

# Trump Attorney General Pick Pam Bondi's Corporate Lobbying Clients Pose Wide Variety Of Conflicts With Her Potential Role Leading The U.S. Department Of Justice

**SUMMARY:** President-elect Trump has <u>picked</u> former Florida Attorney General Pam Bondi (R-FL) as his next nominee to be U.S. Attorney General, after former Rep. Matt Gaetz (R-FL) withdrew from consideration amid allegations of sexual misconduct. Bondi, an early and "<u>outspoken defender of Trump</u>," is poised to politicize the U.S. Department of Justice (DOJ) and <u>reverse</u> the Biden administration's "<u>aggressive</u>" enforcement of antitrust laws designed to protect consumers and small businesses.

Since January 2019, Bondi has been <u>chair</u> of the Corporate Regulatory Compliance practice of "<u>powerful</u>" lobbying firm Ballard Partners, which touts <u>Fortune 500 clients</u>, including major corporations such as Amazon, Google, Blackstone, General Motors, and Boeing. In this role, Bondi helps clients "<u>address their critical regulatory challenges</u>" as well as designing supposedly "<u>publicly conscious</u>" public relations efforts for them.

Accountable.US research has found that at least five of Bondi's major lobbying clients have faced DOJ fines, investigations, or related scrutiny that could pose serious conflicts if she is confirmed as Attorney General:

• **General Motors:** Pam Bondi has directly <u>lobbied</u> for General Motors and Ballard Partners "<u>proudly</u>" represents the corporation. From as early as <u>Q1 2020</u> to as recently as <u>Q3 2021</u>, Bondi lobbied on labor, among other issues, on behalf of GM. In <u>July 2020</u>, DOJ's Civil Rights Division, Immigrant and Employee Rights Section (IER) notified GM that it was investigating the company for hiring discrimination under the Immigration and Nationality Act. By April 2023, DOJ reached a <u>settlement</u> with GM resolving allegations that, until at least September 2021, GM imposed a "discriminatory barrier" against lawful permanent residents in its hiring processes.

Additionally, in November 2024, DOJ imposed a \$500,000 criminal fine on GM's self-driving car unit Cruise and a three-year compliance agreement after Cruise submitted "a false report to influence a federal investigation" into a Cruise robotaxi hitting a pedestrian.

• The GEO Group: Pam Bondi has directly lobbied for the GEO Group, the "nation's largest private prison company" which gave \$1 million to a pro-Trump Super PAC in 2024 and expected to rake in \$400 million a year from Trump's mass deportation plans. In 2021, GEO Group directly criticized President Biden's executive order directing DOJ to not renew contracts with private prisons.

In Q3 2019 and Q4 2019, Bondi lobbied the Trump White House on "promoting the use of public-private partnerships in correctional services." That same year, GEO's full-year net income leaped by \$21.5 million to \$166.6 million as it touted new federal contracts under the Trump administration, which doubled private prison spending in 2019 after moving to roll back Obama DOJ efforts to phase out private prisons.

• **Uber:** Pam Bondi has directly <u>lobbied</u> for Uber, which in 2022 faced a <u>multi-million dollar DOJ</u> <u>settlement</u> affecting over 65,000 consumers alleging Uber violated the Americans with Disabilities Act (ADA) by failing to accommodate disabled users in its wait time fee policy. In 2024, Uber was reportedly under <u>DOJ investigation</u> for potentially new ADA violations against blind riders.

In Q1 2020, Q2 2020, Q3 2020, Q4 2020—largely while alleged ADA violations from the 2022 settlement were occurring—Bondi broadly lobbied Congress, the White House, and the U.S. Department of Transportation on "issues related to sharing economy" and other issues. Due to the vagueness of these disclosures, it is not known what specific aspects of the sharing economy Bondi addressed while influencing policymakers.

- Amazon: Pam Bondi has directly <u>lobbied</u> on behalf of Amazon and Ballard Partners "<u>proudly</u>" counts
  the corporation among its clients. In July 2023, DOJ imposed a <u>\$25 million civil penalty</u> on Amazon
  over allegations its Alexa service illegally retained recordings of children's voices.
- Major League Baseball: Pam Bondi has directly <u>lobbied</u> for Major League Baseball (MLB). The DOJ has <u>repeatedly asked</u> federal courts to rein in MLB's "<u>longtime immunity from antitrust law</u>," including weighing in on a 2023 case from minor league teams claiming MLB "<u>abused its power</u>" in restricting the number of minor teams.

Additionally, while Bondi has chaired Ballard Partners' Corporate Regulatory Compliance practice, the firm's big-name clients have faced major DOJ lawsuits and investigations:

- **Google:** Ballard Partners "<u>proudly</u>" represents Google, which is facing a "<u>landmark</u>" antitrust case from DOJ and multiple states. A separate DOJ lawsuit is alleging the corporation "<u>acquired rivals</u> through anticompetitive mergers" and "<u>bullied</u>" companies into using its ad technology.
- Boeing: Ballard Partners represents Boeing, which in July 2024 reached a guilty plea agreement with the DOJ for seeking to "defraud" the Federal Aviation Administration (FAA) in the approval of its 737 Max planes—the plea agreement included a fine of least \$243.6 million, \$455 million in required compliance improvements, and three years of probation.
- Blackstone: Ballard Partners <u>represents</u> Blackstone, the "<u>world's largest alternative asset manager</u>" with over \$1 trillion in assets under management. In 2022, Blackstone and other private equity firms faced a <u>DOJ investigation</u> for violating antitrust laws by placing executives on boards of competing companies.

Trump's Attorney General Pick, Former Florida Attorney General Pam Bondi (R-FL), Was An Early And "Outspoken Defender Of Trump" And Is Expected To Politicize The U.S. Department Of Justice (DOJ) And Reverse The Biden Administration's "Aggressive" Enforcement Of Antitrust Laws.

