



**December 9, 2025**

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**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED**

Mr. Craig Albert, President and Chief Operating Officer  
Bechtel Corporation  
12011 Sunset Hills Road  
Reston, VA 20190

**Re: Investigation of Potential Unlawful Discrimination in Bechtel Internship and Apprenticeship Programs**

Dear Mr. Albert:

The America First Policy Institute (AFPI) is investigating whether Bechtel Corporation (“Bechtel”) may be violating federal nondiscrimination laws in administering several of its internship and apprenticeship programs. Our concerns arise from publicly available program descriptions, impact reports, and partnership materials suggesting that Bechtel gives preferential treatment in awarding internships or apprenticeships on the basis of a person’s race, color, national origin, sex, or related characteristics in direct violation of federal nondiscrimination laws.

AFPI is a 501(c)(3) organization dedicated to advancing policies and litigation that put the American people first. AFPI’s guiding principles are liberty, free enterprise, national greatness, American military superiority, foreign policy in the American interest and the primacy of American workers, families, and communities.

As a federal contractor and recipient of federal funds, Bechtel is subject to the requirements of

Title VI, Title VII, Title IX, the Equal Protection Clause, and the July 29, 2025, “Guidance for Recipients of Federal Funding Regarding Unlawful Discrimination” issued by Attorney General Pam Bondi. These authorities strictly prohibit the use of race, color, national origin, sex, or their proxies in any aspect of program design, hiring, or selection. (AG Guidance § IV(A)-(D)).

Based on AFPI’s initial examination of Bechtel’s publicly available information about its internship and apprenticeship programs, the specific practices below raise serious concerns of a potential violation:

**I. The Summer 2026 Internship Program postings include certain language that suggests improper criteria may be used to select program applicants.**

Examples of such language includes:

- “Diverse teams build the extraordinary.”
- “As a global company, Bechtel has long been home to a vibrant multitude of nationalities, cultures, ethnicities, and life experiences. This diversity has made us a more trusted partner, more effective problem solvers and innovators, and a more attractive destination for leading talent. We are committed to being a company where every colleague feels that they belong—where colleagues feel part of “One Team,” respected and rewarded for what they bring, supported in pursuing their goals, invested in our values and purpose, and treated equitably.”

Statements of this nature, in the context of applicant recruitment, suggest that Bechtel may be evaluating or prioritizing candidates based on race, ethnicity, national origin, sex, or related demographic characteristics. The Attorney General’s Guidance expressly warns against using “diversity” or similar criteria as proxies for protected characteristics when selecting participants for internships or employment. (AG Guidance § IV(B)(1)-(2)).

**II. The Apprenticeship Program’s explicit use of protected traits.**

- On Bechtel’s current career page under Additional Programs, the Apprentice Program explicitly mentions “advancing ARPs, including programs that help “veterans, women, and people of color launch careers in the construction industry.”
- There is further evidence of continued support for these ARP programs in Bechtel’s 2023 and 2024 Impact Reports, noting the policy and Bechtel’s continued partnership with equity advancing organizations such as TradesFutures and NABTU.

These practices, as described in publicly available information, suggest that Bechtel may be engaged in direct preferential treatment on the basis of sex, race, and/or national origin. The Attorney General’s Guidance is explicit that such preferences are unlawful. (AG Guidance § IV(A)(1)-(2)). Bechtel’s 2023 and 2024 Impact Reports indicate continued support for equity-focused partner organizations such as TradesFutures and NABTU, which are described as advancing minority groups. Funding, endorsing, or participating in programs that restrict

eligibility based on race or sex may constitute unlawful discriminatory practices. (AG Guidance § IV(A)(1); § IV(C)(3)).

\* \* \*

We encourage Bechtel to provide additional information about these internship and apprenticeship programs so that we may assess whether they are in compliance with federal non-discrimination laws. To assist us in assessing whether Bechtel's internship and apprenticeship programs comply with federal nondiscrimination requirements, we request:

- (1) all eligibility criteria, selection procedures, and evaluative materials used for the Summer 2026 Internship Program and the Apprenticeship Program, including any criteria related to "diversity," "advancing ARPs," or similar concepts;
- (2) all partnership agreements, referral arrangements, and pipeline programs involving TradesFutures, NABTU, or groups focused on advancing "underrepresented" populations;
- (3) aggregate demographic data for recent applicant and participant cohorts in these programs; and
- (4) any internal legal or compliance assessments conducted in response to federal nondiscrimination obligations or the July 29, 2025, Attorney General's Guidance.

Thank you for your prompt attention to these serious compliance issues. Given Bechtel's obligations as a federal contractor and recipient of federal funds, it is imperative that all internship, apprenticeship, and workforce-development programs operate in full alignment with federal nondiscrimination requirements.

We look forward to receiving additional information about Bechtel's internship and apprenticeship programs. We also welcome your response detailing the steps Bechtel has taken to ensure that no program, partnership, or selection process confers unlawful preferential treatment based on protected characteristics or their proxies.

Please direct your responses to me at the address above. AFPI looks forward to your affirmative reply to this letter by December 31, 2025.

Sincerely,



Skylar McCann  
America First Policy Institute