

**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 MICHAEL MANCIL

I, Michael Mancil, hereby declare as follows:

1. My name is Michael Mancil. I am currently held in the custody of the Georgia Department of Corrections (“GDC”) at Coastal State Prison (“Coastal”) in Savannah, Georgia.
2. I met Ashley Diamond about a year ago when I was moved to her dorm in N building and enrolled in the Evidence-Based Program. I was in that dormitory until November 2021.
3. My cell was on the same floor as Ashley Diamond’s cell, and on the opposite side of the hall.
4. That dormitory (N-Building) houses many sex offenders as well as gang members. I can tell a person’s gang affiliation based on tattoos, handshakes, and because they tell me or I hear them telling others.
5. Coastal State Prison is very understaffed. When in the dormitory, I rarely saw officers. For count, maybe one or two officers will do their job, but most are just pushovers and let the gang members tell them what to do.
6. Sometimes there are as few as three guards working the entire compound at night. You

might not see an officer all night in N building.

7. The doors to enter the dormitory are often left open. People who are unauthorized to be in the dormitory enter all the time.
8. Inmates would come into the dorm and often look for Ashley Diamond, catcall her, and say rude and disrespectful things to her. They would go into her room and jump in the bed while she's asleep, trying to kiss her and touch her. Some of them I knew to be gang affiliated.
9. At night, the cell doors were not locked. Day and night, people go in and out of each other's cells. The officers were rarely around and, when they were, they would not do anything.
10. I rarely saw Ashley Diamond being accompanied by a security escort.

Sexual Harassment and Assaults

11. It is clear that Ashley Diamond is a woman. She has breasts and feminine mannerisms.
12. Most inmates were very perverted towards Ashley Diamond. When Ashley Diamond is around, she is often getting sexually harassed, abused or assaulted.
13. There were a few of us who tried to keep Ashley Diamond safe. We would check in with her. We would walk with her to chow and medical appointments. In the dormitory, we would stick together because we were outnumbered by sex offenders.
14. When walking to chow or medical appointments, I've seen Ashley Diamond get sexually harassed, abused and assaulted. Inmates often say sexual things, making comments about her body and saying what they wanted to do to her sexually. I've seen men walk up to her and grab her on the chest, pull her towards them, and try to kiss her.
15. I've seen people climb into Ashley Diamond's bed when she's sleeping about seven or

eight times. It's never ending.

16. Sometime last year, Ashley Diamond and I were waiting by a locked gate in the yard. Often times, the gate along the way to and from the dormitory is locked and there is not an officer around to open it. When that happens, we are stuck in the yard until an officer comes around and can open the gate.
17. While in the yard, a bunch of inmates started pushing Ashley Diamond against the fence and grabbing her chest. I was trying to keep people away from her. She was scared for her life. I could see the anxiety on her face. Her voice changed, she was losing her breath, and she was panicking. There were no officers around at the time.

PREA Interview

18. In January 2022, several months after Ashley Diamond's attack, I was called in for a PREA interview with a GDC agent. The interview took place in a private room in the medical building.
19. The GDC agent told me he was there because of Ashley Diamond's PREA complaint and to get an understanding of what was happening with her.
20. I told him about the sexual harassment and assaults that I witnessed.
21. The interview lasted about 15 to 20 minutes. The interview was recorded with an audio recorder. The GDC agent had a pen and paper for notes.

Suicide Attempt

22. Being in our dormitory and facing constant sexual abuse and harassment has had a negative impact on Ashley Diamond.
23. In fall of last year, I walked into Ashley's Diamond's cell and saw her crying with a bunch of pills stacked in front of her. She had saved some medicine and was going to try

to overdose.

24. I took the pills. I wouldn't leave them there with her.
25. After that, I would check in with her. We would talk about our struggles and she would often break down.

Retaliation

26. I was moved out of N building and the Evidence Based Program in November 2021 without reason. Everyone associated with Ashley Diamond who tries to protect her is kicked out of the dormitory.
27. I am now housed in K building. We don't have access to cleaning products to clean our rooms and it's so cold because the air conditioning is running in the wintertime. They won't give us blankets. We rarely get clothes or food. There are gang wars. I haven't slept in days. My bunkmate got stabbed just last night.
28. I believe GDC officers put me over here – essentially throwing me to the wolves – as they have for other men based on our befriending Ashley Diamond.

Pursuant to 28 U.S.C. § 1746, I hereby declare and state under penalty of perjury that the foregoing is true and correct.

February 16, 2022.

Respectfully submitted,

/s/ Michael Mancil*
Michael Mancil

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