<u>Trump's Attorney General Pick Pam Bondi (R-FL), Former Florida Attorney General, Lobbyist, And An Early And "Outspoken Defender Of Trump," Is Poised To Carry Out Trump's "Retribution Against Perceived Adversaries" And Politicization Of The U.S. Department Of Justice (DOJ).</u>

November 22, 2024: President-Elect Trump Picked Former Florida Attorney General Pam Bondi To Be Attorney General, After Former Rep. Matt Gaetz (R-FL) Withdrew From Consideration Due Amid "Sex Trafficking Allegations." "President-elect Donald Trump said Thursday he will nominate former Florida Attorney General Pam Bondi to lead the Justice Department, turning to a longtime ally after his first choice, Matt Gaetz, withdrew his name from consideration amid scrutiny over sex trafficking allegations." [Associated Press, 11/22/24]

Bondi, Who Was Florida's Attorney General From 2011 To 2019, Is Currently Chair Of Corporate Regulatory Compliance With Ballard Partners, A Lobbying Firm. "Pam Bondi, elected twice to serve as Florida's Attorney General from 2011 – 2019, chairs the firm's Corporate Regulatory Compliance practice. This national practice area focuses on serving Fortune 500 companies to implement best practices that proactively address public policy challenges such as human trafficking, opioid abuse and personal data privacy. As chair of the Corporate Regulatory Compliance practice, Pam works with clients to design and implement publicly conscious initiatives that will elevate their corporate responsibility reputation as well as address their critical regulatory challenges." [Ballard Partners, accessed 11/25/24]

Ballard Partners Is "A Lobbying Firm Offering Comprehensive Services For Clients." "Ballard
Partners is a lobbying firm offering comprehensive services for clients, from legislative advocacy to
relationship management. We combine our extensive experience in government and politics with our
dedication to advocacy to meet clients' needs." [Ballard Partners, accessed 11/25/24]

Bondi's Actions As Attorney General Are Expected To Be Scrutinized, Due To Trump's "Threat To Pursue Retribution Against Perceived Adversaries And Concern Among Democrats That He Will Look To Bend The Justice Department To His Will." "If confirmed by the Republican-led Senate, Bondi would instantly become one of the most closely watched members of Trump's Cabinet given the Republican's threat to pursue retribution against perceived adversaries and concern among Democrats that he will look to bend the Justice Department to his will." [Associated Press, 11/23/24]

Bondi, "An Outspoken Defender Of Trump," Represented Trump During His First Impeachment Trial Over Pressuring Ukraine To Investigate Then-Former Vice President Joe Biden. "Bondi has been an outspoken defender of Trump. She was one of his lawyers during his first impeachment trial, when he was accused — but not convicted — of abusing his power as he tried to condition U.S. military assistance to Ukraine on that country investigating then-former Vice President Joe Biden." [Associated Press, 11/22/24]

Bondi "Supported Mr. Trump's Fabricated Claims Of Election Fraud" In 2020, Even Claiming That Then-Vice President Biden Was Benefiting From "Fake Ballots." "She supported Trump's false election claims. After Mr. Biden won the 2020 presidential election, Ms. Bondi supported Mr. Trump's fabricated claims of election fraud. In November 2020, Ms. Bondi deflected when a Fox News host asked her to back up her assertion that "fake ballots" for Mr. Biden were pouring into tabulation centers." [The New York Times, 11/21/24]

Bondi Was "Among A Group Of Republicans Who Showed Up To Support Trump At His New York Hush Money Criminal Trial," Which Resulted In A Conviction On 34 Felony Counts. "And she was among a group of Republicans who showed up to support Trump at his New York hush money criminal trial that ended in May with a conviction on 34 felony counts." [Associated Press, 11/22/24]

Bondi Is A "Longtime And Early Ally" Of Trump's Endorsing Him As Early As March 2016, Over Sen. Marco Rubio (R-FL), Then A Republican Primary Candidate From Her Own State. "Bondi has been a longtime and early ally. In March 2016, on the eve of the Republican primary in Florida, Bondi endorsed Trump at a rally, picking him over the candidate from her own state, Florida Sen. Marco Rubio." [Associated Press, 11/23/24]

While Attorney General In 2013, Bondi Declined To File A Fraud Lawsuit Against Trump University After She "Personally Solicited" A \$25,000 Political Contribution From Trump—Trump Ultimately Paid \$25 Million To Settle Three Lawsuits Alleging His University "Defrauded Its Students."

While Florida Attorney General In 2013, Bondi "Personally Solicited" A Political Contribution From Trump While Office Was Weighing A Fraud Lawsuit Against Trump University—Bondi Then Backed Away From Suing Trump After He Gave Her A \$25,000 Contribution. "Bondi personally solicited a 2013

political contribution from Trump as her office was weighing whether to join New York in suing over fraud allegations involving Trump University. Trump cut a \$25,000 check to a political committee supporting Bondi from his family's charitable foundation, in violation of legal prohibitions against charities supporting partisan political activities. After the check came in, Bondi's office nixed suing Trump's company for fraud, citing insufficient grounds to proceed." [Associated Press, 11/23/24]

Trump And Bondi Denied Wrongdoing And A Prosecutor Assigned By Then-Gov. Rick Scott (R-FL) Claimed There Was "Insufficient Evidence To Support Bribery Charges Over The Donation." "Both Trump and Bondi denied wrongdoing, the state's ethics commission tossed the complaints and a prosecutor assigned by then-GOP Gov. Rick Scott determined there was insufficient evidence to support bribery charges over the donation." [Associated Press, 11/23/24]

Days Before Being Sworn In, Trump "Paid \$25 Million To Settle Three Lawsuits Alleging Trump University Defrauded Its Students." "Two days before being sworn in as president in January 2017, Trump paid \$25 million to settle three lawsuits alleging Trump University defrauded its students. Trump also paid a \$2,500 fine to the IRS over the illegal political donation to support Bondi from the Donald J. Trump Foundation, which he was forced to dissolve amid an investigation by the state of New York." [Associated Press, 11/23/24]

If Confirmed, Bondi Will Oversee A "Sprawling" DOJ And Could Reverse The Biden Administration's "Aggressive" Enforcement Of Antitrust Laws, Which "Apply To Virtually All Industries" And "To Every Aspect Of Business."

