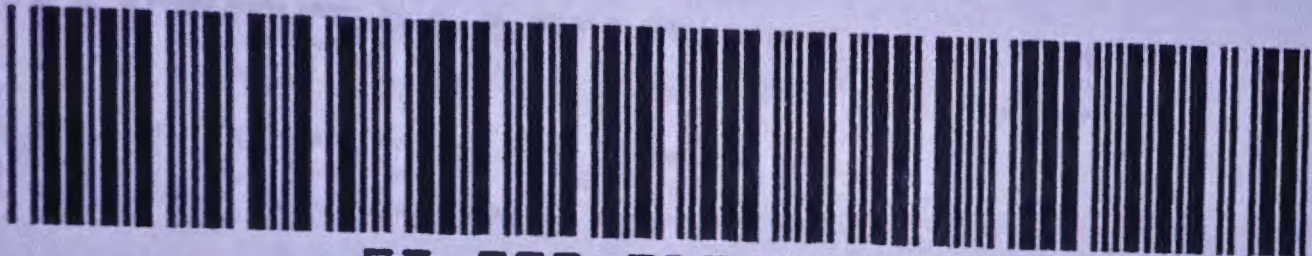


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PAYMENT BY ACCOUNT (if applicable)

Federal Agency Acct. No. or Postal Service™ Acct. No.

ORIGIN (POSTAL SERVICE USE ONLY)

☒ 1-Day☐ 2-Day☐ Military☐ DPO

O ZIP Code

Scheduled Delivery Date
(MM/DD/YY)

Postage

72023

8/15/24

\$ 30.45

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Scheduled Delivery Time

Insurance Fee

COD Fee

8/14/24

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Return Receipt Fee

Live Animal
Transportation Fee

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ORIGIN (POSTAL SERVICE USE ONLY)

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PO ZIP Code

Scheduled Delivery Date
(MM/DD/YY)

Postage

72073

8/15/24

\$ 30.45

Date Accepted (MM/DD/YY)

Scheduled Delivery Time

Insurance Fee

COD Fee

8/14/24

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Time Accepted

☐ AM

☒ PM

Return Receipt Fee

Live Animal
Transportation Fee

2:15

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Special Handling/Fragile

Sunday/Holiday Premium Fee

Total Postage & Fees

\$

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Weight

☒ Flat Rate

Acceptance Employee Initials

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DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)

Time

☐ AM

☐ PM

Employee Signature

Delivery Attempt (MM/DD/YY)

Time

☐ AM

☐ PM

Employee Signature

Required* box if the mailer: 1)
Purchases COD service; OR 4)
leave the item in the addressee's
signature on delivery.

Dept.

0-222-1811.

LABEL 11-B, NOVEMBER 2023

PSN 7690-02-000-9996

SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Is the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's care or other secure location without attempting to obtain the addressee's signature on delivery.

Options
 Saturday Delivery (delivered next business day)
 Sunday/Holiday Delivery Required (additional fee, where available*)
 Refer to USPS.com® or local Post Office™ for availability.

PLEASE PRINT)

PHONE ()

White County Sheriffs Dept.
 Son Lynch 651548
 1000 E Booth Rd.
 Rarney AR 72143
 U.S. ADDRESSES ONLY)

For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
 \$0.00 insurance included.

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70023	8/15/24	\$
Date Accepted (MM/DD/YY) 8/14/24	Scheduled Delivery Time ☒ 6:00 PM	Insurance \$
Time Accepted 2:15 ☐ AM ☒ PM		Return \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total \$
Weight lbs. ozs.	☒ Flat Rate Acceptance Employee Initials W	\$
DELIVERY (POSTAL SERVICE USE ONLY)		
Delivery Attempt (MM/DD/YY)	Time ☐ AM ☐ PM	Employee Signature
Delivery Attempt (MM/DD/YY)	Time ☐ AM ☐ PM	Employee Signature

LABEL 11-B, NOVEMBER 2023

PSN 7690-02-000-9986



Post 8/2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

INSTRUCTIONS FOR FILING COMPLAINT BY PRISONERS
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

This packet contains a complaint form and an in forma pauperis petition. To start an action, you must submit one original and two copies of your complaint. A file-marked copy will be returned to you file-marked for your records. All copies of the complaint must be identical to the original. You must submit one original and two copies of all subsequent pleadings.

