CIVIL-RIGHTS CASE STORY

Checked Every Thirty Minutes

The jail's watch log shows sixteen checks on a man in alcohol withdrawal, one every thirty minutes. The hallway camera shows a deputy in that corridor three times.

MATTER	Estate of Tyler Ashcombe v. Tamarack County, Deputy R. Halloran and Sgt. D. Voigt, No. 2:25-cv-00418
FORUM	United States District Court for the District of Franklin. Settlement conference set for October 6, 2026
WRITTEN FOR	The settlement judge and counsel for the County
DATED	September 29, 2026
PREPARED BY	Counsel for the Estate of Tyler Ashcombe. Your firm's name and letterhead sit here.
RECORD	12 exhibits; the 12 cited pages are attached below.

Confidential settlement statement under Federal Rule of Evidence 408 and the court's settlement conference order.

> **Composite sample.** Every person, company, place, document and number here is invented to show the form. It is set in the State of Franklin, a jurisdiction that does not exist.

01	The person
02	What happened
03	Why it happened
04	What they knew
05	The harm
06	The numbers
07	The ask

BEAT 01 · THE PERSON

Tyler Ashcombe was 29, a roofer, and the father of a six-year-old girl.

He had paid her support every month since 2020. [ASH-FAM-0002] [ASH-FAM-0002]

On March 13, 2025 he was booked into the Tamarack County Jail on a bench warrant for a missed court date. His bond was $500 and his hearing was at nine the next morning. [TCJ-000012]

WHO THIS HAPPENED TO

PHOTOGRAPH GOES HERE

Mr. Ashcombe with his daughter, summer 2024

Tyler Ashcombe

Roofer, father of a six-year-old

AGE	29
CHARGE	A missed court date on a suspended-license case
BOND	$500
COURT	Set for 9:00 the next morning

BEAT 02 · WHAT HAPPENED

He told the jail he drank a fifth a day and had seized before.

The intake nurse wrote it down at 6:55 p.m. and ordered a withdrawal watch. [TCJ-000012] [TCJ-000012] At 9:30 he was moved to observation cell B-4. [TCJ-000012]

WHAT HE TOLD THE INTAKE NURSE

EX. 1 · BOOKING AND MEDICAL INTAKE — TCJ-000012

Intake nurse, 6:55 p.m.	Reports drinking a fifth of vodka a day. Last drink 1:00 p.m. Withdrawal seizure in 2023.
Order	Alcohol withdrawal watch. Withdrawal score 9.
Housing	Moved to observation cell B-4 at 9:30 p.m.

The jail's rule for that watch is a check every thirty minutes.

A deputy must go to the cell and see the person breathing and moving. [TCJ-000410] A seizure means the hospital. [TCJ-000410]

THE JAIL'S OWN RULE

EX. 2 · JAIL POLICY J-412, WITHDRAWAL WATCH — TCJ-000410

Checks	In person, at least every 30 minutes. The deputy must see breathing and movement.
Scoring	Medical staff score withdrawal every 4 hours.
Hospital	A score of 15 or more, or any seizure: send to the hospital.
Log	Each entry is written at the time of the check.

By midnight the log shows five checks. The camera shows two.

The log has an entry at every half hour, each initialed by the same deputy. [TCJ-000033] [TCJ-000033] The camera shows him at the window once, at 10:04, and passing with a cart at 11:33. [SBI-0019] [SBI-0019]

CELL B-4: THE LOG AND THE CAMERA

10:00 p.m.	10:30 p.m.	11:00 p.m.	11:30 p.m.	12:00 a.m.	12:30 a.m.	1:00 a.m.	1:30 a.m.
Logged	Logged	Logged	Logged	Logged	Logged	Logged	Logged
On camera	No one	No one	On camera	No one	No one	No one	No one
2:00 a.m.	**2:30 a.m.**	**3:00 a.m.**	**3:30 a.m.**	**4:00 a.m.**	**4:30 a.m.**	**5:00 a.m.**	**5:30 a.m.**
Logged	Logged	Logged	Logged	Logged	Logged	Logged	Logged
On camera	No one	No one	No one	No one	No one	No one	No one

CHECKS WRITTEN IN THE LOG
16
one every thirty minutes

CHECKS THE CAMERA SHOWS
3
a deputy at the cell window

10:00 p.m. Log: “Awake, sitting on bunk.” Camera: Deputy at the B-4 window at 10:04, for 11 seconds.