**If Confirmed, Bondi Would "Oversee A Sprawling Department Of Justice," And Could Change Policy On Antitrust Enforcement.** "Bondi, if confirmed, would oversee a sprawling Department of Justice responsible for federal criminal prosecution and a wide array of law enforcement. In the role, she could advocate for certain funding priorities, implement internal changes, and shift policy on topics like immigration, voting rights and antitrust enforcement." [Roll Call, 11/21/24]

The Mission Of The DOJ's Antitrust Division Is "To Promote Competition By Enforcing The Antitrust Laws To Protect Economic Freedom"—Federal Antitrust Laws "Apply To Virtually All Industries, Including Technology And Healthcare, And To Every Aspect Of Business." "The mission of the Antitrust Division is to promote competition by enforcing the antitrust laws to protect economic freedom and opportunity on behalf of the American people. As the Supreme Court explained in Northern Pacific Railway v. United States, antitrust enforcement 'provide[s] an environment conducive to the preservation of our democratic political and social institutions.' [...] Federal antitrust laws apply to virtually all industries, including technology and healthcare, and to every aspect of business, including manufacturing, transportation, distribution, labor, and marketing." [U.S. Department of Justice, accessed 11/25/24]

The DOJ's Antitrust Division Enforces Federal Antitrust Laws Alongside The Federal Trade
 Commission (FTC). "Both the FTC and the U.S. Department of Justice (DOJ) Antitrust Division enforce
 the federal antitrust laws. In some respects their authorities overlap, but in practice the two agencies
 complement each other." [Federal Trade Commission, accessed 11/25/24]

The Biden Administration's Efforts To Reshape Competition Law Through "Aggressive" Enforcement Will Likely Be "Thwarted" By The Incoming Trump Administration. "Donald Trump's return to the White House likely portends a rollback of some of the Biden administration's competition initiatives and an end to an M&A enforcement regime centered on deterrence. While it's uncommon for antitrust agencies to drop cases brought by the previous administration, there was little gulf between the parties on competition policy in prior decades. As Biden's antitrust leaders sought to revive aggressive enforcement, a sharper divide emerged. An overhaul of federal merger guidelines and the Federal Trade Commission's push to ban worker noncompete contracts are now in doubt." [Bloomberg Law, 11/06/24]

 Headline: Biden's Bid to Reshape Competition Law Thwarted by Trump Win [Bloomberg Law, 11/06/24]

Since January 2019, Bondi Has Helped Clients Address "Critical Regulatory Challenges" As Chair Of The Corporate Regulatory Compliance Practice Of "Powerful" Lobbying Firm Ballard Partners, Which Touts Fortune 500 Clients, Including Major Corporations Amazon, Google, Blackstone, General Motors, And Boeing.

Bondi Is Currently Chair Of Corporate Regulatory Compliance With Ballard Partners, A "Powerful" Lobbying Firm Which Touts Over 500 Clients, Including Fortune 500 Companies, Including Amazon, Google, Blackstone, General Motors, Sprint, And Boeing.

Bondi, Who Was Florida's Attorney General From 2011 To 2019, Has Been Chair Of Corporate Regulatory Compliance For Lobbying Firm Ballard Partners Since January 2019. "Pam Bondi, elected twice to serve as Florida's Attorney General from 2011 – 2019, chairs the firm's Corporate Regulatory Compliance practice. This national practice area focuses on serving Fortune 500 companies to implement best practices that proactively address public policy challenges such as human trafficking, opioid abuse and personal data privacy. As chair of the Corporate Regulatory Compliance practice, Pam works with clients to design and implement publicly conscious initiatives that will elevate their corporate responsibility reputation as well as address their critical regulatory challenges." [Ballard Partners, accessed 11/25/24]

- Ballard Partners Is "A Lobbying Firm Offering Comprehensive Services For Clients." "Ballard
  Partners is a lobbying firm offering comprehensive services for clients, from legislative advocacy to
  relationship management. We combine our extensive experience in government and politics with our
  dedication to advocacy to meet clients' needs." [Ballard Partners, accessed 11/25/24]
- Bondi Is A Partner At Ballard Partners:



[Ballard Partners, accessed 11/25/24]

 January 2019: Bondi Joined Ballard Partners As Chair Of Its Corporate Regulatory Compliance Practice. [Ballard Partners via Politico, <u>01/22/19</u>]

As Chair Of Ballard Partners' Corporate Regulatory Compliance Practice, Bondi "Works With Clients To Design And Implement Publicly Conscious Initiatives That Will Elevate Their Corporate Responsibility Reputation As Well As Address Their Critical Regulatory Challenges." "As chair of the Corporate Regulatory Compliance practice, Pam works with clients to design and implement publicly conscious initiatives that will elevate their corporate responsibility reputation as well as address their critical regulatory challenges." [Ballard Partners, accessed 11/25/24]

Ballard Partners Is "The Powerful Florida-Based Firm Where Trump's Campaign Chief And Incoming Chief Of Staff Susie Wiles Was A Partner." "Bondi worked as a lobbyist for Ballard Partners, the powerful

Florida-based firm where Trump's campaign chief and incoming chief of staff Susie Wiles was a partner." [Associated Press, 11/23/24]

Ballard Partners Has "More Than 500 Clients Across Industries," Including Fortune 500 Companies. "Our team represents more than 500 clients across industries, from top global innovators and disruptive technologies to major league sports dynasties and Fortune 500 companies. Meet a few of our clients below." [Ballard Partners, accessed 11/25/24]

Ballard Partners' Clients Include Amazon, Google, Blackstone, 3M, Bayer, General Motors, Sprint, **Boeing, And Walgreens:** 





































[Ballard Partners, accessed 11/25/24]

With Ballard Partners, Bondi Has Directly Lobbied For At Least Five Corporations Or Entities That Have Faced DOJ Fines, Investigations, Or Scrutiny, Including Google (\$25 Million DOJ Penalty), Uber (Multi-Million Dollar Disability Settlement With DOJ), And GEO Group (Publicly Opposed To Biden DOJ Moving To End Private Prison Contracts).

