

Cooley



Independent Post-Action Review

March 2026
Old Dominion University Shooting

I. Executive Summary	4
II. Investigative Process and Scope	7
III. Factual Findings	8
A. ODU's System and Governance	9
1. Overview of ODU	9
2. University-Wide Safety Policies	9
3. ODU's Police Department	11
4. Office of Emergency Management	14
5. Emergency Notification System	15
6. ROTC Program	16
7. Admissions	16
8. Threat Assessment Infrastructure and Process	17
B. Relevant Pre-Incident Background Regarding Jalloh	18
1. Jalloh's Admission and Readmission to ODU	18
2. ODU's Lack of Awareness of Jalloh's Criminal History	20
C. March 12 Shooting and Immediate Aftermath	21
1. Events Preceding March 12	21
2. The Hours Before the Shooting	21
3. The Shooting and ROTC Cadet Response	22
4. Chronology of Events Immediately After the Shooting	25
D. Post-Incident Actions and Recovery	32
1. Post-Incident Messaging to the ODU Community	32
2. Counseling Resources and Support	33
3. Review of Emergency Alert System and Delivery	34
4. Post-Incident Changes to Campus Safety	34

E. Other Security-Related Concerns Raised by ODU Community Members During Interviews	35
1. Quantitative Review of ODUPD Complaints and Responses	35
2. Qualitative Assessment of Campus Safety Issues	37
3. Complaints About a Student Safety Incident	38

IV. Analysis and Recommendations 40

A. Key Factual Observations	40
B. Recommendations	47
1. Campus Safety and Security	47
2. Emergency Response	48
3. Emergency Notifications	50
4. Post-Admissions Risk Assessment	51

I. Executive Summary

On March 12, 2026, at approximately 10:41 a.m., Mohamed Bailor Jalloh entered a Constant Hall classroom at Old Dominion University (“ODU,” or the “University”) and asked whether it was an ROTC class. When the students answered in the affirmative, Jalloh yelled a phrase used in violent terror attacks associated with the Islamic State of Iraq and al-Sham (“ISIS”) and opened fire. Lieutenant Colonel Brandon A. Shah, the instructor, was shot multiple times while he fought to disarm Jalloh, as were two other students. A small group of ROTC cadets, two of whom had knives, rushed Jalloh and disarmed and neutralized him after a violent struggle. The first officers from ODU’s Police Department (“ODUPD”) responded to the incident within minutes, arriving on scene to find Lt. Col. Shah and a student cadet injured from gunshot wounds and Jalloh deceased. Norfolk’s Police Department (“Norfolk PD”) and other law enforcement agencies began arriving on scene immediately thereafter.

Law enforcement and student cadets carried Lt. Col. Shah outside and provided emergency medical care until he and the other injured cadet were loaded into ambulances and subsequently transported to the local hospital. Concurrently, ODUPD and other law enforcement personnel cleared Constant Hall, checking for other active threats and any students or faculty sheltering in place. ODU’s leadership immediately responded to the crisis, and ODU’s President Brian O. Hemphill was on scene at Constant Hall within minutes of the shooting. At 12:05 p.m., ODU announced that the situation was all-clear and that there was no longer an active threat on ODU’s campus. All classes and University operations were cancelled for the remainder of the day and the following day.

At approximately 1:23 p.m., Lt. Col. Shah died from his injuries at Sentara Norfolk General Hospital. The two injured students survived.

After the shooting, ODU determined that Jalloh was a readmitted student who had previously been convicted of a federal terrorism offense in which he had planned to use a gun to attack U.S. military personnel on behalf of ISIS. Jalloh served eight years in federal prison and was released in 2024. ODU had no prior knowledge of Jalloh’s conviction. Pursuant to Virginia law, ODU is not permitted to inquire about student criminal history prior to admission or readmission, but is permitted to do so after a student has been admitted. ODU did not at that time ask readmitted students to voluntarily disclose their criminal history, and Jalloh never disclosed his criminal history to ODU. Jalloh’s federal probation officer also could have disclosed that information to ODU or directed Jalloh to do so, but did not. Despite the serious nature of Jalloh’s offense and the risk he posed to ODU and its large population of military-affiliated individuals, no one informed ODU of Jalloh’s conviction.

In the days and weeks following the shooting, ODU offered counseling services to the campus community, and President Hemphill and other University leaders met with various constituencies across campus to speak with community members about the tragedy.

The March 12 incident prompted ODU’s administration to undertake a review of the University’s response to the emergency and relevant policies and procedures. In April 2026, the Office of the Attorney General of the Commonwealth of Virginia appointed Cooley LLP (“Cooley”) as Special Counsel to conduct an independent after-action review of the March 12 incident. Cooley was charged with the following:

- Reviewing the events of the March 12, 2026 shooting, its immediate aftermath, and ODU’s response, including any changes to relevant policies made after the incident.
- Reviewing the readmission of Mohamed Bailor Jalloh at ODU, including relevant admissions policies.
- Reviewing ODU’s safety and security policies and practices as of March 12, 2026, compared to best practices for universities.
- Making recommendations to ODU on areas of improvement to enhance safety and security on campus.

The review covers the period from Jalloh's initial admission to ODU in 2007 through the post-incident actions taken by the University in the weeks and months following March 12, 2026, with a focus on the period immediately before March 12 through the weeks after the incident. This report details our review and sets forth recommendations for ODU's consideration. The report contains four sections.

First, the report details the investigative process and the scope of Cooley's review. In addition to collecting more than 700 documents and reviewing over 30 hours of video footage, the Cooley team visited ODU for multiple days and interviewed a total of 44 students, faculty, staff, administrators, police officers, and ODU leadership to solicit a cross section of different viewpoints and positions. Cooley conducted the investigation independently from ODU and had sole discretion over the content and recommendations of this report.

Second, the report sets forth the factual findings of the investigation, including ODU's system of governance; its campus; and relevant policies pertaining to safety and security, emergency response, and admissions. This section also examines relevant pre-incident background pertaining to Jalloh. A substantial portion of the report's factual findings is dedicated to a detailed review of the events of March 12, 2026, and its aftermath, including the shooting, emergency response, and ODU's post-incident actions. Lastly, this section addresses other security-related concerns raised by ODU community members during our interviews.

Third, the report lays out key observations from the investigation, which are as follows:

1. The March 12 shooting was a targeted terror attack on ROTC students and their leader conducted by a single individual, which would have been difficult, if not impossible, to prevent once Jalloh was enrolled and possessed the privileges of an ODU student.
2. Virginia law prohibits ODU from asking about criminal history at the application stage but does not prohibit post-admission inquiry. ODU did not ask Jalloh to disclose his criminal history and he did not do so. Neither his probation officer nor any federal or state law enforcement official notified ODU of his conviction. ODU had no knowledge of the risk Jalloh posed or his federal terrorism conviction.
3. ODU has an effective threat assessment infrastructure in place to assess risk. Had ODU known about Jalloh's criminal history, it is highly likely that ODU would have sought his removal from campus due to the risk he posed, particularly to military-affiliated individuals.
4. The extraordinary heroism and bravery shown by Lt. Col. Shah and the ROTC cadets by fighting back against Jalloh's attack prevented further loss of life.
5. ODUPD responded to the shooting almost immediately and effectively handled the situation in coordination with external law enforcement, while overcoming logistical challenges posed by 911 systems and issues accessing keys and locks within the building.
6. ODUPD officers acted appropriately in rendering active care to the injured victims, but emergency medical response and patient transport protocols could be improved.
7. ODU promptly issued an emergency alert about the active shooter and provided updates as the situation unfolded. ODU's policy of allowing multiple individuals across departments to authorize emergency notifications created some misalignment regarding who was responsible for sending emergency alerts and the content of those alerts.
8. ODU leadership appropriately prepared for and immediately responded to the March 12 attack, and their actions following the attack drew broad praise from ODU community members.
9. ODUPD provides excellent and regular active shooter trainings for campus community members; however, those trainings are optional, and participation could be higher.
10. ODU community members broadly describe feeling safe on campus. Commonly raised security concerns include inconsistent classroom door locking practices and locking capabilities. The evidence, including interviews with the cadets present during the attack, indicates that a locked classroom door likely would not have materially changed the outcome on March 12; nonetheless, improving physical security is sound preparedness policy, and we address those concerns in our recommendations.

Fourth, the report outlines Cooley's recommendations for ODU. The recommendations are based on the observations outlined above and focus on four main areas for improvement identified in our investigation. They are:

(1) Campus Safety and Security

- **Recommendation 1:** ODU should consider reinforcing a culture of emergency preparedness by encouraging all campus community members to participate in active threat training and encouraging that classroom doors be closed during class as a matter of practice.
- **Recommendation 2:** ODU should continue to ensure every building has an effective Knox box with master key access to each building.
- **Recommendation 3:** ODU should continue to upgrade door locks to electronic key access as feasible over time given the age and technological capabilities of campus buildings.
- **Recommendation 4:** ODU should consider whether it should restrict access to classroom location information to those enrolled in a particular course.

(2) Emergency Response

- **Recommendation 5:** ODUPD should continue to update its 911 call system and consider incorporating joint training exercises with other law enforcement agencies, establishing inter-agency radio operating capabilities, and working with partner agencies to ensure consistent, dignified treatment of victim-witnesses in post-incident interviews.
- **Recommendation 6:** ODU should review its current campus emergency medical services capabilities to enable quicker medical response and consider establishing clear protocols for non-traditional EMS patient transport.
- **Recommendation 7:** ODU should continue and expand efforts to educate campus members about AED and "Stop the Bleed" kits.

(3) Emergency Notifications

- **Recommendation 8:** ODU should implement clear protocols specifying who has the authority to send emergency notifications and consider localizing authority within a single department. ODU should also consider adopting guidelines around the content of emergency notifications.
- **Recommendation 9:** ODU should consider increasing awareness and participation in the ODU Alert System across the campus community.
- **Recommendation 10:** ODU should evaluate and implement supplemental emergency notification capabilities to reach individuals on or near campus who may not be enrolled in the ODU Alert System.

(4) Post-Admissions Risk Assessment

- **Recommendation 11:** ODU should ensure that the Office of Threat Assessment has adequate staffing and budgetary resources to support personnel, training, equipment, and outreach.
 - **Recommendation 12:** ODU should continue, within the bounds of Virginia law, to take steps to learn relevant criminal history applicable to the assessment of risk to campus. ODU should continue to maintain strong relationships with federal and state law enforcement so that critical information to ensure the safety of its campus is passed onto ODU.
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II. Investigative Process and Scope

In April 2026, the Office of the Attorney General of the Commonwealth of Virginia appointed Cooley as Special Counsel to conduct this review. Cooley was given sole responsibility for the content of this report.

Cooley's review was guided by four primary areas of inquiry:

- Reviewing the events of the March 12, 2026 shooting, its immediate aftermath, and ODU's response, including any changes to relevant policies made after the incident.
- Reviewing the readmission of Mohamed Bailor Jalloh at ODU, including relevant admissions policies.
- Reviewing ODU's safety and security policies and practices as of March 12, 2026, compared to best practices for universities.
- Making recommendations to ODU on areas of improvement to enhance safety and security on campus.

Cooley conducted its review independently from ODU as outside counsel appointed by the Office of the Attorney General. ODU complied with all requests for information and facilitated interviews with any member of the ODU community we wished to interview.

Cooley's investigative approach was multi-faceted. Cooley collected and reviewed ODU's internal documents, emails, records, policies, police reports, and video footage from the date of the incident; reviewed publicly available materials; conducted site visits to the ODU campus; interviewed members of the ODU community; consulted with subject matter experts; benchmarked ODU's policies and practices against national standards and peer institutions; and reviewed prior after-action reports from comparable incidents.

Cooley ensured that the perspectives of ODU's leadership, administrators, faculty, staff, law enforcement, and students were included through interviews. Cooley spoke with President Hemphill and the executive cabinet. We interviewed other members of ODU leadership and leaders of the various governing bodies and campus organizations, including the Board of Visitors, the Teaching and Research Faculty Senate, the Administrative and Professional Faculty Senate, the Monarch Staff Senate, and the Student Government Association. We met with members of the admissions team, the threat assessment team, and ODUPD. We spoke with faculty and staff based in Constant Hall, including some who had raised concerns about building safety prior to March 12. We spoke with numerous faculty, students, staff, and administrators present in Constant Hall on March 12. Finally, we spoke to ROTC cadets who were in the classroom on March 12, whose extraordinary bravery stopped Jalloh before he had a chance to inflict any greater harm.

Consistent with standard investigative practice, Cooley conducted interviews on an individual basis. This approach allows each participant to provide candid, uninfluenced accounts and was applied across the vast majority of interviews conducted. We made limited accommodations to the standard interview format in a small number of cases where circumstances warranted due to the trauma the interviewee experienced. We met with each individual who asked to meet with us, and any group or community member who wished to submit information in writing was welcome to do so. All concerns raised during interviews were considered and informed the findings set out in this report.

In May 2026, Cooley spent multiple days on ODU's campus. In total, Cooley interviewed 34 people while on campus and conducted 10 additional interviews virtually. Cooley collected and reviewed relevant documents and data, including over 700 internal documents and emails, over 30 hours of CCTV and body cam footage, university-wide and campus-specific policies, case reports, and publicly available materials. Cooley engaged an outside security consultant with decades of experience in law enforcement and campus security to assist in this review and report. We worked expeditiously to conduct a thorough and timely investigation so that recommendations and improvements could be implemented before the start of the new academic year.

Cooley employed a standard after-action review analytic framework, examining: (1) what was expected to happen based on applicable plans, policies, and training; (2) what actually occurred; (3) what went well and why; and (4) what can be improved and how.

The scope of this review was subject to certain limitations. The review was limited to outreach to personnel who are currently affiliated with ODU and to select external law enforcement bodies, including the United States Probation Office for the Eastern District of Virginia (“Probation”) and the Federal Bureau of Investigation (“FBI”), both of whom did not agree to meet with us. Similarly, the City of Norfolk did not agree to provide their own radio transmissions or emergency medical response records in response to a freedom of information request from the University. These refusals constrain the completeness of our findings with respect to the federal supervision of Jalloh following his release from prison and the fact that federal authorities did not advise ODU of his conviction, as well as certain radio transmissions and records related to what happened on March 12. We note this limitation transparently. It does not, however, affect our findings regarding ODU’s own conduct, policies, and procedures. Those findings rest on more than 700 documents, over 30 hours of video footage, and interviews with 44 members of the ODU community, and are fully supported by the record available to us. Where our findings speak to the actions or inactions of federal authorities or Norfolk emergency responders, we have drawn only on the documentary record and publicly available materials.

The scope of this review did not include a building-by-building physical security evaluation of every structure on ODU’s campus. As an after-action review of a specific incident, the appropriate focal point for assessing physical security conditions was Constant Hall, where the March 12 attack occurred. The recommendations that follow, however, are not limited to Constant Hall; where applicable, they apply campus-wide.

In evaluating the decisions made by responders and administrators on March 12, 2026, Cooley applied a “known-at-the-time” standard; that is, Cooley has assessed those decisions based on what the relevant actors knew or reasonably should have known at the time, and not with the benefit of hindsight. Cooley has also been mindful throughout this review that responses to active threat incidents unfold under conditions of acute stress, rapidly changing circumstances, and incomplete information. Decision-makers and responders on March 12 were operating in real time, without the benefit of the full factual picture that this report was able to reconstruct over months of investigation. Where we identify areas for improvement in the emergency response, we do so not because we believe those involved fell short of a reasonable standard, but because the frank identification of gaps is how institutions prepare more effectively for future events. The standard we apply throughout is one of reasonable preparation and sound judgment under the circumstances known at the time, not hindsight perfection.

Finally, Cooley had sole responsibility for the drafting and content of this report and delivered the full unredacted report directly to the Office of the Attorney General. The findings and recommendations were solely at the discretion of Cooley. This report has been redacted for student scholastic records consistent with federal and Virginia law.

III. Factual Findings

A. ODU's System and Governance

This section provides relevant background regarding ODU's governance structure and university-wide policies in place as of March 12, 2026. Those policies include ODU's active threat response framework and emergency notification protocols, as well as the structure, training practices, and law enforcement relationships of ODUPD. The review also examined ODU's Office of Emergency Management, the ROTC program, ODU's admissions processes, and ODU's threat assessment infrastructure, each of which bears directly on the events of March 12 and ODU's response.

1. Overview of ODU

ODU is a public research university located in Norfolk, Virginia. ODU's on-campus student population is approximately 17,000 students, with approximately 6,000 residing on campus and a substantial population living within walking distance. ODU also operates a large online program called ODUGlobal, serving around 8,000 students. Approximately 28% of ODU's student body is military-affiliated. Effective July 1, 2024, ODU absorbed Eastern Virginia Medical School ("EVMS"), expanding the University's operational scope and geographic footprint beyond the main Norfolk campus.

ODU is an urban and open campus located in Norfolk, Virginia. Members of the public can walk around the campus freely and access buildings during standard business hours or when classes are in session. Outside of those hours, buildings on campus are generally locked. As of March 12, 2026, students and faculty had access via internal ODU systems to course location and schedule information.

In addition to ODU's administration, the University has several governing and advisory bodies that play a role in shaping ODU's policies:

Board of Visitors. ODU is governed by its Board of Visitors, whose members are appointed by the Governor of Virginia. The University's President reports to the Rector and the full Board of Visitors. The Board's role is centered on governance, policy development, and high-level institutional strategy, with the President serving as the chief executive responsible for day-to-day operations. Final institutional authority resides with the Board of Visitors.

Faculty Senate. ODU's Teaching and Research Faculty Senate ("Faculty Senate") is an advisory body representing faculty concerns and overseeing policies and procedures as reflected in the faculty handbook. The Faculty Senate operates through a committee structure with elected representation drawn from academic units across the University. The Faculty Senate's role in practice is to provide a formal mechanism through which faculty may recommend policies on matters relating to academic matters and the professional affairs of the faculty.¹

Staff and Student Representative Bodies. ODU has also established staff-representation structures, including an Administrative and Professional ("A/P") Faculty Senate representing professional staff and a Monarch Staff Senate ("MSS") representing hourly and classified employees. ODU also has a Student Government Association, which is comprised of five elected leadership positions: President, Vice President, Treasurer, Secretary, and Speaker of the Senate.

