

# CONFLICTED JUSTICE:

## U.S. ATTORNEY GENERAL-NOMINEE PAM BONDI'S PROBLEMATIC CORPORATE LOBBYING CLIENTS

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This report was written by Jon Golinger, Public Citizen’s Democracy Advocate.

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## Introduction

Pam Bondi was selected by President-Elect Donald Trump a week before Thanksgiving as a replacement nominee to lead the Department of Justice (DOJ) as Attorney General.<sup>1</sup> In the first Trump Administration, the Attorney General nominee was the first Cabinet nominee to receive a Senate confirmation hearing in early January.<sup>2</sup> Bondi's extensive record as a corporate lobbyist has not yet been scrutinized, and as Senators review her record and prepare for her confirmation hearing, this examination of Bondi's lobbying history raises serious questions about conflicts that must be answered.

This study examines federal lobbying disclosures and Foreign Agents Registration Act reports filed by Bondi and Ballard Partners, the lobbying firm she worked for as a registered federal lobbyist for the last five years that also employed Susie Wiles, Trump's selection for White House Chief of Staff.<sup>3</sup> An examination of Bondi's lobbying disclosures reveals that – like Wiles – Bondi's 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 represented 30 clients - from large corporations and government contractors to a foreign government - between 2019 and 2024.<sup>4</sup> 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.

This study's findings raise serious questions about potential conflicts of interest between Bondi's clients and her potential role as Attorney General and, by themselves, provide sufficient grounds for Senators to deny her confirmation. At a minimum, before Bondi's confirmation hearing, Senators should insist that Bondi disclose all details about her lobbying for these clients, pledge to recuse herself from any dealings that could benefit them, and commit to not lobbying for them again after serving as Attorney General.

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<sup>1</sup> "Trump names Pam Bondi as his pick for attorney general after Gaetz drops from consideration," CNN, 11/21/24; <https://www.cnn.com/2024/11/21/politics/pam-bondi-attorney-general-trump/index.html>

<sup>2</sup> "5 Things to Watch For In Jeff Sessions' Attorney General Hearings," NPR, 1/10/17; <https://www.npr.org/transcripts/508943124>; "Attorney General Confirmation Hearing, Day 1, Part 1," C-SPAN, 1/10/17; <https://www.c-span.org/video/?420932-1/attorney-general-confirmation-hearing-day-1-part-1>

<sup>3</sup> "Our Team: Pam Bondi," Ballard Partners website, accessed 12/3/24; <https://ballardpartners.com/team-member/pam-bondi/>; "Meet Susie Wiles' Controversial Corporate Lobbying Clients," Public Citizen Report, 11/15/24; <https://www.citizen.org/article/meet-susie-wiles-controversial-corporate-lobbying-clients/>

<sup>4</sup> 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>

## Findings

- Federal lobbying disclosures reveal that Trump Attorney General Nominee Pam Bondi has been a registered corporate lobbyist from 2019 through 2024.<sup>5</sup>
- Bondi has lobbied the federal government for 30 different clients, including large corporations, government contractors, and a foreign government.<sup>6</sup>
- On behalf of her clients, Bondi has lobbied the White House, Congress, and 12 federal agencies to influence policy, regulations, legislation, and litigation.<sup>7</sup>
- Bondi's federal lobbying clients have included:
  - *A gambling company that sued 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 Act.*<sup>8</sup>
  - *A private prisons company that has been criticized by DOJ and Homeland Security Inspector General audits and stands to profit substantially from the Trump Administration's new immigration detention and deportation policies.*<sup>9</sup>

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<sup>5</sup> LDA Reports filed for "Pamela Bondi," accessed November 27, 2024; <https://tinyurl.com/4bmhykxb>; FARA Statement, filed 7/23/19; <https://efile.fara.gov/docs/6415-Short-Form-20190723-106.pdf>

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client IGT Global Solutions filed 7/17/19; <https://lda.senate.gov/filings/public/filing/48ca5ceb-b245-40c4-b4ea-185b51b0c0b8/print/>; "Lottery operator IGT sues U.S. Justice Department over ambiguity on Wire Act," Providence Business News, 11/26/21; <https://pbn.com/lottery-operator-igt-sues-u-s-justice-department-over-for-ambiguity-on-wire-act/>

