

**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

**NOTICE OF FURTHER RETALIATION AGAINST PLAINTIFF ASHLEY DIAMOND,
SUPPORTING WITNESSES, AND ADDITIONAL DOCUMENTATION**

1. On April 25, 2021 and April 26, 2021, after news of the Department of Justice (DOJ)'s Statement of Interest in this case aired on television news broadcasts at Coastal State Prison, Ms. Diamond received six new disciplinary charges.

2. Among other things, Ms. Diamond was accused of possessing pornography and obscene materials while listening to gospel music on a prison-issued tablet. Inmate [REDACTED] can speak to the contents of the tablet.

3. Ms. Diamond was accused of insubordination (x2), failure to follow, and a verbal "B12" violation, for objecting when a GDC staffer named Ms. Moore, demeaned her for being transgender and told her she was "a man" and would never be eligible for placement in a female facility. Numerous inmates witnessed the incident, inc [REDACTED]

4. Ms. Diamond was also charged with "assault of staff" by Ms. Moore because their shoulders allegedly brushed while Ms. Diamond was being escorted to her cell by GDC officers on camera.

5. Ms. Diamond has copies of these disciplinary reports in her possession and intends to bring them to the May 12 hearing.

6. Cell phone, body camera, and surveillance video of the incidents underlying these disciplinary reports purportedly exists—including a video showing Ms. Moore accuse Ms. Diamond of hitting her without any provocation or basis. Plaintiff's counsel has asked Defendants to ensure that all such video be preserved.

7. Relevant audio recordings also exist because an Internal Investigations officer conducted a recorded interview with Ms. Diamond concerning the disciplinary charges on April 26, 2021, where he voiced doubt about the validity of certain charges.

8. On April 26, 2021, Ms. Diamond was placed into solitary confinement as a result of these allegations where she reports abhorrent and unsanitary conditions, including feces on the walls and a severe rat infestation that has meant rats crawl on her whenever she tries to sleep.

9. The layout of Ms. Diamond's cell also means that she has no privacy and can be observed by incarcerated men at all times, including while using the bathroom or changing her clothes.

10. As a result of the new disciplinary charges Ms. Diamond received following the DOJ's announcement, Ms. Diamond has now received approximately **twenty (20)** disciplinary charges at Coastal State Prison since October 2020, when she stepped up her advocacy against Coastal officials.

11. In addition, individuals in Ms. Diamond's dormitory who witnessed staff misconduct and retaliation against Ms. Diamond—including [REDACTED]—have also been retaliated against themselves by being moved out of her dormitory en masse.

12. [REDACTED] can all speak to the pattern of retaliation that

took place on April 25 and April 26 if a Transfer Order is issued by the Court.

13. Enclosed are true and correct copies of the following documents:

Exhibit No.	Description
1	SCRIBE Report dated October 8, 2020, showing Ms. Diamond was classified as a PREA Victim (“PREA Vict”).
2	Performance Incentive Credit (PIC) Summary dated November 19, 2020 showing that Ms. Diamond’s projected release date based on PIC credits was March 2021.
3	SCRIBE Report dated February 7, 2021, showing that Ms. Diamond had been reclassified as an “STG” group member and as a PREA Aggressor (“PREA – Both”), but confirming that her projected release date based on PIC credits was March 1, 2021.
4	Disciplinary charge dated February 18, 2021, accusing Ms. Diamond of insubordination.
5	Disciplinary charge dated February 18, 2021, accusing Ms. Diamond of using explicit words.
6	Disciplinary charge dated February 22, 2021 confirming that Ms. Diamond has been classified as an “STG offender[,]” and accusing her of making unauthorized use of social media.
7	Disciplinary charge dated March 17, 2021 accusing Ms. Diamond of unauthorized possession for having arts and crafts scissors.
8	Letters from the Georgia Board of Pardons and Paroles to Plaintiff’s counsel dated April 8, 2021, confirming that Ms. Diamond was denied release in March 2021 and her tentative parole month was reset to April 2022 because of her alleged “institutional conduct.”
9	Notice of Retaliation to Defendants dated April 27, 2021 describing ongoing retaliation by officials at Coastal State Prison.

