
Report of Investigation into Certain Matters Involving GWPD

Summary of Findings and Recommendations

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Summary of Findings and Recommendations

On October 24, 2024, the George Washington University (“GW”) retained Willkie Farr & Gallagher LLP (“Willkie”) to conduct a review of the process of arming campus police officers as well as personnel matters involving the George Washington University Police Department (“GWPD”). The investigation was led by Timothy J. Heaphy, a Willkie partner who formerly served as University Counsel at the University of Virginia and United States Attorney for the Western District of Virginia. Willkie subsequently retained Timothy J. Longo, Assistant Vice President for Safety and Security and Chief of Police at the University of Virginia, to serve as a consultant. Over the course of the review, the Willkie team conducted 43 interviews with current and former GW personnel and reviewed over 820,000 documents. They completed the review in early 2025 and have since been working with university leaders to summarize and explain their findings and implement certain recommendations.

In conducting the review, the team’s goal was to develop the facts and circumstances surrounding the arming program and certain incidents involving firearms, and to evaluate the overall structure and effectiveness of GWPD. The university asked the team to derive from those facts certain lessons learned and recommend potential changes in policy and practice. The review team provided its full report to the President and a summary of its key findings and recommendations to her Cabinet and to the Board of Trustees under attorney-client privilege. The university believes that public disclosure of certain information gained in the review will enhance understanding of the events described and facilitate increased community engagement on the important issues outlined in the report. However, some of the findings and recommendations involve confidential personnel information and sensitive communication and management issues and are not included here.

I. Background on Arming GWPD Supervisors

To put the issues at stake in the review into context, the review began with an examination of the history and culture of GWPD. The department has struggled with morale and definitional issues for many years. There has been substantial debate within the department and among university administrators about the mission of GWPD – whether it should be an unarmed security service reliant on the Metropolitan Police Department for urgent response, or an armed professional police department with robust training and enhanced capacity to prevent and respond to crime on campus. Historically, the department provided security services to the campus community but was not an armed police force with arrest authority and the requisite training. Limitations on the department’s mission impacted recruiting and created a culture of low morale among employees. Over the years, university administrators commissioned several reviews of GWPD by outside experts, though few of the observations and recommendations were implemented or changed the culture of low morale. These issues were exacerbated by frequent transition of GWPD and broader university leadership, which hampered continuity and the implementation of a consistent, unified strategic vision for the department.

The question of whether to arm GWPD was debated for years. Then-President Thomas LeBlanc and his leadership team supported arming the police, and they hired James Tate as Chief of GWPD with an “eye towards arming.” Then-President Mark Wrighton similarly supported

arming GWPD and facilitated discussion of the potential for arming with the Board of Trustees. Then-Chief Tate raised the possible arming of GWPD with the Board beginning in September 2021, presenting information regarding the pros and cons of a decision to arm and information about the approach to this issue taken by other universities. Chief Tate also engaged in what he termed “quiet consultations” with various members of the university community about the possibility of armed officers and the overall mission of GWPD. The police department also retained a consultant to evaluate GWPD and the university’s overall approach to community safety, including evaluation of arming officers.

The discussion of arming GWPD led the Board of Trustees to vote to arm supervisory officers in February 2023. The Board made this decision soon after a mass shooting on Michigan State University’s campus. In that instance, the availability of armed campus police was widely credited with saving lives, which reinforced the Board’s view that GWPD needed to enhance its ability to respond to a mass shooting and other emergency threats to community safety. Prior to the Board’s February 2023 vote to arm GWPD supervisors, university administrators did not engage community stakeholders to create a process to gather feedback about the utility and risk of arming campus police.

In September 2021, when Chief Tate first raised the notion of arming, there was a proposed timeline for engagement with the GW community, however very few steps toward such engagement were taken. Prior to the arming vote in 2023, and despite repeated requests, the Board received little additional information about community engagement in part because university leadership believed that a fulsome discussion of potential arming with various stakeholders would be universally negative and derail any arming of GWPD. While Chief Tate had raised the prospect of arming in some community conversations, there was no communication plan or formalized effort to gather additional feedback. Indeed, the review team found that university administrators decided not to engage various stakeholders due to expected opposition to the threshold question of arming. Rather than gather feedback on arming prior to the vote, university administrators intended to engage the community about the implementation plan without revisiting the arming decision. There was consensus among those interviewed that community engagement efforts during the implementation phase were insufficient and one-directional.

