

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

ASHLEY DIAMOND,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.
	:	5:20-cv-00453-MTT
	:	
TIMOTHY WARD, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**DEFENDANTS’ MOTION FOR RELIEF FROM
BI-WEEKLY REPORTING OBLIGATION**

Defendants Timothy Ward, Sharon Lewis, Ahmed Holt, Robert Toole, Benjamin Ford, Jack Sauls, Brooks Benton, Grace Atchison, Lachesha Smith, and Rodney Jackson, through counsel, submit this motion for relief from the bi-weekly reporting obligation established by the Court’s order dated March 28, 2022. The basis for this motion is that Ashley Diamond was released from confinement on Monday, August 1, 2022, and is no longer in the custody of the Georgia Department of Corrections or Coastal State Prison.

Defendants attach hereto copies of the bi-weekly reports that were submitted to counsel for Ms. Diamond from April 8, 2022 through July 29, 2022, and related correspondence.

WHEREFORE, Defendants ask that the Court terminate the reporting obligation established by the March 28, 2022 order.

Respectfully submitted,

Christopher M. Carr 112505
Attorney General

Kathleen M. Pacious 558555
Deputy Attorney General

s/ Roger A. Chalmers
Roger A. Chalmers 118720
Senior Assistant Attorney General

PLEASE ADDRESS ALL
COMMUNICATIONS TO
Roger A. Chalmers
State Law Department
40 Capitol Square SW
Atlanta, GA 30334
Tel: (404) 458-3220
Fax: (404) 651-5304
Email: rchalmers@law.ga.gov

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Andrea Chinyere Ezie
Paul Henefeld
Elizabeth Littrell
Scott D. McCoy

This 1st day of August, 2022.

s/ Roger A. Chalmers
Roger A. Chalmers

Roger Chalmers

From: Roger Chalmers
Sent: Friday, April 8, 2022 4:25 PM
To: Beth Littrell
Cc: Roger Chalmers (rchalmers@law.ga.gov)
Subject: Diamond v. Ward, No. 5:20-cv-00453
Attachments: DiamondReport.pdf

Counsel:

Please find attached the Warden report and call me with any questions.



Roger Chalmers
Senior Assistant Attorney General - Section Chief
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General Litigation
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rchalmers@law.ga.gov
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Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

COASTAL STATE PRISON

Offender Diamond, Ashley (GDC#1000290565)

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	3/25/2022			
Saturday	3/26/2022			
Sunday	3/27/2022			
Monday	3/28/2022	N-building power shut off for circuit check, between 8:45am-9:15am. Offender was seen in MH for a callout during this time as camera would have been inoperable during that time.	No	No
Tuesday	3/29/2022			
Wednesday	3/30/2022			
Thursday	3/31/2022			
Friday	4/1/2022			
Saturday	4/2/2022			
Sunday	4/3/2022			
Monday	4/4/2022			
Tuesday	4/5/2022			
Wednesday	4/6/2022			
Thursday	4/7/2022			

4.08.22

Aaron Pineiro, Warden

COASTAL STATE PRISON

P.O. Box 7150, 200 Gulfstream Road, Port Wentworth, GA 31408 • Phone 912-965-6303 • Fax 912-966-6799 • www.gdc.ga.gov



Roger Chalmers

From: Roger Chalmers
Sent: Friday, April 8, 2022 4:46 PM
To: Beth Littrell
Cc: Roger Chalmers (rchalmers@law.ga.gov)
Subject: RE: Diamond v. Ward, No. 5:20-cv-00453

Beth –

This is not PREA related, rather in an abundance of caution the described power outage was included on the report because it was a time period when the camera would not have been operational.



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rchalmers@law.ga.gov
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Atlanta, Georgia 30334



From: Beth Littrell [mailto:beth.littrell@splcenter.org]
Sent: Friday, April 8, 2022 4:43 PM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Scott McCoy <Scott.McCoy@splcenter.org>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Chinyere Ezie <cezie@ccrjustice.org>; Aaron Fleisher <aaron.fleisher@splcenter.org>; Jen Vail <jennifer.vail@splcenter.org>
Subject: RE: Diamond v. Ward, No. 5:20-cv-00453

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Roger:
Thank you for forwarding this Warden report and the invitation to ask questions. Do you have any further explanation as to the basis for the Incident Description on 3/28/22?