<sup>9</sup> "Private federal prisons more dangerous, damning DOJ investigation reveals," The Guardian, 8/12/16; <https://www.theguardian.com/us-news/2016/aug/12/private-federal-prisons-more-dangerous-justice-department>; "Executive Summary of The GEO Group's Response to 2016 DOJ OIG Report on Contracted Federal Prisons," The GEO Group website; <https://www.geogroup.com/GEO2016OIGResponse>; "ICE inspector general finds violations at Aurora facility," The Denver Post, 6/7/19; <https://www.denverpost.com/2019/06/06/ice-aurora-immigration-geo-group/>; "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-trumps-reelection-now/story?id=116046776>

- *A waste management company that has resisted removing nuclear waste from its radioactive landfill.<sup>10</sup>*
- *A tech company that has been sued by DOJ over children’s privacy violations,<sup>11</sup> been investigated by DOJ over injury rates and workplace safety at its warehouses,<sup>12</sup> and been referred to DOJ by a bipartisan group of lawmakers for potential criminal obstruction.<sup>13</sup>*
- *A transportation company that has lobbied against consumer protection laws and safety rules that would regulate its operations.<sup>14</sup>*
- *A Kuwaiti investment firm that was embroiled in a dispute about two of its former executives imprisoned on embezzlement charges.<sup>15</sup>*

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<sup>10</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client Republic Services Procurement, Inc., filed 7/18/19; <https://lda.senate.gov/filings/public/filing/dbbd7dcf-abb3-46dd-ad68-3394fd63c7e6/print/>; “How a US health agency became a shield for polluters,” Reuters, 8/7/24 (“For all the radioactive publicity, though, Republic beat back neighbors’ claims. The nuclear waste is still there, and the government hasn’t said when a cleanup will begin.”); <https://www.reuters.com/investigates/special-report/usa-pollution-atsdr-landfill/>

<sup>11</sup> “Amazon to Pay \$25 Million to Settle Children’s Privacy Charges,” NY Times, 5/31/23;

<https://www.nytimes.com/2023/05/31/technology/amazon-25-million-childrens-privacy.html>

<sup>12</sup> “DOJ probes Amazon for alleged knowledge of warehouse safety hazards,” Seattle Times, 1/31/23;

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

“They’re more concerned about profit’: Osha, DOJ take on Amazon’s grueling working conditions,” The Guardian, 3/2/23; <https://www.theguardian.com/technology/2023/mar/02/amazon-safety-citations-osha-department-of-justice>

<sup>13</sup> “Amazon referred to DOJ for potential criminal obstruction of Congress,” CNBC, 3/9/22;

<https://www.cnn.com/2022/03/09/amazon-referred-to-doj-for-potential-criminal-obstruction-of-congress.html>;

“House panel flags Amazon and senior executives to Justice Department over potentially criminal conduct,” Washington Post, 3/9/22; <https://www.washingtonpost.com/politics/2022/03/09/house-judiciary-amazon-obstruction/>

<sup>14</sup> “Uber Beefs Up Lobbying in Pre-IPO Makeover: The Influence Game,” Bloomberg News, 4/4/19;

<https://www.bloomberg.com/graphics/uber-lobbying-washington-dc-2019/>; “Uber and Lyft boost lobbying power as they threaten to pull out of California,” OpenSecrets, 8/21/20;

<https://www.opensecrets.org/news/2020/08/uber-lyft-boost-lobby-california/>; “Uber broke laws, duped police and secretly lobbied governments, leak reveals,” The Guardian, 7/11/22;

<https://www.theguardian.com/news/2022/jul/10/uber-files-leak-reveals-global-lobbying-campaign>

<sup>15</sup> “White House impeachment hire Bondi winding down foreign work,” Associated Press, 11/9/19;

<https://apnews.com/united-states-government-d533bfca6c934034be0ed745cad8c611>; “With food supply of U.S. troops at stake and executives facing prison, Kuwaiti company launches lobbying blitz,” Washington Post, 9/11/19; [https://www.washingtonpost.com/business/economy/with-us-military-funding-at-stake-and-executives-facing-prison-kuwaiti-food-company-launches-a-global-lobbying-blitz/2019/09/11/4422e70e-c903-11e9-a1fe-ca46e8d573c0\\_story.html](https://www.washingtonpost.com/business/economy/with-us-military-funding-at-stake-and-executives-facing-prison-kuwaiti-food-company-launches-a-global-lobbying-blitz/2019/09/11/4422e70e-c903-11e9-a1fe-ca46e8d573c0_story.html)

