IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

DAWN HALL, Administrator of the Estate of
Jeremy Lewis Hall, Deceased,

and

ANTHONY KELLAM,

Plaintiffs,

v. Civil Action No.

CHADWICK DOTSON, Director, Virginia Department of Corrections, in his official capacity;
-and-

DAVID ROBINSON, Chief of Corrections Operations, Virginia Department of Corrections, in his official capacity;
-and-

KEVIN MCCOY, Warden, River North Correctional Center, in his official capacity;

-and-

CAPTAIN KEVIN ALLEN, Captain, Indian Creek Correctional Center,
in his official capacity;

-and-

DARA WATSON, Warden, Indian Creek Correctional Center, in his official capacity;
-and-

JOHN/JANE DOE SUPERVISORY OFFICIALS 1–10, River North Correctional Center, in their official capacities,

-and-

JOHN/JANE DOE SUPERVISORY OFFICIALS 11–20, Indian Creek Correctional Center, in their official capacities,

Defendants.

**COMPLAINT**

Plaintiffs, Dawn Hall, Administrator of the Estate of Jeremy Lewis Hall, and Anthony Kellam, by counsel, allege as follows:

## JURISDICTION AND VENUE

1. This action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983 and the Fourteenth Amendment to the United States Constitution. Plaintiffs seek only declaratory and injunctive relief to remedy and prevent ongoing violations of federal law.

2. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343 because Plaintiffs' claims arise under 42 U.S.C. § 1983 and the Fourteenth Amendment.

3. Defendants are sued in their official capacities only for prospective declaratory and injunctive relief to end ongoing violations of federal law. This action proceeds pursuant to *Ex parte Young*, 209 U.S. 123 (1908), and is not barred by sovereign immunity.

4. Venue is proper in this District under 28 U.S.C. § 1391(b)(1) and (b)(2). Defendants Dotson and Robinson perform their official duties and exercise statewide supervisory authority from Virginia Department of Corrections headquarters in Richmond, Virginia, which is located within the Richmond Division of the Eastern District of Virginia.

5. A substantial part of the policies, practices, and omissions challenged herein—including those governing staffing, threat response, intelligence handling, and assignment practices at Virginia Department of Corrections facilities statewide, such as River North Correctional Center and Indian Creek Correctional Center—were formulated, approved, implemented, or perpetuated within this District.

6. Venue is additionally proper because Plaintiff Anthony Kellam is currently assigned to Indian Creek Correctional Center in Chesapeake, Virginia, within the Eastern District of Virginia, and is presently subject to the same statewide policies and practices challenged herein.

7. The prospective relief requested is directed to statewide DOC leadership headquartered in Richmond and would be implemented and enforced through DOC Headquarters within this District, including through statewide staffing, threat-reporting, intelligence escalation, and training/assignment systems.

8. Accordingly, venue is most appropriate in the Richmond Division, where Defendants' statewide policies originate, are enforced, and where prospective injunctive relief would be directed and administered.

## II. PARTIES

9. Plaintiff Dawn Hall is the duly qualified Administrator of the Estate of Jeremy Lewis Hall ("Hall"), deceased, appointed pursuant to Virginia law. She brings this action in a representative capacity on behalf of the Estate to vindicate Hall's federal constitutional rights and to obtain declaratory and injunctive relief to prevent recurrence of the conditions and practices that resulted in his death.

10. Plaintiff Anthony Kellam is a correctional officer employed by the Virginia Department of Corrections ("VDOC") and currently assigned to Indian Creek Correctional Center in Chesapeake, Virginia. He brings this action in his own right to obtain declaratory and injunctive relief from ongoing policies and practices that expose him, and similarly situated correctional officers, to a substantial and foreseeable risk of serious bodily harm or death.

11. Jeremy Lewis Hall was a Master Corrections Officer employed by VDOC and assigned to River North Correctional Center ("River North") in Grayson County, Virginia, at the time of his death on November 17, 2025.

12. Defendant Chadwick Dotson is the Director of VDOC and the chief policymaker responsible for statewide staffing, security policy, training requirements, threat-response protocols, and institutional safety. He is sued in his official capacity only.

13. Defendant David Robinson is the Chief of Corrections Operations for VDOC and is responsible for operational security, staffing implementation, and oversight of wardens statewide. He is sued in his official capacity only.

14. Defendant Kevin McCoy is the Warden of River North Correctional Center and is responsible for daily operations, staffing assignments, safety enforcement, and threat response at that facility. He is sued in his official capacity only.