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: April 29, 2021

Respectfully Submitted,

/s/ A. Chinyere Ezie*

A. Chinyere Ezie

CENTER FOR CONSTITUTIONAL RIGHTS

666 Broadway, 7th Floor

New York, NY 10012

Phone/Fax: (212) 614-6467

Email: cezie@ccrjustice.org

Counsel for Plaintiff Ashley Diamond

** Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2021, I electronically filed this Notice and all accompanying exhibits with the Clerk of the Court and all counsel of record using the CM/ECF system.

/s/ A. Chinyere Ezie*

A. Chinyere Ezie

Center for Constitutional Rights

666 Broadway, 7th Floor

New York, NY 10012

Phone/Fax: (212) 614-6467

Email: cezie@ccrjustice.org

Counsel for Plaintiff Ashley Diamond

** Admitted Pro Hac Vice*

Georgia Department of Corrections **SCRIPE** User: Tamara Cantera Location: Coastal State Prison ▶ My To Do List

Name: **DIAMOND, ASHLEY ALTON** GDC ID: **1000290565**

Race: **BLACK** Status: **INMATE / PIC Eligible**

Sex: **MALE** Supervision Level/Type: **MEDIUM /**

DOB: **04/09/1978** Type Population: **GENERAL POPULATION**

Last Scribe Move: **COASTAL STATE PRISON N-B-136-B**

Classification Score: **.27197**

AGREEMENTS ASSIGNMENTS ASSESSMENT CASE MGMT. CASE NOTES CARE AND CUSTODY CLASSIFICATION COMM. SERVICE COURT CASES DIAGNOSTICS

DISCIPLINARIES FINANCIALS GRIEVANCES IRTS MEDICAL MENTAL HEALTH MOVEMENTS NOTIFICATIONS OFFENDER DOC'S OTIS INFO

OMBUDSMAN PAROLE INFO PERSONAL INFO PROFILES PROGRAMS RAP RE-ENTRY PLAN RELEASES SCHEDULES STG

PREA VICT

****D/N DESTROY N**

- ▶ Main Menu
- ▶ Find Offender
- ▶ Caseload Search

MAXIMUM RELEASE DATE	PROJECTED PIC DATE	TARGET RSAT REFERRAL DATE	TARGET TC REFERRAL DATE	CURRENT TOTAL PIC CREDITS	CURRENT PROGRAM CREDITS	CURRENT WORK CREDITS	CURRENT EDUC-VOC IMPROVEMENT CREDITS
02/05/2024	05/31/2021	12/31/2019		5	1	0	4

PIC View Summary

PIC information is valid as of Oct 08, 2020

Programs Program History

PAROLE PIC SUMMARY

PAROLE ELIGIBILITY DATE	TENTATIVE PAROLE MONTH	PIC CREDITS AWARDED	PIC CREDIT FREEZE DATE	TOTAL FROZEN PIC CREDITS
05/20/2020	10/31/2021			

PIC SUMMARY

PIC Information is valid as of Nov 19, 2020

OVERVIEW

MAXIMUM RELEASE DATE	PROJECTED PIC DATE	TARGET RSAT REFERRAL DATE	TARGET 1C REFERRAL DATE	CURRENT TOTAL PIC CREDITS	CURRENT PROGRAM CREDITS	CURRENT WORK CREDITS	CURRENT EDUC. VOC IMPROVEMENT CREDITS
02/05/2024	03/31/2021	10/31/2019		17	1	0	6

PIC information is valid as of Nov 19, 2020

PAROLE PIC SUMMARY

PAROLE ELIGIBILITY DATE	TENTATIVE PAROLE MONTH	PIC CREDITS AWARDED	PIC CREDIT FREEZE DATE	TOTAL FROZEN PIC CREDITS
05/20/2020	10/31/2021			

PROGRAM CATEGORY SUMMARY

PIC PROGRAM CATEGORY	COGNITIVE	EDUCATIONAL	MENTAL HEALTH	SOPP	SUBSTANCE ABUSE	VOCATIONAL
TOTAL PROGRAMS	1	0	0	0	0	5
NUMBER OF PROGRAMS COMPLETED	0	0	0	0	0	5