Pam Bondi Has Directly Lobbied For General Motors And Ballard Partners "Proudly" Represents The Corporation—In November 2024, DOJ Imposed A \$500,000 Criminal Fine On GM's Self-Driving Car Unit Cruise And A Three-Year Compliance Agreement After Cruise Submitted "A False Report To Influence A Federal Investigation" Into A Cruise Robotaxi Hitting A Pedestrian.

Pam Bondi Has Directly Lobbied For General Motors, Appearing In Ballard Partners Disclosures Reporting \$850,000 In Lobbying:

Registrant Name	Client Name	Report Type	Filing Year	Amount Reported
Ballard Partners	General Motors LLC	4th Quarter - Termination	2021	\$10,000.00
Ballard Partners	General Motors LLC	2nd Quarter - Report	2021	\$20,000.00

Ballard Partners	General Motors LLC	3rd Quarter - Report	2021	\$20,000.00
Ballard Partners	General Motors LLC	1st Quarter - Report	2021	\$10,000.00
Ballard Partners	General Motors LLC	1st Quarter - Report	2020	\$100,000.00
Ballard Partners	General Motors LLC	2nd Quarter - Report	2020	\$90,000.00
Ballard Partners	General Motors LLC	3rd Quarter - Report	2020	\$90,000.00
Ballard Partners	General Motors LLC	4th Quarter - Report	2020	\$120,000.00
Ballard Partners	General Motors LLC	2nd Quarter - Report	2019	\$100,000.00
Ballard Partners	General Motors LLC	1st Quarter - Report	2019	\$60,000.00
Ballard Partners	General Motors LLC	4th Quarter - Report	2019	\$120,000.00
Ballard Partners	General Motors LLC	3rd Quarter - Report	2019	\$120,000.00
Ballard Partners	General Motors LLC	Registration	2019	
			Total:	\$850,000.00

[U.S. Senate Lobbying Disclosure Database, accessed 11/25/24]

### **Ballard Partners "Proudly" Counts General Motors Among Its Clients:**

## Proudly Representing Leading Organizations

[...]



[Ballard Partners, accessed 11/25/24]

November 2024: DOJ Imposed A \$500,000 Criminal Fine On Cruise, General Motors' Self-Driving Car Unit, After It Admitted To "Submitting A False Report To Influence A Federal Investigation" Into A Crash In Which A Cruise Robotaxi Struck A Pedestrian. "General Motors' self-driving car unit, Cruise, admitted on Thursday to submitting a false report to influence a federal investigation and will pay a \$500,000 criminal fine as part of a deferred prosecution agreement, the Justice Department said. The department said Cruise failed to disclose key details of an October 2023 crash to the National Highway Traffic Safety Administration (NHTSA) in which one of its robotaxis in San Francisco struck a pedestrian after she was hit by another vehicle and dragged her 20 feet (6.1 meters)." [Reuters, 11/14/24]

Under A Three Year Agreement With The DOJ, Cruise "Must Cooperate With Government Investigations, Implement A Safety Compliance Program, And Provide Annual Reports To The U.S. Attorney's Office." "Under the three-year agreement, Cruise must cooperate with government investigations, implement a safety compliance program, and provide annual reports to the U.S. Attorney's Office, which can proceed with prosecution of the charged offense if Cruise fails to comply over the next three years." [Reuters, 11/14/24]

The DOJ Said Cruise "Failed To Disclose Key Details" Of The October 2023 Crash. "The department said Cruise failed to disclose key details of an October 2023 crash to the National Highway Traffic Safety Administration (NHTSA) in which one of its robotaxis in San Francisco struck a pedestrian after she was hit by another vehicle and dragged her 20 feet (6.1 meters)." [Reuters, 11/14/24]

Cruise's CEO And Co-Founder Both Resigned And The Company Fired Nine Executives Following The Accident And Related Investigations. "In response to the accident and subsequent investigations, Cruise's CEO and co-founder both resigned, the company cut a quarter of its workforce and fired nine executives, including its chief operating officer and chief legal and policy officer." [Reuters, 11/14/24]

September 2024: Cruise Agreed To A \$1.5 Million Fine To Resolve National Highway Traffic Safety Administration Investigation And Agreed To Enhanced Reporting Requirements For Two Years. "In September, Cruise agreed to pay a \$1.5 million fine to resolve a NHTSA investigation. Cruise must submit to NHTSA a corrective action plan on how it will improve its compliance with reporting of serious incidents and face enhanced reporting requirements for at least two years." [Reuters, 11/14/24]

Cruise Was Also Undergoing A Securities And Exchange Commission Investigation As Of November 2024. "The company also faces a Securities and Exchange Commission investigation." [Reuters, 11/14/24]

Pam Bondi Has Directly Lobbied For The GEO Group, The "Nation's Largest Private Prison Company" Which Gave \$1 Million To A Pro-Trump Super PAC In 2024 And Expected To Rake In \$400 Million A Year From Trump's Mass Deportation Plans—GEO Group Directly Criticized President Biden's Executive Order Directing DOJ Not To Renew Contracts With Private Prisons.

