



might not see an officer all night in N building.

7. The doors to enter the dormitory are often left open. People who are unauthorized to be in the dormitory enter all the time.
8. Inmates would come into the dorm and often look for Ashley Diamond, catcall her, and say rude and disrespectful things to her. They would go into her room and jump in the bed while she's asleep, trying to kiss her and touch her. Some of them I knew to be gang affiliated.
9. At night, the cell doors were not locked. Day and night, people go in and out of each other's cells. The officers were rarely around and, when they were, they would not do anything.
10. I rarely saw Ashley Diamond being accompanied by a security escort.

#### *Sexual Harassment and Assaults*

11. It is clear that Ashley Diamond is a woman. She has breasts and feminine mannerisms.
12. Most inmates were very perverted towards Ashley Diamond. When Ashley Diamond is around, she is often getting sexually harassed, abused

eight times. It's never ending.

16. Sometime last year, Ashley Diamond and I were waiting by a locked gate in the yard.

Often times, the gate along the way to and from the dormitory is locked and there is not an officer around to open it. When that happens, we are stuck in the yard until an officer comes around and can open the gate.

17. While in the yard, a bunch of inmates

to overdose.

24. I took the pills. I wouldn't leave them there with her.
25. After that, I would check in with her. We would talk about our struggles and she would often break down.

***Retaliation***

26. I was moved out of N building and the Evidence Based Program in November 2021 without reason. Everyone associated with Ashley Diamond who tries to protect her is kicked out of the dormitory.
27. I am now housed in K building. We don't have access to cleaning products to clean our rooms and it's so cold because the air conditioning is running in the wintertime. They won't give us blankets. We rarely get clothes or food. There are gang wars. I haven't slept in days. My bunkmate got stabbed just last night.
28. I believe GDC officers put me over here – essentially throwing me to the wolves – as they have for other men based on our befriending Ashley Diamond.

Pursuant to 28 U.S.C. § 1746, I hereby declare and state under penalty of perjury that the foregoing is true and correct.

February 16, 2022.

Respectfully submitted,

/s/ Michael Mancil\*  
Michael Mancil

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