CURRENT INCARCERATION PIC PROGRAM STATUS

TYPE-CATEGORY	ACTIVITY	PIC PROGRAM CATEGORY	REASON	IDENTIFIED	STARTED	STATUS	END REASON	END DATE
RISK REDUCTION-COGNITIVE INSTRUCTION	THINKING FOR A CHANGE	COGNITIVE	ASSESSED NEED	11/13/2020	12/30/2013			
✓ EDUCATION-OJT	SUPERVISOR AIDE	VOCATIONAL	GDC - REFERRED	07/20/2020	07/20/2020		COMPLETED SUCCESSFULLY	08/03/2020
✓ RISK REDUCTION-PRE-RELEASE	RE-ENTRY SKILLS BUILDING	VOCATIONAL	GDC - REFERRED	10/15/2019	09/28/2020		COMPLETED SUCCESSFULLY	11/13/2020
✓ EDUCATION-OJT	BASIC COMPUTER OPERATION	VOCATIONAL	GDC - REFERRED	10/26/2020	11/13/2020		COMPLETED SUCCESSFULLY	11/16/2020
✓ EDUCATION-OJT	CUSTODIAL MAINTENANCE	VOCATIONAL	GDC - REFERRED	07/20/2020	07/20/2020		COMPLETED SUCCESSFULLY	09/30/2020
✓ EDUCATION-OJT	GROUNDS KEEPER	VOCATIONAL	GDC - REFERRED	09/30/2020	09/30/2020		COMPLETED SUCCESSFULLY	11/13/2020

W/T Floor Tech like no pts

CURRENT NON-PIC PLAN

Type - Category	Activity	Reason	Location Created	Identified	Started	Status
RISK REDUCTION-SUBSTANCE ABUSE	MOTIVATION FOR CHANGE	GDC - REFERRED	GA DIAG CLASS PRISON	10/15/2019		
RISK REDUCTION-SUBSTANCE ABUSE	RSAT: RESIDENTIAL SA PROGRAM	ASSESSED NEED	GA DIAG CLASS PRISON	11/13/2020		

Work Detail Summary for Current Incarceration

Georgia Department of Corrections

User: Anthony Orr Location: Coastal State Prison

Name: DIAMOND, ASHLEY ALTON

GDC ID: 1000290565



Race: BLACK

Status: INMATE / PIC Eligible



Sex: MALE

Supervision Level/Type: MEDIUM /

Last Scribe Move: COA N-B-

DOB: 04/09/1978

Type Population: GENERAL POPULATION

Classification Score: .561

AGREEMENTS ASSIGNMENTS ASSESSMENT CASE MGMT. CASE NOTES CARE AND CUSTODY CLASSIFICATION CI

D/N DESTROY NOTICE

- ▶ Main Menu
- ▶ Find Offender
- ▶ Caseload Search

PIC SUMMARY

PIC information is valid as of Feb 07, 2021

OVERVIEW

MAXIMUM RELEASE DATE	PROJECTED PIC DATE	TARGET RSAT REFERRAL DATE	TARGET TC REFERRAL DATE	CURRENT TOTAL PIC CREDITS	CURRENT PROGRAM CREDITS	CURRE WOR CREDI
02/05/2024	03/01/2021	10/31/2019		7	1	0

PIC

View Summary

Programs

Add Program

Program History

PIC information is valid as of Feb 07, 2021

PAROLE PIC SUMMARY

PAROLE ELIGIBILITY DATE	TENTATIVE PAROLE MONTH	PIC CREDITS AWARDED	PIC CREDIT FREEZE DATE	TOTAL FROZEN PIC CREDITS
05/20/2020	10/31/2021		12/01/2020	7

PROGRAM CATEGORY SUMMARY

DISCIPLINARY REPORT

Coastal State Prison 523 _____
INSTITUTION NAME CODE # TPM/MAX DATE

I. Offender: Diamond, Ashley Medium 1000290565
Name: Last, First, M.I. Security ID Number

II. Offense Data:

A.	Charge	Code	Plea	Finding	Charge	Code	Plea	Finding
1	Insubordination	B-13			4			
2					5			
3					6			

2-18-2021 0836 Mitchell, Michael/STG Sgt.
Date Time of Offense Signature of Reporting Official

B. Factual Statement: On 2-18-2021 at approximately 0836 hours while conducting PREA and Security Checks I stopped to check door N-B 136, and saw Offender Diamond, Ashley fully dressed standing at the locker box through the window on the door. I knocked on the door and slid it open to see if it was properly secured. Offender Diamond came to the door yelling, that I did not knock on the door. I told Offender Diamond that I did knock on the door. Offender Diamond then began yelling I did not give enough time to open the door and that Offender Diamond could have been naked. I stated that I could see that you were fully dressed through the door window. Offender Diamond kept trying to yell over me while being insubordinate, stating that I better knock on the door and wait until someone opens the door next time.