It does not appear to be PREA related, but the reference to video and the fact that it is included on this report, where we understood this report to be limited to PREA reporting, creates ambiguity. We would be grateful if you could clarify whether there is an Incident Report or PREA allegation that is attendant to this entry.

Thanks,
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

Admitted in Georgia

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From: Roger Chalmers <rchalmers@law.ga.gov>
Sent: Friday, April 8, 2022 4:25 PM
To: Beth Littrell <beth.littrell@splcenter.org>
Cc: Roger Chalmers <rchalmers@law.ga.gov>
Subject: Diamond v. Ward, No. 5:20-cv-00453

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Counsel:

Please find attached the Warden report and call me with any questions.



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Atlanta, Georgia 30334



Roger Chalmers

From: Roger Chalmers
Sent: Friday, April 22, 2022 11:57 AM
To: 'Beth Littrell'
Cc: Chinyere Ezie
Subject: RE: Diamond v. Ward, No. 5:20-cv-00453

Thanks. They have completed the second check that I asked for and verified that they have no information of a reported incident in this time period. Just let me know at your convenience.



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rchalmers@law.ga.gov
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Atlanta, Georgia 30334



From: Beth Littrell [mailto:beth.littrell@splcenter.org]
Sent: Friday, April 22, 2022 11:50 AM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Chinyere Ezie <cezie@ccrjustice.org>
Subject: RE: Diamond v. Ward, No. 5:20-cv-00453

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Roger:
Both Chinyere and I are out of the office today, but I wanted to respond briefly to appreciate your email and efforts. Regarding the Warden's Report, we will speak with our client next week regarding recent sexual assaults, and to whom she reported them.

Thanks,
Beth



Beth Littrell she/her/hers
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beth.littrell@splcenter.org | www.splcenter.org
Admitted in Georgia

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From: Roger Chalmers <rchalmers@law.ga.gov>
Sent: Friday, April 22, 2022 9:56 AM
To: Beth Littrell <beth.littrell@splcenter.org>; Chinyere Ezie <cezie@ccrjustice.org>
Cc: Roger Chalmers <rchalmers@law.ga.gov>
Subject: Diamond v. Ward, No. 5:20-cv-00453

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Beth and Chinyere,

Wanted to touch base on a few things. First, I'm working with GDC and Coastal SP on the bi-weekly report and will be sending that later today. The information I have received so far is that there is no incident to report in this time period. That is inconsistent with what Chinyere noted in the hearing last week, so I have asked GDC and Coastal to go back and make sure nothing was reported. If you have specific information you can provide to me – date, location, incident description – I will also provide that information for the follow-up check.

Second, there is video preserved from February 14. After your emails Coastal SP pulled 24 hours of video. It takes a very significant amount of time to download and send those files – more than a month it has been reported to me. I have not yet received them, but when I do I will produce them. Just wanted to let you know this as Beth mentioned that request of yours for video preservation for February 14 at the recent hearing.

Third, I've also got folks inquiring into the status of investigations and whether there is audio of interviews from October and February as discussed at the recent hearing.

Please let me know if you have additional information on the first point above that I can pass along.

Roger



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Roger Chalmers

From: Roger Chalmers
Sent: Friday, April 22, 2022 3:10 PM
To: 'Beth Littrell'
Subject: Diamond v. Ward, No. 5:20-cv-00453
Attachments: Diamond Report.pdf

Counsel:

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Brian P. Kemp
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Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

COASTAL STATE PRISON

Offender Diamond, Ashley (GDC#1000290565)

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	4/08/2022			
Saturday	4/09/2022			
Sunday	4/10/2022			
Monday	4/11/2022			
Tuesday	4/12/2022	Verified and confirmed there has been no additional incidents this monitoring period.		
Wednesday	4/13/2022			
Thursday	4/14/2022			
Friday	4/15/2022			
Saturday	4/16/2022			
Sunday	4/17/2022			
Monday	4/18/2022			
Tuesday	4/19/2022			
Wednesday	4/20/2022			
Thursday	4/21/2022			


4/22/22

 Aaron Pineiro, Warden

COASTAL STATE PRISON

Roger Chalmers

From: Roger Chalmers
Sent: Friday, May 6, 2022 2:50 PM
To: Chinyere Ezie
Cc: Beth Littrell; Roger Chalmers (rchalmers@law.ga.gov)
Subject: RE: Diamond v. Ward
Attachments: RE: Diamond v. Ward, No. 5:20-cv-00453

Chinyere,

I'll pass along the inquiry re: the deposition of Dr. Awe and get back to you on that.