10:30 p.m. Log: “Resting. No distress.” Camera: No one enters the corridor.

11:00 p.m. Log: “Resting. No distress.” Camera: No one enters the corridor.

11:30 p.m. Log: “Lying on bunk.” Camera: Deputy passes B-4 with a cart at 11:33, 4 seconds. Does not look in.

12:00 a.m. Log: “Resting. No distress.” Camera: No one enters the corridor.

12:30 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

1:00 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

1:30 a.m. Log: “Resting. No distress.” Camera: No one enters the corridor.

2:00 a.m. Log: “Asleep, breathing.” Camera: Deputy walks past B-4 at 1:52, 3 seconds. Does not stop.

2:30 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

3:00 a.m. Log: “Resting. No distress.” Camera: No one enters the corridor.

3:30 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

4:00 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

4:30 a.m. Log: “Resting. No distress.” Camera: No one enters the corridor.

5:00 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

5:30 a.m. Log: “Asleep, breathing.” Camera: No one enters the corridor.

March 13 to 14, 2025. Each tile is one entry in the watch log (TCJ-000033). The second line is what the hallway camera shows for that half hour (SBI-0019).

At 2:14 a.m. Mr. Ashcombe went to the floor.

The cell camera shows him go down and move for about two minutes. [SBI-0019] The log entry for 2:30 reads: *Asleep, breathing.* [TCJ-000033]

The log runs to 5:30 a.m.: sixteen checks. The camera shows three.

After 1:52 a.m. no one enters the corridor until the day shift. [SBI-0019] [SBI-0019] Step through the night yourself.

A day-shift deputy found him at 5:52 a.m.

He had been on the floor for three hours and thirty-eight minutes. [SBI-0019] The medical examiner puts his death between 2:15 and 3:30 a.m. [ME-0004]

WHAT THE CAMERAS RECORDED

EX. 4 · VIDEO REVIEW, B CORRIDOR AND CELL B-4 — SBI-0019

TIME	WHAT THE CAMERA SHOWS
10:00 p.m. to 5:52 a.m.	No other person enters B corridor
2:14 a.m.	Cell camera: Ashcombe goes to the floor. Movement for about 2 minutes. None after 2:17.
5:52 a.m.	Day-shift deputy at the window; calls for medical

BEAT 03 · WHY IT HAPPENED

The deputy filled in the sheet at the end of his shift.

Asked whether he walked to B-4 every thirty minutes, Deputy Halloran answered: *No.* [Halloran Dep. 41:8] He wrote all sixteen entries at the end of the shift. [Halloran Dep. 41:15]

The policy requires each entry at the time of the check. [TCJ-000410]

THE DEPUTY: TESTIMONY AND LOG

UNDER OATH, FEBRUARY 10, 2026

EX. 8 · DEPOSITION OF DEPUTY R. HALLORAN — HALLORAN DEP. 41 TO 42

41:8 **Q.** Did you walk to B-4 every thirty minutes that night?
A. No.

41:15 **Q.** When did you write these sixteen entries?
A. At the end of the shift. I filled in the sheet.

HIS ENTRIES, 2:00 TO 3:00 A.M.

EX. 3 · WATCH LOG, CELL B-4 — TCJ-000033

TIME	OBSERVATION	INITIALS
2:00 a.m.	Asleep, breathing.	RH
2:30 a.m.	Asleep, breathing.	RH
3:00 a.m.	Resting. No distress.	RH

Mr. Ashcombe asked for a doctor three times. Then the intercom was muted.