Reviewed by the appropriate supervisor: Walter / Walter Otero LT. 2/18/2021
Signature M/o./day/year

C. Charges served on accused: 2/18/2021 1351 Bray Damien
Mo./day/year/time Signature of Serving Official

III. Investigative Report:
A. Summary of Investigation: _____

B. _____
Title Signature Mo./day/year

C. Advocate's Name: _____

IV. Hearing Officer's Recommendation:
 Greatest _____ High _____ Moderate _____ Low _____

Signature Mo./day/year

V. Disposition of Disciplinary Hearing:
A. Justification for Findings: _____

B. Action Recommended: _____

C. TPM Extension: _____ **Isolation:** _____

D. Offender advised of his/her right to appeal: _____
Yes No

Signature of Disciplinary Hearing Officer Time of Hearing Mo./Day/Year

VI. Reviewing Officer: _____
Signature Title Mo./Day/Year

SOP 209.01
Attachment II
11/06/2017

DISCIPLINARY REPORT

Coastal State Prison 523
INSTITUTION NAME CODE #

I. Offender: Diamond, Ashley medium 1000290565
Name: Last, First, M.I. Security ID Number

II. Offense Data:

A. Charge	Code	Plea	Finding	Charge	Code	Plea	Finding
1 <u>Explicit Words</u>	<u>B12</u>						
2							
3							

02/18/21 0838 Aliyah Parker COI
Date Time of Offense Signature of Reporting Official

B. Factual Statement: On the above date and time, I Sgt. Parker
observed offender Diamond, Ashley GDC # 1000290565
calling Sgt. Mitchell a "cracker" after he completed
his security rounds in N Building B-range. Supervisor
was notified.

Reviewed by the appropriate supervisor: 1- [Signature] /SGT Bray 2/18/21
Signature M.o./day/year

C. Charges served on accused: 2/18/21 2048 [Signature]
Mo./day/year/time Signature of Serving Official

III. Investigative Report:
A. Summary of Investigation:

B. _____
Title Signature Mo./day/year

C. Advocate's Name: _____

IV. Hearing Officer's Recommendation:
Greatest _____ High _____ Moderate _____ Low _____

Signature Mo./day/year

V. Disposition of Disciplinary Hearing:
A. Justification for Findings: _____

B. Action Recommended: _____

C. TPM Extension: _____ Isolation: _____

D. Offender advised of his/her right to appeal: _____
Yes No

Signature of Disciplinary Hearing Officer Time of Hearing Mo./Day/Year

VI. Reviewing Officer:

Signature Title Mo./Day/Year

DISCIPLINARY REPORT

Coastal State Prison 523
INSTITUTION NAME CODE #

I. Offender: Diamond, Ashley Medium 1000290565
Name: Last, First, M.I. Security ID Number

II. Offense Data:

A. Charge	Code	Plea	Finding	Charge	Code	Plea	Finding
1 <u>Social Media</u>	<u>D-300</u>			4			
2				5			
3				6			

2-22-2021 1408 Mitchell, Michael STG
Date Time of Offense Signature of Reporting Official

B. Factual Statement: On 2-22-2021 at approximately 1408 hours
While conducting a social media search for STG offenders
it was found that offender Diamond, Ashley had been
using Facebook to communicate with people outside
incarceration. Screen shots were taken for evidence.

