

Public Citizen’s Written Testimony for the Record
United States Senate Committee on the Judiciary

Hearing: The Nomination of the Honorable Pam Bondi to be Attorney General
of the United States: Day 2

Submitted by Lisa Gilbert
Co-President, Public Citizen

January 16, 2025

Introduction:

Chair Grassley, Ranking Member Durbin, thank you for the opportunity to testify. I am Lisa Gilbert, Co-President of Public Citizen.

Public Citizen is a 54-year-old nonprofit advocacy organization with 500,000 members and supporters around the country. We champion the public interest in the halls of power. We use strategic lobbying, aggressive litigation, in-depth research, coalition-building and savvy grassroots organizing to push for bold, transformative change – ensuring that our government and economy works for the people, not just for corporations or the wealthy and well-connected few.

Public Citizen respectfully submits testimony to the Committee on behalf of our members and supporters in opposition to the nomination of Pam Bondi for the role of Attorney General. The mission of the Department of Justice (DOJ) is to work on behalf of the American people, to keep our country safe, to protect civil rights, and to uphold the rule of law.

The attorney general must be seen by the public as a fair arbiter of our legal system, whose sole duty is to serve them. Unfortunately, the attorneys general who served under President Trump in his first term failed to live up to this high standard. From their validation of President Trump’s subversion of voting rights and our democracy, to their inhumane separation of immigrant families at the border, to their abuses of our criminal justice system, they all too often served as Trump loyalists rather than independent law enforcement officials; and Pam Bondi is cut from this same cloth.

Bondi echoed Donald Trump’s false claims of voter fraud after the 2020 election. On the day after Election Day in 2020, Bondi attended a Trump campaign press conference in Philadelphia alongside Trump attorney Rudy Giuliani. At that press conference, Bondi twice asserted that Trump had “won Pennsylvania.”¹ However, at that time, approximately 1 million mail-in ballots

¹ <https://www.c-span.org/program/campaign-2020/trump-campaign-news-conference-in-philadelphia/556103>

in Pennsylvania had yet to be counted² and no major media outlets had called the state for Trump.

The attorney general oversees enforcement of our nation's voting rights laws, among many other duties. Bondi's record of making false claims of voter fraud and working to limit voter access is more than sufficient reason to reject her nomination.

We should expect an Attorney General Bondi to serve as a Trump loyalist at the expense of the Department's independence and integrity. Bondi helped defend Trump during the first impeachment trial and has numerous troubling conflicts of interest from her time as a lobbyist.

We focus the balance of our testimony on the issue of these conflicts.

Lobbying Clients:

Public Citizen has a long track record of investigating conflicts of interests and potential corruption. Our recent examination³ of the federal lobbying disclosures and Foreign Agents Registration Act reports filed by Pam Bondi and Ballard Partners, the lobbying firm she worked for as a registered federal lobbyist⁴ revealed that her lobbying client list is littered with controversial clients, some of which stand to benefit from having their former lobbyist put in charge of DOJ.

A review of these records and further research into Bondi's lobbying shows that Bondi registered to represent 30 clients - from large corporations and government contractors to a foreign government - between 2019 and 2024 targeting the White House, Congress, and 12 federal agencies.⁵ Bondi represented a variety of controversial corporate clients: a gambling company that sued DOJ over a legal opinion; a private prison firm that the DOJ Inspector General criticized; mega-tech companies that have received billions in government contracts while battling government regulations, and more.