2. University-Wide Safety Policies

a. Active Threat Response Policies

ODUPD's active threat response framework is governed by Chapter 17 of its written directive system, which consists of three general orders: General Order 17.01 (All Hazards Plan), General Order 17.02

¹ ODU, *Teaching & Research Faculty Handbook*, at 14 (Feb. 2026).

(Critical Incidents), and General Order 17.03 (Major Events). Together, these orders establish the mandatory obligations governing ODUPD's response to active threat situations on campus.

An active threat is any incident involving a deliberate, immediate threat to lives or presenting an imminent danger to the community, including active shooter situations.² Under the ODUPD active threat framework, all sworn officers are required to respond immediately upon receiving a report of an active threat, regardless of rank or assignment.³ The first officer or officers to arrive on scene are responsible for isolating, distracting, and neutralizing the threat.⁴ Where multiple officers arrive simultaneously, they are expected to form contact teams of two to five officers; those teams must enter from a non-primary entrance, proceed directly to the threat without conducting a full building sweep, and relay victim locations to a separately formed rescue team.⁵ The next group of three to four arriving officers is expected to form an additional contact team or a rescue team.⁶ Rescue teams are responsible for locating and removing injured victims and directing uninjured persons out of the building.⁷ No attempt to evacuate persons sheltering in place is permitted until the scene has been stabilized and declared safe, and any evacuated persons must exit with their hands raised.⁸

With respect to incident command, an initial responding officer who is not part of a contact or rescue team is required to establish a five-function Incident Command System ("ICS") encompassing Command, Operations, Planning, Logistics, and Finance/Administration.⁹ They must also employ the All Hazards Plan, which provides basic guidelines for responding to and managing critical emergency incidents and other major events, until a patrol supervisor assumes command.¹⁰ Upon assuming Incident Command, the on-duty supervisor bears a mandatory, express obligation to ensure that emergency notifications are disseminated as soon as possible.¹¹

The active threat response framework also imposes ongoing training, reporting, and readiness obligations. An after-action report is mandatory following every critical incident.¹² Annual training on the All Hazards Plan and ICS is required, as are biennial tabletop or full-scale exercises; all related documentation must be maintained by the Training Unit and provided to the Accreditation Team on an annual basis.¹³ Quarterly equipment inspections are required via form PD-15.02, covering body armor, rifles, ammunition, ballistic shields, Go Bags, and breaching kits.¹⁴

As for civilian response, the governing framework for an active threat situation is Run-Hide-Fight, as described in ODU's Crisis and Emergency Management Plan ("CEMP").¹⁵ Under the Run-Hide-Fight framework, individuals are first directed to run and escape, if possible, evacuating the threat area as quickly as possible, leaving belongings behind, and assisting others in escaping where feasible.¹⁶ Once in a safe

² ODUPD, *General Order 17.02 (Critical Incidents)*, at 1 (Oct. 1, 2025).

³ *Id.* at 4.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.* at 5.

⁷ *Id.*

⁸ *Id.* at 5–6.

⁹ *Id.* at 2–3; ODUPD, *General Order 17.01 (All Hazards Plan)*, at 3–5 (Oct. 1, 2025).

¹⁰ ODUPD, *General Order 17.02 (Critical Incidents)*, at 5 (Oct. 1, 2025); ODUPD, *General Order 17.01 (All Hazards Plan)*, at 1 (Oct. 1, 2025).

¹¹ ODUPD, *General Order 17.02 (Critical Incidents)*, at 3 (Oct. 1, 2025).

¹² ODUPD, *General Order 17.01 (All Hazards Plan)*, at 7 (Oct. 1, 2025).

¹³ *Id.* at 7–8.

¹⁴ *Id.* at 8.

¹⁵ ODU, *Crisis and Emergency Management Plan*, at C-2-1 (Dec. 2025).

¹⁶ *Id.*

location, individuals are required to contact ODUPD or 911 and provide as much detail as possible regarding the situation.¹⁷ Where evacuation is not possible, individuals are directed to hide, moving out of the threat's line of sight, remaining silent, and securing their location by locking and barricading doors, closing blinds, and turning off lights to create the appearance that the room is unoccupied.¹⁸ Individuals are directed to fight the shooter only as an absolute last resort and only when the individual's life is in imminent danger.¹⁹

b. Emergency Notification Policies

ODU's emergency notification framework is governed by three general orders: General Order 6.01 (Notifications), General Order 6.02 (First Responder Notifications), and General Order 15.04 (Timely Warnings and Emergency Notifications).

Under this framework, an active shooter incident triggers mandatory immediate notifications to the ODUPD command chain, the Dean of Students Office, the Investigations Unit commander, and the Director of Emergency Management.²⁰ The on-duty supervisor bears sole responsibility for ensuring that all required notifications are made, subject to an escalation protocol if on-call commanders are unreachable.²¹

With respect to campus-wide emergency notifications, each notification must include four elements: the nature of the emergency, the location, recommended protective actions, and information about where to obtain further updates.²² That content requirement is consistent with ODU's emergency notification obligations under the Clery Act.²³

The notification must be distributed without delay through one or more of the following channels: the ODU Alert System (text messages, emails, and phone calls); outdoor warning sirens (where available); building fire alarm systems (for building evacuations only); public address systems in buildings; digital signage and emergency displays; the ODU website homepage; official University social media accounts; local media outlets where appropriate; and face-to-face notification where appropriate.²⁴

3. ODU's Police Department

a. Jurisdiction, Structure, and Accreditation

ODUPD is certified by the Virginia Department of Criminal Justice Services and empowered under the Code of Virginia to carry out law enforcement activities, which include enforcing state and local laws, making arrests, and conducting criminal investigations. ODUPD has jurisdiction over property owned or controlled by ODU and maintains various agreements with federal, state, and local police departments for mutual aid purposes. ODUPD holds concurrent jurisdiction with, and exercises equal authority to, the Norfolk PD within designated areas surrounding the University's campus. Where criminal activity involving ODU students occurs off campus, ODUPD works in conjunction with local law enforcement to monitor and address that activity as appropriate.

ODUPD encompasses patrol operations and a detective unit responsible for investigating crimes occurring on campus; homicide investigations are handled in coordination with Norfolk PD. ODUPD operates a 911 center that functions as a secondary Public Safety Answering Point ("PSAP"): landline 911

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.* at C-2-2.

²⁰ ODUPD, *General Order 6.01 (Notifications)*, at 2 (Aug. 19, 2024).

²¹ *Id.* at 1–2.

²² ODUPD, *General Order 15.04 (Timely Warnings and Emergency Notifications)*, at 4 (Feb. 2, 2025).

²³ Clery Center, *Timely Warnings and Emergency Notifications: Separate and Distinct Requirements*, https://clery.memberclicks.net/assets/docs/member-resources/TWEN-sep-distinct_101223.pdf (last visited June 27, 2026).

²⁴ ODUPD, *General Order 15.04 (Timely Warnings and Emergency Notifications)*, at 4 (Feb. 2, 2025).

calls route directly to ODUPD, while cellular 911 calls route to Norfolk PD, with calls shared bidirectionally between the two departments.

Following the EVMS merger, ODUPD staffing stands at approximately 80 sworn officers and approximately 60 non-sworn, unarmed security personnel. Under Chief Garrett Shelton's leadership, the department prioritizes paying ODUPD officers competitively to recruit talented officers. ODUPD leadership acknowledged being slightly short-staffed as a direct result of the merger-related expansion of the department's geographic and operational responsibilities but characterized current staffing levels as adequate to meet the department's core needs. As part of the broader organizational restructuring that followed the EVMS merger in July 2024, ODUPD was placed within the reporting purview of the Vice President for Student and Campus Life. Under that reporting structure, ODUPD functions as a standalone unit, with Chief Shelton reporting directly to the Vice President for Student and Campus Life, who then reports directly to President Hemphill on a scheduled biweekly basis with immediate access when needed and/or requested.

ODUPD carries statutory responsibility under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the "Clery Act") for compiling and publicly disclosing the University's annual campus crime statistics and security policies, providing timely warnings regarding campus emergencies, and preparing and publishing ODU's Annual Security and Fire Safety Report.

ODUPD holds Tier 2 accreditation under the Commission on Accreditation for Law Enforcement Agencies ("CALEA"), first achieved following an on-site assessment and commission appearance in 2019. CALEA accreditation requires compliance with more than 460 professional standards, with annual evaluations and full reaccreditation required every four years. ODUPD is also accredited under the International Association of Campus Law Enforcement Administrators ("IACLEA"). It is rare for higher education institutions to be accredited under both CALEA and IACLEA.

b. Relationship with External Law Enforcement and Mutual Aid

ODUPD handles most law enforcement matters arising on campus internally but maintains a strong working relationship with the Norfolk PD. In an active threat scenario, ODUPD's protocol is to contact Norfolk PD for assistance and to notify the Virginia State Police. Norfolk PD handles all homicide investigations and may assist ODUPD as needed for all other emergencies.

ODUPD does not maintain its own emergency medical services ("EMS") capability or ambulance fleet. In medical emergencies, ODUPD relies on Norfolk to provide EMS to the campus.²⁵ ODU Emergency Management estimated an average EMS response time of approximately three to four minutes, noting that a fire station is located close to campus. ODUPD officers receive training in basic first aid, CPR training, and Tactical Emergency Casualty Care ("TECC").

ODUPD has a close working relationship with the FBI's Joint Terrorism Task Force ("JTTF"). Chief Shelton has regular calls with the head of the JTTF and otherwise remains in close contact with the FBI.

c. Training and Preparation for Active Shooter Scenarios

ODUPD has conducted active shooter trainings for the ODU community for at least a decade. Chief Shelton is a certified active threat instructor and personally leads nearly all of ODUPD's active shooter training sessions. The curriculum covers the nationally recognized, FBI-endorsed,²⁶ Run-Hide-Fight response system, as discussed above. During those trainings, Chief Shelton routinely provides his mobile phone number for attendees to contact him personally.

Participation in these trainings is voluntary. Since 2016, Chief Shelton and ODUPD have provided over 200 active shooter trainings to student, faculty, and administrative groups on campus. In 2025, ODUPD and

²⁵ ODU, *2025 Annual Security and Fire Safety Report*, at 74.

²⁶ Federal Bureau of Investigation, *Active Shooter Attack Prevention and Preparedness*, <https://www.fbi.gov/how-we-can-help-you/active-shooter-safety-resources/active-shooter-attack-prevention-and-preparedness-asapp> (last visited June 27, 2026).

the Office of Threat Assessment jointly reached out to faculty and staff department heads across campus offering active shooter training; but of the approximately 70 departments contacted, only 17 accepted.

In January and February 2026, ODUPD revised its active shooter policy as part of a broader all-hazards plan incorporating incident command principles. Under the revised policy, first-responding officers are expected to enter the threat environment during an active incident without waiting for additional resources to arrive, and the incident commander is typically the first command-level officer to reach the scene. The policy revision also made more explicit the requirement for biannual full-scale and tabletop exercises and presented the relevant material in a shorter, more accessible format. At the time of the March 12 incident, sergeants had received training on the revised policy, but annual training on the revised policy for all sworn ODUPD personnel had not yet been completed.

Since President Hemphill became President of ODU in July 2021, ODU has increased the equipment available to ODUPD officers for emergency situations. Currently, ODUPD officers carry gauze, bandages, and at least one tourniquet. ODUPD officers do not carry hemostatic agents on their person, which are substances designed to prevent heavy bleeding in trauma situations. However, ODUPD officers do have hemostatic agents in their patrol vehicles, along with protective shields and medical bags. ODUPD officers who are properly trained and certified carry patrol rifles on their person and in their vehicles. All uniformed patrol platoons deployed on ODU's main campus include two to three certified patrol rifle officers. Patrol rifle officers are also assigned to ODUPD's canine, criminal investigations, and administrative units.

President Hemphill's executive team undergoes regular emergency preparedness training. President Hemphill had personally experienced two prior campus shootings across institutions and prioritizes training and preparedness for such incidents as a result. As recently as October 2025, the team underwent a tabletop exercise training that simulated what to do in an active shooter situation.

d. Campus Security

ODU has various safety and security measures in place across campus, including regular ODUPD patrols, dedicated security personnel, security cameras, and emergency medical response materials within each of the buildings on campus.

ODUPD oversees campus 24/7, with officers conducting visible foot patrols throughout campus and on constant standby for incoming calls. ODUPD also utilizes a canine unit, which conducts regular patrols of campus. Chief Shelton has emphasized a "community engagement," as opposed to a "community policing," philosophy informing how ODUPD interacts with the ODU community. While ODUPD increased its presence on campus following March 12, Chief Shelton and ODUPD have worked with ODU student leadership to avoid over-policing the ODU community. As noted above, in addition to ODUPD, ODU employs approximately 60 non-sworn unarmed security personnel. Security personnel assist with daily tasks such as unlocking and locking campus buildings and removing any unauthorized individuals from campus, but security presence tends to be concentrated primarily around late-night escort services and large campus events such as football games. ODU also has approximately 2,500 security cameras deployed across campus. Many of those cameras will require renewal in the coming years, and ODU has allocated some of its budget for technology and infrastructure improvements to upgrade camera systems.

With respect to emergency medical supplies, ODU has 59 Automated External Defibrillator ("AED") boxes distributed throughout its main campus. Each building on campus includes at least one AED kit, and ODU is in the process of installing additional kits in buildings throughout campus. Certain buildings, including Constant Hall, also include "Stop the Bleed" kits inside the AED boxes. Those "Stop the Bleed" kits include a guide for using the kit and hemostatic agents, such as tourniquets, gauze, emergency blankets, and emergency chest seals. The AED boxes containing those "Stop the Bleed" kits do not indicate that they include hemostatic agents, but ODU is in the process of providing separate, clearly labeled "Stop the Bleed" boxes that will be mounted directly below each AED unit. In the meantime, Building Emergency Coordinators ("BECs") have been informed that AED kits contain "Stop the Bleed" materials and are responsible for making their building occupants aware of where they can find AED and "Stop the Bleed" kits.

ODU's campus currently contains a mix of old and new buildings. Newer, upgraded buildings are generally restricted by key card access, and ODU has the capability to lock and unlock doors in those buildings remotely. Previously, that capability was routed through the Technology Services department; as of June 2026, it is routed through ODUPD. Older buildings, on the other hand, are generally locked with physical keys. As of March 12, 2026, Constant Hall had 13 doors with electronic locks, a small percentage of the overall number of doors, and ODU is in the process of upgrading the majority of campus buildings from physical key access to key card access, with upgrades occurring in phases. While not all older buildings on campus have the infrastructure necessary to support electronic locks, some do, or some of the infrastructure can be updated. ODU has recently committed \$9 million over the next three years for security-related improvements across campus, including increased key card access in older buildings as well as camera upgrades.

e. Fire Code Restrictions on Door Locks

The legal framework governing building locks is established primarily by NFPA 101 and the International Building Code ("IBC"). Under these codes, egress doors must be openable from the inside without a key, tool, or special knowledge, and must unlock immediately upon fire alarm activation, power loss, or activation of approved panic hardware.

With respect to educational occupancies specifically, the 2018 IBC (§ 1010.1.4.4) permits classroom and office egress doors to be equipped with locking arrangements designed to keep intruders out, provided that three conditions are satisfied: (1) the door can be unlocked from outside with a key or other approved means; (2) the door remains openable from within; and (3) no modifications are made to listed panic hardware, fire door hardware, or door closers. The 2018 International Fire Code ("IFC") contains a parallel provision to the IBC on lockdown arrangements, with the addition that modification to fire door assemblies shall be in accordance with NFPA guidance.²⁷

4. Office of Emergency Management

Emergency Management is responsible for maintaining compliance with Virginia's emergency planning requirements, including emergency action plans and business continuity plans; planning, training, and conducting emergency response exercises at the university level; and working with ODUPD on emergency planning and preparedness. Emergency Management's function has expanded over time into a portfolio that now encompasses oversight of the Office of Fire Prevention and, following the EVMS merger, emergency management responsibilities at the EVMS campus.

ODU has implemented a scalable ICS governed by a comprehensive incident command plan. The ICS is designed to align with national incident command standards and involves various ODU departments, including Emergency Management and ODUPD. The Board of Visitors sits at the top of the ICS, with Chief Shelton serving as the liaison for ODUPD and the subject matter expert within the command structure. In the event of an active threat scenario, Chief Shelton becomes the head of ICS's command structure, while Emergency Management coordinates functional support through the Emergency Management Operations Center. Emergency Management conducts annual ICS training and tabletop exercises for ODUPD. The trainings cover the fundamentals of ICS and involve scenario-based emergency exercises that vary each year. Past scenarios covered in training include flooding, riots, police chases, and other threats.

Emergency Management also distributes regularly updated Emergency Action Plans ("EAPs") to the ODU community, which provide emergency response guidance for a variety of natural, human-caused, and technological emergency incidents. Those EAPs require the creation of an Emergency Preparedness Committee for each campus building, along with a designated BEC responsible for overseeing the building's response in the event of an emergency. BECs are trained by Emergency Management on topics such as

²⁷ ODU's policies regarding building locks cite to the 2018 versions of the IFC and IBC. While the IFC and IBC were revised in 2024, they contain identical restrictions regarding the use of locking arrangements in educational occupancies. See 2024 IBC § 1010.2.7; 2024 IFC § 1010.2.7.

CPR and active shooter responses. Emergency Management also trains BECs on the use of AED and “Stop the Bleed” kits and works with BECs to ensure that those kits are placed in optimal locations.

Additionally, Emergency Management conducts emergency training for ODU faculty, staff, and students. All faculty and staff are required to complete Virginia-mandated disaster preparedness training, and new employees are required to complete active shooter training. Students receive active threat training through biennial onboarding modules. Emergency Management also conducts ad hoc emergency response training, including active shooter training, upon request. In addition to those ad hoc trainings, Emergency Management also offers Texas A&M Engineering Extension Service courses on emergency response to ODU faculty and staff and works closely with ODUPD to plan additional emergency preparedness exercises, as discussed in greater detail in Section IV.A.9 below.

5. Emergency Notification System

ODU utilizes a multi-channel emergency notification system to enable broad distribution of emergency notifications. ODU’s primary emergency notification platform is RAVE, which supports simultaneous mass notifications across multiple channels, including: SMS text message, voice call, email, push notification via the ODU mobile application, a banner that populates in red at the top of the ODU website when an alert is issued, and an outdoor loudspeaker system that is tested twice each year. ODU also utilizes Alertus to deliver desktop alerts to ODU-managed computers across campus. Alertus is integrated with RAVE and can be selected as a modality when sending emergency messages. Once integrated, Alertus does not require logging into a separate system to send alerts.