- Bondi was also registered to lobby on behalf of a foreign government. According to Foreign Agents Registration Act disclosures filed by Bondi or on her behalf, she was registered as a foreign agent for the Embassy of the State of Qatar in 2019 and 2020.<sup>16</sup>
  - The contract between Bondi’s lobbying firm, 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”<sup>17</sup> and to “provide consulting and advocacy services regarding matters involving anti-human trafficking.”<sup>18</sup>
  - The contract between Qatar and Bondi’s lobbying firm states that Bondi would be a “Key Personnel” who would be “personally and substantially engaged in the delivery of the Services.”<sup>19</sup>
  - The contract stated that, after Bondi and another individual were added, Qatar agreed to pay her lobbying firm \$115,000 per month for its services.<sup>20</sup>

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<sup>16</sup> 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 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>

<sup>17</sup> FARA Filing by Ballard Partners, filed 6/29/18; <https://efile.fara.gov/docs/6415-Exhibit-AB-20180629-14.pdf>

<sup>18</sup> FARA Filing by Ballard Partners, filed 7/23/19; <https://efile.fara.gov/docs/6415-Exhibit-AB-20190723-16.pdf>

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

## Pam Bondi's Corporate Lobbying Clients

Federal lobbying filings reveal that Pam Bondi, President-Elect Trump's Nominee to lead DOJ as Attorney General, was registered to lobby the federal government between 2019 and 2024 on behalf of 30 different clients, including large corporations, government contractors, and a foreign government.<sup>21</sup> According to federal filings, Bondi was registered to lobby the White House, Congress, and 12 federal agencies: the Departments of Energy, Health and Human Services, Homeland Security, State, Transportation, Treasury, and Veterans Affairs, the Environmental Protection Agency, the Small Business Administration, the U.S. Trade Representative, the National Economic Council, and the National Security Council.<sup>22</sup> Bondi was registered to lobby for her clients on policy, regulations, legislation, appropriations, trade practices, and litigation.<sup>23</sup>

Bondi's corporate lobbying clients include several with controversial business, including conflicts and contracts with the agency Bondi has been nominated to lead:

- **INTERNATIONAL GAME TECHNOLOGY (IGT) GLOBAL SOLUTIONS<sup>24</sup>**
  - 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.<sup>25</sup>
  - 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

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<sup>21</sup> LDA Reports filed for "Pamela Bondi," accessed November 27, 2024; <https://tinyurl.com/4bmhykxb>; 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>

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> [www.igt.com](http://www.igt.com)

<sup>25</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client IGT Global Solutions filed 7/17/19; <https://lda.senate.gov/filings/public/filing/48ca5ceb-b245-40c4-b4ea-185b51b0c0b8/print/>; "State lotteries increasingly cede control to huge firms," Associated Press, 7/14/22; <https://apnews.com/article/winter-olympics-covid-technology-sports-health-bf9e681a6cee4bd2d04ec286a1602b94>; "IGT Delivers Upgraded Lottery Solutions to North Carolina Education Lottery with 10-Year Contract Extension," IGT News Release, 10/3/24; <https://ir.igt.com/news/news-details/2024/IGT-Delivers-Upgraded-Lottery-Solutions-to-North-Carolina-Education-Lottery-with-10-Year-Contract-Extension/default.aspx>; "IGT presence returning to Las Vegas through a \$6.2B merger," The Nevada Independent, 2/29/24; <https://thenevadaindependent.com/article/igt-presence-returning-to-las-vegas-through-a-6-2b-merger>

Act<sup>26</sup> and it has had a large merger pending recently that has undergone DOJ review.<sup>27</sup>

- 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 to lobby federal offices on issues including the following:
  - Offices lobbied: White House.
  - Issues lobbied: Issues Pertaining to Lottery and the Wire Act.<sup>28</sup>

- **THE GEO GROUP, INC.**<sup>29</sup>

- 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.<sup>30</sup>
- According to news reports, DOJ and Homeland Security Inspector General audits have been critical of prison management by GEO Group

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<sup>26</sup> "Lottery operator IGT sues U.S. Justice Department over ambiguity on Wire Act," Providence Business News, 11/26/21; <https://pbn.com/lottery-operator-igt-sues-u-s-justice-department-over-for-ambiguity-on-wire-act/>; "IGT Wins Lawsuit against DOJ: 2018 Wire Act Opinion Nixed," Public Gaming Magazine, 9/25/22; <https://publicgaming.com/news-categories/legal/10183-igt-wins-lawsuit-against-doj-2018-wire-act-opinion-nixed/>; "IGT Wins Wire Act Case Against Justice Department in Rhode Island," Vixio, 9/20/22; <https://www.vixio.com/insights/gc-igt-wins-wire-act-case-against-justice-department-rhode-island/>; "All the President's Attorneys," Project on Government Oversight, 2/13/20; <https://www.pogo.org/analysis/all-the-presidents-attorneys>