Regarding the second issue below, we have not had a "conversation about the last Biweekly PREA reporting." Rather, as our emails will show (see attached), before submitting the last report, I asked you and Beth if there had been a report by your client because you had represented to Judge Treadwell at the recent discovery status hearing that there was an incident. Beth said in her email response that you would respond with information, and copied you on her email, and neither of you did respond. We did not have a "conversation" at all following that email exchange. You also did not identify an "omission" in the report when it was submitted. Judge Treadwell has asked for bi-weekly reporting so that you can notify me if you have information from which you believe that an item is not reported. You did not do that, even though I specifically inquired into it. The reports we have provided contained no omissions.

Separately, I learned today that your client sent a jpay communication this morning concerning an alleged April 13 incident. It is my understanding that this is the first the facility has heard of a reported incident, and it is also my understanding that the facility is inquiring into the matter. This information and the status of the inquiry will be reported today in the bi-weekly report.

Your statement below – "Second, further to our conversation about the last Biweekly PREA reporting submitted by your client, on April 13, 2022 Ashley Diamond filed a PREA report Ashley Diamond filed a PREA report concerning a sexual abuse incident she experienced at Coastal State Prison. The PREA Report was processed by Ms. Peppin, Dr. Fass, and Dr. Sheffield (sp?) at her facility." – would have been responsive to my April 22 inquiry. Yet it was never provided to me until today. So I am at this time also passing your statement along to the facility. In the future, please respond to my inquiries on the bi-weekly reporting in a timely manner.

Please call me if you would like to discuss this further.

Roger



Roger Chalmers
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rchalmers@law.ga.gov
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Atlanta, Georgia 30334

From: Chinyere Ezie [mailto:cezie@ccrjustice.org]
Sent: Friday, May 6, 2022 2:14 PM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Diamond Legal Team Only <diamondlegalteamonly@ccrjustice.org>
Subject: Diamond v. Ward

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Roger,

I write to share two updates concerning the *Diamond v. Ward* matter.

First, we would like to notice the Deposition of Dr. Olatunji Awe, one of Ms. Diamond's treating clinicians. Can you confirm whether you are offering him representation at this time, and if so, his availability for a deposition in late May or early June?

Second, further to our conversation about the last Biweekly PREA reporting submitted by your client, on April 13, 2022 Ashley Diamond filed a PREA report Ashley Diamond filed a PREA report concerning a sexual abuse incident she experienced at Coastal State Prison. The PREA Report was processed by Ms. Peppin, Dr. Fass, and Dr. Sheffield (sp?) at her facility.

We are obviously concerned that Coastal State Prison has no record of this PREA report being made, let alone investigated.

Particularly as today marks the deadline for your client's next biweekly report (unless I'm mistaken), we hope you can look into these matters and ensure their next report does not contain significant omissions.

Thanks and best,
Chinyere

Chinyere Ezie
Senior Staff Attorney

Center for Constitutional Rights | Justice takes a fight.

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cezie@ccrjustice.org

Pronouns: She/Her

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Roger Chalmers

From: Roger Chalmers
Sent: Friday, May 6, 2022 3:21 PM
To: Chinyere Ezie
Cc: Beth Littrell; Roger Chalmers (rchalmers@law.ga.gov)
Subject: RE: Diamond v. Ward

Chinyere – Please do provide information when I request it. As Beth acknowledged by her email response, the purpose of my inquiry was to gain information from you so that I could have the prison make inquiries and make sure that any reports from your client were captured and investigated. That was an effort on my part to make sure reporting is complete. Please assist me when I make these inquiries.