RAVE contains pre-built alert templates for emergency notifications covering common emergency event types, enabling authorized senders to dispatch alerts rapidly without first drafting message content. Each template includes pre-selected audience groups, communication modalities, and pre-filled content with blank fields for location-specific information. Follow-up messages sent after the initial emergency notification are not pre-templated, given that the content of those follow-up messages will vary based on how an emergency situation evolves.

Per ODU’s emergency notification policies, any ODUPD supervisor at the rank of sergeant or above is authorized to approve and dispatch an emergency alert. Certain Vice Presidents are also designated as authorized senders, depending on the nature of the incident. The emergency notification system is designed to authorize multiple individuals to dispatch alerts so that the alerts can be timely issued by the first available authorized individual. On-scene law enforcement confirmation of the emergency is generally required before an initial alert is dispatched, and ODUPD sign-off is required before an all-clear message is issued.²⁸

With respect to enrollment in the notification system, all members of the ODU community receive emergency notifications to their ODU email accounts by default. ODU students are also pre-populated and defaulted into SMS notifications based on the contact information they provide when enrolling in ODU’s student information system, but students can opt out of receiving SMS notifications. If a student changes their phone number but does not update their information in ODU’s student information system, they will not receive SMS notifications on their new number. Faculty and staff are currently enrolled in SMS emergency notifications on an opt-in basis. ODU is working to change that opt-in basis default; the University has begun preloading faculty and staff phone numbers so that they are defaulted into the emergency notification system and are able to opt out if they choose to do so.

ODU also has an ODU Safe mobile phone application that allows individuals associated with the University to voluntarily enroll to receive ODUPD alerts and information related to safety from ODUPD; the application also has a panic button embedded in it that allows a user to be geolocated and immediately routed to the ODU 911 center.

²⁸ An all-clear notification will be distributed “once the situation has been resolved or it is determined the imminent threat to the safety of the campus community is mitigated.” ODUPD, *General Order 15.04 (Timely Warnings and Emergency Notifications)*, at 4 (Feb. 2, 2025).

6. ROTC Program

Approximately 120 students participate in ODU's ROTC program. ROTC meets twice per week, including for physical training and regular ruck marches around campus. The program varies depending on a student's class year: the junior classes focus on small patrol operations, while the senior class transitions cadets from training to developing junior officer skills. Participation in the program is open to students of any academic major. ROTC activities and classes are conducted in facilities and spaces that are accessible to the broader campus community, and information about ROTC class locations and schedules is accessible online to ODU students. ROTC has a dedicated building on campus.

7. Admissions

In the most recent calendar year, ODU received 15,024 first-time applications for admission and 744 applications for readmission, with a total enrolled student population of 2,697 first-time enrolled students and 23,469 total enrolled students. ODU's enrollment process differs depending on whether an applicant is a first-time student or a former student seeking readmission, and first-time and readmissions applications are reviewed by different personnel within the enrollment team. ODU is a test-optional institution with a minimum Grade Point Average ("GPA") requirement of 2.5 for first-time applicants. In determining whether to admit a first-time applicant, the enrollment team considers a variety of factors, including GPA and high school coursework completed. For readmissions applications, the enrollment team considers whether the applicant left ODU in good academic standing (*i.e.*, with a 2.0 GPA or higher), whether the applicant is degree-seeking, whether the applicant already holds an undergraduate degree from ODU or another institution, and whether the applicant is an international student. If the readmissions applicant departed in good academic standing and provides the names of institutions attended since leaving ODU, readmission is generally granted. The readmissions process is more streamlined than the first-time admissions process, with decisions typically made within approximately one week once all materials are received.

Following the implementation of a Virginia law in 2022 regarding inquiries into criminal history, no public higher education institution in Virginia is permitted to ask about criminal history at the application stage or take into account criminal convictions in making an admissions decision. After this law was implemented, ODU removed the criminal history question from its admissions application. Because ODU is not permitted to affirmatively inquire about criminal history, it is generally limited to learning of convictions only through self-disclosure or notification from a parole or probation officer or other law enforcement officer.

Virginia law does not, however, preclude voluntary inquiry into criminal history post-admission and pre-enrollment.²⁹ Since January 2022, ODU has sent a voluntary self-disclosure criminal background questionnaire to first-time admitted students, including first-time admitted freshmen, transfer students, and graduate students. Prior to March 12, 2026, ODU did not send the self-disclosure questionnaire to readmitted students; ODU now sends the questionnaire to both first-time admitted and readmitted students.

If a student discloses a conviction or ODU otherwise learns of the conviction, ODU generally withholds registration pending an evaluation by ODU's Threat Assessment Team ("TAT") and may withdraw the admission offer if the conviction presents a threat. The self-disclosure is then evaluated by the TAT under the protocol outlined in the TAT's MOU, as described *infra* Section III.A.8.b, before a recommendation regarding the self-disclosing student's admission is provided to ODU's Office of Admissions. There is no written policy governing how the admissions team should assess the TAT's recommendations on whether to withdraw an admissions offer based on the admitted student's criminal history. However, in practice, the Office of Admissions has always followed the TAT's recommendation.

²⁹ See Va. Code Ann. § 23.1-407.1(C) (West).

Nothing in this section shall be construed to prohibit a public institution of higher education from inquiring into the criminal history of any individual who has been admitted to but has yet to enroll at the institution. Any public institution of higher education may withdraw an offer of admission to any individual whom the institution subsequently determines to have a criminal history that poses a threat to the institution's community.

ODU does not conduct background checks or independent internet research on admitted students. As an initial matter, federal law requires a permissible purpose—such as the written consent of the applicant—to conduct a background check. Background checks typically take several weeks to complete. Moreover, Virginia law contemplates that schools could learn of criminal history for students and applicants through post-admission voluntary disclosure.³⁰

8. Threat Assessment Infrastructure and Process

a. Threat Assessment Team and the Office of Threat Assessment

After the Virginia Tech shooting in 2007, Virginia adopted a statutory requirement for all public institutions of higher education to maintain a threat assessment team. Consistent with that statutory mandate, ODU has a Threat Assessment Team and an Office of Threat Assessment.

ODU's TAT collects reports of concerning behavior, investigates reported incidents, assesses relevant risk factors, and implements risk mitigation strategies to address potential threats. The TAT operates pursuant to a formal standard operating procedure governing its activities and is a cross-functional body comprised of approximately twelve members, including Office of Threat Assessment leadership; ODUPD leadership; representatives from student affairs, student conduct, Title IX, human resources, academic affairs, and housing; and a staff psychologist. The TAT generally meets once per week for two hours.

The Office of Threat Assessment leads and facilitates threat assessment and prevention processes at ODU.³¹ The Office uses a variety of protocols to address threat referrals, applying different tools depending on the specific situation. As of July 13, 2026, the office was overseeing 288 total cases. Of those cases, 63 are considered “active,” meaning they involve weekly or daily review, while “inactive” cases involve less frequent, periodic check-ins. The majority of the Office of Threat Assessment's referrals concern students, though some cases involve faculty and other staff on campus. Consistent with federal and state privacy laws, the TAT and the Office of Threat Assessment may only disclose information regarding a referral “as necessary to fulfill threat assessment and management functions.”

The Office of Threat Assessment manages its caseload with a conduct-tracking software system; however, the office plans to transition to a more dedicated threat assessment platform in the future. In addition to tracking and assessing potential safety threats, the Office of Threat Assessment also coordinates active threat training sessions with ODUPD.

ODU's Office of Threat Assessment is currently comprised of only its Director; TAT members do not have an active role in the Office of Threat Assessment's operations unless they are delegated a task by the Director of Threat Assessment. The Director of Threat Assessment has explained that the Office of Threat Assessment is constrained by the fact that she is the only daily operational member of the office. To alleviate that resource constraint, the Director of Threat Assessment plans to hire at least one additional staff member by August 2026.

b. Process for Admitted Student Self-Disclosed Criminal History

Under the ODU Office of Threat Assessment Memorandum of Understanding (“MOU”), the TAT is the designated review body for criminal history disclosures submitted by newly admitted individuals. The TAT evaluates such disclosures in accordance with Virginia Code § 23.1-407.1, which prohibits Virginia's public universities from inquiring about an applicant's criminal history prior to that applicant being admitted to the university. As noted above, under the Virginia Code, after an applicant is admitted, a public university may request information regarding that student's criminal history and withdraw their admission where their “criminal history poses a threat to the institution's community.”³²

The MOU provides that any student who discloses criminal history after admission is referred to the TAT for review, regardless of the severity of the offense. Such referrals are typically addressed at the TAT's

³⁰ See *id.*

³¹ ODU, *Threat Assessment*, <https://www.odu.edu/police/threat-assessment> (last visited June 8, 2026).

³² Va. Code Ann. § 23.1-407.1(C) (West).

regular weekly meetings, though an expedited review process is available when the Office of Admissions notifies the Director of Threat Assessment of an urgent matter. The TAT may also interview the admitted student or request additional documentation regarding the student's disclosed criminal history. After conducting its evaluation, the TAT provides an advisory recommendation to the admissions team. The admissions team retains final authority over admissions decisions and communicates outcomes directly to the student. Prior to March 12, 2026, only first-time admitted students, not students seeking re-enrollment, were asked to voluntarily disclose their criminal history.

B. Relevant Pre-Incident Background Regarding Jalloh

1. Jalloh's Admission and Readmission to ODU

a. Initial Admission (2007)

Mohamed Bailor Jalloh graduated from McLean High School in McLean, Virginia, in June 2007, and was first admitted to ODU in February 2007 as a degree-seeking freshman for the Fall 2007 semester. His initial intended major was Psychology. No one currently working in ODU's Office of Enrollment Management was involved in ODU's admissions or enrollment process at the time of Jalloh's initial admission in 2007, and the team does not have any information about his initial admission beyond what is contained in his admissions file.

Jalloh struggled academically at ODU. His ODU transcript documents multiple failing grades, withdrawals, and incomplete coursework across disciplines including Mathematics, English Composition, Economics, History, and Sciences. Due to his academic performance, Jalloh was placed on academic suspension in or around May 2010.

b. First Readmission (2011) and Intervening Academic History

Following his academic suspension in 2010, Jalloh continued serving in the United States Army National Guard, in which he enlisted in approximately 2009. His military transcript indicates that he completed Basic Training, Marksmanship Training, and a Combat Engineering course at the United States Army Engineer School at Fort Leonard Wood, Missouri.

Jalloh subsequently applied for readmission to ODU in April 2011 for the Summer 2011 semester. His application was granted the same day. At the time of his first readmission, his declared major was Political Science. In a readmission letter submitted with his application, Jalloh explained that during his suspension, his time in the Army National Guard helped him develop discipline and goal orientation and stated his intention to attend law school following completion of his undergraduate degree. The current enrollment team does not have any information about Jalloh's 2011 readmission beyond what is contained in his admissions file.

Jalloh maintained enrollment at ODU until Spring 2012, after which he stopped taking classes for an unknown reason.

c. Federal Terrorism Conviction (2016)

In 2016, Mohamed Bailor Jalloh pled guilty to attempting to provide material support or resources to a foreign terrorist organization, specifically ISIS, in violation of 18 U.S.C. § 2339B(a)(1), a federal felony.³³ In 2016, Jalloh purchased a gun that he believed would be used in an ISIS-directed attack on U.S. military service members.³⁴

Jalloh had previously tried to join ISIS twice himself and provide money to a known ISIS facilitator before engaging in planning a terror attack in the U.S. In August 2015, Jalloh traveled to Nigeria from his native

³³ Judgment at 1, *United States v. Jalloh*, 1:16-cr-163-AJT (E.D. Va. 2016), Dkt. No. 53.

³⁴ Sentencing Memorandum at 1–6, *United States v. Jalloh*, 1:16-cr-163-AJT (E.D. Va. 2016), Dkt. No. 48. The facts set forth herein are drawn from the sentencing submissions, transcripts, factual record, and judgment found at Jalloh's criminal docket, Dkt. Nos. 37, 48–51, 53, 55.

country of Sierra Leone with the intent of joining ISIS in Libya but did not succeed due to travel delays; he tried again in September 2015 by traveling to Niger but decided not to travel to Libya and gave an ISIS facilitator cash instead. Jalloh stayed in contact with the ISIS facilitator and sent him money later to assist in sending recruits to ISIS-controlled territory in Libya.

In the spring of 2016, Jalloh communicated online with an ISIS figure who Jalloh understood was involved in planning attacks in the U.S. and sent money to him to support ISIS. In March 2016, that ISIS figure connected Jalloh with an individual (who was an FBI source, unbeknownst to the ISIS figure or Jalloh) for the purpose of planning an attack in the U.S. Jalloh and the FBI source met to discuss planning an attack, and Jalloh told the source that he thought about conducting an attack all the time and had been thinking of conducting an attack similar to that of Nidal Hasan, the U.S. Army Major who killed 13 and shot 32 in a terrorist attack in Fort Hood, Texas, in 2009. Jalloh also praised Muhammad Youssef Abdulazeez, a terrorist who had killed five members of the military in Tennessee in 2015, as a “very good man.”

In July 2016, Jalloh purchased an AR-15 rifle from a local gun store in Virginia to use in an attack on U.S. military personnel and was arrested the next day. In the weeks leading up to that purchase, Jalloh had conducted internet research about Omar Mateen, the ISIS gunman who killed 49 and wounded 58 people at a mass shooting at Pulse nightclub in Orlando, Florida, in June 2016, and the rifle he had used in that attack. The Department of Justice sought a sentence of 20 years’ imprisonment, because among other reasons it would “protect the public from future crimes of the defendant.” At sentencing, Jalloh renounced ISIS and stated that he was “in a really bad place, looking for some purpose, and it just really got out of hand.”

On February 10, 2017, a United States District Judge in the Eastern District of Virginia sentenced Jalloh to 132 months’ imprisonment, with credit for time served, followed by five years of supervised release.³⁵ On December 23, 2024, Jalloh was released from prison after serving only eight and one half years of his sentence.³⁶ According to the Federal Bureau of Prisons, Jalloh was released two and a half years early because of a “loophole” that allows some federal inmates to decrease their sentences by completing a substance abuse treatment program.³⁷ The Bureau of Prisons has since closed that “loophole” and barred inmates with terrorism-related convictions from qualifying for such early releases.³⁸

Jalloh was on supervised release starting in December 2024 and would have been supervised by a federal probation officer in the district of his residence, which was in Sterling, Virginia, and thus the Eastern District of Virginia. Among the standard conditions of Jalloh’s release was Condition 13, which required that, as directed by the Probation officer, Jalloh notify third parties of risks that may be occasioned by his criminal record or personal history or characteristics.³⁹ Condition 13 also required that Jalloh permit the Probation officer to make such notifications and to confirm Jalloh’s compliance with the notification requirement.⁴⁰ Jalloh’s Probation officer never notified ODU of Jalloh’s conviction or any risk he posed to ODU.

d. Subsequent Readmissions (2025)

Prior to his early release from prison, Jalloh applied for readmission to ODU on November 25, 2024, for the Spring 2025 semester, seeking to pursue a Bachelor of Science in Geography. In that application, Jalloh reported that he attended Northern Virginia Community College from May 1, 2011, to May 31, 2016, and Adams State College from May 1, 2017, to December 1, 2021. The address Jalloh listed was a private residential address in Sterling, Virginia, and would not have placed ODU on notice of his federal

³⁵ Judgment at 2–3, *United States v. Jalloh*, 1:16-cr-163-AJT (E.D. Va. 2016), Dkt. No. 53.

³⁶ *Inmate Locator*, Fed. Bureau of Prisons, <https://www.bop.gov/inmateloc/> (last visited June 5, 2026).

³⁷ Michael R. Sisak and Safiyah Riddle, *Old Dominion Shooter’s Prison History for Islamic State Group Ties Raises Questions*, AP News (Mar. 13, 2026), <https://apnews.com/article/jalloh-old-dominion-university-shooting-islamic-state-b257727b0167982fbffafae2eb8548fd>.

³⁸ *Id.*

³⁹ Judgment at 3, *United States v. Jalloh*, 1:16-cr-163-AJT (E.D. Va. 2016), Dkt. No. 53.

⁴⁰ *Id.*

incarceration. His admission to ODU was granted on January 24, 2025. Despite being admitted for Spring 2025, Jalloh did not enroll in any courses for that semester.

Jalloh subsequently applied for readmission again for the Summer 2025 semester on May 8, 2025. He was granted readmission on May 15, 2025, as an on-campus student with the option to take online courses. Consistent with ODU's practice at the time, Jalloh was not asked to self-disclose criminal history as part of the readmissions process.

Jalloh had applied to graduate in Spring 2026.

2. ODU's Lack of Awareness of Jalloh's Criminal History

ODU had no information on Jalloh's criminal background at the time of his readmissions in 2025, and ODU's administration was unaware of Jalloh's criminal history prior to March 12, 2026. While Jalloh's Probation officer had the authority to require Jalloh to disclose his criminal record to ODU or other third parties, the officer apparently never directed such a disclosure. Nor did Jalloh's Probation officer or any federal law enforcement agency contact ODU to disclose Jalloh's federal terrorism conviction.⁴¹ Although the FBI investigated Jalloh's original offense, they likewise did not notify ODU of Jalloh's conviction or any risk he posed.

Neither ODUPD nor the Office of Threat Assessment had any knowledge of, or contact with, Jalloh before March 12, 2026. Jalloh was never referred to the TAT, and his criminal history was never brought to the attention of the Director of Threat Assessment.

In terms of process, had the Director of Threat Assessment learned of Jalloh's criminal history, her first step would have been to conduct an open-source review, which would have surfaced publicly available articles about Jalloh's federal indictment. She would then have contacted federal and state law enforcement to request any information they could share. The matter would then have been brought to the full TAT. The Director of Threat Assessment made clear that she would have recommended Jalloh's removal from campus had she known of his criminal history. Her recommendation would have been based on the following facts: Jalloh pled guilty to plotting a terror attack against members of the U.S. military. Norfolk is home to numerous heavily guarded military installations, such as Naval Station Norfolk, which are "hard targets," meaning they are more difficult to attack. However, any military personnel or military-affiliated students, instructors, or staff on campus at ODU would be a relatively "soft target" that would be easier to attack than those on a military base. In light of the fact that ODU has a sizeable population of students who are in the military, veterans, or in ROTC, in the Director of Threat Assessment's view, Jalloh posed an unacceptable risk to ODU's community.