Reviewed by the appropriate supervisor: Brown, Kelly 2-22-2021
Signature M/o./day/year

C. Charges served on accused: 2-22-2021 / 1607 Shawn Smith Shawn Smith CEAT
M/o./day/year Signature of Serving Official

III. Investigative Report:
A. Summary of Investigation: _____

B. _____
Title Signature M/o./day/year

C. Advocate's Name: _____

IV. Hearing Officer's Recommendation:
Greatest _____ High _____ Moderate _____ Low _____
Signature M/o./day/year

V. Disposition of Disciplinary Hearing:
A. Justification for Findings: _____

B. Action Recommended: _____

C. TPM Extension: _____ Isolation: _____

D. Offender advised of his/her right to appeal: _____
Yes No

Signature of Disciplinary Hearing Officer Time of Hearing Mo/Day/Year

VI. Reviewing Officer: _____
Signature Title Mo/Day/Year

Retention Schedule: Upon completion, this form shall become part of the offender's institutional file and shall be maintained according to the official records retention schedule for institutional files.

SOP 209.01
Attachment 11
11/06/2017

DISCIPLINARY REPORT

Coastal State Prison 523
INSTITUTION NAME CODE #
I. Offender: Diamond Ashley A medium 1000290565
Name: Last, First, M.I. Security ID Number

II. Offense Data:

A. Charge	Code	Plea	Finding	Charge	Code	Plea	Finding
1 <u>Unauthorized possession</u>	<u>DI</u>			4			
2				5			
3				6			

Date Time of Offense Signature of Reporting Official

B. Factual Statement: On the above date and time, I ofc Dukes observed offender Diamond Ashley with scissors in his back pocket. I ofc Dukes let my supervisor Sgt. Jackson know and I ofc Dukes took the scissors. End of report.

Reviewed by the appropriate supervisor: Walter Jones CT 3-17-21
Signature M./o./day/year

C. Charges served on accused: 3-17-21 1854 Shakala Dukes / Shakala Duke
Mo./day/year/time Signature of Serving Official

III. Investigative Report:
A. Summary of Investigation: _____

B. _____
Title Signature Mo./day/year

C. Advocate's Name: _____

IV. Hearing Officer's Recommendation:
Greatest _____ High _____ Moderate _____ Low _____
Signature Mo./day/year

V. Disposition of Disciplinary Hearing:
A. Justification for Findings: _____

B. Action Recommended: _____

C. TPM Extension: _____ Isolation: _____

D. Offender advised of his/her right to appeal: _____
Yes No

Signature of Disciplinary Hearing Officer Time of Hearing Mo./Day/Year

VI. Reviewing Officer: _____
Signature Title Mo./Day/Year

APR 14 2021



STATE BOARD OF PARDONS AND PAROLES

Terry E. Barnard

Chairman

Brian Owens

Vice-Chairman

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FLOYD BUILDING, BALCONY LEVEL, EAST TOWER
ATLANTA, GEORGIA 30334-4909
(404) 656-4661
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Member

David Herring

Member

Meg Heap

Member

April 8, 2021

Ms. Beth Littrell, Senior Supervising Attorney, Southern Poverty Law Center
P.O. Box 1287
Decatur, Ga. 30031-1287

Re: Ashley Diamond, EF-751505

Dear Ms. Littrell,

This acknowledges receipt of your Submission in Favor of a Grant of Parole dated March 24, 2021 regarding Ashley Diamond and addressed to the Honorable Terry E. Barnard.

As you know, the Board, on 3/2/2021, notified Ashley Diamond that a new TPM of 4/2022 had been established due to institutional conduct. Ashley Diamond is still eligible to receive Performance Incentive Credits (PIC) for program completions credits and has received 7 PIC credits which may advance Ashley Diamond's TPM to 9/2021.

Upon a thorough review of your Submission, it has been determined that there is insufficient new and compelling information contained in it to warrant a reconsideration of Ashley Diamond's case.

Please contact the Offender Administration Division of the Department of Corrections at 770-504-7312 to receive updated information on Ashley Diamond's institutional conduct. Please encourage Ashley Diamond to maintain a good institutional conduct record so as to increase the likelihood of an eventual parole.

Your Submission has been made a part of Ashley Diamond's file.