At 11:40 p.m. he told the control room he was shaking and needed a doctor. [TCJ-000051] He asked again at 12:15. [TCJ-000051] At 12:21 the entry reads: *Pressing repeatedly. Intercom muted.* [TCJ-000051]

THE INTERCOM LOG

EX. 5 · CONTROL ROOM INTERCOM LOG — TCJ-000051

TIME	CELL	ENTRY
11:40 p.m.	B-4	Says he is shaking and needs a doctor. Told medical will be advised.
12:15 a.m.	B-4	Same request.
12:21 a.m.	B-4	Pressing repeatedly. Intercom muted.

No nurse was in the building, and no one called the one on duty.

The nurse left at 11:00 p.m. [TCJ-000061] The policy calls for a withdrawal score every four hours; none was taken after intake. [TCJ-000410] [TCJ-000061] The on-call telephone did not ring. [TCJ-000061]

MEDICAL COVERAGE THAT NIGHT

EX. 6 · MEDICAL UNIT RECORDS — TCJ-000061

Coverage	Nurse on site until 11:00 p.m. On call by telephone overnight.
Withdrawal scores	6:55 p.m.: 9. No later score recorded.
On-call telephone log	No calls from the jail between 11:00 p.m. and 5:52 a.m.

BEAT 04 · WHAT THEY KNEW

The state had told the Sheriff about the logs fourteen months earlier.

A state inspection in January 2024 found watch-log entries at exact half-hour marks with no video behind them, on three of ten nights sampled. [PUB-0007] It recommended electronic verification of rounds. [PUB-0007]

The Sheriff answered that staff had been reminded and nothing more was planned. [PUB-0007]

THE STATE'S INSPECTION, FOURTEEN MONTHS EARLIER

EX. 10 · STATE JAIL INSPECTION AND THE SHERIFF'S RESPONSE — PUB-0007

Finding 4. On 3 of 10 nights sampled, watch-log entries at exact 30-minute intervals were not supported by hallway video.

Recommendation: install electronic verification of rounds.

Sheriff's response, February 9, 2024: "Staff have been reminded of the policy. No further action is planned."

The County priced the fix at $38,400 and tabled it.

The board took up electronic rounds verification on March 19, 2024 and put it off to the next budget cycle. [PUB-0015] The minutes note an earlier death on a withdrawal watch in the same unit. [PUB-0015]

THE COUNTY BOARD, MARCH 2024

EX. 11 · COUNTY BOARD MINUTES — PUB-0015

Item 9. Electronic rounds verification for the jail, $38,400. Tabled to the next budget cycle.

Discussion noted the in-custody death of August 2023, a withdrawal watch in B unit.

The deputy and his sergeant describe a custom.

The deputy: *That's how everybody did it.* [Halloran Dep. 42:6] His sergeant did not compare logs with video *unless something happened.* [Voigt Dep. 27:3]

DEPUTY AND SUPERVISOR, UNDER OATH

THE DEPUTY

EX. 8 · DEPOSITION OF DEPUTY R. HALLORAN — HALLORAN DEP. 41 TO 42

42:6 **Q.** Who taught you to do it that way?
A. That's how everybody did it.

HIS SERGEANT

EX. 9 · DEPOSITION OF SGT. D. VOIGT — VOIGT DEP. 27

27:3 **Q.** As shift supervisor, did you compare watch logs with the video?
A. Not unless something happened.

The County's best points are on this page too.

Alcohol withdrawal is the medical cause of death. [ME-0004] It is also the danger the watch exists to catch. [TCJ-000410]

The County had a written policy. It also had a state report that the policy was not being followed. [PUB-0007]

THE COUNTY'S BEST POINTS, AND THE RECORD

They say	Withdrawal killed him, not the jail.
Record	The jail's own rule exists because withdrawal kills, and sends a seizure to the hospital.
They say	One deputy broke the rules; the County had a sound policy.
Record	The state reported the same practice in 2024. The fix was priced and tabled.

BEAT 05 · THE HARM

He went to the floor alone, two and a half hours after asking for a doctor.

He asked for help at 11:40 p.m. and went down at 2:14 a.m. [TCJ-000051] [SBI-0019] He was pronounced dead at 6:31, two and a half hours before his hearing. [ME-0004] [TCJ-000012]

THE LAST NIGHT

11:40 p.m.	Asks for a doctor.
12:21 a.m.	Intercom muted.
2:14 a.m.	Goes to the floor.
5:52 a.m.	Found by the day shift.
6:31 a.m.	Pronounced dead.
9:00 a.m.	The hour of his court hearing.