15. Captain Kevin Allen is a supervisory officer at Indian Creek Correctional Center responsible for operational oversight during count and for enforcement of discipline arising from serious incidents. He is sued in his official capacity only.

16. Defendant Dara Watson is the Warden of Indian Creek Correctional Center in Chesapeake, Virginia. As Warden, he is responsible for facility-wide operational oversight, enforcement of Virginia Department of Corrections Operating Procedures, count and emergency-response protocols, intelligence escalation practices, and approval or ratification of discipline arising from serious incidents. He is sued in his official capacity only for prospective declaratory and injunctive relief.

17. Defendants John/Jane Doe Supervisory Officials 1–10 are supervisory officials at River North and/or within VDOC who received, possessed, failed to escalate, or failed to act upon intelligence regarding the planned attack against Jeremy Hall and the systemic conditions that continue to endanger correctional staff. They are sued in their official capacities only.

18. Defendants John/Jane Doe Supervisory Officials 11–20 are supervisory officers and officials at Indian Creek Correctional Center whose identities are presently unknown to Plaintiff. These Defendants include, but are not limited to, lieutenants, shift commanders, duty officers, and other supervisory personnel who participated in, approved, enforced, or ratified the count procedures, emergency-response directives, intelligence handling, and disciplinary actions challenged herein. They are sued in their official capacities only for prospective declaratory and injunctive relief. Plaintiff will amend this Complaint to substitute their true names when discovered.

## III. STANDING AND CASE OR CONTROVERSY

19. Plaintiff Dawn Hall is the duly qualified Administrator of the Estate of Jeremy Lewis Hall, having been appointed pursuant to the laws of the Commonwealth of Virginia, and brings this action in that representative capacity to vindicate Hall's federal constitutional rights and to obtain declaratory and injunctive relief regarding the systemic practices that caused his death and continue to endanger correctional officers employed by the Virginia Department of Corrections. Plaintiff Kellam independently supplies Article III standing for the prospective relief sought herein.

20. Plaintiff Anthony Kellam is a current correctional officer employed by the Virginia Department of Corrections and assigned to Indian Creek Correctional Center in Chesapeake, Virginia. He is regularly assigned to security posts that, upon information and belief, are subject to the same systemic understaffing, deficient threat-response practices, and unsafe assignment policies alleged in this Complaint, and he brings this action in his own right for declaratory and prospective injunctive relief to protect himself and similarly situated officers from future harm.

21. Plaintiff Anthony Kellam faces a concrete, particularized, and imminent risk of serious bodily harm or death as a direct result of Defendants' ongoing policies, practices, and customs, including chronic understaffing, failure to respond adequately to staff-targeted threats, unsafe deployment of trainees and inexperienced officers, and disregard of intelligence-confirmed threats within VDOC facilities. His threatened injury is fairly traceable to Defendants' statewide decisions and omissions described herein, and the declaratory and injunctive relief sought in this action would materially reduce and redress that risk by requiring constitutionally adequate staffing, threat-response, and assignment protocols.

22. Plaintiff Kellam personally experienced Defendants' practice of issuing affirmative commands to disregard emergencies during routine operations, demonstrating that the unconstitutional conduct alleged herein is ongoing and poses a real and immediate risk of serious harm.

23. The unconstitutional practices alleged in this Complaint remain in effect within the Virginia Department of Corrections; Defendants have not ceased or meaningfully remedied the challenged conduct, and the same types of conditions that led to Jeremy Hall's death at River North Correctional Center continue to exist at River North, at Indian Creek Correctional Center where Anthony Kellam is employed, and at other VDOC institutions. As long as those practices persist, Anthony Kellam and other similarly situated correctional officers are exposed to an ongoing and real threat of serious harm, and this case presents a live controversy appropriate for declaratory and prospective injunctive relief under 42 U.S.C. § 1983 and *Ex parte Young*.

## IV. FACTS PERTAINING TO THE INCIDENT AND BACKGROUND FOR C.O. HALL DEATH

24. For years prior to November 17, 2025, River North and the VDOC system as a whole operated with chronic and dangerous staffing shortages for correctional officers and other security staff.

25. State-issued reports, including reports by the Joint Legislative Audit and Review Commission (JLARC) and VDOC-commissioned security assessments, documented critical vacancy rates for security staff positions, often exceeding 25–35%.