<sup>27</sup> "IGT execs confident Apollo deal will win regulatory approval," Las Vegas Review-Journal, 7/30/24; <https://www.reviewjournal.com/business/casinos-gaming/igt-execs-confident-apollo-deal-will-win-regulatory-approval-3104545/>

<sup>28</sup> LDA Report filed by Ballard Partners on 7/17/19; <https://lda.senate.gov/filings/public/filing/48ca5ceb-b245-40c4-b4ea-185b51b0c0b8/print/>; LDA Report filed by Ballard Partners on 10/18/19; <https://lda.senate.gov/filings/public/filing/c7e8e67d-dc70-4988-8499-e6b9208f9d61/print/>

<sup>29</sup> <https://www.geogroup.com/>

<sup>30</sup> 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](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; <https://www.miamiherald.com/news/business/biz-monday/article227477119.html>



and other private prison companies<sup>31</sup> 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.<sup>32</sup>

- Lobbying reports filed in 2019 disclosed that, while Bondi was registered to lobby for The Geo Group, her lobbying firm was paid \$60,000 by IGT Global Solutions to lobby federal offices on issues including the following:
  - Offices lobbied: White House, Department of Homeland Security.
  - Issues lobbied: Promoting the use of public-private partnerships in correctional services.<sup>33</sup>

- **REPUBLIC SERVICES<sup>34</sup>**

- According to federal lobbying filings, Bondi was registered to lobby Congress and three federal agencies in 2019 for the waste management company Republic Services.<sup>35</sup>
- According to news reports, Republic Services has for years fought neighbors' efforts to have the federal government require the company to

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<sup>31</sup>"Private federal prisons more dangerous, damning DOJ investigation reveals," The Guardian, 8/12/16; <https://www.theguardian.com/us-news/2016/aug/12/private-federal-prisons-more-dangerous-justice-department>; "Executive Summary of The GEO Group's Response to 2016 DOJ OIG Report on Contracted Federal Prisons," The GEO Group website; <https://www.geogroup.com/GEO2016OIGResponse>; "ICE inspector general finds violations at Aurora facility," The Denver Post, 6/7/19; <https://www.denverpost.com/2019/06/06/ice-aurora-immigration-geo-group/>; "Biden vowed to close federal private prisons, but prison companies are finding loopholes to keep them open," CNN, 11/12/21; <https://www.cnn.com/2021/11/12/politics/biden-private-prisons-immigration-detention-centers-invs/index.html>

<sup>32</sup> "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-trumps-reelection-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-for-private-prisons-and-amazon/>

<sup>33</sup> LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/908e8081-b0f6-472f-a318-c6f9ca62f28c/print/>

<sup>34</sup> <https://www.republicservices.com/>

<sup>35</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client Republic Services Procurement, Inc., filed 7/18/19; <https://lda.senate.gov/filings/public/filing/dbbd7dcf-abb3-46dd-ad68-3394fd63c7e6/print/>; LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/36ab7694-c72a-4496-8ba4-58ddf37095d9/print/>

pay to remove radioactive nuclear waste from its dump in a suburb of St. Louis, Missouri.<sup>36</sup>

- Lobbying reports filed in 2019 disclosed that, while Bondi was registered to lobby for Republic Services, her firm was paid \$100,000 by Republic Services to lobby federal offices on issues including the following:
  - Offices lobbied: U.S. Senate, U.S. House of Representatives, Department of Energy, Department of Homeland Security, Environmental Protection Agency.
  - Issues lobbied: Disposition of a Superfund designated landfill, Re-siting of a landfill; recyclables pricing, disposition of a closed landfill.<sup>37</sup>

- **AMAZON<sup>38</sup>**

- According to federal lobbying filings, Bondi was registered to lobby the first Trump White House, Congress, and two federal agencies in 2020 for the e-commerce and technology company Amazon.com.<sup>39</sup>
- According to news reports, Amazon has been sued by DOJ over children's privacy violations,<sup>40</sup> been investigated by DOJ over injury rates and workplace safety at its warehouses,<sup>41</sup> been referred to DOJ by a