You **MUST** submit the address of each person you name as a defendant. Without this information the U.S. Marshal cannot serve the defendant.

Your complaint will not be filed unless it conforms to these instructions and to these forms.

Your complaint must be legibly handwritten or typewritten. The plaintiff, or plaintiffs, must sign and swear to the complaint. If you need additional space to answer a question, you may use the reverse side of the form or an additional blank page.

Your complaint can be brought in this court only if one or more of the named defendants is located within this district. Further, it is necessary for you to submit a separate complaint for each claim that you have unless they are all related to the same incident or issue.

In order for this complaint to be filed, it must be accompanied by the fee of \$402. In addition, the U.S. Marshal will require you to pay the costs of serving the complaint on each of the defendants.

If you are unable to pay the filing fee and service costs for this action, you may petition the court to proceed in forma pauperis. Two blank petitions for this purpose are included in this packet. One copy should be submitted with your complaint; the other copy is for your records.

You will note that you are required to give facts. **THIS COMPLAINT SHOULD NOT CONTAIN LEGAL ARGUMENTS OR CITATIONS.**

Under a local rule of this court, it is your obligation as a pro se plaintiff to inform the court at all times of your current mailing address. It is also your duty to prosecute your case diligently and monitor its progress. These obligations normally rest with attorneys in any case. However, because you are not represented by counsel, these duties will fall upon you personally.

Again, you are advised that you must promptly inform the court of any change of address. If you are presently incarcerated, inform the court immediately upon your release.

If the court does not receive a response within 30 days to any communication addressed to

(Post 1/2017)

IMPORTANT NOTICE

RE: AO 240 and Privacy Policy Redaction Requirements

Federal Rule of Civil Procedure 5.2 regarding remote public electronic access to civil case files requires those filing documents to redact certain personal identifiers from documents before they are filed with the court. Social security numbers, taxpayer-identification numbers, and financial account numbers are to be redacted to the last four digits. The names of minor children are to be redacted to the initials, and dates of birth are to be redacted to the year. Exemptions to the redaction requirements can be found in F.R.Cv.P. 5.2(b).

Please be aware that this redaction requirement may impact the way in which the Application to Proceed Without Prepayment of Fees and Affidavit (AO 240) is completed. Question six of this form requests the following information: (1) persons dependant upon the applicant for support, (2) relationship of this person to the applicant, and (3) amount of support. Most often, minor children will be included in responding to this question. In order to comply with the privacy policy, only the initials of the minor should be on the form. Listing the age of the minor is acceptable; however, only the year of birth may be included. Pro se filers are responsible for completing the application in compliance with the privacy policy. The Clerk will not review each filing for redaction.

This package is made from post-consumer waste. Please recycle - again.

PE
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UNIT

FD-36 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT

for the

District of

Division

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS (Prisoner Complaint)