26. Defendants had actual knowledge that such chronic understaffing substantially increased the risk of inmate-on-staff violence, delayed emergency response, and routinely left officers without adequate and experienced backup in high-risk housing units.

27. Despite this knowledge, Defendants made deliberate operational decisions to continue normal operations at River North while staffing levels remained below minimum safe levels necessary to protect staff and inmates.

28. On or about December 13, 2025 Lieutenant Jacob Murray, a supervisory officer at River North Correctional Center with nearly twelve years of service in VDOC, submitted a written resignation to DOC leadership, including Director Chadwick Dotson and facility leadership.

29. In that resignation, Lt. Murray expressly warned that RNCC and DOC were "headed down a dangerous path that will see staff severely injured if not killed," and described the situation as a "grave failure in oversight."

30. Lt. Murray further stated that management's "personal achievements and statistics on audits and EWP's" were being prioritized over staff safety and morale, and that RNCC was losing staff and supervision, "contributing to the already unsafe conditions."

31. Despite receiving this direct warning predicting severe injury or death to staff if conditions were not corrected, Defendants failed to take meaningful corrective action.

32. Shortly before his death, Officer Hall was the subject of a specific and credible death threat made by an inmate, which identified Hall as the intended target.

33. That threat was communicated within the chain of command and was known, or should have been known, to supervisory staff at River North, including those responsible for security, housing assignments, and threat response.

34. Defendants failed to investigate the threat, failed to search or secure the pod from which the threat originated, failed to separate or otherwise control the threatening inmate, and failed to take any protective measures to mitigate the known risk despite mandatory threat-response policies and having ample time to act.

35. These failures violated mandatory internal safety directives reflected in VDOC Operating Procedures, including but not limited to:

    a. VDOC Operating Procedure 135.5 (Workplace Violence), which requires that employees take immediate precautions and treat employee safety and well-being as of paramount importance when workplace violence or credible threats arise;

    b. VDOC Operating Procedure 038.1 (Reporting Serious or Unusual Incidents), which requires immediate reporting and escalation of serious incidents and threats

through designated channels designed to trigger executive and operational response;

c. VDOC Operating Procedure 350.5 (Field Training Officer Program), which establishes structured field-training supervision and governs training assignments; and

d. VDOC Operating Procedure 435.1 (Special Operations Unit), which governs intelligence functions essential to safety and security and contemplates detection, disruption, and prevention of criminal activity within DOC facilities.

e. These Operating Procedures are cited as evidence of Defendants' knowledge, feasibility of protective measures, and deliberate indifference, not as independent sources of state-law liability.

36. On the date of the incident, Defendants affirmatively assigned Officer Hall to work on the floor in proximity to the threatening inmate and to supervise a trainee, even though Hall was not a certified training officer and despite VDOC policies governing training assignments and officer safety that prohibited such an assignment under the prevailing conditions.

37. This assignment further reduced operational safety, diverted Officer Hall's attention to training and supervising the inexperienced officer, left him effectively without competent backup in a known high-risk environment, and substantially increased his vulnerability to an attack.

38. On November 17, 2025, while performing his assigned duties on that floor, Officer Hall was attacked and killed by an inmate.

39. The attack was foreseeable, preventable, and the direct result of Defendants' deliberate indifference to the known specific and systemic risks to which they subjected Officer Hall, including the combination of a specific, intelligence-confirmed threat, chronic understaffing, and unsafe assignment practices they knowingly maintained.

**Ongoing Pattern of Disregarding Emergencies – Indian Creek Correctional Center**

40. In December 2025, Plaintiff Anthony Kellam, a correctional officer assigned to Indian Creek Correctional Center in Chesapeake, Virginia, encountered an inmate who was visibly vomiting inside his cell during head count.

41. Kellam immediately recognized the situation as a potential medical emergency and radioed for assistance, reporting the inmate's condition in accordance with DOC procedures.

42. Kellam was ordered by his supervisors to disregard the emergency, instructed to continue head count, and told that no response would be initiated at that time.

43. Obeying the directive of his superiors, Kellam continued count. Later that same day, the inmate died.

44. This incident reflects the same unconstitutional custom and practice alleged elsewhere in this Complaint: prioritizing routine operations and administrative metrics over immediate safety concerns, disregarding emergency conditions, and issuing affirmative commands that expose both inmates and staff to serious harm.

