



November 5, 2025

The Honorable Harmeet K. Dhillon
Assistant Attorney General
U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

**Re: Request for Investigation into the City of Alexandria, Virginia, for
Violations of the Civil Rights Act of 1964**

Dear Assistant Attorney General Dhillon:

America First Legal Foundation (“AFL”) is a national, nonprofit organization working to fight for due process and equal protection for all Americans, defend the rule of law, and save Americans from invidious discrimination in the United States. Accordingly, AFL respectfully requests that the Department of Justice (“DOJ”) Civil Rights Division investigate the City of Alexandria, Virginia (“Alexandria” or “City”) for violating Title VI and Title VII of the Civil Rights Act of 1964,¹ by unlawfully discriminating based on race. Alexandria’s equity directives apply citywide, requiring agencies providing public services — including the Alexandria Police Department (“APD” or “Department”) — to consider race in their employment and operations. Disguising its discriminatory actions under the pretext of “racial equity,” Alexandria openly defies federal civil rights laws and Executive Orders issued by President Donald J. Trump.²

Americans rely on public services to treat them equally, not to enforce an equity agenda that equalizes outcomes along racial lines. But Alexandria directs its agencies, like the Alexandria Police Department, to treat people differently based on their race — the stated purpose of which is to solve racism.³ Accordingly, the Civil Rights Division should investigate the City of Alexandria, a recipient of federal financial assistance,⁴ for engaging in unlawful discrimination and for committing to embedding discriminatory, race-based equity policies across city agencies.

¹ 42 U.S.C. § 2000d et seq.

² See Exec. Order No. 14173, 90 Fed. Reg. 8,633 (Jan. 31, 2025); see generally Exec. Order No. 14151, 90 Fed. Reg. 8,339 (Jan. 29, 2025).

³ *The Office of Race and Social Equity*, ALEXANDRIA, <https://perma.cc/572N-28EQ> (last updated on Oct. 1, 2025).

⁴ See, e.g., City of Alexandria, *Approved Operating Budget Fiscal Year 2026*, <https://perma.cc/D4KR-T3M3>.

I. Alexandria Bases Decisions on Race

In 2021, the Alexandria City Council passed the All Alexandria Resolution,⁵ codifying citywide commitments to:

- 1) Ensure that race and social equity is incorporated and centered in all planning;
- 2) Implement and sustain structures and systems to advance race and social equity;
- 3) Align and implement policy efforts designed to advance race and social equity goals; and
- 4) Ensure accountability mechanisms related to the progression and transparency of work to advance race and social equity⁶

Alexandria’s Office of Race and Social Equity (“RASE”) was created to “to fulfill the All Alexandria Resolution by embedding racial and social equity into all city policies, programs, decisions, and environments” and ensure city policies and programs “are discussed and evaluated through a racial and social justice lens.”⁷ These policies are aimed at “reducing, and ultimately eliminating, inequities throughout the City.”⁸ RASE “imagine[s] a City of Alexandria that lives up to the All Alexandria Resolution, whereby *racial and social equity is fully embedded in all aspects of how the City works.*”⁹

As a member of the Government Alliance on Race and Equity (“GARE”) network, Alexandria made “a commitment to achieving racial equity.”¹⁰ It is clear that, through its commitments to racial equity, the City intends to discriminate on the basis of race. Alexandria states that being color-blind (*not* basing decisions on race or ethnicity) “invalidates the importance of peoples’ culture; ignores the manifestations of racist policies which preserve the ongoing processes that maintain racial and ethnic stratification in social, political, and cultural institutions.”¹¹ To Alexandria, it is wrong to *not* discriminate. To the contrary, it is seemingly imperative to do so.

⁵ Resolution No. 2974, All Alexandria: Committing to Race and Social Equity.

⁶ *Id.*

⁷ *The Office of Race and Social Equity*, *supra* note 3.

⁸ *Id.*

⁹ *Id.* (emphasis added) (also describing that RASE is takes “an intersectional approach to consider a myriad of social oppressions and injustices while *leading explicitly with race.*” (emphasis added)).