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<sup>36</sup> "How a US health agency became a shield for polluters," Reuters, 8/7/24 ("For all the radioactive publicity, though, Republic beat back neighbors' claims. The nuclear waste is still there, and the government hasn't said when a cleanup will begin."); <https://www.reuters.com/investigates/special-report/usa-pollution-atsdr-landfill/>; "Records reveal 75 years of government downplaying, ignoring risks of St. Louis radioactive waste," St. Louis Business Journal, 7/12/23; <https://lda.senate.gov/filings/public/filing/36ab7694-c72a-4496-8ba4-58ddf37095d9/print/>; "Two Stay-At-Home Moms Are Waging War Against the Feds Over Illegal Toxic Waste," Vice, 6/1/16; <https://www.vice.com/en/article/two-stay-at-home-moms-are-waging-war-against-the-feds-over-illegal-toxic-waste/>

<sup>37</sup> LDA Report filed by Ballard Partners on 7/18/19; <https://lda.senate.gov/filings/public/filing/dbbd7dcf-abb3-46dd-ad68-3394fd63c7e6/print/>; LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/36ab7694-c72a-4496-8ba4-58ddf37095d9/print/>

<sup>38</sup> <https://www.amazon.com/>

<sup>39</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client Amazon.com, filed 4/1/20; <https://lda.senate.gov/filings/public/filing/c0eb222d-09af-460d-afe1-44e5a54c0790/print/>; LDA Report filed by Ballard Partners on 7/20/20; <https://lda.senate.gov/filings/public/filing/c0eb222d-09af-460d-afe1-44e5a54c0790/print/>

<sup>40</sup> "Amazon to Pay \$25 Million to Settle Children's Privacy Charges," NY Times, 5/31/23;

<https://www.nytimes.com/2023/05/31/technology/amazon-25-million-childrens-privacy.html>

<sup>41</sup> "DOJ probes Amazon for alleged knowledge of warehouse safety hazards," Seattle Times, 1/31/23;

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

"'They're more concerned about profit': Osha, DOJ take on Amazon's grueling working conditions," The Guardian, 3/2/23; <https://www.theguardian.com/technology/2023/mar/02/amazon-safety-citations-osha-department-of-justice>

bipartisan group of lawmakers for potential criminal obstruction,<sup>42</sup> and had its robotaxi unit federally investigated over safety concerns.<sup>43</sup> Amazon has also received multi-billion dollar government contracts from multiple federal agencies.<sup>44</sup>

- Lobbying reports filed in 2020<sup>45</sup> disclosed that, while Bondi was registered to lobby for Amazon, her firm was paid \$140,000 to lobby federal offices on issues including the following:
  - Offices lobbied: White House, U.S. Senate, U.S. House of Representatives, National Economic Council, Department of Transportation.
  - Issues lobbied: Issues related to surface transportation, including autonomous vehicles, vehicle electrification, appropriations bills, issues involving IT modernization, issues related to trade policy.
  
- **UBER**<sup>46</sup>
  - According to federal lobbying filings, Bondi was registered to lobby the first Trump White House, Congress, and federal agencies in 2020 for the transportation company Uber Technologies, Inc. (Uber).<sup>47</sup>
  - Uber is a major federal contractor<sup>48</sup> that has lobbied the federal government extensively to win approvals for the use of its robot cars for

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<sup>42</sup> “Amazon referred to DOJ for potential criminal obstruction of Congress,” CNBC, 3/9/22; <https://www.cnbc.com/2022/03/09/amazon-referred-to-doj-for-potential-criminal-obstruction-of-congress.html>; “House panel flags Amazon and senior executives to Justice Department over potentially criminal conduct,” Washington Post, 3/9/22; <https://www.washingtonpost.com/politics/2022/03/09/house-judiciary-amazon-obstruction/>

<sup>43</sup> “Amazon’s self-driving robotaxi unit Zoox under investigation by US after 2 rear-end crashes,” Associated Press, 5/13/24; <https://apnews.com/article/amazon-autonomous-vehicle-investigation-crashes-zoox-45c53600710407bc6f82b0a855c46e12>

<sup>44</sup> “Top Government Contracts Won by Amazon Web Services,” ExecutiveGov.com, 8/11/23; <https://executivegov.com/articles/top-government-contracts-won-by-amazon-web-services/>; “For Jeff Bezos and his businesses, Washington has become more important,” Washington Post, 10/30/24; <https://www.washingtonpost.com/nation/2024/10/30/bezos-business-federal-government/>

<sup>45</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client Amazon.com, filed 4/1/20; <https://lda.senate.gov/filings/public/filing/c0eb222d-09af-460d-afe1-44e5a54c0790/print/>; LDA Report filed by Ballard Partners on 7/20/20; <https://lda.senate.gov/filings/public/filing/c0eb222d-09af-460d-afe1-44e5a54c0790/print/>