45. Kellam remains employed at Indian Creek and continues to work under the same supervisory structure and policies that resulted in this incident, placing him at ongoing risk of being ordered to disregard emergencies or safety threats in violation of the Fourteenth Amendment.

46. Plaintiff Kellam reasonably anticipates receiving similar directives in future emergency situations, as the supervisory practices that produced the December 2025 incident remain unchanged.

**Retaliatory Discipline for Seeking Counsel in Death-in-Custody Investigation**

47. On information and belief, Defendant Dara Watson, as Warden of Indian Creek Correctional Center, is responsible for enforcing and supervising the count procedures, emergency-response directives, and disciplinary practices challenged herein, including the practices that resulted in Plaintiff Kellam being ordered to disregard a reported emergency and later disciplined for seeking legal counsel.

48. On information and belief, Defendants John/Jane Doe Supervisory Officials at Indian Creek Correctional Center participated in, approved, or enforced the directive ordering Plaintiff Kellam to disregard a reported emergency during count and later participated in, approved, or ratified disciplinary action imposed on Kellam for seeking legal counsel in connection with a death-in-custody investigation.

49. These John/Jane Doe supervisory officials continue to exercise supervisory authority over Plaintiff Kellam and other correctional officers at Indian Creek Correctional Center and continue to enforce the same practices challenged herein, thereby subjecting Plaintiff Kellam to an ongoing and unreasonable risk of serious harm absent judicial intervention.

50. Defendant White continues to enforce these practices at Indian Creek Correctional Center, subjecting Plaintiff Kellam and other correctional officers to an ongoing and unreasonable risk of serious harm absent judicial intervention.

51. On information and belief, various supervisors at Indian Creek Correctional Center participated in, approved, or ratified the directive ordering Plaintiff Kellam to disregard a reported emergency during count and the subsequent disciplinary action imposed for Kellam's decision to seek legal counsel.

52. On December 9, 2025, Plaintiff Anthony Kellam was interviewed by a Special Agent of the Virginia Department of Corrections regarding the same December 2025 incident at

Indian Creek Correctional Center in which Kellam had reported an apparent medical emergency during count.

53. During that interview, Kellam declined to answer questions and expressly stated that he would be obtaining legal counsel before proceeding. Kellam completely cooperated with investigators on December 12, 2025 with counsel present.

54. DOC thereafter issued a formal Probationary Progress Review extending Kellam's probationary period until October 10, 2026, expressly citing Kellam's decision to seek legal counsel as a "direct violation" of DOC Operating Procedure 135.1, Standards of Conduct.

55. This disciplinary action was imposed not for misconduct, but for invoking the right to counsel in connection with a death-in-custody investigation and reflects an ongoing practice of retaliating against correctional officers who raise safety concerns or seek legal protection.

56. As a result, Kellam continues to work under the same supervisory structure that issued affirmative commands to disregard emergencies and then punished him for seeking counsel, reinforcing the ongoing and imminent risk of unconstitutional harm absent judicial intervention.

## V. GOVERNING STANDARDS AND LEGAL STANDARDS CITED

57. This action is brought pursuant to 42 U.S.C. § 1983, which provides a federal cause of action against any person who, acting under color of state law, subjects any citizen of the United States to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws.

58. The Fourteenth Amendment to the United States Constitution provides that no State shall deprive any person of life, liberty, or property, without due process of law. The substantive component of the Due Process Clause protects fundamental rights, including the right to bodily integrity, from arbitrary government action that is of constitutional magnitude and "shocks the conscience." *County of Sacramento v. Lewis*, 523 U.S. 833, 846–49 (1998); *Collins v. City of Harker Heights*, 503 U.S. 115, 125–29 (1992).

59. Under the state-created danger doctrine, a state actor may, in narrow circumstances, be held liable under the Fourteenth Amendment for violence committed by a third party where the state actor's affirmative conduct directly creates or substantially increases the risk of harm to the plaintiff, and the state actor does so through affirmative acts rather than mere inaction or omissions. *Doe v. Rosa*, 795 F.3d 429, 439–42 (4th Cir. 2015); *Graves v. Lioi*, 930 F.3d 307, 319–20 (4th Cir. 2019); *Callahan v. N.C. Dep't of Pub. Safety*, 18 F.4th 142, 151–54 (4th Cir. 2021).