Pam Bondi Has Directly Lobbied For The GEO Group Inc. Appearing In Ballard Partners Disclosures Reporting \$120,000 In Lobbying:

Registrant Name	Client Name	Report Type	Filing Year	Amount Reported
Ballard Partners	The GEO Group, Inc	3rd Quarter - Report	2019	\$60,000.00
Ballard Partners	The GEO Group, Inc 4th Quarter -		2019	\$60,000.00
			Total:	\$120,000.00

[U.S. Senate Lobbying Disclosure Database, accessed 11/25/24]

GEO Group, "The Nation's Largest Private Prison Company," Gave \$1 Million To A Pro-Trump Super PAC In 2024, While The Private Prison Industry Was "A Surge In Business Driven By Trump's Plan To Deport Millions Of Undocumented Immigrants." "In the months leading up to Election Day, the nation's largest private prison company poured a million dollars into a super PAC supporting former President Donald Trump. The donations from Geo Group were far from the largest corporate contribution to Trump's war chest —but few industries are set to benefit from the incoming Trump administration as significantly as private prisons, which are expecting a surge in business driven by Trump's plan to deport millions of undocumented immigrants." [ABC News, 11/20/24]

GEO Group Subsidiary GEO Acquisition II Gave \$1 Million To Pro-Trump Super PAC Make America Great Inc. In 2024 Alone. "Both Zoley and Evans both made contributions directly to Trump's Save America Joint Fundraising Committee, though their \$11,600 contributions are a fraction of the million dollars that Geo Acquisition II Inc. -- a subsidiary of the private prison company -- contributed to the Make America Great Again Inc. over the last year. Geo Acquisition II contributed \$500,000 in February before contributing \$250,000 in August and again in September, according to Federal Election Commission records." [ABC News, 11/20/24]

In An Earnings Call, GEO Group CEO Brian Evans Projected That His Company Could Make As Much As \$400 Million A Year By Meeting "'Future Needs For ICE And The Federal Government." "During a recent corporate earnings call, Geo Group CEO Brian Evans estimated that his company could make as much as \$400 million annually by filling empty or underutilized beds at existing detention facilities to support what he

called the 'future needs for ICE and the federal government,' referring to the U.S. Immigration and Customs Enforcement agency." [ABC News, <u>11/20/24</u>]

January 2021: President Biden Issued An Executive Order Directing The U.S. Attorney General "Not To Renew Justice Department Contracts With Privately Operated Criminal Detention Facilities." "On the campaign trail, Joe Biden vowed to end the federal government's use of private prisons, declaring that 'the federal government should not use private facilities for any detention, including detention of undocumented immigrants.' His policy platform also stated that his administration would tie funding decisions for a new grant program to the elimination of private prisons and all forms of for-profit incarceration. Given these promises, it wasn't surprising when Biden issued an executive order in January directing the attorney general not to renew Justice Department contracts with privately operated criminal detention facilities." [Brennan Center for Justice, 08/27/21]

President Biden's Executive Order Said, "To Decrease Incarceration Levels, We Must Reduce Profit-Based Incentives To Incarcerate By Phasing Out The Federal Government's Reliance On Privately Operated Criminal Detention Facilities." "More than two million people are currently incarcerated in the United States, including a disproportionate number of people of color. There is broad consensus that our current system of mass incarceration imposes significant costs and hardships on our society and communities and does not make us safer. To decrease incarceration levels, we must reduce profit-based incentives to incarcerate by phasing out the Federal Government's reliance on privately operated criminal detention facilities." [The White House, 01/26/21]

On The Day Of President Biden's Executive Order, GEO Group Issued A Statement Calling The Order "A Solution In Search Of A Problem" And That It "Merely Represents A Political Statement, Which Could Carry Serious Negative Unintended Consequences, Including The Loss Of Hundreds Of Jobs And Negative Economic Impact." "President Biden's Executive Order is a solution in search of a problem. For more than three decades, our company has provided high-quality services under a private-public partnership with the Federal Bureau of Prisons. During this timeframe, our facilities, which are newer and more modern than the generally older government-run prisons, have helped the BOP meet the significant overcrowding challenges facing the federal crimes, thus allowing government-run facilities to care for U.S. citizens without significant overcrowding challenges. Given the steps the BOP had already announced, President Biden's Executive Order merely represents a political statement, which could carry serious negative unintended consequences, including the loss of hundreds of jobs and negative economic impact for the communities where our facilities are located, which are already struggling economically due to the COVID pandemic." [The GEO Group, Inc., accessed 01/26/21]

Critics Of Private Prisons Have Argued That "The Profit Motive Creates Perverse Incentives That Drive Overcrowding By Cutting Costs And Reducing The Quality Of Life For Those Who Are Incarcerated Or Detained." "Firms that own and manage jails, prisons, and immigrant detention facilities have long come under scrutiny since the industry emerged in the mid-1990s. As I've written before, it has been criticized since it has existed. Some argue the profit motive creates perverse incentives that drive overcrowding by cutting costs and reducing the quality of life for those who are incarcerated or detained. Or that the corporations that manage these facilities earn additional revenue when individuals in their custody stay incarcerated for longer periods of time, encouraging staff to hand out extra infractions that result in longer stays. Others take issue with the concept of a corporation profiting off the nation's penchant for incarceration." [Brennan Center for Justice, 08/27/21]

Pam Bondi Has Directly Lobbied For Uber, Which In 2022 Faced A Multi-Million Dollar DOJ Settlement Affecting Over 65,000 Consumers Alleging Uber Violated The Americans With Disabilities Act (ADA) By Failing To Accommodate Disabled Users In Its Wait Time Fee Policy—In 2024, Uber Was Reportedly Under DOJ Investigation For Potentially New ADA Violations.

Pam Bondi Has Directly Lobbied For Uber Technologies Inc., Appearing In Ballard Partners Disclosures Reporting \$120,000 In Lobbying:

Registrant Name	Client Name	Report Type	Filing Year	Amount Reported
Ballard Partners	Uber Technologies, Inc.	2nd Quarter - Report	2020	\$30,000.00
Ballard Partners	Uber Technologies, Inc.	4th Quarter - Termination	2020	\$30,000.00
Ballard Partners	Uber Technologies, Inc.	3rd Quarter - Report	2020	\$30,000.00
Ballard Partners	Uber Technologies, Inc.	1st Quarter - Report	2020	\$30,000.00
			Total:	\$120,000.00

[U.S. Senate Lobbying Disclosure Database, accessed 11/25/24]

July 2022: The DOJ Announced A Multi-Million Dollar Settlement With Uber To Resolve A Lawsuit Alleging Uber Violated The Americans With Disabilities Act (ADA). "The Department of Justice filed in court today a multi-million-dollar settlement agreement with Uber Technologies Inc. (Uber) to resolve a lawsuit alleging that Uber violated the Americans with Disabilities Act (ADA)." [U.S. Department of Justice, 07/18/22]