Roger



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From: Chinyere Ezie [mailto:cezie@ccrjustice.org]
Sent: Friday, May 6, 2022 3:18 PM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Roger Chalmers <rchalmers@law.ga.gov>; Diamond Legal Team Only <diamondlegalteamonly@ccrjustice.org>
Subject: RE: Diamond v. Ward

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Roger,

Perhaps you misunderstood the Court's order, but it only imposes disclosure duties on your client, not Plaintiff's counsel.

Because your client inexplicably failed to note Ms. Diamond's initial report, I followed up and provided you the specific date of the report as soon as I obtained it to permit further inquiry.

Plaintiff's counsel remain concerned that Ms. Diamond sat for PREA interviews in April that your clients either concealed or failed to document contrary to the Court's directive; respectfully, it should concern you as well. Hopefully this won't become a pattern.

Best,

Chinyere

Chinyere Ezie

Senior Staff Attorney

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From: [Roger Chalmers](#)

Sent: Friday, May 6, 2022 2:50 PM

To: [Chinyere Ezie](#)

Cc: [Beth Littrell](#); [Roger Chalmers](#)

Subject: RE: Diamond v. Ward

Chinyere,

I'll pass along the inquiry re: the deposition of Dr. Awe and get back to you on that.

Regarding the second issue below, we have not had a "conversation about the last Biweekly PREA reporting." Rather, as our emails will show (see attached), before submitting the last report, I asked you and Beth if there had been a report by your client because you had represented to Judge Treadwell at the recent discovery status hearing that there was an incident. Beth said in her email response that you would respond with information, and copied you on her email, and neither of you did respond. We did not have a "conversation" at all following that email exchange. You also did not identify an "omission" in the report when it was submitted. Judge Treadwell has asked for bi-weekly reporting so that you can notify me if you have information from which you believe that an item is not reported. You did not do that, even though I specifically inquired into it. The reports we have provided contained no omissions.

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Please call me if you would like to discuss this further.

Roger



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From: Chinyere Ezie [<mailto:cezie@ccrjustice.org>]
Sent: Friday, May 6, 2022 2:14 PM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Diamond Legal Team Only <diamondlegalteamonly@ccrjustice.org>
Subject: Diamond v. Ward

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We are obviously concerned that Coastal State Prison has no record of this PREA report being made, let alone investigated.

Particularly as today marks the deadline for your client's next biweekly report (unless I'm mistaken), we hope you can look into these matters and ensure their next report does not contain significant omissions.

Thanks and best,
Chinyere

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Roger Chalmers

From: Roger Chalmers
Sent: Friday, May 6, 2022 3:30 PM
To: Chinyere Ezie
Cc: Beth Littrell; Roger Chalmers (rchalmers@law.ga.gov)
Subject: RE: Diamond v. Ward

Chinyere – Your emails are inaccurate. Our exchange shows that we have taken steps to ensure that we comply with the Court’s order, and there is no basis for your assertion of “hiding responsive discovery information concerning Ms. Diamond’s safety.” That has not occurred. I’ll not respond further to your effort to manufacture a position by these emails.

Roger



Roger Chalmers
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From: Chinyere Ezie [mailto:cezie@ccrjustice.org]
Sent: Friday, May 6, 2022 3:26 PM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Roger Chalmers <rchalmers@law.ga.gov>
Subject: RE: Diamond v. Ward

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Roger,

As I stated in my last email, I provided you the information as soon as I obtained it. GDC does not allow me unfettered access to my clients, as I assume you well know.

Please ensure your clients comply with the Court’s order and stop hiding responsive discovery information concerning Ms. Diamond’s safety.

Best,
Chinyere

Chinyere Ezie
Senior Staff Attorney

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From: [Roger Chalmers](#)
Sent: Friday, May 6, 2022 3:21 PM
To: [Chinyere Ezie](#)
Cc: [Beth Littrell](#); [Roger Chalmers](#)
Subject: RE: Diamond v. Ward

Chinyere – Please do provide information when I request it. As Beth acknowledged by her email response, the purpose of my inquiry was to gain information from you so that I could have the prison make inquiries and make sure that any reports from your client were captured and investigated. That was an effort on my part to make sure reporting is complete. Please assist me when I make these inquiries.
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Senior Staff Attorney

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Sent: Friday, May 6, 2022 2:50 PM
To: [Chinyere Ezie](#)
Cc: [Beth Littrell](#); [Roger Chalmers](#)
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Please call me if you would like to discuss this further.