ODU's Office of Enrollment Management likewise had no specific knowledge of Jalloh prior to March 12, 2026. Nothing in Jalloh's admissions file indicated that he had a criminal background, and when Office of Enrollment Management personnel reviewed his file in the wake of March 12, they confirmed that there were no other "red flags" in his file indicating that he might be a threat to campus safety. No one in the Office of Enrollment Management recalled Jalloh specifically as a readmissions candidate, and leadership indicated that there was nothing notable in Jalloh's file for readmission.

Others within the ODU community shared that they were not aware that Jalloh would pose any threat to campus safety. ODU leadership were not aware of Jalloh. Student affairs leadership confirmed that the shooter was not known to their office, and two ODU faculty members who taught Jalloh in the months preceding the March 12 attack never noticed any behavioral concerns or warning signs.

⁴¹ The Chief United States Probation Officer for the Eastern District of Virginia did not agree to meet with Cooley but provided publicly available information, including a website outlining a probation officer's duty to warn when they determine that the person under supervision "presents a reasonably foreseeable risk of harm to a third party." In determining whether to give a warning, a probation officer must weigh both the seriousness of the risk created and the impact on the defendant's rehabilitation. See Admin. Office of the U.S. Courts, *Overview of Probation and Supervised Release Conditions*, at 38–40 (2024). As noted above, no such notification was made to ODU.

C. March 12 Shooting and Immediate Aftermath

This section examines the events preceding March 12, including the hours immediately before the attack. We next recount the shooting itself and the extraordinary heroism of Lt. Col. Shah and the ROTC cadets, who fought back against Jalloh and prevented further loss of life. A detailed, minute-by-minute account of the immediate aftermath follows.

1. Events Preceding March 12

According to a federal criminal complaint, on or about March 11, 2026, Jalloh purchased a handgun, despite the fact that he was legally barred from doing so as a result of his federal criminal conviction.⁴²

Starting in or about March 2026, ROTC members on campus at ODU were directed to dress in civilian clothing to minimize the risk they would be targeted as a result of increased tensions due to the Iran war.⁴³ ODUPD also increased its patrol of the ROTC building and surrounding area and began altering its patrol routes during this period.

2. The Hours Before the Shooting

On the morning of March 12, 2026, at approximately 9:40 a.m., Jalloh drove to ODU's campus, parked his vehicle near Constant Hall outside the Islamic Center adjacent to campus, and walked down 49th Street toward the building.⁴⁴ At approximately 10:00 a.m., Jalloh entered Constant Hall through the 49th Street entrance. He then took the stairwell to the second floor and walked toward classroom 2065. At approximately 10:10 a.m., Jalloh walked back to his vehicle, and approximately 10 minutes later, he parked his vehicle in the parking lot next to the football stadium adjoining 49th Street and walked back toward Constant Hall. At approximately 10:28 a.m., for the second time that morning, Jalloh entered Constant Hall through the 49th Street entrance and took the stairwell to the second floor.

⁴² Criminal Complaint at 1, *United States v. Chapman*, 2:26-mj-00074 (E.D. Va. 2026), Dkt. No. 1; Affidavit in Support of Criminal Complaint at 6, *United States v. Chapman*, 2:26-mj-00074 (E.D. Va. 2026), Dkt. No. 2.

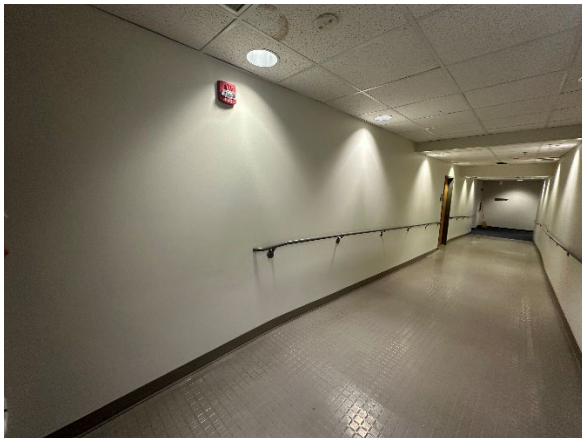
⁴³ Similar guidance was received by high school JROTC programs in early March 2026. See, e.g., Alyssa Williams, *Kentucky JROTC Programs Weigh Uniform Guidance Amid Iran Conflict*, WKYT (Mar. 4, 2026), <https://www.wkyt.com/2026/03/04/kentucky-jrotc-programs-weigh-uniform-guidance-amid-iran-conflict/>; Louisa Moller, *Iran War Changes Uniform Guidance for Junior ROTC Cadets at Massachusetts High School*, CBS Boston (Mar. 13, 2026), <https://www.cbsnews.com/boston/news/lowell-high-school-jrotc-uniform-iran-war/>.

⁴⁴ We are not aware of any connection between Jalloh and the Islamic Center.



View of Constant Hall from 49th Street

Classroom 2065 is located on the second floor in a back corner and accessed through a small hallway down a ramp. Jalloh waited outside the hallway leading to classroom 2065 for approximately 13 minutes before the shooting. During that time, numerous individuals passed by Jalloh.



*Hallway leading to classroom 2065,
with classroom door on the left*



*View of the inside of classroom 2065
from the back of the room*

3. The Shooting and ROTC Cadet Response

That morning, a senior ROTC class was in session in Constant Hall classroom 2065, which began at 9:30 a.m. and typically concluded by 10:45 a.m. Approximately five minutes prior to the end of class, group presentations by the ROTC cadets had just finished for the day, and Lt. Col. Shah was at the front of the room addressing the class. 26 ROTC cadets—almost all senior class members—were present. Lt. Col. Shah was the head of the ROTC program at ODU and himself an alumnus of ODU who served in Iraq, Afghanistan, and Eastern Europe, and was twice awarded the Bronze Star.

At approximately 10:41 a.m., Jalloh entered the classroom and asked whether the class was ROTC. In response, Lt. Col. Shah indicated there were four minutes of class remaining. Jalloh then asked again whether the class was ROTC. After students confirmed that it was, Jalloh closed the classroom door, shouted “Allahu Akbar,” which is an Arabic phrase that translates to “God is the greatest,” but has been used as a

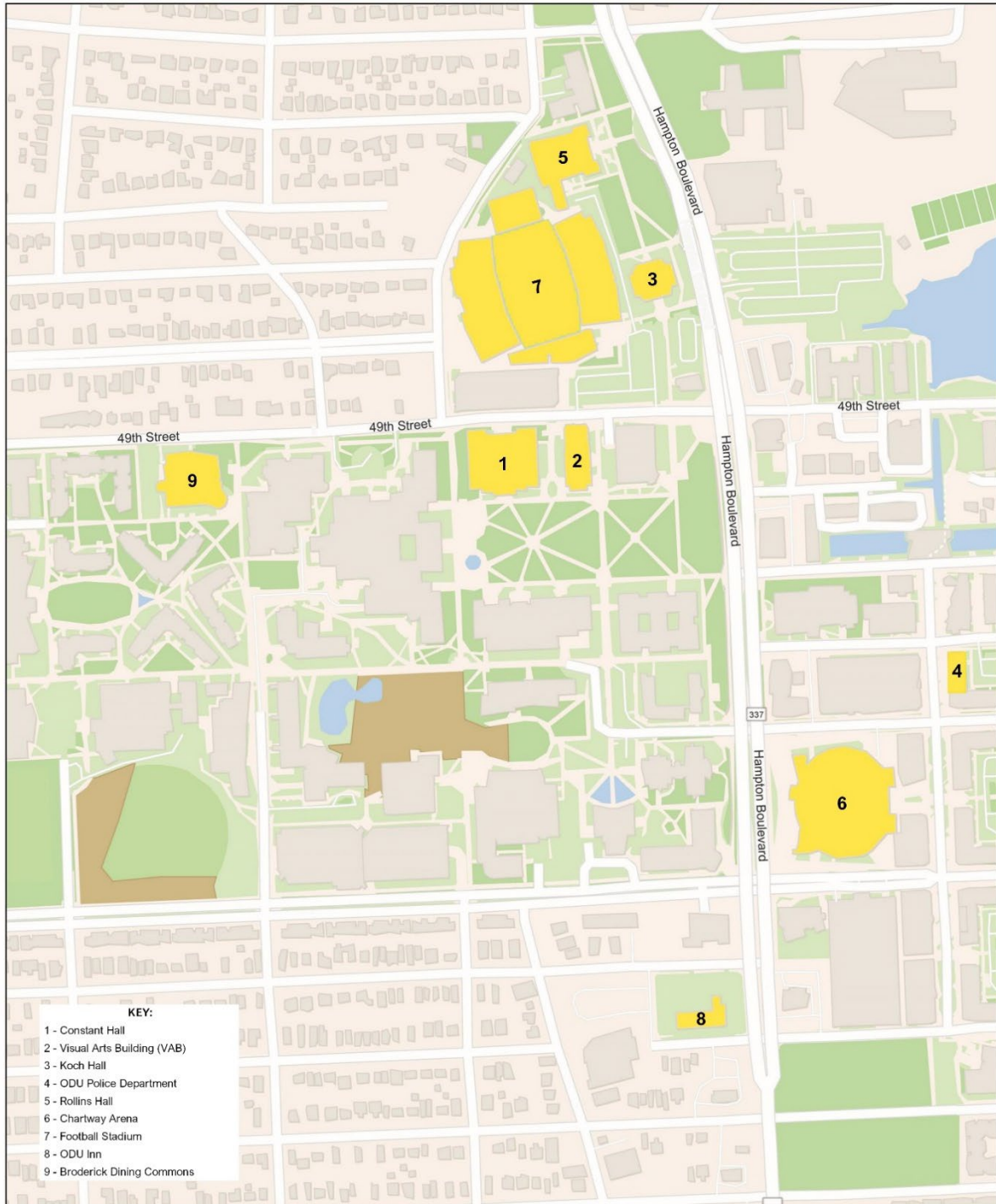
violent rallying cry by ISIS and in ISIS-inspired terror attacks.⁴⁵ Jalloh then began firing at Lt. Col. Shah, who stepped toward Jalloh and grappled with him in an effort to stop the attack.

When Jalloh began shooting, the cadets in the classroom immediately dropped to the ground and took cover behind their desks. But within seconds, several cadets moved toward Jalloh to stop the attack. A violent physical struggle ensued, during which multiple cadets recalled that Jalloh continued firing several shots and continued attempting to fire his weapon while cadets wrestled for control of the weapon. Two cadets had small knives and stabbed Jalloh multiple times to stop the attack. After they had incapacitated Jalloh, the cadets removed and unloaded his gun and set it aside, and checked Jalloh for other threats, such as a suicide vest. During the struggle, other ROTC cadets quickly exited the room.

After incapacitating Jalloh, the cadets remaining in the room immediately began treating Lt. Col. Shah, who appeared to be bleeding heavily from his right leg, and another cadet (“Cadet-1”) who had been shot in the abdomen.⁴⁶ Other cadets attempted to contact law enforcement: one cadet attempted to call ODUPD using a red campus emergency telephone in Constant Hall but did not remain on the line long enough for the call to connect; however, the system registered the five-second contact. After unsuccessfully trying to call 911, a cadet (“Cadet-2”) successfully called Chief Shelton directly on his mobile phone to notify him of the emergency. Another cadet (“Cadet-3”) successfully called 911 after the class evacuated. The chronology below details the call from Cadet-2 to Chief Shelton and the events that followed in the immediate aftermath of the shooting.

⁴⁵ See, e.g., Mahita Gajanan & Alana Abramson, *What to Know About New York City Terror Attack Suspect Sayfullo Saipov*, Time (Oct. 31, 2017), <https://time.com/5004635/new-york-city-attack-suspect-sayfullo-saipov-lower-manhattan/> (ISIS-affiliated terrorist reportedly yelling “Allahu Akhbar” during terrorist attack); *Strasbourg Shooting Witnesses Say Christmas Market Killer Shouted “Allahu Akbar”*, CBS News (Dec. 12, 2018), <https://www.cbsnews.com/news/strasbourg-christmas-market-attack-france-arrests-manhunt-suspect-extremism-2018-12-12/> (same).

⁴⁶ A third cadet suffered a gunshot wound and drove in a private car to the hospital.



Map of ODU Campus

4. Chronology of Events Immediately After the Shooting

TIMESTAMP ⁴⁷	EVENT
10:43:00*	Chief Shelton receives a call from Cadet-2 notifying him about the shooting. Cadet-2 identifies himself and states that he is in a classroom in Constant Hall, that his commanding officer has been shot, and that he is getting students out. The call lasted approximately 3 minutes and 22 seconds as Chief Shelton stayed on the line with Cadet-2 while he was en route to Constant Hall. Immediately after receiving the call, Chief Shelton leaves his office, encounters the Deputy Chief of Police ("DC"), and announces that an active shooter is at Constant Hall. An ODUPD officer ("Officer-1"), who is with the DC, immediately responds and heads to Constant Hall while Chief Shelton and the DC head to ODUPD's dispatch.
10:43:22‡	A Norfolk PD officer at an ODU campus event radios a report of an active shooter in Constant Hall.
10:43:07*	One of the ROTC cadets fleeing the classroom pulls the fire alarm, causing Constant Hall occupants to evacuate into the hallways and out of the building.
10:43:38*	Chief Shelton proceeds to ODUPD's Communication Center, which is ODUPD's own 911 dispatch facility. An ODUPD lieutenant ("Lieutenant-1") opens the door for Chief Shelton.
10:43:43*	Chief Shelton enters the Communication Center and directs officers to respond to an active shooter at Constant Hall. Chief Shelton then directs Lieutenant-1 to get everyone moving to Constant Hall. Per that order, Lieutenant-1 directs an ODUPD officer ("Officer-2") to respond.
10:44:08*	Chief Shelton directs ODUPD dispatch to send an emergency alert to ODU regarding the active shooter situation. The DC and an Assistant Chief of Police ("ACOP-1"), observing that the dispatcher is overwhelmed with calls, tell Chief Shelton that they will send the emergency alert.
10:45:42§	An active shooter report is transmitted over ODUPD radio. An ODUPD sergeant ("Sergeant-1") hears reports of an active shooter located at Monarch Hall and transmits this over radio just as Norfolk PD dispatch puts out the call for an active shooter at Constant Hall.

⁴⁷ Timestamps are drawn from CCTV footage (*), bodycam footage (**), radio transmissions (§) and interviews and related documents (‡). Because some of the event descriptions are based on personal recollections of the individuals involved, not all timestamps are exact. Further, because the CCTV footage, bodycam footage, and radio transmissions are synced to different clocks, the timestamps are not exact in relation to one another.

ODUPD submitted a freedom of information request on June 2, 2026, to the City of Norfolk to provide all 911 center CAD information and radio traffic related to fire and EMS movements on that day. The request was denied, citing the ongoing FBI investigation.

10:45:47 [§]	Norfolk PD dispatch calls the ODUPD phone line and notifies ODUPD that there are units en route to Constant Hall in reference to an active shooter. ODUPD confirms the location.
~10:46:00 [‡]	The Executive Vice President for Administration receives a text message from the Senior Associate Vice President for Administration stating “active shooter.” The Executive Vice President for Administration then notifies President Hemphill of the situation, who directs the Executive Vice President for Administration to set up Executive Incident Command and then runs towards Constant Hall. The Executive Vice President for Administration subsequently returns to Koch Hall, briefs a team of approximately 10 to 12 people, and begins coordinating the Executive Incident Command response. The individuals in the Executive Incident Command room were the Executive Vice President for Administration, the Vice President for Digital Transformation and Technology, the Vice President for Student and Campus Life, the Director of Emergency Management, the Executive Vice President for Health Sciences, the Vice President for Research and Economic Development, the Vice President for University Communications, the Provost and Executive Vice President for Academic Affairs, the Vice President for Finance, University Counsel, and President Hemphill, who eventually joined the group when he returned from Constant Hall.
10:46:52 ^{**}	Officer-1 arrives on scene in a squad car with lights and sirens on 49th Street. He exits the vehicle and draws his firearm. Officer-2 also arrives on scene and enters through the 49th Street entrance.
~10:47:00 [‡]	Chief Shelton arrives on scene just after Officer-1 and Officer-2, approaching from the Kaufman Mall side of the building. An ODUPD officer and three Norfolk PD officers enter Constant Hall. They begin a room-by-room clearing of the first-floor east side but bypass all locked rooms because they have no means to open them. Later, additional officers arrive on scene to search and clear the locked key card access doors that were bypassed during the previous sweep using an ODUPD officer’s ID card.
10:47:01 [§]	Jalloh’s description is transmitted over radio by an ODUPD officer: “Black male, puffer jacket, backpack.” Upon hearing this over the radio, an ODUPD officer informs multiple Norfolk PD officers by text to advise them of the shooting and the location.
10:47:12 [§]	ODUPD units enter Constant Hall and report that there is one victim by radio.
10:47:22 ^{**}	Officer-1 enters Constant Hall and is directed to the incident scene by evacuating students. Officer-1 and Officer-2 proceed to the second floor.

	After arriving at Constant Hall classroom 2065, where the shooting occurred, Officer-1 encounters a ROTC cadet outside who says Lt. Col. Shah was shot. Two cadets are treating Lt. Col. Shah.
10:47:48**	Officer-1 proceeds past Lt. Col. Shah in the hallway and enters the classroom, where he visually confirms that Jalloh is down and that Cadet-1 has a gunshot wound. Two individuals are applying pressure to Cadet-1's left shoulder and left lower abdomen.
10:48:00§	Officer-1 requests tourniquets to the second floor of Constant Hall to treat Lt. Col. Shah.
10:48:06**	Officer-2 arrives at the classroom shortly after Officer-1, who is still requesting tourniquets. Officer-2 then calls local emergency services and requests two ambulances be dispatched to Constant Hall.
10:48:08§	After observing that Jalloh is on the ground unresponsive, Officer-2 transmits a "shooter down" radio transmission broadcast.
10:48:25†	ODU sends the first emergency alert via SMS text, email, and desktop alerts. The alert is transmitted by ACOP-1 and reads: "O.D.U. Urgent Alert: Active threat reported at Constant Hall. Follow Run-Hide-Fight protocols. Emergency personnel responding. Avoid area." To send the alert, ACOP-1 selected the active threat template in the RAVE portal, entered "Constant Hall" as the location, and changed the header from "Alert" to "O.D.U. Urgent Alert." He estimated that the entire process of sending the emergency alert took just over one minute.
10:48:29**	Norfolk PD Special Operations Team ("SOT") arrives on scene and proceeds to start treating Cadet-1. Officer-1 then redirects his attention to Lt. Col. Shah's treatment.
10:48:45**	Outside the classroom, Officer-2 attempts to apply a STAT tourniquet to Lt. Col. Shah's leg. Officer-1 attempts to apply a CAT tourniquet to Lt. Col. Shah's leg but is unable to secure the tourniquet before Lt. Col. Shah starts getting moved down the stairs and outside by the cadets.
10:49:00–10:50:00**	Lt. Col. Shah is transported out of Constant Hall by Officer-1, Officer-2, two cadets, and a Norfolk PD sergeant. The group reaches the sidewalk outside of Constant Hall, and Officer-1 successfully applies a tourniquet to Lt. Col. Shah's leg. An additional ODUPD unit reports arriving on scene.
10:49:53§	ODUPD makes an additional radio transmission: "One shooter down." ACOP-1 arrives on scene with the DC. Upon arrival, ACOP-1 hears "suspect was down" via radio and moves to wave in EMS and Norfolk Fire Department units. The DC similarly directs arriving fire trucks upon arrival.