Partly because of this lack of engagement, the decision has been criticized by faculty, staff, students, and community groups. Faculty leaders expressed frustration that subject matter experts were not provided an opportunity to provide research and other data about the risks and benefits of arming campus police. Faculty in the School of Public Health provided such data after the arming vote was taken, expressing concern with both the decision to arm and the lack of prior consultation prior to the Board vote. Student groups protested the decision and expressed opposition to both the arming decision and lack of consideration of student perspectives. Community groups also expressed concern with the arming decision and expressed surprise and frustration with the lack of community engagement. The review team found consistent discontent with the process that informed the Board’s decision, resulting in strained relationships and diminished trust.

Another contentious aspect of the arming decision was its limitation to supervisors and the lack of community protection the “hybrid” arming provides. The proposal to arm supervisors only as opposed to all sworn GWPD officers was Chief Tate’s alone and did not stem from a reasoned internal discussion of the pros and cons of such an approach. By his account, Chief Tate’s proposal was borne of his belief that the community would not be comfortable with a fully armed police department. At the February 2023 Board meeting when Chief Tate proposed that only a subset of officers be armed, he had not consulted with university leadership and other university stakeholders while crafting that proposal. As a result, the “hybrid” proposal became the sole option presented to the Board for consideration. Then-President Mark Wrighton and then-EVP Sharon Paulsen believed that arming supervisors should be a first step toward arming of the entire department, though they did not promote discussion of that broader approach and allowed Chief Tate to put the “hybrid” approach before the Board.

II. Specific Issues with Implementation of Arming Decision

Several specific issues with the guns carried by two supervisory officers—the former Chief and Captain of Operations of GWPD—delayed and complicated implementation of the arming decision. The Board’s plan was to implement the hybrid approach in three phases, as supervisory officers obtained the requisite training necessary for authorization to arm. Shortly after Chief Tate and his top deputy, Captain Gabe Mullinax, were armed in August of 2023, Captain Mullinax discovered that the guns assigned to him and Chief Tate had not been registered as required by D.C. law. While those two firearms were quickly registered as required, Chief Tate and Captain Mullinax had carried them for approximately 30 days prior to that registration in violation of D.C. law. Moreover, GW’s Compliance Department received a report in September of 2023 that Chief Tate and Captain Mullinax had not completed all the training required by department policy before being allowed to carry firearms. Finally, in December of 2023, a GWPD lieutenant discovered that Chief Tate stored his weapon fully loaded in violation of GWPD safety policies. Willkie’s investigation confirmed these allegations.

III. Recommendations

Based on the foregoing facts, the review team worked closely with Chief Longo to propose a series of recommendations designed to improve policy and practice. The team specifically recommends that the university consider arming all sworn officers to more adequately protect public safety. To consider moving from the current “hybrid” model to arming all sworn officers, the university should engage its Campus Safety Advisory Group and other key stakeholders. The university should also consider providing campus security services through its own GWPD employees rather than relying on third party contractors. This model would create two types of GWPD officers: sworn officers receiving academy training and armed while on duty and a separate group of unsworn employees providing security and other support services. This model would provide enhanced community safety and give GWPD the in-house resources to tailor appropriate responses to non-emergency situations.

Additionally, the review team recommends that GWPD consider hiring a dedicated training officer and creating both a mental health response team and a rapid response unit. The department should also establish more robust relationships with partner law enforcement and community organizations. GWPD's facilities need improvement and should include a secure armory and a more visible public presence on campus.

The review team also recommends the integration of GWPD into a broader campus safety unit at the university. The police department needs to work closely with other components responsible for Clery Act compliance, youth protection, threat assessment, emergency management, environmental health and safety and GWorld. The university has taken an important step toward increased public safety coordination by creating an Associate Vice President for Campus Safety, with supervisory authority over these units. We understand the university will soon be announcing national searches to identify both the next GWPD chief and a permanent associate vice president.

Beyond the core issues of public safety, we believe the lessons learned from the review provide opportunities for improved process and information-sharing among university leaders. The facts we developed demonstrate the need for better internal communication among university leaders and clarity as to what categories of information should be provided to the President and Board of Trustees. The review made clear that university leaders did not communicate effectively with each other or the Board of Trustees, resulting in a decision-making process that left many participants and stakeholders frustrated. University administrators have incorporated those lessons and implemented more robust internal communication among university officials, including the establishment of a regular cabinet meeting at which President Granberg and her Chief of Staff gather component heads from across the university to discuss important information about policy and process.

The review also makes clear that communication with the university community should never be discouraged or avoided, but rather formalized and embraced. The university has an opportunity to reiterate its commitment to engaging the GW community when considering significant policy changes, including faculty, staff, student and community partners. Giving stakeholders the opportunity to provide feedback before important decisions are made is essential to establishing trust and strengthening community. While the decisions that result from community consultation will not always please everyone, the objective should be to ensure that all relevant data and perspectives are considered. GW has an opportunity to move forward with a renewed spirit of cooperation and transparency, not only on the issue of public safety, but in all that it does.