Roger



Roger Chalmers
Senior Assistant Attorney General - Section Chief
Office of the Attorney General Chris Carr
General Litigation
(404) 458-3220
rchalmers@law.ga.gov
Georgia Department of Law
40 Capitol Square SW
Atlanta, Georgia 30334



From: Chinyere Ezie [<mailto:cezie@ccrjustice.org>]
Sent: Friday, May 6, 2022 2:14 PM
To: Roger Chalmers <rchalmers@law.ga.gov>
Cc: Diamond Legal Team Only <diamondlegalteamonly@ccrjustice.org>
Subject: Diamond v. Ward

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Roger,

I write to share two updates concerning the *Diamond v. Ward* matter.

First, we would like to notice the Deposition of Dr. Olatunji Awe, one of Ms. Diamond's treating clinicians. Can you confirm whether you are offering him representation at this time, and if so, his availability for a deposition in late May or early June?

Second, further to our conversation about the last Biweekly PREA reporting submitted by your client, on April 13, 2022 Ashley Diamond filed a PREA report concerning a sexual abuse incident she experienced at Coastal State Prison. The PREA Report was processed by Ms. Peppin, Dr. Fass, and Dr. Sheffield (sp?) at her facility.

We are obviously concerned that Coastal State Prison has no record of this PREA report being made, let alone investigated.

Particularly as today marks the deadline for your client's next biweekly report (unless I'm mistaken), we hope you can look into these matters and ensure their next report does not contain significant omissions.

Thanks and best,
Chinyere

Chinyere Ezie
Senior Staff Attorney

Center for Constitutional Rights | Justice takes a fight.

666 Broadway, 7th Floor New York, NY 10012

Phone & Fax: 212.614.6467

cezie@ccrjustice.org

Pronouns: She/Her

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Roger Chalmers

From: Roger Chalmers
Sent: Friday, May 6, 2022 3:41 PM
To: Chinyere Ezie; Beth Littrell
Cc: Scott McCoy; Roger Chalmers (rchalmers@law.ga.gov)
Subject: RE: Diamond v. Ward, No. 5:20-cv-00453

Chinyere – We have not had a conversation, so I assume you are referring to our email exchange of today. And yes, as stated in my earlier email, I have passed along this information which you have provided today to the facility so that they can look into it. I have also provided the bi-weekly report today which indicates that a PREA investigation will be initiated.

Roger



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40 Capitol Square SW
Atlanta, Georgia 30334



From: Chinyere Ezie [mailto:cezie@ccrjustice.org]
Sent: Friday, May 6, 2022 3:33 PM
To: Roger Chalmers <rchalmers@law.ga.gov>; Beth Littrell <beth.littrell@splcenter.org>
Cc: Scott McCoy <Scott.McCoy@splcenter.org>; Roger Chalmers <rchalmers@law.ga.gov>; Diamond Legal Team Only <diamondlegalteamonly@ccrjustice.org>
Subject: RE: Diamond v. Ward, No. 5:20-cv-00453

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks Roger.

Further to our conversation, please confirm whether Dr. Fass, Dr. Sheffield, and Ms. Pepin of Coastal State Prison received an earlier version of the PREA report reflected here (on or around April 13, 2022), and whether an investigation is currently underway.

Thanks and best,
Chinyere

Chinyere Ezie
Senior Staff Attorney

Center for Constitutional Rights | Justice takes a fight.

666 Broadway, 7th Floor New York, NY 10012

Phone & Fax: 212.614.6467

cezie@ccrjustice.org

Pronouns: She/Her

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From: Roger Chalmers

Sent: Friday, May 6, 2022 3:26 PM

To: Beth Littrell

Cc: Scott McCoy; Chinyere Ezie; Roger Chalmers

Subject: Diamond v. Ward, No. 5:20-cv-00453

Counsel:

Please find attached the Warden report and call me with any questions.