¹⁰ *Id.*

¹¹ *Race and Social Equity Definitions*, ALEXANDRIA (last updated on May 30, 2025), <https://perma.cc/686G-TLT3>. The description of Color-Blind Racial Ideology as harmful, requiring race-based considerations contradicts the City’s own definition for discrimination: “The unequal treatment of members of various groups based on race, ethnicity, gender, gender expression, socioeconomic class, sexual orientation, physical or mental ability, religion, citizenship status, a combination of those identified, and/or other categories. In contrast to prejudice, discrimination is behavior. To discriminate is to treat a person, not on the basis of his or her intrinsic qualities, but on the basis of a prejudgment about that person or group...” *Id.*

Alexandria defines “Equity” as treating people differently to achieve “*equitable outcomes*.” It further defends its commitments to equity by distinguishing “equity” as treating residents differently based on historical disparities:

*[E]quity involves recognizing and providing for individuals’ specific needs to achieve an equal outcome, whereas equality focuses on treating everyone the same regardless of their starting conditions. Equity acknowledges that because of systemic inequalities, individuals require different resources and opportunities to reach an equal footing. Implementing equity involves adjusting resource allocation and opportunities to level the playing field, which is crucial in addressing historical and structural disadvantages faced by marginalized groups.*¹²

Alexandria’s equity policies specifically target “Racial Equity,” which it defines as “eliminat[ing] of policies, practices, attitudes and cultural messages that reinforce differential outcomes by race or fail to eliminate them,” and progress towards achieving racial equity is measured by the extent to which “outcomes are equalized among racial groups.”¹³ By its own definitions, Alexandria commits to treating residents differently in order to achieve equal outcomes, ignoring the possibility of nondiscriminatory causes of unequal outcomes.

Lastly, the City has required the use of The Racial Equity Tool to ensure that BIPOC (“Black, Indigenous, and People of Color,” which Alexandria describes “is the evolution of the term ‘minority’”) communities are consulted across City actions.

Alexandria makes it clear that these policies that address “historical injustices” are not racist, because it defines “Racism” as perpetuating “a presumed superiority of the white race” and only oppressing people of color to the “benefit of the dominant group, whites.”¹⁴ To Alexandria, it is not racist to discriminate against white Americans.

Alexandria’s agencies are directed to further the City’s discriminatory directives, and the agencies have answered the call.¹⁵

The Alexandria Police Department, for example, has published a Racial Equity Plan in which it states that the Department “continues to make efforts in creating a diverse workforce” with the goal of “improv[ing] the demographic representation” through

¹² *Race and Social Equity FAQs*, ALEXANDRIA, <https://perma.cc/2XPJ-MQVB> (emphasis added) (last updated on March 20, 2025).

¹³ See *Race and Social Equity Definitions*, *supra* note 11.

¹⁴ *Id.*

¹⁵ Goal 2 of the Alexandria Fire Department 2022-2027 Strategic Plan states that “Establish[ing] a diverse recruitment and retention committee” is a “Critical Task.” Alexandria Fire Department 2022-2027 Strategic Plan, at 13, ALEXANDRIA FIRE DEPARTMENT (available at <https://perma.cc/34MR-5BZW>).

recruitment.¹⁶ In the Racial Equity Plan, the Alexandria Police Department describes the goal of holding regular implicit and social bias trainings, and it also describes that “[r]acial equity is achieved when race can no longer be used to predict outcomes.”

These policies are only several of Alexandria’s discriminatory policies, which aim to resolve discrimination through discrimination.

II. Request For Investigation

Diversity, equity, and inclusion are a divisive, destructive, and inherently unfair part of any organization. The City of Alexandria has embedded divisive and discriminatory, race-centric concepts of equity citywide and throughout all aspects of agencies like the Alexandria Police Department. Accordingly, we ask that your office investigate the allegations in this complaint to ensure Alexandria’s full compliance with Title VI and Title VII of the Civil Rights Act of 1964 and Executive Orders issued by President Donald J. Trump¹⁷ and to take all actions necessary to remedy the unlawful practices and procedures and seek all appropriate relief under federal law.

Thank you for your attention to this crucial matter. Please do not hesitate to contact us for further information.

Sincerely,

/s/ Will Scolinos

Attorney

America First Legal Foundation

¹⁶ *Racial Equity Plan*, ALEXANDRIA POLICE DEP’T, <https://perma.cc/5ESX-KUXC>.

¹⁷ See Exec. Order No. 14173, 90 Fed. Reg. 8,633 (Jan. 31, 2025); see generally Exec. Order No. 14151, 90 Fed. Reg. 8,339 (Jan. 29, 2025).