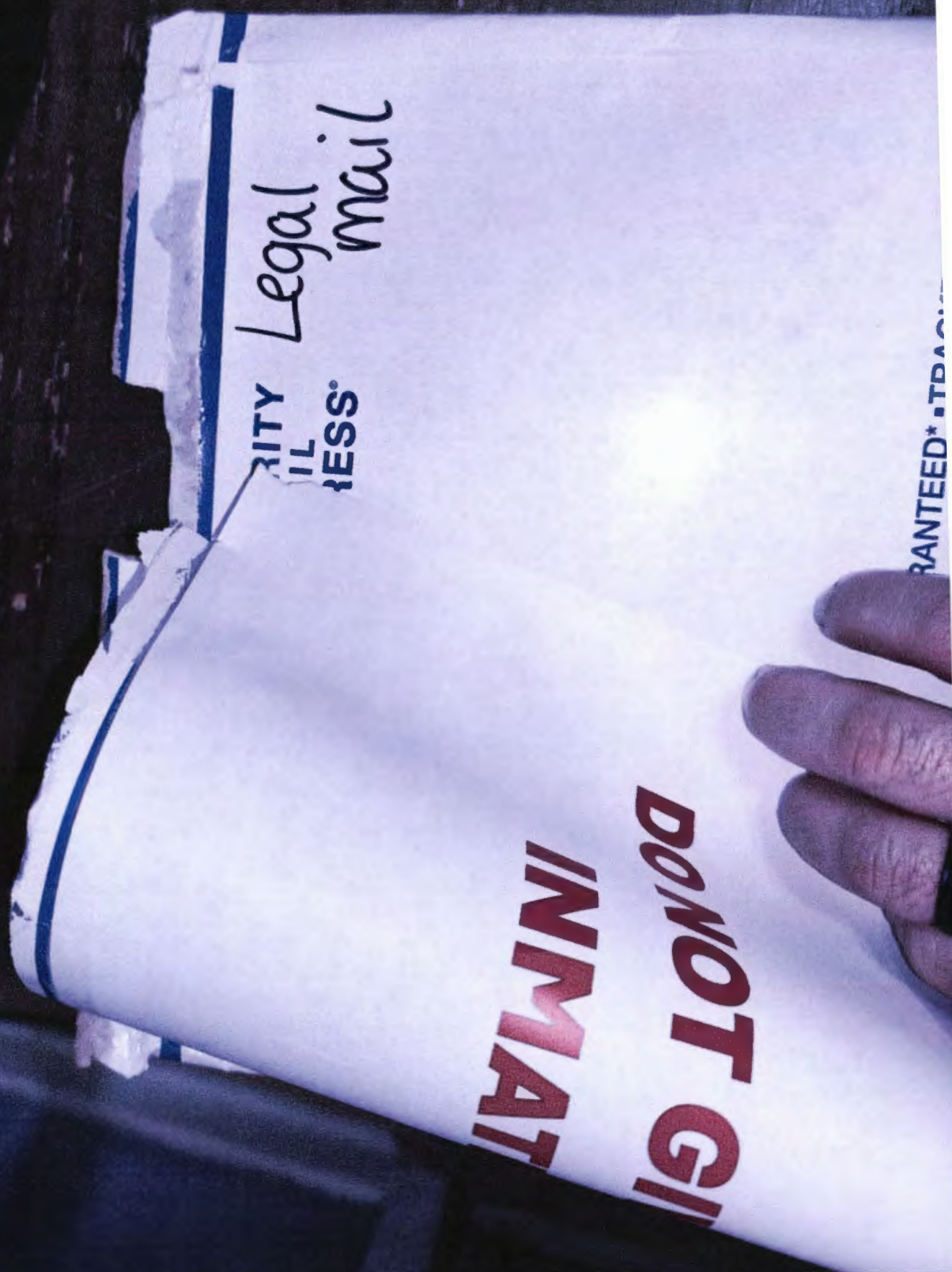
NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**DO NOT GIVE TO
INMATE**



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FI 972 913 157 US

Alexander Law Firm
1500 W. Main St N.
Jacksonville AL 36204

Journal of Management Systems Research

SIGNATURE REQUIRED Note: The motor must check the "Signature Required" box if the motor requires the addressee's signature. ☐ (OR) ☐ Purchase additional insurance, ☐ Purchase COD service, ☐ Purchase Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mailbox or at other secure location without attempting to obtain the addressee's signature on delivery.

Delivery Options

☐ **Next Business Day Delivery** (delivered next business day)
☐ **Weekend/Holiday Delivery Required** (additional fee, where available)
 *Refer to USPS.com or local Post Office for availability

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White County Sheriff's Dept.
Jason Lynch 651548
1600 E. Booth Rd.
Searcy AR 72143

100

■ For pricing or USPS Tracking[®], visit USPS.com or call 800-325-1811.
■ \$100.00 Insurance Included.