Uber Agreed To "Offer Several Million Dollars In Compensation To More Than 65,000 Uber Users Who Were Charged Discriminatory Fees Due To Disability." "Under the agreement, Uber will offer several million dollars in compensation to more than 65,000 Uber users who were charged discriminatory fees due to disability." [U.S. Department of Justice, <u>07/18/22</u>]

Passengers Who Needed More Time To Reach And Get Into Uber Cars. "In November 2021, the department filed a lawsuit alleging that Uber violated Title III of the ADA, which prohibits discrimination by private transportation companies like Uber. According to the complaint, in April 2016, Uber began charging passengers wait time fees in a number of cities, eventually expanding the policy nationwide. The wait time fees started two minutes after the Uber car arrived at the pickup location and were charged until the car began its trip. The department's complaint alleged that Uber violated the ADA by failing to reasonably modify its wait time fee policy for passengers who, because of disability, needed more than two minutes to get in an Uber car." [U.S. Department of Justice, 07/18/22]

The Settlement Included A Two-Year Agreement In Which Uber Committed To Waive Wait Time Fees For Uber Riders Who Certified A Disability. "Under the two-year agreement, Uber has committed to waive wait time fees for all Uber riders who certify that they (or someone they frequently travel with) need more time to get in an Uber car because of a disability. Uber also will ensure that refunds are easily available for anyone who does not have a waiver and is charged a wait time fee because of disability." [U.S. Department of Justice, 07/18/22]

Uber Agreed To Credit The Accounts Of Over 65,000 Eligible Uber Riders And To Pay Over \$1.7 Million To Over 1,000 Riders Who Complained To The Company About Being Charged Wait Time Fees Due To Disability. "Additionally, Uber will credit the accounts of more than 65,000 eligible riders who signed up for the waiver program for double the amount of wait time fees they were ever charged, which could amount to potentially hundreds of thousands or millions of dollars in compensation. Uber will also pay \$1,738,500 to more

than one thousand riders who complained to Uber about being charged wait time fees because of disability, and \$500,000 to other harmed individuals identified by the department." [U.S. Department of Justice, <u>07/18/22</u>]

Kristen Clarke, Assistant Attorney General Of DOJ's Civil Rights Division, Said, "People With Disabilities Should Not Be Made To Feel Like Second-Class Citizens Or Punished Because Of Their Disability, Which Is Exactly What Uber's Wait Time Fee Policy Did." "People with disabilities should not be made to feel like second-class citizens or punished because of their disability, which is exactly what Uber's wait time fee policy did,' said Assistant Attorney General Kristen Clarke of the Justice Department's Civil Rights Division." [U.S. Department of Justice, 07/18/22]

July 2024: DOJ Was Investigating Uber After Multiple Legally-Blind People Who Said They Were "Constantly Left Stranded By Uber And Lyft Drivers Because Of Their Seeing Eye Dogs," In Violation Of The ADA. "Three Bay Area people, all legally blind, tell NBC Bay Area they are still constantly left stranded by Uber and Lyft drivers because of their seeing eye dogs. The years-long issue has caught the attention of the US Department of Justice, this news organization has confirmed through a source with the Department and a national non-profit that says it's sharing data. [...] The refusals are a violation of the Americans with Disabilities Act, which prohibits discrimination based on a person's disability." [NBC Bay Area, 07/28/24]

Pam Bondi Has Directly Lobbied On Behalf Of Amazon And Ballard Partners "Proudly" Counts The Corporation Among Its Clients—In July 2023, DOJ Imposed A \$25 Million Civil Penalty On Amazon Over Allegations Its Alexa Service Illegally Retained Recordings Of Children's Voices.

**Ballard Partners "Proudly" Counts Amazon Among Its Clients:** 

Proudly Representing Leading Organizations

[...]



[Ballard Partners, accessed 11/25/24]

Pam Bondi Has Directly Lobbied For Amazon, Appearing In Two Ballard Partners Disclosures Reporting \$140,000 In Lobbying:

Registrant	Client	Report Type	Report Year	Amount Reported
Ballard Partners	Amazon.Com	2nd Quarter - Report	2020	\$70,000.00
Ballard Partners	Amazon.Com	1st Quarter - Report	2020	\$70,000.00
			Total:	\$140,000.00

[U.S. Senate Lobbying Disclosure Database, accessed 11/25/24]

July 2023: The U.S. Justice Dept. And The Federal Trade Commission (FTC) Imposed A \$25 Million Civil Penalty Against Amazon And Amazon.Com Services LLC To Resolve Alleged Violations Of The Children's Online Privacy Protection Act (COPPA) And The Federal Trade Commission Act Related To Amazon's Voice Assistance Service Alexa. "The Justice Department, together with the Federal Trade Commission (FTC), today announced that Amazon.com Inc. and its wholly-owned subsidiary Amazon.com

Services LLC (collectively Amazon), have agreed to a permanent injunction and a \$25 million civil penalty as part of a settlement to resolve alleged violations of the Children's Online Privacy Protection Act (COPPA), the Children's Online Privacy Protection Rule (COPPA Rule) and the Federal Trade Commission Act (FTC Act) relating to Amazon's voice assistant service Alexa." [U.S. Department of Justice, 07/19/23]

- The Government Alleged That Alexa And Its Child-Directed Offerings Illegally Retained Children's Voice Recordings By Default. "In a complaint filed in the U.S. District Court for the Western District of Washington, the government alleges that, since at least May 2018, Amazon violated the FTC Act, COPPA and the COPPA Rule with respect to Alexa and Alexa's child-directed offerings. The complaint alleges that Amazon retained children's voice recordings indefinitely by default, in violation of COPPA's requirement that these recordings be retained only as long as reasonably necessary to fulfill the purposes for which they were collected." [U.S. Department of Justice, 07/19/23]
- The Government Also Alleged That Amazon Made "Deceptive Representations That Alexa App Users Could Delete Their Or Their Children's Voice Recordings, Including Audio Files And Transcripts And Their Geolocation Information." "Other alleged violations include making deceptive representations that Alexa app users could delete their or their children's voice recordings, including audio files and transcripts and their geolocation information, when in fact Amazon on some occasions failed to delete all such information at users' request." [U.S. Department of Justice, 07/19/23]