Sources: TCJ-000051; SBI-0019; ME-0004; TCJ-000012.

He left a daughter who is six.

His mother brings this case for his estate and for his daughter. [ASH-FAM-0002] [ASH-FAM-0002]

WHO HE LEFT

EX. 12 · FAMILY AND WORK RECORDS — ASH-FAM-0002

Daughter	Age 6. Child support paid every month since 2020.
Estate	Personal representative: his mother, Diane Ashcombe.

BEAT 06 · THE NUMBERS

The economic loss is $421,800. The case is larger than that.

An economist values the support his daughter lost at $412,000, and the funeral cost $9,800. [ASH-FAM-0002]

A jury will also weigh what he went through that night, the loss of his life at 29, and the conduct of a deputy who wrote sixteen entries he had not earned. [Halloran Dep. 41:15]

WHAT A JURY WILL WEIGH

$421,800
support lost to his daughter, and his funeral

3 h 38 min
on the floor before anyone looked

$38,400
the cost of the fix the County tabled

$500
the bond he was held on

Sources: ASH-FAM-0002; SBI-0019; PUB-0015; TCJ-000012.

BEAT 07 · THE ASK

The Estate will resolve the case for $4,750,000 and verified rounds.

The second term matters to Diane Ashcombe as much as the first: within 90 days, the County installs the electronic rounds verification it tabled in 2024. [PUB-0015]

> The log says he was checked every thirty minutes. [TCJ-000033] The camera and the deputy say otherwise. [SBI-0019] [Halloran Dep. 41:8]

THE DEMAND

$4,750,000
to the estate and his daughter

90 days
to install verified electronic rounds

FOR COUNSEL

Cite table

Every cited statement in the piece, in reading order, beside the page it rests on. Counsel checks each line and signs off before anything is sent.