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July 2022
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Federal Agency Appl. No. or Postal Service® Acct. No.

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☒ X-Ray	☐ X-Ray	☐ Mammogram	☐ Ultrasound
NO. 20-200	Service and Delivery Date (MM/DD/YY)	Provider	
70023	8/15/2014	70-45	
Basic Annual (PAP/STD) Fee	Diagnostic Fee	Microscopic Fee	USG Fee
8/14/2014			
Time Allowed	QW	Secret Passage Fee	Lost Address Transposition Fee
0-15			
Secret Passage Fee	Surgeon's Premium Fee	Total Passage & Fees	
Money?	Ref. Paid	Assigned Employee Office	
COPIES: ORIGINAL, Duplicate and FINAL			
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	☐ PM		
Delivery Address (NAME/DOY) Date	☐ M	Employee Signature	
	☐ PM		

LÄSBA, 11.0. NOVEMBER 2013 PUNKT 7620-02-000-000

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Post 8/2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

INSTRUCTIONS FOR FILING COMPLAINT BY PRISONERS
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

This packet contains a complaint form and an in forma pauperis petition. To start an action, you must submit one original and two copies of your complaint. A file-marked copy will be returned to you file-marked for your records. All copies of the complaint must be identical to the original. You must submit one original and two copies of all subsequent pleadings.

You **MUST** submit the address of each person you name as a defendant. Without this information the U.S. Marshal cannot serve the defendant.

Your complaint will not be filed unless it conforms to these instructions and to these forms.

Your complaint must be legibly handwritten or typewritten. The plaintiff, or plaintiffs, must sign and swear to the complaint. If you need additional space to answer a question, you may use the reverse side of the form or an additional blank page.

Your complaint can be brought in this court only if one or more of the named defendants is located within this district. Further, it is necessary for you to submit a separate complaint for each claim that you have unless they are all related to the same incident or issue.

In order for this complaint to be filed, it must be accompanied by the fee of \$402. In addition, the U.S. Marshal will require you to pay the costs of serving the complaint on each of the defendants.

If you are unable to pay the filing fee and service costs for this action, you may petition the court to proceed in forma pauperis. Two blank petitions for this purpose are included in this packet. One copy should be submitted with your complaint; the other copy is for your records.

You will note that you are required to give facts. **THIS COMPLAINT SHOULD NOT CONTAIN LEGAL ARGUMENTS OR CITATIONS.**

Under a local rule of this court, it is your obligation as a pro se plaintiff to inform the court at all times of your current mailing address. It is also your duty to prosecute your case diligently and monitor its progress. These obligations normally rest with attorneys in any case. However, because you are not represented by counsel, these duties will fall upon you personally.

Again, you are advised that you must promptly inform the court of any change of address. If you are presently incarcerated, inform the court immediately upon your release.

If the court does not receive a response within 30 days to any communication addressed to

you at the last address provided by you, the court will assume that you have no further interest in the case and may dismiss same without prejudice, upon motion of an adverse party or sua sponte (i.e., by the court acting on its own initiative).

When these forms are completed, mail the original and the copies to:

Pro Se Clerk
600 West Capitol Avenue, Room A149
Little Rock, Arkansas 72201

NOTICE: Pro se parties must have prior approval from the Court before submitting any non-documentary exhibits in support of their claims. Non-documentary exhibits must remain in the custody of the party until the trial or hearing unless otherwise directed by the Court. Any item received through the mail that is not a paper document or that is potentially hazardous will not be considered as evidence by the Court and will be immediately disposed of.

IMPORTANT NOTICE

RE: AO 240 and Privacy Policy Redaction Requirements

Federal Rule of Civil Procedure 5.2 regarding remote public electronic access to civil case files requires those filing documents to redact certain personal identifiers from documents before they are filed with the court. Social security numbers, taxpayer-identification numbers, and financial account numbers are to be redacted to the last four digits. The names of minor children are to be redacted to the initials, and dates of birth are to be redacted to the year. Exemptions to the redaction requirements can be found in F.R.Cv.P. 5.2(b).