Sincerely,

Steve Baustin/Attorney Liaison



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(404) 656-4661
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Jacqueline Bunn, Esq.
Member
David Herring
Member
Meg Heap
Member

April 8, 2021

Ms. A. Chinyere Ezie, Senior Staff Attorney, Center for Constitutional Rights
666 Broadway, 7th Floor
New York, N.Y. 10012

Re: Ashley Diamond, EF-751505

Dear Ms. Ezie,

This acknowledges receipt of your Submission in Favor of a Grant of Parole dated March 24, 2021 regarding Ashley Diamond and addressed to the Honorable Terry E. Barnard.

As you know, the Board, on 3/2/2021, notified Ashley Diamond that a new TPM of 4/2022 had been established due to institutional conduct. Ashley Diamond is still eligible to receive Performance Incentive Credits (PIC) for program completions credits and has received 7 PIC credits which may advance Ashley Diamond's TPM to 9/2021.

Upon a thorough review of your Submission, it has been determined that there is insufficient new and compelling information contained in it to warrant a reconsideration of Ashley Diamond's case.

Please contact the Offender Administration Division of the Department of Corrections at 770-504-7312 to receive updated information on Ashley Diamond's institutional conduct. Please encourage Ashley Diamond to maintain a good institutional conduct record so as to increase the likelihood of an eventual parole.

Your Submission has been made a part of Ashley Diamond's file.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Baustin".

Steve Baustin/Attorney Liaison



Chinyere Ezie <cezie@ccrjustice.org>

Continued Retaliation Against Ms. Diamond

Beth Littrell <beth.littrell@splcenter.org>

Tue, Apr 27, 2021 at 5:23 PM

To: Roger Chalmers <rchalmers@law.ga.gov>

Cc: Robert Shapiro <RShapiro@law.ga.gov>, "Elizabeth M. Crowder" <ecrowder@law.ga.gov>, cezie <cezie@ccrjustice.org>, Tyler Clemons <Tyler.Clemons@splcenter.org>, Annarita McGovern <amcgovern@satchermcgovernlaw.com>, Terry Long <tlong@satchermcgovernlaw.com>, Maya Rajaratnam <maya.rajaratnam@splcenter.org>

Roger:

Unfortunately, it appears that the retaliation campaign against our client and witnesses, as described in our filings and supported with affidavits, continues unabated. Indeed, it continues with renewed vigor in the wake of recent court filings. Specifically, and most recently, Ms. Diamond was thrown into solitary confinement yesterday based on another unfounded rule violation. And, this is but one of six unfounded DRs she has received in the wake of the Department of Justice's filing on Friday. This retaliation must stop.

We are requesting that you immediately investigate these allegations and insist that Ms. Diamond be returned to her cell as advised by the Mental Health Director. Not only is solitary confinement contrary to the medical advice of her treating psychiatrist, treating psychologist and all her mental health providers, it is inhumane. She is in a cell with rats crawling on her night and day, feces on the walls and filling the toilet, glass window on the door and a large hole in the adjoining cell leaving her in full view of male offenders. Given this environment, she is unable to change clothing or otherwise avoid a hostile sexual environment.

These recent actions have had the intended effect of further deteriorating Ms. Diamond's mental health. Accordingly, please ensure that she is promptly assessed for potential elevation of her Mental Health category to Level III and considered for a transfer to an appropriate facility.

In addition to ensuring that Ms. Diamond is properly assessed and considered for a Mental Health escalation, advocating that she be returned to her cell pending your investigation and a hearing that provides actual due process (i.e., one in which she can call a list of witnesses and show video evidence), please ensure that all video of Ms. Diamond is retained pursuant to your client's obligations as set out in our multiple litigation hold letters. We believe they will exonerate our client and are directly relevant to our claims that she is unsafe and harshly treated by GDC staff. It may be helpful for you to discuss with your clients the court's reference in its email that the allegations in our filings implicate "misconduct" that is "perhaps criminal." Ms. Diamond is fully aware of her obligation with respect to her sworn testimony.

We trust you will treat these allegations with the seriousness they require, ensure the preservation of **all** video and other evidence, and let us know what steps your office will take to investigate and advocate for Ms. Diamond's return from her current disciplinary and unwarranted segregation.

Respectfully,

Beth



Beth Littrell she/her/hers

Sr. Supervising Attorney | Legal

Southern Poverty Law Center

T 404.221.5876 F 404.221.5857

beth.littrell@splcenter.org | www.splcenter.org