Roger Chalmers

Senior Assistant Attorney General - Section Chief

Office of the Attorney General Chris Carr

General Litigation

(404) 458-3220

rchalmers@law.ga.gov

Georgia Department of Law

40 Capitol Square SW

Atlanta, Georgia 30334

Roger Chalmers

From: Roger Chalmers
Sent: Friday, May 6, 2022 3:26 PM
To: Beth Littrell
Cc: Scott McCoy; Chinyere Ezie; Roger Chalmers (rchalmers@law.ga.gov)
Subject: Diamond v. Ward, No. 5:20-cv-00453
Attachments: Diamond Report 5 6 22.pdf

Counsel:

Please find attached the Warden report and call me with any questions.



Roger Chalmers

Senior Assistant Attorney General - Section Chief

Office of the Attorney General Chris Carr

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40 Capitol Square SW

Atlanta, Georgia 30334

Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	4/22/2022			
Saturday	4/23/2022			
Sunday	4/24/2022			
Monday	4/25/2022			
Tuesday	4/26/2022			
Wednesday	4/27/2022			
Thursday	4/28/2022			
Friday	4/29/2022			
Saturday	4/30/2022			
Sunday	5/01/2022			
Monday	5/02/2022			
Tuesday	5/03/2022			
Wednesday	5/04/2022			
Thursday	5/05/2022			
Friday	5/06/2022	On 5/06/22 Warden received notification through the Jpay PREA reporting by Ashley Diamond that on or about 4/13/22, while in the MH waiting room, an unknown offender made lude comments and exposed himself to offender Diamond. MH was aware of the report by offender Diamond. A PREA investigation will be initiated immediately. The supervision staff of each department was called to meet with the Warden and informed again that they must report any allegation made by offender Diamond to the Warden immediately.	No, cameras are in the process of being installed in this area as part of the camera project, but this project area is not yet complete.	No-

[Signature] 5/10/22
Aaron Pineiro, Warden

COASTAL STATE PRISON

Roger Chalmers

From: Roger Chalmers
Sent: Friday, May 20, 2022 5:39 PM
To: 'Beth Littrell'
Cc: Roger Chalmers (rchalmers@law.ga.gov)
Subject: Diamond v. Ward, No. 5:20-cv-00453
Attachments: Diamond report 5 20 22.pdf

Counsel:

Please find attached the Warden report and call me with any questions.



Roger Chalmers
Senior Assistant Attorney General - Section Chief
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Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	5/06/2022	On 5/06/22 Warden received notification through the Jpay PREA reporting by Ashley Diamond that on or about 4/13/22, while in the MH waiting room, an unknown offender made lude comments and exposed himself to offender Diamond. MH was aware of the report by offender Diamond. A PREA investigation will be initiated immediately. The supervision staff of each department was called to meet with the Warden and informed again that they must report any allegation made by offender Diamond to the Warden immediately. (Reported on last report)	No, cameras are in the process of being installed in this area as part of the camera project, but this project area is not yet complete.	No-
Saturday	5/07/2022			
Sunday	5/08/2022			
Monday	5/09/2022			
Tuesday	5/10/2022			
Wednesday	5/11/2022			
Thursday	5/12/2022			
Friday	5/13/2022	PREA Unit completed the investigation for the 4/13/22 allegation. PREA allegation was found to be Unsubstantiated. PREA report was forwarded to the AG.		
Saturday	5/14/2022			
Sunday	5/15/2022			
Monday	5/16/2022			
Tuesday	5/17/2022			
Wednesday	5/18/2022			
Thursday	5/19/2022			

Aaron Pineiro, Warden

COASTAL STATE PRISON

Roger Chalmers

From: Roger Chalmers <rchalmers@law.ga.gov>
Sent: Sunday, June 5, 2022 6:50 PM
To: Beth Littrell
Cc: Roger Chalmers
Subject: Diamond v Ward report
Attachments: Diamond Report.pdf

Beth,

I'm traveling so forwarding this report this way. Please let me know if there are any questions.