60. The standard of deliberate indifference requires a showing that the official was aware of facts from which the inference could be drawn that a substantial risk of serious harm exists, that the official actually drew that inference, and that the official nonetheless consciously disregarded the known, serious danger. *See County of Sacramento v. Lewis*, 523 U.S. 833, 849–50 (1998); *Doe v. Rosa*, 795 F.3d 429, 439–40 (4th Cir. 2015).

## VI. COUNT I – 42 U.S.C. § 1983: SUBSTANTIVE DUE PROCESS – STATE-CREATED DANGER / DELIBERATE INDIFFERENCE

**(Against All Defendants in Their Official Capacities for Declaratory and Injunctive Relief Only)**

61. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

62. This claim alleges that Defendants, with actual knowledge of a specific, credible, and imminent death threat against Officer Hall, and with knowledge that River North was operating below minimum safe staffing levels, affirmatively placed Officer Hall in a position of heightened, foreseeable, and lethal danger through the application and enforcement of their policies, practices, and operational decisions. This claim is not premised on a generalized failure to provide a "safe workplace," but on specific affirmative acts and systemic practices that substantially increased his vulnerability to a targeted violent attack and that continue to expose other correctional officers, including Plaintiff Anthony Kellam, to similar state-created dangers.

63. At all relevant times, Defendants acted under color of state law and exercised authority over institutional security, staffing, training assignments, intelligence handling, and threat-response procedures that governed Officer Hall's work conditions at River North and that continue to govern the conditions under which correctional officers, including Plaintiff Anthony Kellam, work in VDOC facilities statewide.

64. Defendants affirmatively created and maintained a dangerous situation by operating River North in a chronically and dangerously understaffed condition and by deliberately continuing normal operations under those conditions despite knowledge that staffing was inadequate to respond effectively to inmate-on-officer violence and to protect officers from known, serious threats.

65. Defendants were on actual notice, through JLARC reports, internal security assessments, incident reports, prior staff assaults, and staffing rosters, that these pervasive shortages posed a substantial and ongoing risk of serious bodily injury or death to correctional staff, yet they chose to maintain and enforce the challenged policies and practices rather than take reasonable measures to abate the danger.

66. Despite actual or constructive knowledge of a specific and credible death threat made against Officer Hall, Defendants failed to implement required threat-response measures, failed to separate Officer Hall from the threatening inmate, and failed to take any steps to mitigate the known, targeted risk, notwithstanding existing policies and the time and opportunity to act.

67. Further, on the date of the incident, Defendants increased the risk to Officer Hall by affirmatively assigning him to supervise a trainee, despite Officer Hall not being a certified training officer and in violation of VDOC policies, under dangerously low staffing conditions that left him without competent backup in a known high-risk environment.

68. Defendants' acts and omissions were not mere negligence or even gross negligence; with full awareness of a specific, credible, and intelligence-confirmed threat, and with ample time for reflection and deliberation, they acted with deliberate indifference to a known, specific, and substantial risk of lethal harm to Officer Hall, and affirmatively created a situation in which serious injury or death was not just possible but a substantial certainty in light of the chronic understaffing, unsafe assignment, and unaddressed threat. This degree of culpability lies at the extreme end of deliberate indifference, supports an inference of intent to harm in the constitutional sense, and constitutes arbitrary, conscience-shocking conduct under the Fourteenth Amendment.

69. Defendants' conduct deprived Jeremy Hall of his Fourteenth Amendment substantive due process rights, including his right to bodily integrity and to be free from state-created dangers in which state actors, through affirmative decisions and policies, substantially increase an individual's vulnerability to a known and specific threat, and the same ongoing policies and practices continue to expose Plaintiff Anthony Kellam and other similarly situated correctional officers to comparable unconstitutional risks. These unconstitutional practices include affirmative directives to correctional staff to disregard reported emergencies during routine operations, as alleged in the December 2025 Indian Creek incident involving Plaintiff Kellam.

## VII. COUNT II – 42 U.S.C. § 1983: PROSPECTIVE DECLARATORY AND INJUNCTIVE RELIEF TO REMEDY ONGOING UNCONSTITUTIONAL THREAT-RESPONSE AND ASSIGNMENT PRACTICES

(Against All Defendants in Their Official Capacities for Declaratory and Injunctive Relief Only)

70. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

71. Defendants maintain and enforce a custom, policy, and practice of failing to implement constitutionally adequate threat-response, intelligence escalation, and safe assignment protocols for correctional staff, including when staff are specifically targeted and when intelligence confirms planned attacks.