<sup>46</sup> <https://www.uber.com/us/en/about/>

<sup>47</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client Uber Technologies, Inc., filed 4/1/20; <https://lda.senate.gov/filings/public/filing/d9e5d85f-5bd8-4e59-9d60-26ecc2403272/print/>

<sup>48</sup> Federal Government Contracts for Uber Technologies, Inc., USASPENDING.GOV (accessed 12/5/24); <https://www.usaspending.gov/search/?hash=f2bf89cb2e8532ee6c8cc4236736579c>; “U.S. federal government awards transportation contract to Uber, Lyft,” Reuters, 11/23/20;

commercial purposes, ensure its drivers are regulated as independent contractors rather than employees, and shape consumer protection laws and safety rules that would regulate its operations.<sup>49</sup>

- Lobbying reports filed in 2020<sup>50</sup> disclosed that Bondi’s firm was paid \$120,000 that year by Uber to lobby federal offices on issues including the following:
  - Offices lobbied: White House, U.S. Senate, U.S. House of Representatives, Department of Transportation, Department of the Interior, Department of Veterans Affairs, Department of the Treasury, Small Business Administration.
  - Issues lobbied: Issues related to sharing economy, surface transportation measures, foreign regulation of data management, regulatory relief and legislative measures for COVID-19.
  
- **KGL INVESTMENT COMPANY KSCC**<sup>51</sup>
  - According to federal lobbying filings, Bondi was registered to lobby the first Trump White House, Congress, and federal agencies in 2019 for the KGL Investment Company KSCC (KGLI), a Kuwaiti investment firm.<sup>52</sup>
  - According to news reports, KGLI has been embroiled in a dispute about two of its former executives in Kuwait on embezzlement charges and Bondi’s lobbying firm contacted U.S. administration and congressional

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<https://www.reuters.com/article/technology/us-federal-government-awards-transportation-contract-to-uber-lyft-idUSKBN2831VD/>

<sup>49</sup> “Uber Beefs Up Lobbying in Pre-IPO Makeover: The Influence Game,” Bloomberg News, 4/4/19; <https://www.bloomberg.com/graphics/uber-lobbying-washington-dc-2019/>; “Uber and Lyft boost lobbying power as they threaten to pull out of California,” OpenSecrets, 8/21/20; <https://www.opensecrets.org/news/2020/08/uber-lyft-boost-lobby-california/>; “Uber broke laws, duped police and secretly lobbied governments, leak reveals,” The Guardian, 7/11/22; <https://www.theguardian.com/news/2022/jul/10/uber-files-leak-reveals-global-lobbying-campaign>

<sup>50</sup> LDA Report filed by Ballard Partners on 4/1/20; <https://lda.senate.gov/filings/public/filing/d9e5d85f-5bd8-4e59-9d60-26ecc2403272/print/>; LDA Report filed by Ballard Partners on 7/20/20; <https://lda.senate.gov/filings/public/filing/4e5a6954-6ac3-4ad7-8e07-0f4c92b704c6/print/>; LDA Report filed by Ballard Partners on 10/20/20; <https://lda.senate.gov/filings/public/filing/64e108b1-bcf1-4bf4-992a-f9b5bfbdfcb7/print/>; LDA Report filed by Ballard Partners on 1/7/21; <https://lda.senate.gov/filings/public/filing/e0ca1cc2-d8d6-41e0-825a-9a98d4a62e5d/print/>

<sup>51</sup> “KGL Investment adds another lobbying firm,” Politico, 11/20/19; <https://www.politico.com/newsletters/politico-influence/2019/11/20/kgl-investment-adds-another-lobbying-firm-782790>; Internet Archive Wayback Machine, [www.kglinvest.com](http://www.kglinvest.com) (10/26/22); <http://web.archive.org/web/20221026165208/http://www.kglinvest.com/> (accessed 12/5/24)

<sup>52</sup> LDA Report for Ballard Partners, listing Pam Bondi as a lobbyist for client KGL Investment Company KSCC, filed 7/18/19; <https://lda.senate.gov/filings/public/filing/335a8be7-be37-4ed1-8deb-9ba37fd85769/print/>; “What to know about Pam Bondi, Trump’s new pick for attorney general,” Associated Press, 11/25/24; <https://apnews.com/article/things-to-know-pam-bondi-ec1d16075c7debda62223b475e3977d>

officials on KGLI's behalf about using Magnitsky Act sanctions against Kuwaiti officials.<sup>53</sup>

- Lobbying reports filed in 2019<sup>54</sup> disclosed that, while Bondi was registered to lobby for KGLI, her firm was paid \$300,000 by KGLI to lobby federal offices on issues including the following:
  - Offices lobbied: White House, U.S. Senate, U.S. House of Representatives, Department of State, National Security Council.
  - Issues lobbied: Immigration Policy and Process, Human Rights Abuses, Issues Related to Potential Global Magnitsky Act Violations and Imprisonment.