10:50:26**	Lt. Col. Shah appears to regain a greater level of consciousness and reports difficulty breathing.
10:50:40**	The group providing care to Lt. Col. Shah requests the location of medics.
~10:51:00†	A Norfolk SOT officer requests keys to the offices and classrooms on the second floor. An ODUPD officer uses his cellular phone with swipe card access to clear the locked offices and classrooms. Another ODUPD officer gives his keyset to a Norfolk SWAT officer.
10:51:01**	The group providing care to Lt. Col. Shah picks him up and begins moving him closer to Constant Hall's parking garage entrance where the fire department chief's truck is parked.
10:51:17**	Officer-1 requests medics for Lt. Col. Shah and confirms that 49th Street is "secure."
10:51:30**	The group providing care to Lt. Col. Shah places him back on the ground and reassesses his tourniquets. Lt. Col. Shah continues to report trouble breathing.
10:52:26**	Officers begin receiving conflicting information regarding whether medics are "en route" versus "on scene." Officers also receive conflicting radio reports regarding the location of the shooting and the scope of the threat.
10:53:00**	An individual in the group providing care to Lt. Col. Shah reassures him that "medics are coming, try to relax."
10:53:17†	Cadet-1 is transported toward EMS on 49th Street. ⁴⁸
10:54:07**	Lt. Col. Shah asks for the ambulance's location.
10:54:16**	An individual in the group providing care to Lt. Col. Shah reports that the "ambulance is at the corner."
10:54:27**	A Norfolk PD SOT medic arrives and begins to assess Lt. Col. Shah's injuries.
10:54:34**	A Norfolk Fire Department vehicle arrives on scene.
10:54:57**	An individual in the group providing care to Lt. Col. Shah indicates that "the paramedics are here."

⁴⁸ As noted above, ODUPD submitted a public records request of the City of Norfolk to determine what time the Norfolk ambulances arrived and departed campus that day; the City of Norfolk denied the request. Accordingly, the descriptions of ambulance movement herein are drawn from ODUPD body camera footage and/or surveillance footage.

10:55:30**	The first Norfolk Fire Department ambulance arrives on the scene from Hampton Boulevard and parks on 49th Street near the East end of the visitor's parking lot, not in front of Constant Hall.
10:55:45**	The Norfolk PD SOT medic identifies a gunshot wound to Lt. Col. Shah's back for the first time.
10:55:59**	The Norfolk PD SOT medic sits Lt. Col. Shah up and assesses him for other wounds.
10:56:07**	Norfolk Fire Department personnel approach with a medical bag but do not engage in treatment.
10:56:29**	The Norfolk PD SOT medic applies occlusive dressing to the gunshot wound on Lt. Col. Shah's right shoulder.
10:57:01**	Norfolk Fire Department personnel arrive but continue further up the street.
10:57:13**	The Norfolk PD SOT medic applies a tourniquet to Lt. Col. Shah's left upper arm.
10:57:38**	Norfolk Fire Department and emergency medical services arrive with a Reeves stretcher. ⁴⁹
~10:58:00‡	Another ODUPD officer in the area joins the dispatch team to provide further support to the only dispatcher on duty.
10:58:00§	Additional radio transmissions requesting the location of ambulances and emphasizing the need for their arrival are sent.
10:58:23**	Lt. Col. Shah is transported on a Reeves stretcher toward the second staged ambulance.
10:58:49**	As Lt. Col. Shah is transported past the first staged ambulance, the tactical officer nearby confirms that Lt. Col. Shah is "the second" patient.
10:59:17**	Lt. Col. Shah is transferred to an ambulance stretcher. After the transfer, Officer-1 returns to the scene in front of Constant Hall.
~11:00:00‡	ODU's IT personnel overseeing remote door lockdown contact the Chief Information Security Officer because they cannot reach ODUPD dispatch and do not know who has authority to initiate an emergency building lockdown.
11:01:40‡	A Norfolk Fire Department ambulance leaves ODU's campus and travels west on 49th Street toward the hospital.

⁴⁹ A Reeves stretcher is a patient transport device that can rapidly secure a patient and move them through confined spaces. It is a flexible tarpaulin with six handholds supported by wooden planks.

11:07:15 [§]	An ODUPD officer announces over the radio that they are setting up a temporary Joint/Unified Command Post on 49th Street by the main football stadium entrance inside of the garage.
11:08:00 [§]	At the direction of the Fire Marshal, ACOP-1 directs that the fire alarm in Constant Hall be silenced after confirming that there is no active fire. The fire alarm is then reset. Norfolk PD officers report that some rooms still have not been cleared due to locked doors. An ODUPD officer leaves to obtain a “big key set” from headquarters.
11:17:00 [§]	Radio transmissions confirm that an Emergency Operations Center (“EOC”) has been established in the football stadium. ODUPD subsequently moves the ROTC students to the locker room in the football stadium. Cadets are offered phones so that they can contact their families, and law enforcement personnel explain the details of the incident to the cadets. Some cadets receive calls from the Virginia National Guard checking on their status. Later in the day, some cadets were transported to Norfolk PD to be interviewed.
11:20:00 [§]	ODUPD officers receive unconfirmed reports from two students regarding a second shooter.
11:22:00 [§]	Due to difficulties unlocking doors while clearing Constant Hall, Norfolk PD officers request master keys for the building.
~11:23:00 [‡]	The Unified Command Post is formally established in the University’s emergency operations center in the football stadium.
~11:25:00 [‡]	A “big key set” is handed to Norfolk PD officers who are clearing the building.
11:30:17 [‡]	ODU sends the second emergency alert via SMS text, email, and desktop alerts. The alert is transmitted by the Director of Emergency Management and reads: “Due to an active shooter situation in which the shooter has been neutralized, all classes and operations on the main campus are suspended for the remainder of the day (Thursday, March 12, 2026). Avoid the area in and around Constant Hall where emergency officials continue to work. An update will be provided as soon as possible.” The Executive Vice President for Administration drafted the language for the alert and transmitted it to the Director of Emergency Management by email; he then pasted the text into the RAVE system for transmission. In the time between the first and second emergency alert, ODU’s leadership was gathering information about the evolving situation.
~11:40:00 [‡]	Emergency Management is notified of the emergency lockdown request. Emergency Management then contacts the IT personnel overseeing remote lockdown and orders an emergency lockdown where technically possible (<i>i.e.</i> , buildings with electronic locks that can be activated remotely).

11:41:00 [§]	Radio transmissions are shared regarding parent reunification and staging areas. ACOP-1 takes Norfolk PD's Public Information Officer to the EOC for better coordination of emergency messages. Upon arrival at the EOC, ACOP-1 meets with the Emergency Planner and the other Assistant Chief of Police ("ACOP-2") regarding a reunification center, and they decide that Chartway Arena would be best. The Family Information/Reunification Center is established in the Big Blue Room in Chartway Arena. There, officers meet with families and provide information about the situation.
~11:51:00 [‡]	Chief Shelton goes to the EOC and confers with Norfolk PD.⁵⁰ ACOP-1 receives a call from Chief Shelton advising him to issue an all-clear message out through ODU's emergency alert system. ACOP-1 announces the all-clear to all members in the EOC.
~12:00:00 [‡]	The Unified Command Post is moved to the EOC underneath the east stands of the stadium.
12:04:00 [§]	Radio transmissions are shared requesting information for the media.
12:05:24 [§]	Radio transmissions are shared seeking keys for Norfolk PD and other outside law enforcement for locked areas of Constant Hall.
12:05:24 [‡]	ODU sends the third emergency alert via SMS text, email, and desktop alerts. The alert is transmitted by ACOP-1 and reads: "O.D.U. Urgent Alert: This is an all-clear notification. The emergency at Constant Hall has ended. There is no longer an active threat to the campus community. Avoid the area in and around Constant Hall where emergency officials continue to work."⁵¹
12:12:00 [§]	A second radio transmission is shared seeking keys for Norfolk PD and outside law enforcement for locked areas of Constant Hall.
~12:15:00 [‡]	ODUPD officers continue to help Norfolk PD officers with accessing doors that require a key fob.
1:18:00 [§]	ODUPD units begin returning to regular service and report themselves available for calls.
~1:23:00 [‡]	Lt. Col. Shah passes away at Sentara Norfolk General Hospital from his injuries.
1:43:16 [‡]	ODU sends the fourth and final emergency alert via SMS text, email, and desktop alerts. The alert is transmitted by the Director of Emergency Management.

The SMS text version of the alert reads: “O.D.U. Urgent Alert: In an effort to provide counseling services & other support for the campus & the community, Old Dominion University will be closed tomorrow (Friday, March 13, 2026) at all locations. Classes are cancelled, & operations are suspended. On Friday, March 13, 2026, counselors will be on the main campus, available from 8:00 a.m. through 5:00 p.m. Student counseling will be available in Broderick Dining Commons. Faculty/staff/community counseling will be available in Student Government Chambers at Webb Center. Food services will be available for those remaining in campus housing.”

The email version of the alert reads: “O.D.U. Urgent Alert: In an effort to provide counseling services and other support for the campus and the community, Old Dominion University will be closed tomorrow (Friday, March 13, 2026) at all locations. Classes are cancelled, and operations are suspended.”

~4:00:00 and later[†]

By 4:00 p.m., ROTC cadets who remained on campus have been transported to Norfolk PD for interviews. Multiple cadets are held at the station for approximately eight hours, during which they do not have the opportunity to wash their hands or change clothes even though they were covered in blood. While at the station, the cadets are informed that Lt. Col. Shah passed away from his injuries. After the interviews, a few cadets are transported to the hospital at the urging of their parents due to their exposure to blood and some cadets do not return home until as late as 11:00 p.m.

D. Post-Incident Actions and Recovery

1. Post-Incident Messaging to the ODU Community

Following the all-clear notification on March 12, ODU announced that all classes were cancelled on Thursday, March 12, and Friday, March 13. Later that day, the University published an open letter from President Hemphill informing the community of the day’s tragic events and encouraging community members to access counseling resources offered by the university.⁵² ODU also shared a video message from President Hemphill in which he provided additional details regarding the incident, expressed condolences to the victims, and offered words of support. The next day, ODU published two open letters from President Hemphill by email to the entire campus community, including all students, faculty, and staff,

⁵⁰ Around 11:45–noon.

⁵¹ ACOP-1 sent the third alert after receiving authorization from Chief Shelton. Chief Shelton shared that, because of various reports of multiple suspects and the delay in clearing Constant Hall, he authorized the all-clear message only after the ODUPD and local law enforcement reasonably confirmed that Jalloh was the only shooter and ODUPD had located Jalloh’s vehicle. After receiving the directive from Chief Shelton to send the third alert, ACOP-1 confirmed with other law enforcement that the area was clear.

After confirming, ACOP-1 had difficulty sending the alert because of cellular service issues but was eventually able to step into an area with cellular service and send the alert. Approximately 14 minutes elapsed between the time that the third alert was authorized and the time it was sent.

⁵² Brian O. Hemphill, *A Message from President Brian O. Hemphill, Ph.D.*, Old Dominion Univ. (Mar. 12, 2026), <https://www.odu.edu/president/article/message-from-president-hemphill>.

and on its website: one honoring the memory of Lt. Col. Shah, and another providing an update on the health of the victims from the incident and detailing next steps for the ODU community.⁵³

In the week following March 12, President Hemphill, his staff, and Chief Shelton met with various constituencies across ODU's campus, including campus leadership groups, to discuss the incident. During those meetings, President Hemphill spoke about what the administration was doing in response to the March 12 incident, and attendees shared their thoughts on safety protocols, trainings, and the emergency notifications. President Hemphill visited the faculty and staff who had offices in Constant Hall to check in on their well-being and offer words of support. President Hemphill also visited with faculty and staff in other campus buildings and leased spaces on the day of the incident and in the days that followed to offer information and support.

Aside from meeting with faculty and staff, President Hemphill organized a group dinner with the ROTC cadets who fought and subdued Jalloh during the incident. The cadets described the dinner and the support they have been shown by President Hemphill and his staff very positively. During that dinner, the cadets shared specific security requests, including a request for dedicated ODUPD officer presence during ROTC PT sessions and outside of ROTC classrooms. Chief Shelton has already begun implementing those security measures.

2. Counseling Resources and Support

Starting with the final emergency alert sent on March 12, ODU made multiple announcements that counseling and support services would be made available to the ODU community. Because the March 12 shooting occurred on the eve of spring break, which started the following Monday, ODU immediately stood up a dedicated website offering telehealth resources to all members of the campus community during the break. ODU also offered group and individual counseling sessions in both in-person and virtual formats, including counseling sessions through the Employee Assistance Program ("EAP")—which several faculty and staff members reported as being helpful. Additionally, within a few days of the incident, ODU secured a commitment of approximately 300 external counselors through coordination with the state, though a smaller number of counselors were ultimately deployed. These counseling resources were made widely available and prominently communicated to students, faculty, and staff.

During the spring break period, ODU prepared faculty and staff for students' return to campus, including by holding dedicated workshops to educate faculty on how to engage with students through trauma-informed classroom practice. For faculty and staff not on campus during spring break, ODU offered online training sessions regarding post-attack trauma. During the break, ODU also decided to relocate classes in Constant Hall to other buildings for the spring and summer semesters. The University offered faculty and staff who worked in Constant Hall the option of temporarily relocating to other workspaces, but only two individuals requested to be relocated.

After classes resumed on March 23, 2026, ODU continued its effort to provide counseling resources to the ODU community. EAP counseling sessions remained an option for ODU faculty and staff, and counselors were also made available in individual classrooms upon faculty request. ODU also deployed therapy dogs across campus, which received positive reviews from the student community, and offered self-defense training to everyone on campus after students returned from spring break. The Virginia Crisis Response Team and additional external counseling resources were also made available by ODU.

ODU took additional measures to provide support to the ROTC cadets involved in the March 12 incident after they returned from spring break. ODU brought in the Navy Sprint Team, a psychological intervention team specifically designed for short term mental health support after critical incidents, to work with the ROTC cadre. A counselor attended the cadets' regular Tuesday and Thursday class sessions to check in

⁵³ Brian O. Hemphill, *Time of Reflection and Need for Support in the Wake of Tragedy*, Old Dominion Univ. (Mar. 13, 2026), <https://www.odu.edu/president/article/time-of-reflection-and-need-for-support-the-wake-of-tragedy>; Brian O. Hemphill, *Paying Tribute to Lt. Col. Brandon A. Shah '07: A Dedicated Monarch, Public Servant, and True Hero*, Old Dominion Univ. (Mar. 13, 2026), <https://www.odu.edu/president/article/paying-tribute-brandon-shah>.

with the group, individual counseling was made available to all members of the class, and a student advocate was assigned to the group to serve as a liaison for the ROTC cadets. The Army separately made support resources available to the cadets.

ODU also provided support to the victims of the March 12 incident. In the days immediately after the incident, President Hemphill made several visits to the hospital to check on Cadet-1 and his family. The Vice President for Student and Campus Life also conducted hospital visits in the aftermath of the shooting. ODU helped Lt. Col. Shah's family organize his funeral, which was held on March 22, 2026, on ODU's campus at Chartway Arena.⁵⁴ The service was open to all ODU students, faculty, and staff.⁵⁵ In addition to Lt. Col. Shah's funeral, ODU coordinated with the Army to organize an on-campus memorial service, where military officers gave remarks regarding Lt. Col. Shah's legacy and a traditional 21-gun salute was performed in his honor.⁵⁶ The cadets, students, faculty, and staff described those services as significant emotional moments for the ODU community.

3. Review of Emergency Alert System and Delivery

In response to reports of some ODU community members not receiving emergency alerts, ODU conducted a post-incident review of its emergency alert system and found that it functioned as intended. Specifically, ODU's Office of Emergency Management investigated each report of delivery failure that it received and determined that none of the reported instances resulted from failures of the emergency notification system. The causes identified included cell phone carrier delivery failures, outdated contact information, and user error. Some students did not receive text message alerts because they had not updated their contact information in ODU's system and had outdated phone numbers on file. Additionally, faculty and staff must self-enroll, and those who chose not to do so did not receive emergency alerts via email or text.

In addition to ODU's post-incident review of reported emergency alert delivery failures, ODU's Chief Information Security Officer confirmed that no network or wireless issues prevented emergency alerts from being transmitted. While there were some reports of a power outage that occurred immediately before the shooting and affected Constant Hall, the Chief Information Security Officer and her office investigated and determined that those reports were unfounded. Because ODU operates on the City of Norfolk's power grid, which has been undergoing upgrades and experiencing power surges, ODU is occasionally affected by power surges outside of its control; ODU has personnel responsible for addressing those power surges as soon as they occur. On March 12, one such power surge briefly disrupted 11 of 274 network switches on campus, representing less than five percent of campus infrastructure. All affected switches came back online quickly, and after reviewing bandwidth data, the Chief Information Security Officer verified that there was no network or wireless outage. The surge may have required some University computers connected to the 11 affected switches to be powered back on manually, and it is possible that those computers did not receive a desktop emergency alert because they had not yet been turned back on. However, any power surge issues would have impacted only a small minority of ODU desktops, if any.