Amazon Has Faced Anti"In September, the F.T.C. and 17 states sued Amazon, accusing it of protecting a monopoly by squeezing sellers on its vast marketplace and favoring its own services. The practices also harmed consumers, the F.T.C. argued, and resulted in some cases of "artificially higher prices" because Amazon prevented those selling goods on its site from offering the same products on other online sites for less. A judge in U.S. District Court for the Western District of Washington set the beginning of the trial for October 2026." [The New York Times, 05/03/24]

Pam Bondi Has Directly Lobbied For Major League Baseball (MLB)—The DOJ Has Repeatedly Asked Federal Courts To Rein In MLB's "Longtime Immunity From Antitrust Law," Including In A 2023 Case From Minor League Teams Claiming MLB "Abused Its Power" In Restricting The Number Of Minor Teams.

Pam Bondi Has Directly Lobbied For Major League Baseball (MLB), Appearing In Ballard Partners Disclosures Reporting \$70,000 In Lobbying:

Registrant Name	Client Name	Report Type	Filing Year	Amount Reported
Ballard Partners	Major League Baseball	Registration - Amendment	2019	
Ballard Partners	Major League Baseball	4th Quarter - Report	2019	\$40,000.00
Ballard Partners	Major League Baseball	2nd Quarter - Report	2019	\$30,000.00
Ballard Partners	Major League Baseball	3rd Quarter - Report	2019	\$40,000.00
			Total:	\$70,000.00

[U.S. Senate Lobbying Disclosure Database, accessed <a href="11/25/24">11/25/24</a>]

January 2023: In An Amicus Filing, DOJ Asked A Federal Appeals Court To Not Extend MLB's "Longtime Immunity From Antitrust Law" In A Dispute About Restrictions On The Number Of Minor League Teams. "The U.S. Justice Department on Monday asked a federal appeals court not to 'extend' Major

League Baseball's longtime immunity from antitrust law to a dispute involving restrictions on the number of minor league teams that can be affiliated with professional clubs. The DOJ submitted a friend-of-the-court filing to the 2nd U.S. Circuit Court of Appeals that cautioned against allowing MLB to wield its antitrust shield in the case pending at the New York-based court." [Reuters, 01/31/23]

- The Lawsuit Was Filed In 2021 By Several Minor League Teams Who Alleged MLB "Abused its Power" It MLB Created A New Professional Development League And Reduced The Number Of Minor League Teams From 160 To 120. "The case was filed in 2021 in Manhattan federal court by several minor league clubs that lost their affiliation with big league teams, including the Houston Astros, after MLB crafted a new professional development league. That move eliminated the number of minor league affiliates from 160 to 120. Attorneys for the minor league clubs are seeking to revive their lawsuit that alleged pro baseball abused its power in the reshuffling. Lawyers for the minor league teams have called the MLB exemption a 'get-out-of-antitrust-jail-free card." [Reuters, 01/31/23]
- In 1922, The U.S. Supreme Court Exempted MLB From Antitrust Law, Claiming Baseball Games
  Were "'Purely State Affairs," And The League's Antitrust Exemptions Have Been Subject To
  Legal Dispute Since. "The U.S. Supreme Court in 1922 crafted the exemption, saying exhibitions of
  baseball games were 'purely state affairs' beyond the scope of antitrust law. Courts ever since have
  grappled with legal challenges seeking to overturn it, or minimize its reach. 'In contrast to other antitrust
  exemptions, the Federal Baseball exemption was not created to reconcile competing legal authorities or
  substantive policy goals,' DOJ lawyers said in their brief." [Reuters, 01/31/23]

June 2022: The DOJ Asked A Federal Court To Limit MLB's Century-Old Antitrust Exemption, Calling It An Aberration That Doesn't Exist For Other Sports Leagues. "In a filing on Wednesday, the Department of Justice asked a federal court to limit the scope of Major League Baseball's antitrust exemption to 'conduct that is central to the offering of professional baseball exhibitions.' Calling the century-old exemption an aberration — no such exemption exists for other United States-based sports leagues — the filing said the Supreme Court ruling that created the exemption was based on a 'repudiated' interpretation of the Constitution." [The New York Times, 06/15/22]

Ballard Partners' Clients Have Faced A Variety Of DOJ Issues During Bondi's Time At The Firm, Including: DOJ's "Landmark" Antitrust Case Seeking To Break Up Google, DOJ's \$243 Million Guilty Plea Deal With Boeing For Defrauding Federal Aviation Inspectors, And DOJ's Antitrust Probe Of Private Equity Giant Blackstone For Placing Executives On Boards Of Competing Companies.

Ballard Partners "Proudly" Represents Google, Which Is Facing A "Landmark"

Antitrust Case From DOJ And Multiple States, And A Separate DOJ Lawsuit

Alleging The Corporation "Acquired Rivals Through Anticompetitive Mergers"

And "Bullied" Companies Into Using Its Ad Technology.