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<sup>53</sup> "White House impeachment hire Bondi winding down foreign work," Associated Press, 11/9/19; <https://apnews.com/united-states-government-d533bfca6c934034be0ed745cad8c611>; "With food supply of U.S. troops at stake and executives facing prison, Kuwaiti company launches lobbying blitz," Washington Post, 9/11/19; [https://www.washingtonpost.com/business/economy/with-us-military-funding-at-stake-and-executives-facing-prison-kuwaiti-food-company-launches-a-global-lobbying-blitz/2019/09/11/4422e70e-c903-11e9-a1fe-ca46e8d573c0\\_story.html](https://www.washingtonpost.com/business/economy/with-us-military-funding-at-stake-and-executives-facing-prison-kuwaiti-food-company-launches-a-global-lobbying-blitz/2019/09/11/4422e70e-c903-11e9-a1fe-ca46e8d573c0_story.html)

<sup>54</sup> LDA Report filed by Ballard Partners on 7/18/19; <https://lda.senate.gov/filings/public/filing/0a120287-673e-4bd2-a407-4376b4e81acb/print/>; LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/dfcc04fa-2595-427e-8378-c2d29200ab7a/print/>

## Pam Bondi's Federal Lobbying Clients, 2019-2024

| <i>Client Name</i>  | <i>Bondi's Lobbying Firm</i> | <i>Filing Year(s)</i> | <i>LDA Reports Source</i>  |
|---|------------------------------|-----------------------|--|
| ALDEN TORCH FINANCIAL, LLC  | Ballard Partners, LLC        | 2021-23               | <a href="https://tinyurl.com/6j2jp6eb">https://tinyurl.com/6j2jp6eb</a>  |
| AMAZON.COM  | Ballard Partners, LLC        | 2020-21               | <a href="https://tinyurl.com/36e4chkr">https://tinyurl.com/36e4chkr</a>  |
| AMERICAN KITCHEN CABINET ALLIANCE                                       | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/3mmz86t6">https://tinyurl.com/3mmz86t6</a>  |
| AMERICAN ROAD & TRANSPORTATION BUILDERS ASSOCIATION                     | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/yzfdv9n9">https://tinyurl.com/yzfdv9n9</a>  |
| ANDERSON KILL P.C. (FOR CERTAIN PLAINTIFFS IN "9/11" LITIGATION)        | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/ycxv5ck5">https://tinyurl.com/ycxv5ck5</a>  |
| BALSAM BRANDS, INC.   | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/2kbjwyc4">https://tinyurl.com/2kbjwyc4</a>  |
| BANKERS FINANCIAL CORPORATION   | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/bdeaeefd">https://tinyurl.com/bdeaeefd</a>  |
| CARNIVAL NORTH AMERICA LLC  | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/263xdnjw">https://tinyurl.com/263xdnjw</a>  |
| CHILDREN'S HOSPITAL ASSOCIATION   | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/k5ca3rmz">https://tinyurl.com/k5ca3rmz</a>  |
| DETROIT INTERNATIONAL BRIDGE COMPANY, INC.                              | Ballard Partners, LLC        | 2021                  | <a href="https://tinyurl.com/4pw944wf">https://tinyurl.com/4pw944wf</a>  |
| EMBASSY OF THE STATE OF QATAR   | Ballard Partners, LLC        | 2019, 2020            | <a href="https://tinyurl.com/yumxd954">https://tinyurl.com/yumxd954</a> ;<br><a href="https://tinyurl.com/mr2a8zcc">https://tinyurl.com/mr2a8zcc</a> |
| FIDELITY NATIONAL FINANCIAL, INC.                                       | Ballard Partners, LLC        | 2020                  | <a href="https://tinyurl.com/4hxyjfc">https://tinyurl.com/4hxyjfc</a>  |
| FLORIDA SHERIFFS ASSOCIATION  | Ballard Partners, LLC        | 2021-24               | <a href="https://tinyurl.com/4eb5f3ba">https://tinyurl.com/4eb5f3ba</a>  |
| FLORIDA SHERIFFS RISK MANAGEMENT FUND                                   | Ballard Partners, LLC        | 2021-24               | <a href="https://tinyurl.com/mrxjkm4u">https://tinyurl.com/mrxjkm4u</a>  |
| GENERAL MOTORS LLC  | Ballard Partners, LLC        | 2019-21               | <a href="https://tinyurl.com/yc25hbbx">https://tinyurl.com/yc25hbbx</a>  |
| IGT GLOBAL SOLUTIONS  | Ballard Partners, LLC        | 2019-20               | <a href="https://tinyurl.com/d7xhcwef">https://tinyurl.com/d7xhcwef</a>  |
| KGL INVESTMENT COMPANY KSCC   | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/29s4s734">https://tinyurl.com/29s4s734</a>  |
| KREINDLER & KREINDLER LLP (FOR CERTAIN PLAINTIFFS IN "9/11" LITIGATION) | Ballard Partners, LLC        | 2019                  | <a href="https://tinyurl.com/yc5djvb9">https://tinyurl.com/yc5djvb9</a>  |

