

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA**

|                      |   |                                     |
|----------------------|---|-------------------------------------|
| ASHLEY DIAMOND,      | ) |                                     |
|                      | ) |                                     |
| Plaintiff,           | ) |                                     |
|                      | ) |                                     |
| v.                   | ) | Civ. Action No. 5:15-cv-00050 (MTT) |
|                      | ) |                                     |
| BRIAN OWENS, et al., | ) |                                     |
|                      | ) |                                     |
| Defendants.          | ) |                                     |

**DECLARATION OF ASHLEY DIAMOND**

I, Ashley Diamond, hereby declare and state as follows:

1. I am a transgender woman with gender dysphoria, and the plaintiff in this case.
2. Prior to entering the Georgia Department of Corrections (“GDC”) on March 27, 2012, I lived as a woman and received hormone therapy for 17 years as part of the medically necessary treatment for my gender dysphoria.
3. For the seventeen years I received hormone therapy prior to my incarceration, I received a regimen of 0.2 mg of Estridol per week and 100 mg of spironolactone per day in accordance with medical guidelines. Through hormone therapy I developed breasts, soft skin, and other female secondary sex characteristics. Once I entered GDC custody, however, all of my gender dysphoria treatment stopped.
4. After I initiated this lawsuit and filed a motion for preliminary injunction, GDC officials told me I would receive hormone treatment. However, to date I have only received a token amount of hormone therapy—0.1 mg of Estridol and 25 mg of spironolactone—a fraction of the treatment I’ve received my entire adult life. As a result of these low dosages I have not experienced any relief from my gender dysphoria. I have not had breast development, my skin remains coarse, and I continue to experience erections and grow facial hair.

5. I have asked GDC personnel to provide me with medically appropriate hormone treatment but they have refused. As a result, I continue to feel trapped in the wrong body and look more “male” than I have in my entire life.

6. In addition, GDC officials continue to prohibit me from outwardly expressing my gender, despite GDC healthcare providers’ confirmation that female gender expression is crucial to my care and psychological well-being as a transgender person.

7. On almost a daily basis I am reprimanded by GDC staff for being feminine. I have been scolded for my walk, my mannerisms, my use of female pronouns, and for describing myself as female.

8. Although I have explained to GDC personnel that I am a transgender woman and asked them to please refer to me as Inmate Diamond rather than “he,” “he-she,” “it,” “Mr. Diamond,” or “young man,” they have refused. Instead, I have been told “you’re not a woman, you’re a man in a man’s facility” and to “stop that gay shit.” And just this week, on May 16, 2015, GDC officer Sergeant Siter confronted me and said, “I am not going to refer to you as Inmate Diamond, you ain’t no miss, you’re an *it*.”

9. I have also been reprimanded for attempting to grow or part my hair, and was recently made to shave my head because of



17. James “Candi” Moore, GDC No. 1001090349, is also a transgender woman who lived as a woman and received hormone therapy for many years until her treatment was terminated by GDC. Although Candi has requested hormone therapy and female gender expression as continued gender dysphoria care, her requests have been denied by GDC officials—including Defendant Silver, who recently told Candi that she would not be receiving treatment for her gender dysphoria but should learn “coping mechanisms” instead. Candi has also been harassed and reprimanded by GDC staff for expressing her female gender.

18. Robert “Robin” Bayse, GDC No. 954691, is a transgender woman who lived as a woman for decades prior to entering GDC. Although Robin has been formally diagnosed with gender dysphoria, GDC officials have denied her requests for treatment and confiscated her bras. GDC officials have also continually harassed and reprimanded Robin for expressing her female gender, and addressed her by names like “he-she” and “it.”

19. Ronald “Olivia” Cox, GDC No. 1000447278, is also a transgender woman being denied gender dysphoria treatment by GDC, despite living as a woman for many years prior to her incarceration. Although Olivia has repeatedly requested gender dysphoria care from GDC officials, her requests have been ignored, and she has repeatedly been harassed, reprimanded, and called derogatory names for expressing her female gender.

20. Joseph “Joey” Stapleton, GDC No. 1001245547, is a female-identified inmate who has always known that she is a woman and is seeking an initial evaluation for gender dysphoria care. Since her arrival at GDC, however, Joey’s requests for evaluation and treatment have been denied, and she has been repeatedly harassed and reprimanded by GDC staff for her femininity—including by Defendant Hatcher, who threw Joey into solitary confinement in April 2015 for expressing her female gender.

21. The problems facing these and other transgender inmates at Rutledge State Prison are not isolated. I know this because I have been housed at six different GDC facilities and transferred eight times since March 2012, bringing me into contact with many other transgender inmates and many GDC staff.

22. In addition to the abuses I have suffered and continue to suffer, I have witnessed transgender inmates endure staff mistreatment at every GDC facility where I have been housed. On a routine basis transgender inmates are reprimanded for being feminine, blamed when we are sexually assaulted, and called demeaning names such as “faggots,” “sissies,” “punks,” “he-shes,” and “its.”

23. Across facilities, I have also encountered GDC personnel from wardens on down, who lack even basic training on transgender inmate health and safety needs, and who make a point to ridicule inmates with a gender expression not stereotypically male.

24. GDC officials will continue to deny medical care to transgender inmates unless  
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Since then I have been told on a daily basis that my placement at Rutledge is not permanent and I will not be here for long.

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, T8T-2(a)4(t)-2(i)/0(y)20( )-2( of)3( nr)-2