Please be aware that this redaction requirement may impact the way in which the Application to Proceed Without Prepayment of Fees and Affidavit (AO 240) is completed. Question six of this form requests the following information: (1) persons dependant upon the applicant for support, (2) relationship of this person to the applicant, and (3) amount of support. Most often, minor children will be included in responding to this question. In order to comply with the privacy policy, only the initials of the minor should be on the form. Listing the age of the minor is acceptable; however, only the year of birth may be included. Pro se filers are responsible for completing the application in compliance with the privacy policy. The Clerk will not review each filing for redaction.

AO 240 (Rev. 07-10) Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form)

UNITED STATES DISTRICT COURT

for the
Eastern District of Arkansas_____
Plaintiff/Petitioner

v.

Defendant/Respondent

)

)

)

)

)

Civil Action No.

**APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS
(Short Form)**

I am a plaintiff or petitioner in this case and declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief requested.

In support of this application, I answer the following questions under penalty of perjury:

1. *If incarcerated.* I am being held at: _____.

If employed there, or have an account in the institution, I have attached to this document a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months for any institutional account in my name. I am also submitting a similar statement from any other institution where I was incarcerated during the last six months.

2. *If not incarcerated.* If I am employed, my employer's name and address are:

My gross pay or wages are: \$ _____, and my take-home pay or wages are: \$ _____ per

(specify pay period)

3. *Other Income.* In the past 12 months, I have received income from the following sources (check all that apply):

- | | | |
|--|------------------------------|-----------------------------|
| (a) Business, profession, or other self-employment | ☐ Yes | ☐ No |
| (b) Rent payments, interest, or dividends | ☐ Yes | ☐ No |
| (c) Pension, annuity, or life insurance payments | ☐ Yes | ☐ No |
| (d) Disability, or worker's compensation payments | ☐ Yes | ☐ No |
| (e) Gifts, or inheritances | ☐ Yes | ☐ No |
| (f) Any other sources | ☐ Yes | ☐ No |

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

EXHIBIT H

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

JASON MATTHEW LYNCH,	)	Case No. 4:24-cv-00740-LPR-BBM
Plaintiff,	)	
v.	)	
WHITE COUNTY, ARKANSAS, et al.,	)	
Defendants.	)	

**DECLARATION OF JASON MATTHEW LYNCH AUTHENTICATING
PHOTOGRAPHIC EXHIBITS AND DESCRIBING THE WITHHOLDING OF
FEDERAL COURT FORMS**

I, Jason Matthew Lynch, declare as follows:

1. I am the Plaintiff in this action. I make this Declaration from my own personal knowledge and could testify competently to the matters stated below.
2. I was incarcerated at the White County Detention Center in White County, Arkansas, from approximately June 9, 2024, through September 9, 2024.
3. While incarcerated, I was attempting to prepare and pursue federal civil-rights claims concerning the treatment I received at the White County Detention Center, including claims arising from the denial, interruption, crushing, dissolving, and improper administration of my prescribed HIV medication and the failure to provide constitutionally adequate medical care.
4. During my incarceration, I requested official federal prisoner civil-rights complaint forms and applications to proceed in forma pauperis from White County Detention Center personnel on more than thirty occasions.
5. Despite my repeated requests, I was not provided the official forms I needed.
6. Because I could not obtain the forms from detention-center personnel, I arranged for another person outside the detention center to obtain official United States District Court

prisoner civil-rights forms and in forma pauperis forms and mail them directly to me at the White County Detention Center.