4. Post-Incident Changes to Campus Safety

Following March 12, ODU implemented a number of enhanced safety and security measures in response to the shooting. In the weeks immediately after the incident and at the direction of President Hemphill, the University undertook a comprehensive survey of all locks on campus, prioritizing assessment of academic buildings. ODU also increased ODUPD officer presence on campus. Additionally, under ODUPD's supervision, ODU is examining a keyboard-based panic button system campus-wide, modeled on

⁵⁴ Brian O. Hemphill, *Honoring Lieutenant Colonel Brandon A. Shah '07: Memorial Service Information & Community Support Resources*, Old Dominion Univ. (Mar. 19, 2026), <https://www.odu.edu/president/article/honoring-lieutenant-colonel-brandon-a-shah-07-memorial-service-information>.

⁵⁵ *Id.*

⁵⁶ Jane Alvarez-Wertz, *Memorial Service at ODU Pays Tribute to LTC Brandon Shah*, WAVY (Apr. 2, 2026), <https://www.wavy.com/news/local-news/norfolk/memorial-service-at-odu-pays-tribute-to-lt-col-brandon-shah/>.

a system in place at EVMS. Additionally, ODU has restricted access to Constant Hall: the building is now only open Monday through Friday from 8:00 a.m. to 5:00 p.m., and the 49th Street entrance is kept locked at all times.

As for ODU's threat assessment structures following March 12, the Registrar's office has begun implementing its new policy of issuing questionnaires asking currently enrolled students to self-disclose criminal history. Student participation in responding to the questionnaires is voluntary. ODU's Office of Threat Assessment has also received dedicated funding to provide additional staffing support for the office, including the use of a dedicated software program specific to threat assessment. The Director of Threat Assessment also re-offered active shooter training to ODU faculty. In response to these changes, the Student Government Association issued statements of support and endorsed the University's ongoing efforts.

In addition to those newly implemented security changes, ODU accelerated several campus safety improvements that were initiated prior to March 12. While ODU had already started planning to install Knox boxes throughout campus, Emergency Management and Facilities Maintenance made that installation a priority following March 12 and is currently in the process of ensuring Knox boxes are available across campus to provide law enforcement with day-of building access during emergencies.⁵⁷ This project will be completed no later than November 1, 2026. As discussed *supra* Section III.A.3.d, ODU has also continued expanding the availability of "Stop the Bleed" kits around campus at Emergency Management's direction. Prior to March 12, ODU had completed the installation of "Stop the Bleed" kits in approximately 50% of AED boxes on the main campus. ODU expedited that process after March 12 and also began purchasing and installing separate "Stop the Bleed" kits for each AED location so that individuals will not have to search inside AED boxes for those kits. In connection with that change, ODU has started posting signage clearly indicating the location of the separate AED and "Stop the Bleed" kits. Moreover, ODU has continued upgrading campus buildings to key card access, working to automatically enroll ODU faculty and staff in SMS emergency alerts, and constructing a new 911 center for ODUPD,⁵⁸ which are all security changes initiated prior to March 12.

E. Other Security-Related Concerns Raised by ODU Community Members During Interviews

While Cooley's review was focused principally on the March 12 attack, we also conducted a quantitative review of campus safety through our review of documents and materials and a more qualitative review of feelings of campus safety in interviews, during which we asked open-ended questions.

1. Quantitative Review of ODUPD Complaints and Responses

Cooley collected and reviewed reports of incidents to which ODUPD responded over the past five years. Like any campus in an urban environment, ODUPD responds to and investigates a broad set of incidents and violations. Based on our review, ODUPD has an appropriate response and closure rate with respect to complaints that is in line with peer institutions. ODUPD's double certification under CALEA and IACLEA is a testament to the department's commitment to excellence and adherence to professional law enforcement standards, and based on our review, ODUPD is led by competent and experienced leadership that has won widespread respect on campus.

Cooley also benchmarked ODU's campus crime data against a broad spectrum of institutions across the nation using publicly available Clery Act data for the period from 2022 through 2024. During that period, ODU recorded a total of 263 Clery-reportable on-campus crimes and Violence Against Women incidents, which is below that of peer institutions such as the University of Alabama at Birmingham (467 incidents); the University of Louisville (386 incidents); and the University of North Texas (386 incidents). With respect

⁵⁷ Knox boxes are high-security lockboxes that are affixed to the exterior of buildings to facilitate controlled key access.

⁵⁸ The new 911 center is slated to be completed by Fall 2027.

to non-campus crime and public-property reportable incidents for the same period, ODU recorded 20 incidents, which is the lowest reported number of incidents compared to those of the same peer institutions: the University of Louisville (37 incidents); the University of Alabama at Birmingham (28 incidents); and the University of North Texas (26 incidents). These figures indicate that ODU's overall crime rate is lower than many comparable institutions.⁵⁹

We reviewed prior safety complaints including those related to Constant Hall. In July 2024, in response to faculty and staff complaints regarding a student incident that occurred on campus in April 2024, discussed below, along with other issues, the Interim Dean of Strome College of Business, which operates in Constant Hall, sent an informal survey to Strome faculty and staff soliciting their feedback on Constant Hall and any safety concerns they had. Their responses focused on maintenance and safety issues, including electronic key locks and panic buttons for classrooms. The Interim Dean convened a meeting during which those responses were reviewed and discussed with representatives of ODUPD, Facilities Maintenance, and the Interim Provost's office. Facilities Maintenance initiated repairs for certain maintenance issues following the meeting and prepared an estimate of the cost of updating keyed locks to electronic locks. The meeting participants understood that Strome would be responsible for paying for that update out of its own funds or making a funding request to the Provost's office. Following that meeting, the Interim Dean asked Chief Shelton to conduct an active shooter training for Constant Hall, which Chief Shelton did, although the training was only attended by a small number of faculty and staff. The Interim Dean also asked Chief Shelton to conduct a safety assessment of Constant Hall, and a safety walk-through was done on July 31, 2024, by ODUPD's Community Policing unit and Public Safety Information Technologies unit (the "2024 Assessment").

A draft report was prepared internally at the Community Policing unit but was never finalized because a portion of the walk-through related to night security was not completed. The draft report was provided to the Interim Dean in December 2024. The draft report flagged several areas of potential improvement, including that staff should not leave classroom doors propped open; that interior locks be installed in classrooms; that additional cameras be installed in the building; that signage in the building be improved; and that processes be improved for submitting maintenance requests.⁶⁰ Although Chief Shelton did not review the draft report, he had conversations with the Interim Dean at the time about many of these recommendations including relating to classroom doors remaining shut, classroom door lock improvements, and improving camera coverage.

The Interim Dean then addressed those concerns that could be quickly resolved with current resources, while also creating a strategy to address issues that would require increased capital and a multi-year plan. For example, the Interim Dean used Strome College of Business funds to purchase the third-party door securing devices. A staff member worked to upgrade signage, and the Interim Dean continued to proactively engage with faculty members and staff over their safety concerns. The Interim Dean verbally raised with the Provost in January 2025 the cost of the door lock upgrade and that there were insufficient college funds to cover that upgrade. Strome's written funding requests for the upcoming fiscal year, dated February 2025, did not include keycard lock upgrades.⁶¹ In January 2026, Strome requested electronic key access to the exterior doors in Constant Hall to a project manager for the facilities department; that project was underway but not completed as of March 2026. As noted above, the University has committed \$9 million over the next

⁵⁹ U.S. Department of Education, *Campus Safety and Security Data Analysis Cutting Tool*, <https://ope.ed.gov/campusafety/#/> (last visited July 4, 2026).

⁶⁰ The annual fire marshal inspections organized through Emergency Management happened to coincide with the 2024 Assessment. Several work orders were initiated by the fire marshal review, as were other work orders for maintenance items identified by facilities.

⁶¹ Individual colleges, such as the Strome College of Business, submit annual funding requests to the administration for larger projects, such as updating locks or keys or cameras. To the extent the individual college wishes to undertake a project outside of the normal annual funding process, the college is responsible for using its own funds to do so (for example, with respect to the third-party door-securing devices).

three years for security-related improvements across campus, including increased key card access in older buildings as well as camera upgrades.

On October 18, 2024, a Strome faculty member wrote to President Hemphill to raise concerns about classroom door locks in Constant Hall, and specifically how it would be difficult to lock the classroom from the outside in an active shooter situation or any scenario requiring lockdown, along with several other issues (the faculty member had previously raised these concerns to the Interim Dean and they were discussed during the July 2024 meeting described above). That day, President Hemphill directed Chief Shelton of ODUPD to respond. The next business day, Chief Shelton contacted the faculty member, and the two spoke on the phone to discuss the faculty member's concerns about classroom door security in Constant Hall. After acknowledging those concerns and offering to provide training to the faculty member on active shooter defense, Chief Shelton and the faculty member discussed the possibility of the University providing third-party door-securing devices. However, Chief Shelton explained that such devices—which can be wedged against or fitted to a door to prevent it from being opened from the outside—could not be purchased or distributed by the University because they violate the Norfolk Fire Code.⁶² The next day, the faculty member emailed Chief Shelton, expressing appreciation for taking their concerns seriously and requesting additional information about third-party door-securing devices. Chief Shelton responded later that day with the requested information and expressed his willingness to continue the conversation.

2. Qualitative Assessment of Campus Safety Issues

Community members generally reported that they feel safe on campus, with some long-term faculty noting that they feel much safer on campus now than in previous decades. Some ODU faculty also emphasized that ODU is safe relative to comparable institutions. The ROTC students we spoke with generally also felt safe on campus, even those who directly experienced the March 12 attack. Several ROTC students reported that they appreciated the additional security that the university has provided to them while they conduct training drills or exercise and noted the importance of continuing that security and visible police presence.

ODU community members we interviewed generally believe that ODUPD maintains an appropriate level of on-campus presence. However, some interviewees indicated that a more consistent and visible police presence on campus and inside academic buildings would enhance their sense of safety. Some faculty reported that they do not usually see officers during the day unless there is a scheduled event and expressed that they would feel meaningfully safer if officers conducted visible patrols of buildings at regular times. While some ODU community members reported that police presence increased noticeably in the days immediately following March 12, they also noted that it dissipated quickly and expressed the view that a heightened presence should have been sustained for a longer period.

Several faculty members, including the faculty member who raised the 2024 complaints, raised concerns to us related to the inability to secure classroom doors in Constant Hall, along with certain other buildings. Almost all doors inside Constant Hall require a physical key to lock them, and not every instructor has a key. Several faculty members shared that in their experience, obtaining a key from Facilities Maintenance can take significant time, and that sometimes the keys provided have not worked, requiring faculty to return multiple times to obtain a functional key. However, faculty members universally acknowledged that the general practice at ODU is to leave classroom doors unlocked or propped open during instruction so that students can leave to use the bathroom, without requiring the instructor to interrupt a lecture to unlock the door.

Several faculty members also reported concerns regarding broken classroom door locks in the building, and some faculty reported being aware of broken door locks in the Visual Arts Building. Facilities Records indicated that maintenance promptly fixed these locks.

⁶² See 13 Va. Admin. Code § 5-63-245(J) (2024).

3. Complaints About a Student Safety Incident

Several faculty members raised concerns about what they had heard related to a student safety matter unrelated to the March 12 incident. The matter involved an ODU student who was convicted of an offense that occurred on campus in April 2024. They shared their belief that ODU's response to the matter was inadequate or not sufficiently transparent based on the fact that faculty were not updated by the Office of Threat Assessment on what happened with the implicated student. Several faculty members had raised concerns about the student prior to the offense, and both ODU's Office of Threat Assessment and ODUPD were involved in responding to those concerns. Federal and Virginia law imposes strict mandates on student privacy, and Title IX requires that student proceedings be kept private with respect to anyone not directly involved in the events at issue and any records held by the Office of Threat Assessment are confidential by state law.

a. Office of Threat Assessment's Response to the [REDACTED] Incident⁶³

The Director of Threat Assessment provided a detailed account of the Office of Threat Assessment's response to the [REDACTED] incident, which she was directly involved with handling.

April 2024: Incident and Arrest. The Office of Threat Assessment first became aware of [REDACTED] in April 2024 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁶³ Scholastic records are protected from release by 34 C.F.R. §§ 99.30–99.31 (2025) and are redacted herein.

⁶⁴ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



The Office of Threat Assessment is only legally permitted to provide some case information to the complaining victim or to ensure a particular person's safety. Accordingly, the Director of Threat Assessment is not legally permitted to provide information about the case, investigation, or resolution to the broader community. In our review, faculty members acknowledged that information could not be shared if there were not a "need to know," but stated that they felt they had a need to know because the implicated student was in their community. While we acknowledge the desire to know more and the faculty's focus on safety, based on our review, the Office of Threat Assessment has dedicated appropriate attention to this matter and provided appropriate notifications to those with a need to know consistent with state and federal law.

IV. Analysis and Recommendations

Below are our key factual observations and recommendations arising from our investigation. First, we present ten observations drawn from our review of the events of March 12 and ODU's policies and practices. We then outline twelve recommendations for ODU's consideration, focused on four areas of improvement identified during the investigation.

A. Key Factual Observations

1. The March 12 shooting was a targeted terror attack on ROTC students and their leader conducted by a single individual, which would have been difficult, if not impossible, to prevent once Jalloh was enrolled and possessed the privileges of an ODU student.

Jalloh planned and executed a terror attack and did so, by all indications, alone. He targeted a specific population: individuals associated with the U.S. military, as evidenced by the fact that he waited outside their classroom for 13 minutes while other students and individuals passed him by; that the location of the classroom is not easily accessible; and that he confirmed that the class was ROTC before opening fire. Moreover, Jalloh had previously pled guilty in 2016 to a federal terrorism offense related to a strikingly similar plan to shoot U.S. military members in a terror attack on behalf of ISIS. Terror attacks committed by ideologically motivated attackers working alone are notoriously difficult to detect and prevent.⁶⁵ Lone-actor

⁶⁵ See, e.g., Edwin Bakker & Beatrice de Graaf, *Preventing Lone Wolf Terrorism: Some CT Approaches Addressed*, 5 Persps. on Terrorism 43 (2011); Mark S. Hamm & Ramon Spaaij, *Lone Wolf Terrorism in America: Using Knowledge of Radicalization Pathways to Forge Prevention Strategies* (2015); Clare Ellis et al., *Lone-Actor Terrorism Final Report*, Royal United Servs. Inst. for Def. & Sec. Studies (2016); Boaz Ganor, *Understanding the Motivations of "Lone Wolf" Terrorists: The "Bathtub" Model*, 15 Persps. on Terrorism 23 (2021); Francis O'Connor, Lasse Lindekilde & Stefan Malthaner, *Radicalisation of 'Lone Actors'*, in *The Routledge Handbook on Radicalisation and Countering Radicalisation* 213 (J. Busher, L. Malkki & S. Marsden eds., 2023); Stefan Malthaner, Francis O'Connor & Lasse Lindekilde, *Scattered Attacks: The Collective Dynamics of Lone-Actor Terrorism*, 22 Persps. on Pol. 463 (2024); Inst. for Econ. & Peace, *Lone Wolf and Youth Terrorism: Evolving Patterns of Terrorism & Radicalisation in Western Democracies* (2025).

terrorism is itself an unpredictable, low-probability, high-impact event that unfortunately has become more common in the last 20 years in the United States. Taken together, these facts show that this was a targeted terror attack that was planned and executed in a way that would have made detection and prevention extremely difficult, if not impossible.

While this review examined safety policies and procedures in place at ODU at the time of the March 12 attack, given that Jalloh was by all indications an ideologically motivated lone attacker who targeted a specific population, we do not believe that the recommendations we make here would have prevented the attack once Jalloh had been admitted as a student and possessed the privileges of access and information that ODU students had.

2. Virginia law prohibits ODU from asking about criminal history at the application stage but does not prohibit post-admission inquiry. ODU did not ask Jalloh to disclose his criminal history and he did not do so. Neither his probation officer nor any federal or state law enforcement official notified ODU of his conviction. ODU had no knowledge of the risk Jalloh posed or his federal terrorism conviction.

Jalloh was on campus and had access to information about course locations because he was an enrolled student at ODU. Virginia law prohibited ODU from asking Jalloh at the time he applied whether he had been convicted of a crime or conducting a background check. Jalloh did not disclose his conviction. There was nothing notable in Jalloh's readmission application that made him stand out, positively or negatively, to ODU's Office of Enrollment Management. Two of Jalloh's professors who were interviewed similarly relayed that they never noticed any issues or behavior concerns with Jalloh, and no one in ODUPD, ODU leadership, the TAT, or student leadership was even aware of Jalloh. ODU had no knowledge of Jalloh's prior criminal conviction and did not miss red flags.

"[T]errorism represents a particularly grave threat because of the dangerousness of the crime and the difficulty of deterring and rehabilitating the [defendant]."⁶⁶ There are a relatively small number of terrorism defendants on supervised release, and it should be feasible to ensure that those defendants are closely supervised.⁶⁷ Critically, even though his probation officer had knowledge of the underlying offense—which involved targeting military service members with a gun in a terror attack on behalf of ISIS—the officer did not notify ODU about his conviction or direct Jalloh to do so. Similarly, although the FBI investigated Jalloh's original offense and had a close working relationship with ODUPD, no federal or state law enforcement agency provided notice of Jalloh's conviction to ODU.

Given that Virginia law requires universities to rely on student self-disclosure, it is even more important that other law enforcement agencies ensure that information that universities need to know to safeguard their students is shared with universities. This critical failure led to tragic consequences here.

3. ODU has an effective threat assessment infrastructure in place to assess risk. Had ODU known about Jalloh's criminal history, it is highly likely that ODU would have sought his removal from campus due to the risk he posed, particularly to military-affiliated individuals.

The University's Office of Threat Assessment operates pursuant to a robust threat assessment protocol empowering it to assess any case presenting the potential for harm to others in the campus community. This threat assessment approach involves specific procedures for admissions-related criminal history

⁶⁶ *United States v. Meskini*, 319 F.3d 88, 92 (2d Cir. 2003); cited with approval in *United States v. Stewart*, 590 F.3d 93, 143 (2d Cir. 2009) (Walker, J., concurring) ("In no area can the need for adequate deterrence be greater than in terrorism cases, with their potential for devastating loss of innocent life."), *United States v. Mumuni Saleh*, 946 F.3d 97, 112–13 (2d Cir. 2019).