A recent New York Times review, "A 'Business-Friendly' Lawyer's Rise from Lobbyist to Attorney General Pick,"⁶ found several pieces of evidence that seem to demonstrate her general tendency to assist corporate allies, and corporate lobbyists' belief that Bondi, when she was Florida's Attorney General, was exceptionally accessible to lobbyists, eager to meet with lobbyists and private dinners and other functions, and amenable to agendas of the lobbyists' clients. From her time as Florida AG they sourced a confidential memo from the firm Dickstein

² <https://www.nbcphiladelphia.com/news/politics/decision-2020/millions-of-ballots-left-to-be-counted-in-pennsylvania-as-vote-tally-continues/2584607/>

³ <https://www.citizen.org/article/conflicted-justice/>

⁴ <https://ballardpartners.com/team-member/pam-bondi/>

⁵ United States Senate Lobbying Disclosure Act Database Lobbying Reports (LDA Reports) filed for "Pamela Bondi," accessed November 27, 2024; <https://tinyurl.com/4bmhykxb>; Foreign Agents Registration Act (FARA) Statement, filed 7/23/19, stating that Pamela Bondi was registering to lobby on behalf of the Embassy of the State of Qatar; <https://efile.fara.gov/docs/6415-Short-Form-20190723-106.pdf>

⁶ Id.

Shapiro in Washington DC where their lobbyists characterized Bondi as a “... business friendly, media-savvy AG.” They also documented her close relationship with Bernard Nash. Nash is the self-described Washington DC “godfather” of law practices that lobby state attorneys general⁷. Nash identified Bondi as an AG “willing to engage with his team as they discouraged investigations and litigations.” Emails show that “Ms. Bondi was among the most receptive to Mr. Nash’s appeals.” The Times reported several examples, including that after Mr. Nash’s team pushed Pam Bondi to drop a lawsuit against the travel site Travelocity that had been filed by her predecessor, she soon did.⁸

Domestic Conflicts:

Pam Bondi had a large number of corporate clients with business matters and engagements across government, but for purposes of this testimony we highlight three: Geo Group- a private prisons company, IGT Global Solutions- a gambling company, and Amazon- a merchandise distributor and e-commerce giant.

According to federal lobbying filings, Bondi was registered to lobby the first Trump White House in 2019 for The Geo Group, the nation’s largest private prisons company, which owns, leases, and manages correctional, detention, and re-entry facilities for DOJ agencies the United States Marshals Service and the Board of Prisons, U.S. Immigration and Customs Enforcement (ICE) under the Department of Homeland Security, and for states, counties, and cities across the U.S.⁹ Both DOJ and Homeland Security Inspector General audits have been critical of prison management by GEO Group and other private prison companies¹⁰ and the GEO Group stands to profit substantially if the Trump Administration’s new immigration detention and deportation policies result in filling empty or underutilized beds at its facilities.¹¹ As precedent, Public Citizen research in 2019 showed Geo Group’s contract dollars rising by just over 40% during the first two years of Trump’s first term.¹² Lobbying reports filed in 2019 reveal that while Bondi was registered to lobby for The Geo Group, her lobbying firm was paid \$60,000 by The Geo Group.

⁷ <https://www.cozen.com/people/bios/nash-bernie>

⁸ <https://www.nytimes.com/2025/01/08/us/politics/pam-bondi-trump-attorney-general-lobbyist.html>

⁹ LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client The Geo Group, filed 10/21/19; <https://lda.senate.gov/filings/public/filing/908e8081-b0f6-472f-a318-c6f9ca62f28c/print/>; “Audit of the United States Marshals Service’s Contract Awarded to The Geo Group, Incorporated to Operate the Robert A. Deyton Detention Facility, Lovejoy, Georgia,” U.S. Department of Justice Office of the Inspector General, July 2020; https://oig.justice.gov/sites/default/files/reports/20-085_0.pdf; “The nation’s largest private prisons operator is based in Florida. And profits are up,” Miami Herald, 4/22/19

¹⁰ <https://oig.justice.gov/reports/2016/e1606.pdf>

¹¹ “Private prison firms contributed more than \$1M to Trump’s reelection. Now they expect a business boom,” ABC News, 11/20/24; <https://abcnews.go.com/US/private-prison-firms-contributed-1m-trumpsreelection-now/story?id=116046776>; “Pam Bondi, Trump’s New AG Pick, Lobbied for Private Prisons and Amazon,” The Intercept, 11/22/24; <https://theintercept.com/2024/11/22/trumps-new-ag-pick-lobbied-forprivate-prisons-and-amazon/>

