

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, *et al.*,

Defendants.

No. 5:20-cv-00453-MTT

DECLARATION OF A. CHINYERE EZIE

I, A. Chinyere Ezie, declare under penalty of perjury that the following is true and correct:

1. I am a Senior Staff Attorney at the Center for Constitutional Rights and one of Plaintiff Ashley Diamond's attorneys.

2. Following the Parties' hearing on May 13-14, 2021, Counsel for Plaintiff contacted Counsel for Defendants to inquire whether Defendants would withdraw or expunge the disciplinary report (DR) they issued Ms. Diamond accusing her of engaging in penetrative sex with John Doe. To date, however, they have refused to act. So upon information and belief, the John Doe disciplinary report remains part of Ms. Diamond's institutional record to this day.

3. On January 28, 2022, I personally contacted Defendants, through their attorney, to notify them that Ashley Diamond had suffered additional PREA incidents in her dormitory at Coastal State Prison.

4. I notified Defendants' attorney that Ms. Diamond had attempted to report the PREA incident using multiple means, but that she was currently being threatened by inmates who perceived her to be a snitch.

5. I asked Defendants, through their attorneys, to engage a retaliation monitor for Ms. Diamond's protection. I also asked whether Defendants could make arrangements for Ms. Diamond to complete her PREA reports and PREA interviews discreetly.

6. I also asked Defendants, through their counsel, to identify the steps they would take to prevent Ms. Diamond from being subjected to further retaliation in connection with her PREA reports on two occasions, but they did not respond.

7. Instead, Ms. Diamond was approached by GDC officials in a manner that jeopardized her safety by heightening the perception that she is a snitch. Upon information and belief, a retaliation monitor was never assigned.

8. On February 14, 2022, Ms. Diamond experienced another PREA incident in her dormitory at Coastal State Prison and reported the incident to GDC personnel.

9. Attached to this declaration are true and correct copies of the following

Pl's Exhibit 280	January 28, 2022 Email Chain between Counsel for Plaintiffs and Roger Chalmers entitled <i>Diamond v. Ward: Additional PREA Incidents at Coastal State Prison</i>
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Dated: February 18, 2022

Signed,

/s/ A. Chinyere Ezie*

A. Chinyere Ezie, Esq.

CENTER FOR CONSTITUTIONAL RIGHTS

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Admitted Pro Hac Vice