NO.	BEAT	STATEMENT	SOURCE	CHECKED
01	The person	He had paid her support every month since 2020.	[Ex. 12 · ASH-FAM-0002] [Ex. 12 · ASH-FAM-0002]	☐
02	The person	On March 13, 2025 he was booked into the Tamarack County Jail on a bench warrant for a missed court date. His bond was $500 and his hearing was at nine the next morning.	[Ex. 1 · TCJ-000012]	☐
03	What happened	The intake nurse wrote it down at 6:55 p.m. and ordered a withdrawal watch.	[Ex. 1 · TCJ-000012] [Ex. 1 · TCJ-000012]	☐
04	What happened	At 9:30 he was moved to observation cell B-4.	[Ex. 1 · TCJ-000012]	☐
05	What happened	A deputy must go to the cell and see the person breathing and moving.	[Ex. 2 · TCJ-000410]	☐
06	What happened	A seizure means the hospital.	[Ex. 2 · TCJ-000410]	☐
07	What happened	The log has an entry at every half hour, each initialed by the same deputy.	[Ex. 3 · TCJ-000033] [Ex. 3 · TCJ-000033]	☐
08	What happened	The camera shows him at the window once, at 10:04, and passing with a cart at 11:33.	[Ex. 4 · SBI-0019] [Ex. 4 · SBI-0019]	☐
09	What happened	The cell camera shows him go down and move for about two minutes.	[Ex. 4 · SBI-0019]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
10	What happened	The log entry for 2:30 reads: Asleep, breathing.	[Ex. 3 · TCJ-000033]	☐
11	What happened	After 1:52 a.m. no one enters the corridor until the day shift.	[Ex. 4 · SBI-0019] [Ex. 4 · SBI-0019]	☐
12	What happened	He had been on the floor for three hours and thirty-eight minutes.	[Ex. 4 · SBI-0019]	☐
13	What happened	The medical examiner puts his death between 2:15 and 3:30 a.m.	[Ex. 7 · ME-0004]	☐
14	Why it happened	Asked whether he walked to B-4 every thirty minutes, Deputy Halloran answered: No.	[Ex. 8 · Halloran Dep. 41:8]	☐
15	Why it happened	He wrote all sixteen entries at the end of the shift.	[Ex. 8 · Halloran Dep. 41:15]	☐
16	Why it happened	The policy requires each entry at the time of the check.	[Ex. 2 · TCJ-000410]	☐
17	Why it happened	At 11:40 p.m. he told the control room he was shaking and needed a doctor.	[Ex. 5 · TCJ-000051]	☐
18	Why it happened	He asked again at 12:15.	[Ex. 5 · TCJ-000051]	☐
19	Why it happened	At 12:21 the entry reads: Pressing repeatedly. Intercom muted.	[Ex. 5 · TCJ-000051]	☐
20	Why it happened	The nurse left at 11:00 p.m.	[Ex. 6 · TCJ-000061]	☐
21	Why it happened	The policy calls for a withdrawal score every four hours; none was taken after intake.	[Ex. 2 · TCJ-000410] [Ex. 6 · TCJ-000061]	☐
22	Why it happened	The on-call telephone did not ring.	[Ex. 6 · TCJ-000061]	☐
23	What they knew	A state inspection in January 2024 found watch-log entries at exact half-hour marks with no video behind them, on three of ten nights sampled.	[Ex. 10 · PUB-0007]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
24	What they knew	It recommended electronic verification of rounds.	[Ex. 10 · PUB-0007]	☐
25	What they knew	The Sheriff answered that staff had been reminded and nothing more was planned.	[Ex. 10 · PUB-0007]	☐
26	What they knew	The board took up electronic rounds verification on March 19, 2024 and put it off to the next budget cycle.	[Ex. 11 · PUB-0015]	☐
27	What they knew	The minutes note an earlier death on a withdrawal watch in the same unit.	[Ex. 11 · PUB-0015]	☐
28	What they knew	The deputy: That's how everybody did it.	[Ex. 8 · Halloran Dep. 42:6]	☐
29	What they knew	His sergeant did not compare logs with video unless something happened.	[Ex. 9 · Voigt Dep. 27:3]	☐
30	What they knew	Alcohol withdrawal is the medical cause of death.	[Ex. 7 · ME-0004]	☐
31	What they knew	It is also the danger the watch exists to catch.	[Ex. 2 · TCJ-000410]	☐
32	What they knew	The County had a written policy. It also had a state report that the policy was not being followed.	[Ex. 10 · PUB-0007]	☐
33	The harm	He asked for help at 11:40 p.m. and went down at 2:14 a.m.	[Ex. 5 · TCJ-000051] [Ex. 4 · SBI-0019]	☐
34	The harm	He was pronounced dead at 6:31, two and a half hours before his hearing.	[Ex. 7 · ME-0004] [Ex. 1 · TCJ-000012]	☐
35	The harm	His mother brings this case for his estate and for his daughter.	[Ex. 12 · ASH-FAM-0002] [Ex. 12 · ASH-FAM-0002]	☐
36	The numbers	An economist values the support his daughter lost at $412,000, and the funeral cost $9,800.	[Ex. 12 · ASH-FAM-0002]	☐
37	The numbers	A jury will also weigh what he went through that night, the loss of his life at 29, and the conduct of a deputy	[Ex. 8 · Halloran Dep. 41:15]	☐

NO.	BEAT	STATEMENT	SOURCE	CHECKED
		who wrote sixteen entries he had not earned.		
38	The ask	The second term matters to Diane Ashcombe as much as the first: within 90 days, the County installs the electronic rounds verification it tabled in 2024.	[Ex. 11 · PUB-0015]	☐
39	The ask	The log says he was checked every thirty minutes.	[Ex. 3 · TCJ-000033]	☐
40	The ask	The camera and the deputy say otherwise.	[Ex. 4 · SBI-0019] [Ex. 8 · Halloran Dep. 41:8]	☐

40 cited statements, 12 exhibits. Sign-off: _____ Date: _____

ATTACHED

The record

This sample attaches the cited pages. A client piece attaches each exhibit in full, behind the same chips, on a private link.

