

**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 JIMMY WINDLE HORNE**

I, Jimmy Windle Horne, declare under penalty of perjury that the following is true and correct:

1. My name is Jimmy Windle Horne. I am 48 years old. My GDC number is 0000679622. I am currently held in the custody of the Georgia Department of Corrections (“GDC”) at Coastal State Prison (“Coastal”) in Savannah, Georgia. Prior to that, I was held at Georgia Diagnostic and Classification State Prison (“GDCP”) in Jackson, Georgia, where I sometimes worked as a floor cleaner.

2. I met Ashley Diamond at GDCP, where we were housed together in the same unit, C House. I knew Ashley was transgender because she told me and because she had visible breasts. Our dormitory was not a safe environment. Incarcerated people with close and medium security designations were held together, and the cameras in the unit did not work.

3. One of the correctional officers at GDCP was Arneika Smith. She would often engage in inappropriate behavior with incarcerated people, including by propositioning them for sexual activities and by requesting that they send her money in exchange for favors. She once propositioned me, but I declined. I found Officer Smith’s behavior very shocking and

inappropriate.

4. One day in May 2020 when I was working on my floor cleaning shift, I saw Officer Smith enter a staff bathroom with Ashley Diamond and close and lock the door behind them. At the time, I was cleaning floors just about five feet away from the staff bathroom door, so I could hear Officer Smith's keys jangle and turn in the lock.

5. Ashley was locked in the room with Officer Smith for about four to four-and-a-half hours. Near the end of that time, Officer Ridley tried to enter C House, but the gate was locked because Officer Smith was not at her post. Officer Ridley saw me through the gate and asked where Officer Smith was. I responded that Officer Smith was in the staff bathroom.

6. I saw Officer Ridley call for Officer Smith on the radio but there was no response. Afterwards, he left to get keys. When he returned, I saw Officer Ridley walk up to the staff bathroom where Officer Smith was locked in with Ashley. I saw Officer Smith start to exit the room, but I did not see Ashley. After that, we were all put on lockdown, so I did not see anything else.

7. No one at GDCP did anything to discipline or reprimand Officer Smith after she was discovered with Ashley, even though she was a very unprofessional and corrupt officer. Officer Smith continued working in our dorm at GDCP like nothing happened, and she was still working at the prison in December 2020 when I transferred from GDCP to Coastal.

8. Since I arrived at Coastal in December 2020, safety has been a constant issue. Conditions at Coastal are even worse than GDCP because human life means nothing to Coastal's wardens and staff.

9. Ashley and I were housed together in N-Building for a period of time at Coastal. The dorm we were held in was supposed to be a safe dorm, but we were housed with

incarcerated people who were gang members and who had been convicted of sex offenses or had PREA records. Most of the time Ashley didn't have escorts. I also saw officers harass and mistreat her. I was able to speak to Ashley a little, and she feared for her life at Coastal.

10. Coastal State Prison is also extremely understaffed and the problem is getting worse. People are regularly attacked and even killed. I was recently stabbed and seriously injured in an attack, but it took the prison staff three hours to respond. My requests for protective custody were also denied, even though I had just been stabbed. Instead, an officer told me, "Whatever happens, happens." My attackers didn't even get disciplined by Coastal staff, even though I identified them.

11. I also have trouble getting access to necessary medical care, including insulin and other diabetes medication. I was recently sick with COVID-19, but I did not receive any treatment besides cough syrup. I have five staples in my head following my attack that were only removed after a long delay. I've also had trouble getting treatment for my heart condition, as well as basic necessities like toilet paper.

12. It is very difficult to submit grievances and complaints at Coastal in response to these issues. We often cannot even get access to the appropriate paperwork for submitting grievances and medical requests. When we do submit grievances and other requests, they often go unanswered. I am still waiting for a response to a grievance I filed with Officer Brandi Moore in November of last year.

13. Anyone who says that Coastal State Prison is the safest men's prison in GDC is not telling the truth.

14. There was a fatal stabbing here just on Saturday, February 12. Another incarcerated person's jaw was recently broken in an attack. In both instances, the wardens and

staff did not respond. It's like no one cares.

15. Of all the GDC facilities I have been to over the years, Coastal is the absolute worst.

16. Coastal is so unsafe that it needs to be closed.

17. Although I'm worried about being retaliated against, I feel it is important that people know what's going on here.

Date: February 22, 2022

/s/ Jimmy Windle Horne\*  
Jimmy Windle Horne

\*Signed electronically by the declarant with prior court permission; scanned signature page to follow