

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

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, et al.,

Defendants.

CASE NO. 5:20-CV-00453-MTT

**DECLARATION OF [REDACTED]**

I, [REDACTED] hereby declare and state as follows:

1. My name is [REDACTED] and I am incarcerated at Coastal State Prison.
2. I met Ashley Diamond in June 2020 when she was transferred to my dormitory at Coastal.
3. When I met Ashley, it was obvious that she was a woman. Ashley looks like a woman, acts like a woman, and has breasts. So I was surprised that GDC officials put her at Coastal in a dormitory full of men.
4. The day before Ashley was transferred to my dormitory, Unit Manager Rodney Jackson held a dormitory wide meeting. During the meeting, Jackson announced that a “freak” was coming to our dormitory, and said “even though [Ashley] has breasts, looks can be deceiving.” He also made a lot of crude jokes and statements about Ashley’s body and about Ashley being transgender.
5. Afterwards, I saw Ashley suffer a lot of abuse and attacks from other people in the dormitory.
6. Even though I did not know Ashley well, I didn’t like seeing people treat her that way. I could tell that Ashley was very afraid and in a lot of pain.
7. As time passed, I got to know Ashley a little better. Ashley helped me work on my habeas corpus petition because she knows a lot about the law. Over time, she also became one of my friends.
8. The more I got to know Ashley, the more instances of abuse I saw. It was an every day, frequent kind of thing involving multiple guys.

9. Ashley was followed around the dormitory by men constantly who harassed and came on to her. She was constantly being harassed by men who forced themselves on her sexually, attacked her, and even raped her.
10. One time when I walked by Ashley's cell, I saw a man sitting on her bed staring at Ashley while she slept. The man only left Ashley's cell after I confronted him.
11. I started checking on Ashley from time to time because her cell door didn't lock, and because I knew about all of the sexual abuse she has experienced in our dormitory.
12. One night around Halloween when I checked on Ashley, I found her with a belt around her neck in her cell, trying to hang herself.
13. Ashley was barely conscious when I found her, but she came to once I took the noose off her neck and gave her some water. Afterwards, Ashley was light-headed and disoriented, and couldn't stop sobbing.
14. At the time, I didn't see any corrections officers around who could help us since they don't really patrol our dormitory much in the evenings. Sometimes after count, GDC officers are gone for hours at a time.
15. Because I was terrified that Ashley might attempt suicide again, I stayed with her for the rest of the night to make sure that she was stable.
16. The next morning when an officer finally passed by Ashley's cell, the officer saw me present and reacted with anger.
17. Ashley was dragged out of her cell and I was handcuffed and thrown into solitary confinement for the first time since I entered GDC custody.
18. At first, I didn't know what the problem was. But later I was handed a disciplinary report ("DR") that said Ashley and I had been caught having sex, with Ashley anally penetrating me.
19. The DR was so absurd that it would have been funny if the allegations weren't so serious.
20. Ashley and I have never been romantically involved. We were fully dressed at the time when the officer walked in on us. We weren't even touching. In addition, I don't even think that Ashley as a transgender woman could even do the sex act that GDC accused us of doing.
21. I asked to be sent to medical for an exam and rape kit to prove that the allegations against me were false. I also did not shower for a week so GDC officials could test my body for DNA evidence, but they refused to conduct any kind of investigation whatsoever.
22. Instead, GDC officials blocked me from having a real hearing on my DR and sustained the charge without reviewing any evidence. GDC officials denied my request to have a

Sexual Assault nurse speak at the hearing on my behalf. They also blocked me from appealing the charge.

23. After my DR was sustained, I was approached by Deputy Warden of Care and Treatment Carl Betterson, who works closely with Warden Benton.
24. Deputy Warden Betterson told me my DR was “still not over” and brought me to his office at Coastal.
25. Betterson told me he needed me to file a PREA complaint against Ashley Diamond, saying that she had raped me. He asked me to write a statement saying that Ashley had forced me to have sex, or that she drugged and coerced me into having sex with her—even though both statements were false and Ashley and I have never been intimate.
26. I told Deputy Warden Betterson that I could not make the statement he had requested because it would require me to lie. But Deputy Warden Betterson refused to take no for an answer.
27. Deputy Warden Betterson called me to his office two more times and asked me to make the same false statement. Betterson told me to be a “Team Player,” and implied that if I cooperated, I would be released from solitary confinement and allowed back into my dormitory in [REDACTED].
28. Each time I refused, Deputy Warden Betterson looked angry and defeated—like I had stopped an important plan—and sent me back to solitary confinement.
29. In the end, I spent three months in solitary confinement for refusing to lie about Ashley as Deputy Warden Betterson requested.
30. GDC officers also went around telling everyone in solitary that I had been “fucked by a sissy,” so I was constantly called gay and harassed by others. Coupled with the isolation, which took a toll on me emotionally, being in solitary was truly hell.
31. When Deputy Warden Betterson finally agreed to release me from solitary, he blocked me from returning to my dormitory. Instead, he tried to place me in a series of dormitories that are known for being especially dangerous, including [REDACTED] [REDACTED] [REDACTED], which house lots of gang members.
32. When I arrived at [REDACTED], GDC officers who work under Deputy Warden Betterson loudly announced “this is the guy getting screwed by a transsexual” to everyone present in the dormitory.
33. That same day, I was approached by a group of gang members who brandished a knife, called me anti-gay slurs, and threatened to kill me unless I paid them protection money.
34. Because of the environment in [REDACTED] and all of the threats I received, I feared for my life. But when I asked GDC officials for a new housing placement, I was sent back to solitary confinement.

35. Eventually, I was transferred from solitary confinement to a cell in [REDACTED] but I still feel very unsafe. It feels like I'm living in a den of wolves. I'm afraid to show any weakness and I have to put on emotional armor every day so I don't get preyed upon.
36. I have been scared to come forward about my experiences, even though I'm just standing up for what's right and true, because I am afraid of retaliation by Deputy Warden Betterson and Warden Benton.
37. Deputy Warden Betterson is one of the most powerful people at Coastal, and he's punished me already in more ways than I can count just because I befriended Ashley Diamond and refused to lie about her.
38. Because GDC officials, including Deputy Warden Betterson, are out to get Ashley and I did not cooperate with their plan, I spent three excruciating months in solitary confinement.
39. Because of Betterson, I was placed into one of the most dangerous dormitories at Coastal and threatened at knifepoint. Because of Betterson, I'm on edge all the time. I am always looking over my shoulder. I can't sleep well at night.
40. I'm afraid that by speaking up, GDC officials, including Warden Benton and Deputy Warden Betterson, will find new ways to punish and intimidate me, or even get me killed.
41. At this point, if I cannot return to [REDACTED], I want to be transferred away from Coastal and Deputy Warden Betterson for the sake of my safety.

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

Dated: March 8, 2021

Respectfully submitted,

[REDACTED]