7. The materials sent to me included official federal court instructions, prisoner civil-rights complaint forms for claims brought under 42 U.S.C. § 1983, and forms for requesting permission to proceed in forma pauperis.
8. The materials were sent to me in a United States Postal Service Priority Mail package. The package was addressed to me and was plainly marked "LEGAL MAIL."
9. I was not called to receive or open this package while I was incarcerated at the White County Detention Center.
10. The package and its contents were not delivered to me during my confinement.
11. I did not authorize any White County employee or any other person to open the package outside my presence, withhold the package from me, or place it into my stored property without giving me access to its contents.
12. When the package was eventually recovered from my stored personal property, it had already been opened.
13. The package contained the federal court forms that had been mailed to me.
14. The package or materials associated with it displayed the words "DO NOT GIVE TO INMATE."
15. I did not write, direct anyone to write, or authorize anyone to place the words "DO NOT GIVE TO INMATE" on the package or its contents.
16. The photographs submitted with the accompanying Motion were taken after the package was recovered from my stored property.
17. I personally examined the package, its exterior markings, and its contents after the package was recovered.
18. The photographs attached as Exhibits A, B, F, and G fairly and accurately depict the package, its markings, its opened condition, and its contents as I personally observed them after recovering the package.

19. Exhibit A fairly and accurately depicts the exterior of the USPS Priority Mail package addressed to me and marked "LEGAL MAIL."
20. Exhibit B fairly and accurately depicts the condition of the package after it was recovered from my stored personal property.
21. Exhibit C fairly and accurately depicts the official federal court instructions for filing a prisoner civil-rights action that were contained within the package.
22. Exhibit D fairly and accurately depicts the official prisoner civil-rights complaint forms contained within the package.
23. Exhibit E fairly and accurately depicts the official application to proceed in forma pauperis contained within the package.
24. Exhibit F fairly and accurately depicts the words "DO NOT GIVE TO INMATE" appearing on materials associated with the package.
25. Exhibit G fairly and accurately depicts the contents of the package as recovered.
26. The photographs accurately represent the appearance and condition of the package and its contents when I examined them.
27. The photographs have not been altered in a manner that changes the appearance, substance, or meaning of what they depict.
28. To the extent any photograph has been cropped, enlarged, or redacted for filing, those changes were made only to improve readability or protect personal identifying information and did not change the substantive contents of the photograph.
29. I recognize the package as the package sent to me because it was addressed to me, contained the federal court materials I had arranged to have mailed, bore legal-mail markings, and was recovered from the personal property maintained for me during my incarceration.
30. The package was not merely personal correspondence. It contained official court forms that I needed to prepare and pursue federal civil-rights claims concerning ongoing medical treatment and other conditions at the White County Detention Center.

31. At the time the forms were mailed, I was seeking a means to present claims concerning the interruption and alteration of essential HIV medication and the failure to provide adequate medical care.
32. Because I was not given the package or its contents while incarcerated, I was unable to use those particular forms when the alleged medical violations were occurring.
33. The withholding of the forms hindered my ability to prepare a complete and organized federal complaint, request timely judicial review of my ongoing medical treatment, request preservation of relevant evidence, and identify the correctional and medical personnel involved.
34. My underlying medical claims were concrete and serious. They concerned the administration of prescribed HIV medication and other medical treatment, rather than an abstract or hypothetical legal issue.
35. Medical issues arising during and following the events described in my lawsuit remain under medical evaluation and treatment.
36. I offer the photographs to establish what the package and its contents looked like when recovered and to corroborate my account that the court forms mailed to me were not delivered during my incarceration.
37. I understand that the photographs alone may not establish the identity of every person who handled the package or the reasons for each person's actions.
38. I submit this Declaration to authenticate the photographic exhibits and to provide the Court with my firsthand account of the package, its contents, its condition when recovered, and the circumstances under which I was denied access to those materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30 day of July, 2026, in
June A. Lynch, Arkansas.

Jason Matthew Lynch

Plaintiff, Pro Se

Mailing Address:

Telephone:

261 Wilson Loop West AA 72476
501 605-4481

Email: Kyach@ARToaches.com
Optional certificate identifying Exhibit H

Place this page immediately before the declaration:

EXHIBIT H

Plaintiff's Declaration Under 28 U.S.C. § 1746 Authenticating the Photographic Exhibits and
Describing the Withholding of Official Federal Court Forms