⁶⁷ The Terrorist Recidivism Study, an academic database tracking recidivism rates for individuals convicted of terrorism offenses in the U.S. between 2001–2020, found that there were 629 individuals convicted of such offenses during that time period, 183 of which were released from prison between 2001–2010 and 158 of which were released between 2011–2020. The study found that approximately 17 terrorism defendants were released per year. Omi Hodwitz, *The Terrorism Recidivism Study (TRS): An Update on Data Collection and Results*, 15 Persps. on Terrorism 27, 31–32 (2021).

disclosures and other threat assessment cases and is tailored to the level of risk that each case poses, allowing the Office of Threat Assessment to implement the appropriate tools for each unique situation. The Office of Threat Assessment has consistently escalated cases in a timely manner and made carefully considered recommendations for action. It has done so despite operating with significant resource constraints—the office currently has only one full-time operational staff member—a limitation that ODU is actively working to address, as discussed in Recommendation 11 below.

Had she been aware of Jalloh's prior conviction, the Director of Threat Assessment would have sought Jalloh's removal from campus—particularly given the military population at ODU and the “soft” target it presented to Jalloh. While we can only speculate as to the outcome if the Director of Threat Assessment had initiated the process to remove Jalloh, it appears that the process likely would have culminated in Jalloh's removal from campus given the nature of his criminal history and precedent for removing students who similarly posed significant risk to campus safety. Unfortunately, because ODU was never made aware of Jalloh's criminal history prior to March 12, the Office of Threat Assessment had no opportunity to mitigate or eliminate the risk that Jalloh posed.

4. The extraordinary heroism and bravery shown by Lt. Col. Shah and the ROTC cadets by fighting back against Jalloh's attack prevented further loss of life.

This attack resulted in a tragic loss of life and life-altering injuries for those who survived. But the reason this attack did not result in further loss of life is the extraordinary heroism and bravery shown by Lt. Col. Shah and the ROTC cadets who fought back. Active shooter training emphasizes that the best response is to run, hide, or fight. Given that the attacker was in the doorway of a relatively small classroom, the available option was to fight, and Lt. Col. Shah did that even while he was shot multiple times. He immediately grappled with the attacker, which allowed other brave students to come to his aid and many other students to escape unharmed.

The ROTC cadets also showed extraordinary bravery. They fought and disarmed Jalloh even while Jalloh shot at them and fought back in a violent struggle. They placed themselves at considerable risk to save their fellow students and attempt to save their instructor. And after Jalloh was incapacitated, the students performed life-saving measures on Lt. Col. Shah and the injured cadet in an incredibly traumatic situation.

The cadets uniformly told us that the way the shooting unfolded that day was the “best bad option.” Although the classroom door was shut and Jalloh entered it, if Jalloh had knocked on the door because it was locked, the cadets believe he would have been let in, because he appeared to be (and was) a student. If Jalloh had waited for students to leave and conducted his attack from the hallway outside the classroom, which was narrow and elevated compared to the classroom, that would have created a “fatal funnel” likely resulting in further loss of life and a more difficult environment in which to fight back. While none of this changes the fact that the attack did result in the tragic loss of life, Lt. Col. Shah's heroism and the cadets' bravery almost certainly saved numerous lives.

5. ODUPD responded to the shooting almost immediately and effectively handled the situation in coordination with external law enforcement, while overcoming logistical challenges posed by 911 systems and issues accessing keys and locks within the building.

ODUPD responded to the active shooter with commendable speed and mobilized immediately upon learning of the situation. Only approximately two minutes elapsed from when Chief Shelton was notified of the active shooter to when the first ODUPD officer arrived on scene. This response time is commensurate with, or faster than, national averages, depending on the reporting source. The FBI's most recent report on active shooter incidents (published June 2025, covering calendar year 2024) documented 24 active shooter incidents in the United States, four of which occurred in educational institutions outside of the higher education context.⁶⁸ The FBI reported an average law enforcement response time of 1 minute and 48

⁶⁸ Federal Bureau of Investigation, *Active Shooter Incidents in the United States* (2024).

seconds and an average incident duration of 3 minutes and 18 seconds.⁶⁹ Other national estimates place average law enforcement response times for active shooter incidents in the range of 3 to 4 minutes.⁷⁰

Once on scene, ODUPD, working with other law enforcement agencies, assessed the situation efficiently and effectively. After arriving at Constant Hall, law enforcement officers proceeded to classroom 2065, where the shooting occurred, and assessed the situation within a minute of arriving on scene. After the officers confirmed that Jalloh no longer posed an active threat, they appropriately turned their attention to the victims requiring medical assistance and began clearing the building. ODUPD called for ambulances almost immediately upon observing the victims, and ODUPD and Norfolk PD officers assisted in moving the two victims out of Constant Hall and onto the street for ambulance transport. Officers also engaged in life-saving measures, including applying tourniquets, consistent with ODUPD training.

Other ODUPD officers worked with external law enforcement to sweep Constant Hall, appropriately checking for additional threats, victims, and anyone sheltering in place. However, clearing the building took longer than necessary due to difficulties with key access. Some law enforcement officers could not access certain areas of Constant Hall because they did not have key access and had to obtain keys from other officers or wait for master keys. Master keys were first requested at 11:22 a.m., and radio transmissions seeking keys for Norfolk PD and outside law enforcement continued at 12:05 p.m. and 12:12 p.m. Additionally, two interior doors and one exterior door needed to be mechanically breached because immediate access to master keys was not available. While these issues did not cause any delay in responding to the active threat, which had been eliminated prior to law enforcement's arrival, it did prolong the building sweep, which took over an hour to complete.

ODUPD was adequately staffed and prepared to respond to an active shooter situation. On March 12, ODUPD had no shortage of officers to dispatch to the scene immediately, with other officers staying behind to assist with dispatch and coordinating emergency response. Officers who were interviewed exhibited a clear understanding of their respective roles during active threat response operations and of the relevant ODUPD protocol. ODUPD's immediate response to the reported shooter and compliance with ODUPD protocol in assessing the scene, rendering emergency medical care, and clearing the building, demonstrates that ODUPD's active threat training prepared officers effectively for March 12. ODU's 911 center became quickly overwhelmed by calls, and although there was some difficulty posed by the capabilities of the 911 dispatcher, ODUPD ably adjusted and responded that day.

The coordinated law enforcement response to March 12 also demonstrates ODUPD's strong working relationship with Norfolk PD and capacity to work effectively with other agencies. Throughout the day, ODUPD and Norfolk PD proactively informed each other that units were en route, exchanged texts with officers from the other agency to advise them of the shooting and location, jointly treated victims on scene, and coordinated key access while clearing Constant Hall. Various other agencies were involved in directing the emergency response alongside ODUPD: approximately fifty personnel from ODUPD, Norfolk PD, Virginia State Police, the FBI, the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the Department of Homeland Security, were present at the EOC. Despite generally smooth inter-agency coordination between all of these entities, at times on March 12 there were conflicting radio reports—including about the scope and location of the threat, as well as whether medics were "en route" or "on scene," and there were different radio channels used by ODUPD and Norfolk PD and EMS. Another area warranting attention is the treatment of the cadets during the post-incident interview process. Once Norfolk PD assumed jurisdiction over the investigation, the cadets were transported to Norfolk PD and held for approximately eight hours of interviews, during which they were unable to wash their hands or change their clothes despite significant exposure to blood. The cadets also learned of Lt. Col. Shah's death at this time. Some did not return home until as late as 11:00 p.m.

⁶⁹ *Id.*

⁷⁰ M. Hunter Martindale, William L. Sandel, and J. Pete Blair, *Wait for Backup or Not? How Police Officers View Their Role When Responding to an Active Shooter Event*, J. Experimental Criminology 21, 113–26 (2023).

Emergency Management also carried out its role effectively on March 12. The Director of Emergency Management joined the Executive Incident Command group almost immediately after learning of the shooting, participated in coordinating the University's incident response, transmitted the second and fourth emergency notifications to the campus community, and ordered an emergency building lockdown for all campus buildings with electronic locks. Emergency Management also conducted a post-incident review of reported alert delivery failures to ensure that the emergency alert system was functioning as intended.

6. ODUPD officers acted appropriately in rendering active care to the injured victims, but emergency medical response and patient transport protocols could be improved.

Norfolk's EMS was called almost immediately, but the delay in getting Lt. Col. Shah into an ambulance demonstrates an opportunity to strengthen future protocols. The ambulances were called at 10:48 a.m., and the first ambulance arrived at 10:55 a.m. Both ambulances were staged on 49th Street, approximately half a block down by Hampton Boulevard but not in front of Constant Hall, which appears to have delayed getting the victims into the ambulances.⁷¹ Although Cooley did not have access to Norfolk radio transmissions or EMS records, it would have been standard protocol to stage ambulances away from the "hot" zone until it is declared "all-clear" and safe for EMS. ODUPD transmitted over the radio that the area in front of Constant Hall was "clear" at 10:51 a.m., but the Norfolk Fire Battalion Chief did not arrive on scene until 10:54 a.m. It would be reasonable to assume it was not until then that Norfolk gave an "all-clear" to EMS. Similarly, because we do not have access to Norfolk radio transmissions or EMS records, we could not determine why the ambulance response time was longer than the usual response time on campus, or from where the ambulance was dispatched.

Lt. Col. Shah was not loaded into an ambulance until 10:59 a.m., approximately 11 minutes after the call for emergency medical services. Sentara Norfolk General Hospital, which is a Level I trauma center, is approximately a five-minute drive from Constant Hall.

That ODUPD waited for an ambulance and rendered active care with Norfolk SWAT rather than transport Lt. Col. Shah by patrol vehicle was consistent with ODUPD's standard protocol. ODUPD leadership explained that in their view, because it is not possible to perform CPR in the back of a squad car, it is not advisable to transport patients in that manner. We also note that given that Norfolk SWAT was on scene and a trauma medic from Norfolk SWAT was treating Lt. Col. Shah, it was reasonably understood by ODUPD that Norfolk SWAT was in operational control. Finally, it bears noting that ODUPD and Norfolk SWAT did not know at the time that the ambulance would not arrive for 11 minutes, particularly given that the average response time is significantly less than that, and that they and the cadets worked tirelessly to render medical care to Lt. Col. Shah and Cadet-1.

Although it is possible that a quicker ambulance response time or transport to the hospital could have made a difference, we did not have access to Lt. Col. Shah's autopsy report and cannot opine on whether any delay in transporting Lt. Col. Shah and Cadet-1 to the hospital would have made a difference in the ultimate outcome.

7. ODU promptly issued an emergency alert about the active shooter and provided updates as the situation unfolded. ODU's policy of allowing multiple individuals across departments to authorize emergency notifications created some misalignment regarding who was responsible for sending emergency alerts and the content of those alerts.

ODU notified the campus community of the active shooter immediately: ODUPD sent the first emergency notification within minutes of learning of the active shooter, appropriately using the pre-loaded template in the RAVE emergency notification system and specifying the location of the threat. Consistent with the CEMP, the alert directed recipients to follow Run-Hide-Fight protocols and to avoid Constant Hall. The alert was also largely consistent with ODU's policies which were written in compliance with the Clery Act: it contained the nature of the emergency, the location, and recommended protective actions; however, it did not include where to obtain additional information. Additionally, ACOP-1 manually added the word

⁷¹ See *supra* Section III.C.4.

“Urgent” to the templated message before sending; while this did not materially delay sending the alert, it could have been avoided by using templates with such language already included.

The second emergency notification was sent by Emergency Management approximately 42 minutes later, which slightly exceeded Emergency Management’s target cadence of approximately 30 minutes between updates. The second alert stated that the shooter had been “neutralized,” that classes and operations were suspended for the day, and that the area around Constant Hall should be avoided. The choice of language and inclusion of non-urgent administrative updates caused some confusion about whether the situation was all-clear. Some campus members interpreted the second alert as confirmation that they could leave the locations they had chosen to hide in, though an all-clear had not yet been issued. While this did not pose any safety risks on March 12, it could have presented risks if there were a second active shooter or remaining threat on campus.

ODUPD sent the third emergency notification after confirming that there was no longer an active threat on campus, consistent with ODU’s policy to issue an all-clear once the situation has been resolved. The notification clearly communicated that the emergency had ended and that the situation was all-clear. However, there was a 14-minute transmission delay between when the third alert was authorized and when it was sent, during which the ODUPD officer transmitting the alert confirmed that the situation was all-clear with other law enforcement agencies and resolved a cellular service issue.

Emergency Management sent a fourth emergency notification canceling classes that day and on Friday, March 13, 2026, suspending campus operations, offering counseling services, and providing information about food services for those remaining on campus. There was a discrepancy between the SMS and email versions of that notification; unlike the SMS version, the email notification did not include information regarding the availability of counseling and food services. However, in both versions, the informational notifications were consistent with the Clery Act’s broader obligation to provide the community with adequate follow-up as the situation develops.

The emergency alerts largely reached the intended recipients without any systemic delivery failures. Many interviewees noted that they received emergency notifications in real time through emails, texts, and desktop notifications. Further, ODU’s post-incident review confirmed that notifications were largely delivered as they should have been. While some individuals reported not receiving alerts, those failures do not appear to be attributable to any emergency alert system deficiencies but rather resulted from external issues such as carrier failures or outdated contact information.

While ODU’s policy of allowing multiple individuals to send emergency notifications allows ODU to issue an alert as quickly as practicable upon learning of an emergency event, this policy also poses a challenge for executing a coordinated emergency notification response. On March 12, consistent with ODU’s policy, ODUPD and Emergency Management each sent emergency alerts without first coordinating with the other. This resulted in some confusion about the sequencing and content of the second alert, which was sent by Emergency Management and contained some non-urgent administrative information, and the third alert, which was sent by ODUPD and announced the all-clear. While people found the emergency alerts helpful, they could have been more effective if the administrative information contained in the second message was sequenced after the all-clear communicated in the third message.

8. ODU leadership appropriately prepared for and immediately responded to the March 12 attack, and their actions following the attack drew broad praise from ODU community members.

ODU leadership was prepared for a wide variety of emergency situations and had prepared in particular for an active shooter scenario in October 2025. University leadership immediately stood up a command center, closely coordinated with each other, and provided appropriate messaging to the campus immediately following the shooting. President Hemphill visited the hospital multiple times and personally visited impacted groups.

In the wake of the March 12 incident, ODU mobilized a broad range of support resources for the campus community. The University offered individual and group counseling services for students, faculty, and staff, including classroom-based counselor availability upon faculty request and Employee Assistance Programs

for faculty and staff. Therapy dogs were brought to campus. Additional online sessions were offered in the following weeks, including a faculty session on dealing with post-attack trauma. The administration also engaged in direct outreach to various groups, including the cadets who were affected and with staff representative bodies.

Many community members we spoke to praised ODU's response and provision of support services. Community members described being impressed by ODU's immediate mobilization of resources, which reflected active engagement from leadership experienced in providing support in similar crisis situations and strong support from outside agencies. One administrator commented that ODU did well, and that the response was "as fast as you could want." Students we spoke with echoed this sentiment, stating that leadership did the best they could and that "every service [that the University could offer] was offered." Cadets in particular reported ODU's support response as "genuine and appreciated," citing bi-weekly counselor visits, individual counseling services, online support resources, and an armed police escort to classes for the remainder of the semester. A staff representative commented that they were "really impressed and thankful" that the administration opened the door to conversation about safety priorities in a meeting with the MSS working group. On the whole, interviewees described the campus community as coming together in the aftermath of the incident.

Some community members indicated that they would have welcomed more individualized outreach, particularly for faculty and staff who were present in Constant Hall. Staff and student workers who continued their duties on March 12 and the days that followed conveyed that the expectation to carry on working as usual while processing trauma was difficult.

Not everyone utilized the counseling services available. The most commonly cited reasons for not utilizing counseling were personal readiness to discuss the events, the demands of keeping up with workloads, and access to campus. Further, the group counseling format presented some interpersonal challenges when participants had meaningfully different exposures to the same event. Some community members who were not present in Constant Hall during the incident reported feeling hesitant to express distress in a group setting, perceiving their own reactions as less valid than those who were present during the shooting. Conversely, those who were present at the time faced the additional burden of navigating a group environment that made open participation more difficult. Even in specialized group sessions for cadets, reactions were mixed, with some participants choosing to discontinue attendance. These reactions to the group counseling sessions reinforce that ODU appropriately offered a variety of counseling tools and resources, including individualized sessions for those who preferred such a format.

9. ODUPD provides excellent and regular active shooter trainings for campus community members; however, those trainings are optional, and participation could be higher.

ODUPD and Emergency Management have provided hundreds of in-person, regular and voluntary active shooter training sessions across campus in the last decade. The training material is focused on the Run-Hide-Fight tactic that is commonly taught and is overall an excellent training opportunity. However, the training is voluntary, and on the whole the community does not broadly take advantage of the many training opportunities. Last fall, of the 70 departments offered active shooter training, only a quarter actually scheduled a training. We found a meaningful difference in the reaction of those who had received active shooter training prior to March 12 and those that did not. Generally speaking, those who had taken active shooter training had more tools to navigate the situation than those who did not have the training. For example, there was confusion among some faculty and staff in Constant Hall about what to do and where to go in the event of an active shooter. In addition, pulling a fire alarm in an active shooter scenario is not advisable, since it moves people into open spaces and hallways, which is the opposite of what should happen, and the loud noises and lights exacerbate an already stressful situation. These are both examples of areas where further training could be useful.

10. ODU community members broadly describe feeling safe on campus. Commonly raised security concerns include inconsistent classroom door locking practices and locking capabilities. The evidence, including interviews with the cadets present during the attack, indicates that a locked classroom door likely would not have materially changed the outcome on March 12; nonetheless,

improving physical security is sound preparedness policy, and we address those concerns in our recommendations.

The overwhelming majority of ODU community members described feeling safe on campus both before and after March 12 and recognized that ODU is relatively safe for an open urban campus. One long-time faculty member shared that ODUPD had improved significantly over the last 25 years, especially under the leadership of Chief Shelton. Another faculty member commented that they feel “ten times more secure” now than in the 1990s, citing improvements to the surrounding neighborhoods over time. Other faculty and staff compared ODU favorably to other campuses where they have studied and worked, finding it comparable or safer. That sentiment is borne out by relevant data, which shows that ODU’s crime rate is lower than comparable institutions.

Some community members expressed a desire for more visible police presence on campus and/or building patrols during daytime hours, reflecting the inherent challenges of an open urban campus and the attendant safety concerns. Other community members were most concerned about the inability to lock classroom doors. The individuals we interviewed generally described an inconsistent approach by faculty to locking classroom doors and a culture in which classroom doors are often left open during class, regardless of the type of door lock.