EX.	DOCUMENT	DATE	BATES RANGE	CITED
1	**Booking and medical intake**	March 13, 2025	TCJ-000010 to TCJ-000018	4×
2	**Jail policy J-412, withdrawal watch**	Revised 2022	TCJ-000408 to TCJ-000412	5×
3	**Watch log, cell B-4**	March 13 to 14, 2025	TCJ-000032 to TCJ-000034	3×
4	**Video review, B corridor and cell B-4**	April 22, 2025	SBI-0015 to SBI-0024	6×
5	**Control room intercom log**	March 13 to 14, 2025	TCJ-000050 to TCJ-000052	4×
6	**Medical unit records**	March 13 to 14, 2025	TCJ-000060 to TCJ-000063	3×
7	**Report of the medical examiner**	March 15, 2025	ME-0001 to ME-0009	3×
8	**Deposition of Deputy R. Halloran**	February 10, 2026	Pages 1 to 88	5×
9	**Deposition of Sgt. D. Voigt**	February 24, 2026	Pages 1 to 74	1×
10	**State jail inspection and the Sheriff's response**	January and February 2024	PUB-0005 to PUB-0010	4×

EX.	DOCUMENT	DATE	BATES RANGE	CITED
11	County board minutes	March 19, 2024	PUB-0014 to PUB-0016	3×
12	Family and work records	Various	ASH-FAM-0001 to ASH-FAM-0012	3×

EXHIBIT 1

Booking and medical intake

Jail records · March 13, 2025
Produced by the County
TCJ-000010 to TCJ-000018

EX. 1 · BOOKING AND MEDICAL INTAKE TCJ-000012

Booked	Thursday, March 13, 2025, 6:40 p.m. Bench warrant: missed court date on a charge of driving while suspended. Bond $500. Court at 9:00 a.m.
Intake nurse, 6:55 p.m.	Reports drinking a fifth of vodka a day. Last drink 1:00 p.m. Withdrawal seizure in 2023.
Order	Alcohol withdrawal watch. Withdrawal score 9.
Housing	Moved to observation cell B-4 at 9:30 p.m.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 2

Jail policy J-412, withdrawal watch

Sheriff's Office policy · Revised 2022
Produced by the County
TCJ-000408 to TCJ-000412

EX. 2 · JAIL POLICY J-412, WITHDRAWAL WATCH TCJ-000410

Checks	In person, at least every 30 minutes. The deputy must see breathing and movement.
Scoring	Medical staff score withdrawal every 4 hours.
Hospital	A score of 15 or more, or any seizure: send to the hospital.
Log	Each entry is written at the time of the check.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 3

Watch log, cell B-4

Jail record · March 13 to 14, 2025
Produced by the County
TCJ-000032 to TCJ-000034

ASHCOMBE, Tyler. Withdrawal watch

TIME	OBSERVATION	INITIALS
10:00 p.m.	Awake, sitting on bunk.	RH
10:30 p.m.	Resting. No distress.	RH
11:00 p.m.	Resting. No distress.	RH
11:30 p.m.	Lying on bunk.	RH
12:00 a.m.	Resting. No distress.	RH
12:30 a.m.	Asleep, breathing.	RH
1:00 a.m.	Asleep, breathing.	RH
1:30 a.m.	Resting. No distress.	RH
2:00 a.m.	Asleep, breathing.	RH
2:30 a.m.	Asleep, breathing.	RH
3:00 a.m.	Resting. No distress.	RH
3:30 a.m.	Asleep, breathing.	RH
4:00 a.m.	Asleep, breathing.	RH
4:30 a.m.	Resting. No distress.	RH
5:00 a.m.	Asleep, breathing.	RH
5:30 a.m.	Asleep, breathing.	RH

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 4

Video review, B corridor and cell B-4

State Bureau of Investigation report · April 22, 2025
Produced by subpoena
SBI-0015 to SBI-0024