¹² <https://www.citizen.org/news/private-contractors-made-billions-from-immigration-and-corrections-contracts-under-trump-obama/>

According to federal lobbying filings, Bondi was registered to lobby the first Trump White House in 2019 and 2020 for the gambling company IGT Global Solutions, which operates state lotteries and video game slot machines across the U.S. along with its parent company and subsidiaries.¹³ According to news reports, IGT has had multiple conflicts with DOJ in recent years: it sued DOJ and the Attorney General to overturn DOJ's legal position on whether the company could perform gambling-related transactions electronically across state lines under the Interstate Wire Act¹⁴ and it has a large merger pending that has undergone DOJ review.¹⁵ Lobbying reports filed in 2019 disclosed that, while Bondi was registered to lobby for IGT Global Solutions, her lobbying firm was paid \$120,000 by IGT Global Solutions.¹⁶

Amazon is of course a well-known tech company. According to news reports, in recent years, it has been investigated by DOJ over injury rates and workplace safety at its warehouses,¹⁷ been referred to DOJ by a bipartisan group of lawmakers for potential criminal obstruction,¹⁸ and had its robotaxi unit federally investigated over safety concerns.¹⁹ In addition, DOJ and the Federal Trade Commission (FTC) recently reached a settlement with Amazon regarding children's privacy violations via Alexa,²⁰ though the company is still facing a wide-ranging antitrust suit from the FTC.²¹ Amazon has also received multi-billion-dollar government contracts from multiple federal agencies. According to federal lobbying filings, Bondi was registered to lobby the first Trump White House, Congress, and two federal agencies in 2020 for Amazon.²²

International Clients:

As mentioned, Pam Bondi was registered as a Foreign Agent under FARA. The New York Times called her a "particular kind of lobbyist" – a "well-known lawyer, with close connections to power, who uses these ties to free foreign clients from sanctions, human rights scrutiny, or criminal charges."²³

Pam Bondi was registered as a foreign agent for Qatar²⁴, with a goal of improving their human rights record before the 2022 World Cup. The official contract between Bondi's lobbying firm,

¹³ <https://lda.senate.gov/filings/public/filing/48ca5ceb-b245-40c4-b4ea-185b51b0c0b8/print/>

¹⁴ <https://www.vixio.com/insights/gc-igt-wins-wire-act-case-against-justice-department-rhode-island>

¹⁵ <https://www.reviewjournal.com/business/casinos-gaming/igt-execs-confident-apollo-deal-will-winregulatory-approval-3104545/>

¹⁶ <https://lda.senate.gov/filings/public/filing/c7e8e67d-dc70-4988-8499-e6b9208f9d61/print/>

¹⁷ <https://www.seattletimes.com/business/doj-probes-amazon-for-alleged-knowledge-of-warehouse-safety-hazards/>

¹⁸ <https://www.washingtonpost.com/politics/2022/03/09/house-judiciary-amazon-obstruction/>

¹⁹ <https://apnews.com/article/amazon-autonomous-vehicle-investigation-crashes-zoox-45c53600710407bc6f82b0a855c46e12>

²⁰ <https://www.justice.gov/opa/pr/amazon-agrees-injunctive-relief-and-25-million-civil-penalty-alleged-violations-childrens>

²¹ <https://www.ftc.gov/news-events/news/press-releases/2023/09/ftc-sues-amazon-illegally-maintaining-monopoly-power>

²² <https://lda.senate.gov/filings/public/filing/c0eb222d-09af-460d-afe1-44e5a54c0790/print/>

²³ <https://www.nytimes.com/2025/01/08/us/politics/pam-bondi-trump-attorney-general-lobbyist.html>

²⁴ FARA Statement, filed 7/23/19, stating that Pamela Bondi was registering to lobby on behalf of the Embassy of the State of Qatar; <https://efile.fara.gov/docs/6415-Short-Form-20190723-106.pdf>; FARA Filing by Ballard

Ballard Partners, and the Embassy of Qatar stated that the scope of services was to “provide Government relations strategic advice and advocacy with respect to enhancing US-Qatar bilateral relations, and further developing trade, investment and business opportunities,” and to “provide consulting and advocacy services regarding matters involving anti-human trafficking.”