Roger

Sent from my iPhone

Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	5/20/2022			
Saturday	5/21/2022			
Sunday	5/22/2022			
Monday	5/23/2022			
Tuesday	5/24/2022			
Wednesday	5/25/2022	No incidents reported for this monitoring period.		
Thursday	5/26/2022			
Friday	5/27/2022			
Saturday	5/28/2022			
Sunday	5/29/2022			
Monday	5/30/2022			
Tuesday	5/31/2022			
Wednesday	6/01/2022			
Thursday	6/02/2022			

6/03/22

Aaron Pineiro, Warden

COASTAL STATE PRISON

Roger Chalmers

From: Roger Chalmers
Sent: Friday, June 17, 2022 2:38 PM
To: Beth Littrell
Subject: Fwd: Diamond v. Ward, MD 5:20-cv-453 Warden report 6 17 22
Attachments: Diamond Report.pdf

Counsel,
Please see the attached Warden report and let me know if there are any questions.

Sent from my iPhone

Begin forwarded message:

From: Roger Chalmers <rchalmers@law.ga.gov>
Date: June 17, 2022 at 2:28:24 PM EDT
To: Roger Chalmers <rchalmers@law.ga.gov>
Subject: **Diamond v. Ward, MD 5:20-cv-453 Warden report 6 17 22**

Sent from my iPhone

Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	6/03/2022			
Saturday	6/04/2022			
Sunday	6/05/2022			
Monday	6/06/2022			
Tuesday	6/07/2022			
Wednesday	6/08/2022			
Thursday	6/09/2022			
Friday	6/10/2022			
Saturday	6/11/2022			
Sunday	6/12/2022			
Monday	6/13/2022			
Tuesday	6/14/2022	Boiler being installed in N-building hot water was shut off at 2PM. Offender Diamond was offered a shower in Medical, offender Diamond declined a shower and wrote a statement.		
Wednesday	6/15/2022	Boiler install complete in N-building, hot water was back on at 4:50PM.		
Thursday	6/16/2022			

[Handwritten Signature] 6/17/22

Aaron Pineiro, Warden

COASTAL STATE PRISON

SOP 209.04
Attachment 5
2/18/21

WITNESS STATEMENT			
PLACE	DATE	TIME	FILE NUMBER
Central State Prison	6-14-22		
LAST NAME, FIRST NAME, MIDDLE NAME	EMPLOYEE ID NUMBER		STATE ID NO.
Diamond Ashley	1600240565		
INSTITUTION OR ADDRESS			

SWORN STATEMENT

I, Ashley Diamond WANT TO MAKE THE FOLLOWING STATEMENT UNDER OATH:

I do not wish to shower at this time. Just showered few hours ago -

~~AD~~

~~AD~~

~~AD~~

EXHIBIT	INITIALS OF PERSON MAKING STATEMENT	PAGE 1 OF ___ PAGES
---------	-------------------------------------	---------------------

ADDITIONAL PAGES MUST CONTAIN THE HEADING "STATEMENT OF [] TAKEN AT [] DATED [] CONTINUED." THE BOTTOM OF EACH ADDITIONAL PAGE MUST BEAR THE INITIALS OF THE PERSON MAKING THE STATEMENT AND BE INITIALED AS "PAGE ___ OF ___ PAGES." WHEN ADDITIONAL PAGES ARE UTILIZED, THE BACK OF PAGE 1 WILL BE LINED OUT, AND THE STATEMENT WILL BE CONCLUDED ON THE REVERSE SIDE OF ANOTHER COPY OF THIS FORM.

(Reproduced locally)

Retention Schedule: Upon completion, this form shall be maintained locally for three (3) years, with the Incident Report, and then destroyed.

STATEMENT (Continued)

[Handwritten initials and scribbles in the statement area]

AFFIDAVIT

I, _____ HAVE READ OR HAVE HAD READ TO ME THIS STATEMENT WHICH BEGINS ON PAGE _____ AND ENDS ON PAGE _____. I FULLY UNDERSTAND THE CONDITIONS OF THE ENTIRE STATEMENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL CORRECTIONS AND HAVE INITIALED THE BOTTOM OF EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT FREELY WITHOUT HOPE OF BENEFIT OR REWARD, WITHOUT THREAT OF PUNISHMENT, AND WITHOUT COERCION, UNLAWFUL INFLUENCE, OR UNLAWFUL INDUCEMENT.