EX. 4 · VIDEO REVIEW, B CORRIDOR AND CELL B-4 SBI-0019

Findings from the hallway and cell cameras

TIME	WHAT THE CAMERA SHOWS
10:04 p.m.	Deputy at the B-4 window, 11 seconds
11:33 p.m.	Deputy passes B-4 pushing a cart, 4 seconds; does not look in
1:52 a.m.	Deputy walks past B-4, 3 seconds; does not stop
10:00 p.m. to 5:52 a.m.	No other person enters B corridor
2:14 a.m.	Cell camera: Ashcombe goes to the floor. Movement for about 2 minutes. None after 2:17.
5:52 a.m.	Day-shift deputy at the window; calls for medical

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 5

Control room intercom log

Jail record · March 13 to 14, 2025
Produced by the County
TCJ-000050 to TCJ-000052

EX. 5 · CONTROL ROOM INTERCOM LOG TCJ-000051

TIME	CELL	ENTRY
11:40 p.m.	B-4	Says he is shaking and needs a doctor. Told medical will be advised.
12:15 a.m.	B-4	Same request.
12:21 a.m.	B-4	Pressing repeatedly. Intercom muted.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 6

Medical unit records

Jail medical records · March 13 to 14, 2025
Produced by the County
TCJ-000060 to TCJ-000063

EX. 6 · MEDICAL UNIT RECORDS TCJ-000061

Coverage	Nurse on site until 11:00 p.m. On call by telephone overnight.
Withdrawal scores	6:55 p.m.: 9. No later score recorded.
On-call telephone log	No calls from the jail between 11:00 p.m. and 5:52 a.m.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 7

Report of the medical examiner

Autopsy report · March 15, 2025
Public record
ME-0001 to ME-0009

EX. 7 · REPORT OF THE MEDICAL EXAMINER ME-0004

Cause of death	Complications of alcohol withdrawal, including seizure.
Time of death	Estimated between 2:15 and 3:30 a.m. Pronounced 6:31 a.m.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 8

Deposition of Deputy R. Halloran

Deposition transcript · February 10, 2026
Taken by plaintiff
Pages 1 to 88

EX. 8 · DEPOSITION OF DEPUTY R. HALLORAN HALLORAN DEP. 41 TO 42

41:8 **Q.** Did you walk to B-4 every thirty minutes that night?
A. No.

41:15 **Q.** When did you write these sixteen entries?
A. At the end of the shift. I filled in the sheet.

42:6 **Q.** Who taught you to do it that way?
A. That's how everybody did it.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 9

Deposition of Sgt. D. Voigt

Deposition transcript · February 24, 2026
Taken by plaintiff
Pages 1 to 74

EX. 9 · DEPOSITION OF SGT. D. VOIGT VOIGT DEP. 27

27:3 **Q.** As shift supervisor, did you compare watch logs with the video?
A. Not unless something happened.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 10

State jail inspection and the Sheriff's response

State inspection report · January and February 2024
Public record
PUB-0005 to PUB-0010

EX. 10 · STATE JAIL INSPECTION AND THE SHERIFF'S RESPONSE PUB-0007

Finding 4. On 3 of 10 nights sampled, watch-log entries at exact 30-minute intervals were not supported by hallway video.

Recommendation: install electronic verification of rounds.

Sheriff's response, February 9, 2024: "Staff have been reminded of the policy. No further action is planned."

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 11

County board minutes

Public meeting minutes · March 19, 2024
Public record
PUB-0014 to PUB-0016

EX. 11 · COUNTY BOARD MINUTES PUB-0015

Item 9. Electronic rounds verification for the jail, $38,400. Tabled to the next budget cycle.

Discussion noted the in-custody death of August 2023, a withdrawal watch in B unit.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES

EXHIBIT 12

Family and work records

Estate’s records · Various

Plaintiff

ASH-FAM-0001 to ASH-FAM-0012

EX. 12 · FAMILY AND WORK RECORDS ASH-FAM-0002

Tyler Ashcombe	Age 29. Roofer. 2024 earnings $38,900.
Daughter	Age 6. Child support paid every month since 2020.
Estate	Personal representative: his mother, Diane Ashcombe.
Economist	Support lost to his daughter, present value $412,000. Funeral $9,800.

INVENTED RECORD · COMPOSITE SAMPLE · CHECKED EVERY THIRTY MINUTES