

UNITED STATES DISTRICT COURT

MACON DIVISION

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, et al,

Defendants.

No. 5:20-cv-00453-MTT

DECLARATION OF JIMMY WINDLE HORNE

I, Jimmy Windle Horne, declare under penalty of perjury that the following is true and correct:

1. My name is Jimmy Windle Horne. I am 48 years old. My GDC number is 0000679622. I am currently held in the custody of the Georgia Department of Corrections (“GDC”) at Coastal State Prison (“Coastal”) in Savannah, Georgia. Prior to that, I was held at Georgia Diagnostic and Classification State Prison (“GDCP”) in Jackson, Georgia, where I sometimes worked as a floor cleaner.

2. I met Ashley Diamond at GDCP, where we were housed together in the same unit, C House. I knew Ashley was transgender because she told me and because she had visible breasts. Our dormitory was not a safe environment. Incarcerated people with close and medium security designations were held together, and the cameras in the unit did not work.

3. One of the correctional officers at GDCP was Arneika Smith. She would often engage in inappropriate behavior with incarcerated people, including by propositioning them for sexual activities and by requesting that they send her money in exchange for favors. She once propositioned me, but I declined. I found Officer Smith’s behavior very shocking and

inappropriate.

4.

incarcerated people who were gang members and who had been convicted of sex offenses or had PREA records. Most of the time Ashley didn't have escorts. I also saw officers harass and mistreat her. I was able to speak to Ashley a little, and she feared for her life at Coastal.

10. Coastal State Prison is also extremely understaffed and the problem is getting worse

staff did not respond. It's like no one cares.

15. Of all the GDC facilities I have been to over the years, Coastal is the absolute worst.

16. Coastal is so unsafe that it needs to be closed.

17. Although I'm worried about being retaliated against, I feel it is important that people know what's going on here.

Date: February , 2022

/s/ Jimmy Windle Horne*
Jimmy Windle Horne

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