WITNESS

INSTITUTION OR ADDRESS

INSTITUTION OR ADDRESS

INITIALS OF PERSON MAKING STATEMENT

[Handwritten Signature]
(Signature of Person Making Statement)

Subscribed and sworn to before me, a person authorized by law to administer oaths, this _____ day of _____, 20__ at _____

(Signature of Person Administering Oath)

(Typed Name of Person Administering Oath)

(Authority to Administer Oath)

PAGE OF PAGES

Roger Chalmers

From: Roger Chalmers
Sent: Friday, July 1, 2022 3:05 PM
To: 'Beth Littrell'
Cc: Roger Chalmers (rchalmers@law.ga.gov)
Subject: Diamond v. Ward, MD 5:20-cv-453
Attachments: Diamond Report 7 1 22.pdf

Counsel,

Please see the attached Warden report and let me know if there are any questions.



Roger Chalmers
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Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	6/17/2022			
Saturday	6/18/2022			
Sunday	6/19/2022			
Monday	6/20/2022			
Tuesday	6/21/2022	There were no incidents regarding offender Diamond for this monitoring period.		
Wednesday	6/22/2022			
Thursday	6/23/2022			
Friday	6/24/2022			
Saturday	6/25/2022			
Sunday	6/26/2022			
Monday	6/27/2022			
Tuesday	6/28/2022			
Wednesday	6/29/2022			
Thursday	6/30/2022			

7/01/22

Aaron Pineiro, Warden

COASTAL STATE PRISON

P.O. Box 7150, 200 Gulfstream Road, Port Wentworth, GA 31408 • Phone 912-965-6303 • Fax 912-966-6799 • www.gdc.ga.gov

Roger Chalmers

From: Roger Chalmers
Sent: Monday, July 18, 2022 9:32 AM
To: Beth Littrell
Cc: Roger Chalmers
Subject: Diamond v. Ward, MD 5:20-cv-453 Warden report 7 15 22
Attachments: Diamond Report 7 15 22.pdf

Counsel,

Please see the attached Warden report and let me know if there are any questions.

This report was prepared last week but as the deposition ran past the end of the business day on Friday I overlooked forwarding it on that date.



Roger Chalmers
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Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	07/01/2022			
Saturday	07/02/2022			
Sunday	07/03/2022			
Monday	07/04/2022			
Tuesday	07/05/2022	There were no incidents regarding offender Diamond for this monitoring period.		
Wednesday	07/06/2022			
Thursday	07/07/2022			
Friday	07/08/2022			
Saturday	07/09/2022			
Sunday	07/10/2022			
Monday	07/11/2022			
Tuesday	07/12/2022			
Wednesday	07/13/2022			
Thursday	07/14/2022			
Friday	07/15/2022			

A. Pineiro 7/15/22

Aaron Pineiro, Warden

COASTAL STATE PRISON

Roger Chalmers

From: Roger Chalmers
Sent: Friday, July 29, 2022 10:57 PM
To: Beth Littrell
Cc: Roger Chalmers (rchalmers@law.ga.gov)
Subject: Diamond v. Ward, MD 5:20-cv-453
Attachments: Diamond Report 7 29 22.pdf

Counsel,

Please see the attached Warden report and let me know if there are any questions.



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Brian P. Kemp
Governor



Timothy C. Ward
Commissioner

GEORGIA DEPARTMENT OF CORRECTIONS

Offender Diamond, Ashley (GDC#1000290565)

COASTAL STATE PRISON

Day	Date	Incident Description and Response	Video Footage? Yes or no	Video Pulled? Yes or no
Friday	07/16/2022			
Saturday	07/17/2022			
Sunday	07/18/2022			
Monday	07/19/2022			
Tuesday	07/20/2022	There were no incidents regarding offender Diamond for this monitoring period.		
Wednesday	07/21/2022			
Thursday	07/22/2022			
Friday	07/23/2022			
Saturday	07/24/2022			
Sunday	07/25/2022			
Monday	07/26/2022			
Tuesday	07/27/2022			
Wednesday	07/28/2022			
Thursday	07/29/2022			

Aaron Pineiro, Warden

COASTAL STATE PRISON

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