|   |                       |         |   |
|---|-----------------------|---------|---|
| LATHROP GAGE LLP  | Ballard Partners, LLC | 2019    | <a href="https://tinyurl.com/dc7xyywb">https://tinyurl.com/dc7xyywb</a> |
| LENDER'S CONSULTING GROUP, LLC                                    | Ballard Partners, LLC | 2020    | <a href="https://tinyurl.com/y2yecbmb">https://tinyurl.com/y2yecbmb</a> |
| MAJOR COUNTY SHERIFFS OF AMERICA, INC.                            | Ballard Partners, LLC | 2024    | <a href="https://tinyurl.com/yv7cxxbr">https://tinyurl.com/yv7cxxbr</a> |
| MAJOR LEAGUE BASEBALL   | Ballard Partners, LLC | 2019    | <a href="https://tinyurl.com/3ctn2mty">https://tinyurl.com/3ctn2mty</a> |
| NES HEALTH  | Ballard Partners, LLC | 2020    | <a href="https://tinyurl.com/2dv89e84">https://tinyurl.com/2dv89e84</a> |
| PULASKI LAW FIRM, PLLC (ON BEHALF OF BUSINESS INTERRUPTION GROUP) | Ballard Partners, LLC | 2021-22 | <a href="https://tinyurl.com/yed34t9t">https://tinyurl.com/yed34t9t</a> |
| PULTE CAPITAL PARTNERS, LLC                                       | Ballard Partners, LLC | 2021-23 | <a href="https://tinyurl.com/2wd6rrs5">https://tinyurl.com/2wd6rrs5</a> |
| REPUBLIC SERVICES PROCUREMENT, INC.                               | Ballard Partners, LLC | 2019    | <a href="https://tinyurl.com/ysxr8hsb">https://tinyurl.com/ysxr8hsb</a> |
| THE GEO GROUP, INC  | Ballard Partners, LLC | 2019    | <a href="https://tinyurl.com/mv6c2dhp">https://tinyurl.com/mv6c2dhp</a> |
| U.S. INSTITUTE AGAINST HUMAN TRAFFICKING                          | Ballard Partners, LLC | 2019    | <a href="https://tinyurl.com/2yphb282">https://tinyurl.com/2yphb282</a> |
| UBER TECHNOLOGIES, INC.   | Ballard Partners, LLC | 2020    | <a href="https://tinyurl.com/33w5zupt">https://tinyurl.com/33w5zupt</a> |
| VARIAN MEDICAL SYSTEMS  | Ballard Partners, LLC | 2020-21 | <a href="https://tinyurl.com/fkybz9uj">https://tinyurl.com/fkybz9uj</a> |

## Recommendations

Senators should not confirm a person with this record of controversial business and foreign government lobbying representation as Attorney General of the United States.

Assuming, however, that Bondi's nomination as Attorney General will proceed, before her Senate confirmation hearing, Senators should ask Bondi at a bare minimum to:

- 1) Disclose the full list of what exactly she did for each client she lobbied the federal government for: the names of the individuals she lobbied, what she asked those individuals to do or not to do, and what resulted from her lobbying.
- 2) Recuse herself from all decision-making involving her past lobbying clients and the federal agencies that are making decisions that affect her lobbying clients.
- 3) Accept a Voluntary Permanent Post-Employment Ban on Lobbying the DOJ or Federal Government on behalf of these or other clients after she leaves the DOJ.