Bondi also registered to lobby on behalf of a Kuwaiti investment firm in an attempt to free the principal—characterized by the Times²⁵ as a Russian money manager—who was arrested in Kuwait on charges of embezzlement by her and her staff of tens of millions in government funds. That advocacy included lobbying Congress, the State Department and the White House to pressure Kuwait to release her and to consider using Magnitsky Act sanctions against Kuwaiti officials and generated \$350,000 in fees for Ballard Partners.²⁶

Conclusion:

Senators should not confirm a person with this record of controversial business and foreign government lobbying representation as Attorney General of the United States. We want to be clear: these are not problems that can be addressed adequately by Bondi agreeing to recuse herself from cases involving corporations and countries for which she previously lobbied. Bondi’s broad representation of, and lobby registration for, corporate interests is much more than a list of specific potential conflicts, but instead reflects an overall sense of priorities that cannot be cured by recusals. It constitutes a net of potential conflicts from which there is no realistic escape. A well-functioning Justice Department should be tough on corporate crime and work to improve the lives of our communities. This level of corporate entanglement speaks to exactly the wrong incentives.

There is a proven record of this problem. Though President-Elect Trump may talk tough on crime, the last time he took office, corporate enforcement plummeted. Public Citizen research found that in the first year of the Trump administration corporate penalties at the DOJ dropped 90 percent.²⁷

If Pam Bondi becomes AG, we would have every reason to expect a similar result. Public Citizen has created a *Corporate Enforcement Tracker*²⁸ to serve as a resource for watchdogging ongoing federal investigations and cases against alleged corporate wrongdoing that are at risk of being dropped, weakened, or otherwise modified in the next administration.

As of today, Public Citizen’s *Corporate Enforcement Tracker* includes a total of 237 investigations and cases against 192 distinct corporations. Nearly one third of these companies have known ties with the Trump administration. They or their executives have either contributed

Partners, filed 7/23/19, reflecting Pam Bondi’s addition to the lobbying contract; <https://efile.fara.gov/docs/6415-Exhibit-AB-20190723-16.pdf>

²⁵ <https://www.nytimes.com/2025/01/08/us/politics/pam-bondi-trump-attorney-general-lobbyist.html>

²⁶ <https://lda.senate.gov/filings/public/filing/335a8be7-be37-4ed1-8deb-9ba37fd85769/print/>

²⁷ <https://www.citizen.org/news/penalties-for-corporate-violations-plummet-by-double-digits-under-trump/>

²⁸ <https://www.citizen.org/article/corporate-enforcement-trump-tracker/>

to his inauguration, or Trump has nominated their former employees, investors, and lobbyists. And as highlighted throughout our testimony, Pam Bondi is no exception.

This nation needs a Justice Department that will do everything in its power to crack down on corporate crime and fight for voting rights, criminal justice, LGBTQ equality, disability rights, environmental justice, reproductive freedom, the rights of working people, and other pressing civil and human rights issues. The ability of the Attorney General to represent the interests of the American public must not be compromised. We depend on the DOJ to vigorously enforce our laws, hold corporate wrongdoers accountable, and protect the rule of law

If Pam Bondi's nomination as Attorney General proceeds, we fear she will instead be a driven loyalist to Donald Trump and take actions that reflect the needs of the entities she so recently represented. The Senate should refuse to confirm Pam Bondi to be attorney general of the United States.

Senator Durbin has sent important inquiries to the National Archives and the DOJ asking them to turn over additional information on Bondi to determine whether her past lobbying work for companies and foreign governments could post a conflict of interest if she is confirmed as attorney general. We support this request for additional essential details beyond what is available in public disclosures.²⁹

Thank you for giving me the opportunity to present the views of Public Citizen. I would be pleased to answer any questions you may have.

²⁹ <https://thehill.com/homenews/administration/5079887-durbin-questions-bondi-conflict/>