



December 9, 2025

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VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ms. Laura McGill, Laboratories Director
Sandia National Laboratories
1515 Eubank SE
Albuquerque, NM 87123

**Re: Investigation of Potential Unlawful Discrimination in Sandia National Laboratories
Student Programs, Hiring Practices and Employee Benefits**

Dear Ms. McGill:

The America First Policy Institute (AFPI) is investigating whether Sandia National Laboratories (“Sandia”) may be violating federal nondiscrimination laws in administering discriminatory student programs, biased hiring processes, and provision of employee benefits. Our concerns arise from publicly available program descriptions, advertisements, and statements on Sandia’s website and from spokespeople. Evidence suggesting that Sandia gives preferential treatment on the basis of a person’s race, color, national origin, sex, or related characteristics may indicate a 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 government contractor and recipient of federal funds, Sandia is subject to the

requirements of Title VI as well as 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 Sandia’s publicly available information, the specific practices below raise serious concerns of a violation:

I. The HMTech student program postings include language that suggests improper criteria may be used to select program applicants.

According to a blog post written by Sandia employee Kim Vallez Quintana on June 29th, 2023, (<https://www.sandia.gov/labnews/2023/06/29/stem-program-inspires-black-students-for-nearly-50-years/>), HMTech is a student program that is sponsored and operated by Sandia. According to this post, the stated purpose of the program is “exposing Black students to science and engineering to help increase the number who pursued collegiate and professional careers in STEM.” Quintana also states that HMTech “continues to bring together Sandians and Black students.”

Sandia spokesperson and employee Breanna Gallegos-Robinson also advertised the HMTech program on LinkedIn, claiming the following:

“HMTech targets Black middle and high school students, but students of all backgrounds are welcome to attend!”

(https://www.linkedin.com/posts/bgallegosrobinson_save-the-date-sandia-national-laboratories-activity-7176603776672231426-8d9E)

Statements of this nature, in the context of applicant recruitment, suggest that Sandia 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 such criteria when selecting participants for internships, programs, or employment. (AG Guidance § IV(A)(2)).

II. Sandia operates “Employee Resource Groups” that provide a benefit to employees based on protected characteristics.

Sandia advertises on its public website that it operates employee resource groups (ERGs) at its facilities. Amongst other listed benefits, Sandia states that participation in an ERG presents “career development opportunities.” A number of these groups are specifically designed for members of particular demographic groups including those based on race, ethnicity or sexual orientation. Listed examples include:

- Black Leadership Committee
- Sandia Pride Alliance

- Hispanic Leadership Committee
- Asian Pacific Leadership Committee

The existence of these groups may themselves be an example of unlawful employee segregation. Of greater concern, in the accompanying descriptions for these groups, Sandia indicates that these groups are involved directly in the employee hiring process. For example, the Black Leadership Committee purportedly “participates in identifying and recruiting qualified employment candidates,” and the Sandia Pride Alliance “support(s) recruiting activities.” The Attorney General’s Guidance expressly warns about using facially neutral criteria as a proxy for discrimination in hiring. (AG Guidance § IV(B)(1)).

III. Sandia provides employee benefits to certain groups based on protected characteristics.

A public blog post concerning Sandia’s 2025 employee benefits lists a partnership with the legal insurance provider ARAG. (<https://www.sandia.gov/labnews/2024/10/17/open-enrollment-for-2025-benefits/>) This benefit is putatively to offer “expanded coverage” to support “Diversity, Equity and Inclusion.” ARAG’s attached flyer discusses LGBTQ+ specific services, including “Gender Identifier Change,” and “Name Change” coverage.

The Attorney General’s Guidance specifically states that using race, sex, or other protected characteristics for resource allocation, or other similar activities, opportunities, or benefits, is unlawful. If Sandia is actively procuring and providing employee resources and benefits that are not universally available to employees on the basis of a “Diversity, Equity, and Inclusion” initiative or group identifier, then it may be in violation of federal law. (AG Guidance § IV(C)(3)).

These practices, as described in publicly available information, suggest that Sandia 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)).

To assist us in evaluating Sandia’s compliance with federal non-discrimination laws, we request:

- (1) the eligibility criteria, selection procedures, and decision-making processes used for the Sandia HMTech Student Program, any guidance regarding the use of race or “representation gap” objectives, and aggregate demographic data for recent applicant and recipient cohorts in this program;
- (2) all documents and internal policies relating to the “Black Leadership Committee,” “Sandia Pride Alliance,” or other such identity group’s involvement in Sandia’s hiring process, including candidate criteria, identification and evaluation;
- (3) any internal report compiled or presented on the need to develop or acquire employee

benefits to support “Diversity, Equity, and Inclusion,” and any such DEI or substantively similar human resources policy currently in force; 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 Sandia’s obligations as a federal contractor and recipient of federal funds, it is imperative that its programs operate in full alignment with federal nondiscrimination requirements.

We look forward to receiving the information about Sandia’s programs as requested above. We also welcome your response detailing the steps Sandia 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 listed above. We look forward to your affirmative reply to this letter by December 31, 2025.

Sincerely,



Isaac Loring
America First Policy Institute