

**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

**PLAINTIFF’S DEPOSITION DESIGNATIONS
FOR THE MAY 10, 2021 DEPOSITION OF TAMARA CANTERA**

Citation Start	Citation End	Subject Matter
13:17	13:19	Educational background
14:10	14:22	Role at Coastal in relation to Plaintiff
15:22	16:2	Supervisors and reports
19:25	20:7	Familiarity with Plaintiff and transgender status
21:10	21:14	Plaintiff’s suicidality at Coastal
23:11	23:22	GDC Mental Health (MH) classifications
23:23	25:9	Bases for decision to increase Plaintiff’s classification from MH II to III; Plaintiff’s suicidality and castration attempts at Coastal
25:14	26:23	Plaintiff’s reports of sexual assault and sexual harassment
27:15	27:21	Bases for Plaintiff’s suicidality
27:22	28:9	Knowledge of Plaintiff’s safety concerns and request for placement in female facility
29:4	29:18	Observations and opinion regarding Plaintiff’s female gender identity and female appearance.
29:19	29:25	Observations regarding staff interactions with Plaintiff, including use of derogatory terms
30:4	30:5	Observations regarding staff interactions with Plaintiff, including use of derogatory terms
32:8	32:18	Plaintiff’s symptomology following sexual assaults
32:19	33:1	Recommendation for Plaintiff’s transfer to safe housing
33:10	33:16	Deputy Warden Betterson’s role in housing decisions
33:21	34:13	Discussion regarding placing Plaintiff in “the segregation unit” for safety and risks associated with such placement; decision to increase Plaintiff’s classification to MH III
37:4	37:10	Number of times deponent recommended a safe housing transfer for Plaintiff

Citation Start	Citation End	Subject Matter
37:13	37:15	Knowledge regarding failure to transfer Plaintiff from dorm
38:18	38:20	Knowledge regarding failure to transfer Plaintiff from cell
38:22	39:3	Third Party PREA notices
40:3	40:7	Third Party PREA notices
43:16	43:23	Plaintiff's participation in mental health evaluations for sexual allegations
44:11	44:21	Knowledge regarding directions and requests for accommodations Plaintiff's attorney
45:2	45:24	Knowledge of reasons Plaintiff "declined to be interviewed at times about sexual allegations"
46:4	46:7	Deputy Warden Betterson's representations that he was making arrangements for Plaintiff's lawyers to participate in PREA interview
46:8	46:14	Observation regarding ease of incorporating attorneys into PREA investigations via speakerphone
47:2	47:5	Notice to Plaintiff that declining to share details without counsel present would not end PREA investigations
49:3	49:21	Process and determination concerning Plaintiff's PREA allegations
51:8	52:2	Cantera Exhibit 2: PREA Investigative Summary
52:3	55:1	PREA Investigation into sexual assaults on September 18, 19, and 20 and basis for closing the investigation
55:8	56:2	Opinions and observations regarding Plaintiff's credibility and sincerity
59:12	59:19	Plaintiff's designation as PREA Victim upon arrival at Coastal
60:9	60:12	Connection between Plaintiff's previous victimization at GDC and PREA Victim designation
60:22	61:2	Knowledge regarding Plaintiff's lack of "sexually aggressive behavior" or conviction for violent offenses
62:3	62:9	Knowledge regarding Plaintiff's lack of violent or sexual crime history
62:15	63:1	Cantera Exhibit 4: October 8, 2020 PIC Summary
63:13	64:6	Explanation of SCRIBE report showing May 31, 2021 projected PIC date
64:10	64:20	Cantera Exhibit 5: February 7, 2020 PIC Summary
64:21	65:7	SCRIBE report showing Plaintiff's PREA Aggressor designation and security threat classification
65:13	65:18	Knowledge regarding Plaintiff's lack of gang affiliation
67:13	67:20	Decision to elevate Plaintiff to MH III
67:23	68:19	GDC administration's reversal of treatment team's decision to elevate Plaintiff to MH III
70:12	70:22	Emails regarding Plaintiff's PREAs and MH III transfer
71:11	72:9	Emailed reports regarding Plaintiff to Defendant Benton
76:24	77:9	Recollection of Plaintiff's mental health symptoms
77:18	77:23	Awareness of Plaintiff's castration attempts
78:4	78:10	Opinion regarding whether Plaintiff "would be safer in a women's facility."

Citation Start	Citation End	Subject Matter
88:12	88:21	Recollection of SART meetings and differing opinions
93:19	94:4	Sources of information regarding MH III override and reaction
95:7	95:12	Awareness of another mental health staff member who “recommended Ms. Diamond be transferred to a woman’s facility.”
95:22	96:7	Bases for recommendations to transfer Plaintiff from Coastal
106:22	107:3	Frequency with which SART team initially does not know identity of aggressor
125:6	126:9	Awareness and experience with victims fearing “retaliation from other incarcerated people”; the “risk of gang retaliation if one identifies a PREA aggressor”; Plaintiff’s reluctance to “name names” based on fears of retaliation and physical violence
126:10	127:15	Recollection of treatment team’s discussion regarding housing Plaintiff in a women’s facility and application of GDC policy/practice prohibiting housing transgender women in women’s facilities

Respectfully submitted,

Dated: June 4, 2021

/s/ A. Chinyere Ezie

A. Chinyere Ezie*

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CERTIFICATE OF SERVICE

I hereby certify that, on June 4, 2021, the foregoing document and all attachments were served on all counsel of record through the Court's CM/ECF system.

/s/ A. Chinyere Ezie

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