72. These unconstitutional practices are evidenced by recurring disregard of mandatory protective measures reflected in VDOC Operating Procedure 135.5 (Workplace Violence), including requirements to take immediate precautions and treat the threatened employee's safety and well-being as paramount.

73. These unconstitutional practices are further evidenced by failure to utilize mandatory reporting and escalation mechanisms reflected in VDOC Operating Procedure 038.1 (Reporting Serious or Unusual Incidents), including immediate reporting requirements for serious incidents and threat-reporting pathways designed to trigger operational coordination.

74. These unconstitutional practices are further evidenced by unsafe training and assignment practices inconsistent with VDOC Operating Procedure 350.5 (Field Training Officer Program), including deploying officers in circumstances that leave threatened staff without competent backup or materially divert attention from personal safety and situational awareness when a specific known threat exists.

75. These unconstitutional practices are further evidenced by failure to act on intelligence-confirmed targeting and planning and the breakdown in actionable intelligence dissemination contemplated by VDOC Operating Procedure 435.1 (Special Operations Unit).

76. Plaintiffs seek declaratory and injunctive relief compelling Defendants to implement and enforce constitutionally adequate procedures, including mandatory threat-response measures when credible threats are made against staff; mandatory intelligence escalation and responsive search/separation protocols when a planned attack is identified; prohibitions on trainee deployment and training assignments that leave threatened staff without competent backup; and auditing and compliance reporting sufficient to ensure consistent statewide implementation.

77. Defendants Dara Watson and Kevin Allen are responsible for day-to-day enforcement of the challenged practices at Indian Creek Correctional Center and would be directly bound by the injunctive relief sought herein.

78. Defendants John/Jane Doe Supervisory Officials at Indian Creek Correctional Center are responsible for day-to-day enforcement of the challenged practices and would be directly bound by the injunctive relief sought herein.

79. Defendants' unconstitutional practices are further evidenced by retaliatory discipline imposed on correctional officers who seek legal counsel in connection with serious incidents, thereby chilling reporting, cooperation, and compliance with constitutionally adequate safety practices.

80. The relief sought is narrowly tailored to remedy ongoing constitutional violations and does not seek to supplant discretionary policy-making authority beyond what is required by the Fourteenth Amendment.

## XI. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, Dawn Hall, Administrator of the Estate of Jeremy Lewis Hall, and Anthony Kellam, respectfully request that the Court:

a. Declare that Defendants' ongoing policies, practices, and omissions—including chronic and dangerous understaffing, failure to respond adequately to staff-targeted death threats, unsafe assignment and trainee-deployment practices, and disregard or non-use of intelligence confirming planned attacks against correctional officers—violate the

Fourteenth Amendment rights of correctional officers employed by the Virginia Department of Corrections, including the late Jeremy Lewis Hall and current officers such as Anthony Kellam;

b. Enter a permanent injunction requiring Defendants, in their official capacities, to implement and enforce on a statewide basis, including but not limited to River North Correctional Center and Indian Creek Correctional Center, at least the following remedial measures:

    1. Mandatory threat-response protocols for credible staff-targeted threats, including prompt investigation, documentation, notification to appropriate supervisory personnel, and timely separation or other control measures with respect to inmates who make such threats;

    2. Minimum safe staffing requirements, or equivalent compensating safeguards, for high-risk housing units and security posts, such that officers are not left without adequate and competent backup in foreseeable danger situations, including when specific threats have been identified;

    3. Prohibitions on assigning trainees or unqualified personnel in a manner that leaves threatened officers without competent backup or that materially diverts their attention from their own safety and situational awareness when a specific, known threat exists;

    4. Required pod searches, weapon and contraband sweeps, and appropriate segregation, transfer, or other control of inmates when intelligence or other credible information identifies a planned attack "hit," or coordinated assault against a correctional officer;

    5. Reporting, monitoring, training, auditing, and compliance mechanisms sufficient to ensure that these requirements are consistently implemented and enforced across VDOC facilities, including written policies, mandatory training for supervisory and line staff, and mechanisms for corrective action when violations occur;

c. Award Plaintiffs their reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988 upon prevailing in this action;

d. Retain jurisdiction over this matter to enforce compliance with the Court's declaratory and injunctive orders; and

e. Grant such other and further equitable relief as the Court may deem just, proper, and necessary to protect the constitutional rights of correctional officers employed by the Virginia Department of Corrections.

Respectfully submitted,

/s/

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