In investigating these concerns about door locks, we found that the 2024 Assessment of Constant Hall revealed that some aspects of Constant Hall’s physical security could be improved, and that the Interim Dean of the Strome College of Business took numerous steps to improve safety at the building following that assessment (even though a report was never finalized), including arranging for additional training and maintenance. Certain upgrades to exterior doors were underway at the time of the March 12 shooting, and the University has committed funding to updating locks and cameras campus-wide over the next three years.

We note, however, that based on cadet interviews and the unique features of the March 12 attack, it appears unlikely that improving those aspects of campus security would have materially affected the outcome of the March 12 shooting. For instance, it is unlikely that a security guard stationed at the building entrance would have prevented Jalloh from entering Constant Hall, as he was an enrolled student with open access to campus buildings. It is also unlikely that interior locking doors would have prevented Jalloh from entering the ROTC classroom, given the general culture at ODU of leaving classroom doors unlocked or open while class is in session, as discussed above. Even if the classroom door had been locked, cadets we interviewed stated that someone likely would have opened the door for Jalloh. It is also worth noting that in the hypothetical scenario that the classroom door was locked and Jalloh had to wait outside in the hallway to execute his attack, the results likely would have been more devastating. These observations inform our findings as to the March 12 attack specifically; they do not diminish the value of continued lock upgrades and improved door closing practices as a sound preparedness measure for the future, which we address in Recommendations 1 and 3 below.

B. Recommendations

Our investigation and key factual observations lead us to make recommendations for ODU in four categories: (1) Campus Safety and Security; (2) Emergency Response; (3) Emergency Notifications; and (4) Post-Admissions Risk Assessment.

(1) Campus Safety and Security

Recommendation 1: ODU should consider reinforcing a culture of emergency preparedness by encouraging all campus community members to participate in active threat training and encouraging that classroom doors be closed during class as a matter of practice.

ODU should consider taking certain steps to promote a greater culture of emergency preparedness on campus. One such step for consideration is increasing participation in active-threat training across the campus community. Possible methods for increasing participation include incorporating active threat

training into existing required trainings, conducting outreach to promote active threat trainings, and partnering with campus groups to expand reach and exposure.

Additionally, ODU should consider fostering a common practice of keeping classroom doors closed as much as possible, including while class is in session. Currently, ODU faculty have differing practices on whether they keep classroom doors open during class. While, as discussed above, a locked classroom door may not have made a material difference in the outcome of the March 12 shooting given the unique features of the attack, keeping doors closed by default, and a culture of keeping doors shut, would still improve classroom security as to potential future threats. A closed door serves as a physical barrier that can delay entry of the active threat, providing additional time for law enforcement or occupants to respond to the threat. This is true whether or not there is an interior lock. A closed door also makes hiding and sheltering in place more effective.

Finally, with respect to certain at-risk populations such as ROTC who may be targeted, ODU should continue to work with those groups to evaluate whether there are heightened security measures appropriate to better protect those groups, including added security, greater efforts to restrict location information, or appropriate accommodations for meetings.

Recommendation 2: ODU should continue to ensure every building has an effective Knox box with master key access to each building.

We received conflicting information about whether ODU already has Knox boxes with secured master keys at each building on campus; and in any event, ODU has allocated funds to ensure that every building has a Knox box by November 1, 2026. ODU should keep Knox boxes current at all times so that corresponding master keys are updated promptly to reflect any changes in building locks. ODU should assess whether to establish a protocol for using those master keys for emergency entry by ODUPD or other law enforcement agencies in the event of an emergency in the building.

ODU should also continue to improve its system to monitor building maintenance issues and facilitate building upkeep to ensure that work orders are promptly addressed. Additionally, ODU should consider monitoring security camera health and ensuring that cameras are regularly checked by ODU personnel in the ordinary course of business. In addition to instituting regular checks of security cameras, ODU should consider implementing an annual review of planned security camera and placement.

Recommendation 3: ODU should continue to upgrade door locks to electronic key access as feasible over time given the age and technological capabilities of campus buildings.

ODU, as is common for many universities, has buildings that were built at different times and that have different locks and entry mechanisms. Older buildings in particular do not always have the electronic infrastructure to install electronic key access. ODU is in the process of updating its electronic key access across campus and should continue and look for ways to prioritize that process, understanding that the necessary technological infrastructure may lengthen the process. Where it is not possible to install electronic locks, ODU should work to prioritize the installation of classroom doors with functioning locks.

Recommendation 4: ODU should consider whether it should restrict access to classroom location information to those enrolled in a particular course.

While it is unclear how Jalloh learned of the location of the ROTC class, all ODU students have access to course location information. ODU should consider whether it should restrict access to location information to those actually enrolled in a particular class. While students do need to know location information when selecting courses or in advance of the first weeks of classes, that need decreases over time. Keeping location information limited to those who need to know it would mitigate the risk of particular groups or classes being targeted.

(2) Emergency Response

Recommendation 5: ODUPD should continue to update its 911 call system and consider incorporating joint training exercises with other law enforcement agencies, establishing inter-agency radio operating capabilities, and working with partner agencies to ensure consistent, dignified treatment of victim-

witnesses in post-incident interviews.

ODUPD is already in the process of renovating the ODU Inn to be the Public Safety Building with a state-of-the-art 911 center, which is slated to be completed by Fall 2027. ODUPD should ensure that the upgraded infrastructure incorporates functionality that supports joint operations with external law enforcement agencies.

Given the importance of effectively coordinating with external law enforcement to respond to emergency situations, particularly if ODUPD lacks the resources to respond to a large-scale incident, ODUPD should review its existing joint training with other law enforcement agencies, including the type and frequency of tabletop, functional, and full-scale exercises for multiple casualty incidents. ODUPD should also consider coordinating tours of ODU's campus for Norfolk PD and Norfolk Fire-Rescue to help familiarize those agencies with ODU's campus layout and buildings.

Additionally, ODUPD should review radio communications for joint law enforcement operations and consider establishing or expanding inter-agency radio operability capacity. Improved inter-agency radio operability capacity may reduce conflicting reports or misinformation communicated through radio transmissions in situations where multiple law enforcement agencies are simultaneously responding to an emergency situation.

Finally, ODU should leverage its strong working relationship with Norfolk PD to work toward protocols governing the care of trauma-impacted victim-witnesses during post-incident interviews conducted by outside law enforcement. Such protocols should aim to afford victim-witnesses greater respect and care, including access to hygiene facilities, and where feasible, a change of clothing, even when investigative control has passed to an outside agency.

Recommendation 6: ODU should review its current campus emergency medical services capabilities to enable quicker medical response and consider establishing clear protocols for non-traditional EMS patient transport.

In mass casualty and active-threat scenarios, the interval between injury and dedicated emergency medical care is a critical determinant of survival. Accordingly, ODU should consider evaluating its current on-campus EMS capabilities and potential mechanisms for enabling a faster EMS response. Possible frameworks to evaluate include: (1) establishing campus-based EMS, which may be run by students or volunteers; (2) contracting with EVMS to provide dedicated campus EMS; or (3) creating, embedding, and training a rescue task force in partnership with Norfolk EMS for active-threat incidents. Rescue task forces enable coordinated response between law enforcement and fire/EMS personnel during emergency incidents, thus enabling faster delivery of medical care.

Where traditional EMS transport is delayed or overwhelmed, the use of law enforcement vehicles or other non-EMS vehicles to transport critically injured individuals to nearby trauma centers can materially reduce mortality. This principle is supported by after-action reviews of prior mass casualty incidents, including the 2012 shooting in Aurora, Colorado, in which police vehicles transported more victims to hospitals than ambulances,⁷² and the 2016 Pulse nightclub shooting in Orlando, Florida, where law enforcement officers transported critically wounded victims to a nearby hospital in patrol vehicles, contributing to an 84% survival rate among those alive at the time of first responder arrival.⁷³ ODUPD should

⁷² TriData Division, *Aurora Century 16 Theater Shooting After Action Report for the City of Aurora, Colorado* 24 (2014). On July 20, 2012, a lone gunman opened fire at the Century 16 Theater movie complex in Aurora, Colorado, shooting 70 people; an additional 12 individuals sustained injuries while attempting to flee the scene. Of the 82 total injured, 60 were taken to area hospitals and survived. During the incident, police vehicles transported more victims than ambulances, carrying 27 to 28 victims compared to 20 transported by ambulance and 13 to 14 by private vehicle.

⁷³ Frank Straub et al., *Rescue, Response, and Resilience: A Critical Incident Review of the Orlando Public Safety Response to the Attack on the Pulse Nightclub* 77 (2017). During the Pulse nightclub shooting in Orlando, Florida, 102 people were shot, and five others were injured. 69 were alive when first responders arrived, and 58 (84%) survived. All 35 people who had been shot and reached operating rooms alive, even those with the most critical of injuries, survived. Once they were extricated from the club and brought to the triage area, law enforcement officers, following the example

consider developing protocols authorizing officers to transport patients in patrol vehicles in extreme circumstances. These protocols may encompass guidelines for determining when non-traditional EMS transport may be appropriate, training for officers on safe patient handling and transport procedures, identification of the nearest trauma-capable medical facilities, and coordination with Norfolk Fire-Rescue and local hospital emergency departments to ensure seamless handoff of patients transported by law enforcement.

Recommendation 7: ODU should continue and expand efforts to educate campus members about AED and “Stop the Bleed” kits.

ODU should consider increasing awareness of AED kits and “Stop the Bleed” materials located in buildings throughout campus. Such efforts should include educating the community on where AED and “Stop the Bleed” materials are typically located in buildings, when those tools should be utilized, and how to utilize those tools. While BECs are currently responsible for educating their respective buildings on such issues, ODU should consider conducting campus-wide outreach. Additionally, the University should continue undertaking the ongoing installation of separate, clearly labeled “Stop the Bleed” kits below the AED kits in each building until updates are complete across campus.

(3) Emergency Notifications

Recommendation 8: ODU should implement clear protocols specifying who has the authority to send emergency notifications and consider localizing authority within a single department. ODU should also consider adopting guidelines around the content of emergency notifications.

To prevent any misalignment or confusion about who is responsible for sending emergency alerts and the content of those alerts, ODU should establish clear protocols that designate a single point of authority or a defined coordination mechanism for the authorization, drafting, and dissemination of emergency notifications. These protocols should address the approval process, if any, to ensure that the notification accurately reflects the current operational status of the incident.

To reduce potential friction in coordinating the emergency notification response, ODU should consider localizing authority to send emergency notifications with a single department at the University. Given that ODUPD and Emergency Management will likely be most proximate to any emergency incident, ODU should consider localizing the authority with one of these two entities. To the extent there are concerns that localizing authority will impede ODU’s ability to issue emergency notifications as promptly as possible upon learning of an event, ODU should consider a protocol that authorizes a broader range of individuals to send the first emergency notification but restricts such authority for subsequent notifications.

In addition, ODU should consider issuing guidelines governing the content of emergency notifications—in particular, notifications that do not utilize pre-drafted templates. Those guidelines should address the appropriate content to include in alerts as well as the sequencing of content, with a focus on ensuring that any alerts sent prior to confirmation that a situation is all-clear do not unintentionally cause confusion. ODU should consider adopting guidelines recommending that less urgent information, such as class cancellations, be omitted from any alerts sent prior to an all-clear message. Omitting such information from alerts until after the all-clear has been communicated reduces the risk that recipients will misinterpret alerts with operational or administrative information as an implicit all-clear message before the emergency has actually concluded.

Finally, the 14-minute delay between authorization and transmission of the all-clear alert on March 12—caused in part by a cellular service issue—demonstrates the operational risk of relying on a single sender with access to a single transmission channel. ODU should establish backup protocols designating alternative authorized senders and transmission methods so that a cellular service failure or other technical issue does

of officers who responded to the Aurora, Colorado, movie theater shooting, transported critical patients to the hospital in police vehicles. Because the Orlando Regional Medical Center emergency room (ORMC) was less than half a mile from the club, officers and deputies placed injured victims in the beds of their trucks and back seats of their cars and drove them to the hospital, quickly returning to Pulse to transport more critically wounded victims.

not delay a critical alert. ODU should also evaluate whether buildings or areas on campus with known poor cellular coverage warrant dedicated supplemental alert infrastructure.

Recommendation 9: ODU should consider increasing awareness and participation in the ODU Alert System across the campus community.

ODU should consider incorporating campus-level access to the Federal Emergency Management Agency's ("FEMA") Integrated Public Alert and Warning System ("IPAWS") to enhance existing alert modalities and reach individuals on or near campus who may not be enrolled in the ODU Alert System. IPAWS⁷⁴ enables authorized alerting authorities to issue Wireless Emergency Alerts ("WEA") that are geographically targeted to reach all compatible wireless devices within a defined area, regardless of whether the device owner is enrolled in any campus-specific notification system. This capability addresses a significant gap in ODU's current notification architecture: visitors, contractors, event attendees, patients and personnel at EVMS-affiliated facilities, and other individuals who may be present on or near campus during an emergency but are not registered on the RAVE platform would receive critical safety information in real time. IPAWS can be integrated into ODU's existing RAVE infrastructure, allowing authorized personnel to issue IPAWS-compliant alerts through the same interface used for current campus notifications without requiring a separate workflow. To implement this capability, ODU would need to apply to FEMA for designation as an authorized alerting authority, complete the required training and credentialing process, and coordinate with FEMA to define appropriate geographic alerting zones that correspond to the campus footprint and surrounding areas. ODU should also develop internal protocols governing when IPAWS activation is warranted to ensure that the system is reserved for confirmed emergencies posing an immediate threat to life safety and is not used in a manner that could contribute to alert fatigue among the broader Norfolk community.

Recommendation 10: ODU should evaluate and implement supplemental emergency notification capabilities to reach individuals on or near campus who may not be enrolled in the ODU Alert System.

ODU should consider increasing awareness of emergency alerts through campus outreach that could include demonstrations during orientation sessions, periodic test alerts accompanied by educational messaging, digital signage and social media campaigns promoting enrollment, and partnerships with student organizations to amplify awareness. The University should also consider incorporating orientation about the ODU emergency alert system into new-student onboarding, residence-life programming, and annual training cycles so that all community members understand how to enroll in the alert system, what to expect when an alert is issued, and how to respond appropriately upon receipt. Additionally, ODU should consider auto-enrolling any cell phone owned or issued by the University to staff to receive emergency alerts. Increasing enrollment and educating the campus community about emergency alerts is critical because the effectiveness of any emergency notification system depends not only on its technical delivery capability but also on recipients' ability to recognize, interpret, and act on the information received. Research on campus emergency notifications has found that students who are familiar with alert systems and have received prior education on expected protective actions are significantly more likely to comply rapidly with emergency directives, reducing exposure to harm during the critical initial minutes of an incident.⁷⁵

(4) Post-Admissions Risk Assessment

Recommendation 11: ODU should ensure that the Office of Threat Assessment has adequate staffing and budgetary resources to support personnel, training, equipment, and outreach.

The University should evaluate whether the Office of Threat Assessment has sufficient resources for its operations, particularly in light of the recent EVMS merger expanding ODU's footprint as well as any enhanced threat assessment policies that may be instituted following March 12. This evaluation should

⁷⁴ *Integrated Public Alert & Warning System*, FEMA (May 22, 2026), <https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system>.

⁷⁵ C.J. Rogers et al., *A Cross-Sectional Study Using Health Behavior Theory to Predict Rapid Compliance With Campus Emergency Notifications Among College Students*, 15 *Disaster Med. & Pub. Health Preparedness* 198 (2021).

account for the administrative workload associated with intake, triage, assessment, management, and documentation of TAT cases. To the extent that additional funding has not already been earmarked consistent with the planned hiring of additional personnel, ODU should make those resources a near-term budgetary priority. We understand that ODU is in the process of hiring for at least one additional position in the Office of Threat Assessment.

ODU should also consider whether the Office of Threat Assessment has the appropriate technology, software, and processes to address high-priority cases, including case management systems that support real-time tracking of referral status, automated escalation of high-priority cases, and secure communication channels among TAT members and relevant institutional stakeholders. To this end, we understand that ODU is in the process of purchasing a new top-tier threat assessment system and investigative platform. Additionally, ODU should review any barriers to sharing case information among the various units involved in the threat assessment process, including ODUPD, Student Engagement, Student Accountability & Academic Integrity, University Counsel, Title IX, Counseling Services, Housing & Residence Life, and Academic Affairs, and should establish or formalize protocols that enable timely, lawful information-sharing.

To ensure that all members of the campus community understand how to identify and report concerning behavior and are aware of the resources available to them, ODU should consider incorporating education on the university's threat assessment function into student and new employee orientation, as well as any other regularly scheduled safety trainings.

Recommendation 12: ODU should continue to, within the bounds of Virginia law, take steps to learn relevant criminal history applicable to the assessment of risk to campus. ODU should continue to maintain strong relationships with federal and state law enforcement so that critical information to ensure the safety of its campus is passed onto ODU.

ODU's voluntary self-disclosure criminal background questionnaire is a reasonable and feasible mechanism of attempting to identify students who may pose a risk to campus safety within the applicable legal framework. Considering the large volume of students who apply and are admitted to ODU, it is reasonable for ODU to conclude that conducting independent background checks or independent internet research on prospective or admitted students is unfeasible, and it is not clear doing so would even comply with Virginia law. ODU's voluntary self-disclosure questionnaire program was established in January 2022 and was extended to readmitted students following March 12, 2026. This is an appropriate, incremental improvement within the constraints of Virginia law, which prohibits affirmative inquiry into criminal history at the application stage. It bears noting, however, that voluntary self-disclosure carries inherent limitations since an individual may be unlikely to disclose a conviction voluntarily. The more reliable safeguard, or at least necessary backstop, is proactive notification from federal and state law enforcement to the institutions where high-risk individuals enroll. ODU's self-disclosure questionnaire is one reasonable tool within the limits of what Virginia law permits, but it is not a substitute for the kind of inter-agency information sharing that should have occurred in Jalloh's case.

To the extent it is possible, ODU should consider coordinating with relevant federal and state agencies to identify individuals who could pose a particular risk to the campus community. Further, ODU should consider leveraging existing relationships with the FBI's JTTF to explore whether a protocol can be established to notify ODU when terrorism defendants or defendants convicted of other particularly dangerous offenses seek to enroll, or are enrolled, at ODU.⁷⁶

⁷⁶ See *supra* Section III.A.3.b.