**Ballard Partners "Proudly" Counts Google Among Its Clients:** 

Proudly Representing Leading Organizations



[Ballard Partners, accessed 11/25/24]

November 2024: As Part Of A "Landmark" Antitrust Case Against Google, DOJ And Multiple States Asked A Federal Court To Force Google To Sell Its Web Browser Chrome After A Federal Judge Found Google "Illegally Maintained A Monopoly In Online Search." "In a landmark antitrust case, the government asked a judge to force the company to sell its popular Chrome browser. [...] The Justice Department and a group of states asked a federal court late Wednesday to force Google to sell Chrome, its popular web browser, a move that could fundamentally alter the \$2 trillion company's business and reshape competition on the internet. The request followed a landmark ruling in August by Judge Amit P. Mehta of the U.S. District Court for the District of Columbia that found Google had illegally maintained a monopoly in online search." [The New York Times, 11/20/24]

• **Headline: "U.S. Proposes Breakup of Google to Fix Search Monopoly"** [The New York Times, 11/20/24]

In A "Sweeping" Filing, DOJ And States Also Sought Other Remedies, Including Having Google Sell Its Android Operating System Or To Bar Google From Making Its Services Mandatory On Android Phones. "Beyond the sale of Chrome, the government asked Judge Mehta to give Google a choice: Either sell Android, its smartphone operating system, or be barred from making its services mandatory on phones that use Android to operate. If Google broke those terms, or the remedies failed to improve competition, the government could force the company to sell Android at a later date. In a sweeping filing, the government also asked the judge to stop Google from entering into paid agreements with Apple and others to be the automatically selected search engine on smartphones and in browsers. The court should also require Google to allow rival search engines to display the company's results and have access to its data for a decade, the government said." [The New York Times, 11/20/24]

**DOJ's Requests Were "The Most Significant Remedies Requested In A Tech Antitrust Case" Since The Department Sought To Break Up Microsoft In 2000.** "The proposals are the most significant remedies requested in a tech antitrust case since the Justice Department asked to break up Microsoft in 2000. If Judge Mehta adopts the proposals, they will set the tone for a string of other antitrust cases that challenge the dominance of tech behemoths, including Apple, Amazon and Meta." [The New York Times, 11/20/24]

January 2024: In A Separate Lawsuit, DOJ And Eight States Sued Google Alleging It "Acquired Rivals Through Anticompetitive Mergers And Bullied Publishers And Advertisers Into Using The Company's Ad Technology." "In addition to the search lawsuit, the Justice Department filed a separate suit against Google in January over online advertising. That case is expected to go to trial in September. The department and eight states sued in U.S. District Court for the Eastern District of Virginia, saying Google acquired rivals through anticompetitive mergers and bullied publishers and advertisers into using the company's ad technology." [The New York Times, 05/03/24]

Ballard Partners "Proudly" Represents Boeing, Which In July 2024 Reached A Guilty Plea Agreement With The DOJ For Seeking To "Defraud" The Federal Aviation Administration (FAA) In The Approval Of Its 737 Max Planes—The Plea Agreement Included A Fine Of Least \$243.6 Million And \$455 Million In Compliance Improvements.

**Ballard Partners "Proudly" Counts Boeing Among Its Clients:** 

## Proudly Representing Leading Organizations

[...]



[Ballard Partners, accessed 11/25/24]

July 2024: DOJ Submitted An Agreement With Boeing In Which The Company Would Plead Guilty To Fraud For "Misleading U.S. Regulators Who Approved The 737 Max Jetliner Before Two Of The Planes Crashed, Killing 346 People." "The Justice Department submitted an agreement with Boeing on Wednesday in which the aerospace giant will plead guilty to a fraud charge for misleading U.S. regulators who approved the 737 Max jetliner before two of the planes crashed, killing 346 people." [Associated Press, 07/24/24]

In Its Plea Agreement, Boeing Admitted That it Sought To "Defraud" A Federal Aviation Administration (FAA) Group That Evaluated The Safety Of The 737 Max. "The detailed plea agreement was filed in federal district court in Texas. The American company and the Justice Department reached a deal on the guilty plea and the agreement's broad terms earlier this month. The final version states Boeing admitted that through its employees, it made an agreement 'by dishonest means' to defraud a Federal Aviation Administration group that evaluated the 737 Max. Because of Boeing's deception, the FAA had 'incomplete and inaccurate information' about the plane's flight-control software and how much training pilots would need for it, the plea agreement says." [Associated Press, 07/24/24]

The Plea Deal Included A Fine Of At Least \$243.6 Million, Compliance Investments Of At Least \$455 Million, Three Years Of Probation, And The Appointment Of An Independent Compliance Monitor. "The deal calls for the appointment of an independent compliance monitor, three years of probation and a fine of at least \$243.6 million. It also requires Boeing to invest at least \$455 million in its compliance, quality, and safety programs." [Associated Press, 07/24/24]

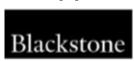
The Case Was Still Pending, As Of October 2024, When A Federal Judge Was Weighing Whether He Would Accept Boeing's Guilty Plea. "A federal judge in Fort Worth heard arguments Friday but withheld a ruling on whether he would accept a guilty plea by Boeing in connection to the tragic crashes of two 737 Max jets that resulted in the loss of 346 lives. The proposed agreement would have Boeing plead guilty to conspiracy to defraud the federal government by deceiving regulators, which is a felony. But in tough questioning, U.S. District Judge Reed O'Connor pressed officials from the Justice Department, asking why he should accept a deal that would prevent him from imposing penalties beyond those already negotiated." [The New York Times, 10/11/24]

Ballard Partners "Proudly" Represents Blackstone, The "World's Largest Alternative Asset Manager" With Over \$1 Trillion In Assets Under Management—Blackstone And Other Private Equity Firms Have Faced A DOJ Investigation For Violating Antitrust Laws By Placing Executives On Boards Of Competing Companies.

Ballard Partners "Proudly" Counts Blackstone—The "World's Largest Alternative Asset Manager," With Over \$1 Trillion In Assets Under Management—Among Its Clients:

## Proudly Representing Leading Organizations

[...]



[Ballard Partners, accessed 11/25/24]

Blackstone Is "The World's Largest Alternative Asset Manager," With Over \$1 Trillion In Assets
Under Management. "Blackstone is the world's largest alternative asset manager, with more than \$1
trillion in AUM." [Blackstone, accessed 11/25/24]

October 2022: Blackstone And Other Private Equity Firms Were Facing A DOJ Investigation Into "Whether They Influence Boards Across Corporate America In Ways That Violate Antitrust Laws." "Blackstone, Apollo Global Management and KKR & Co. are among private equity firms that are facing a Justice Department investigation into whether they influence boards across corporate America in ways that violate antitrust laws, according to people familiar with the matter." [Pensions & Investments, 10/28/22]

Antitrust Enforcers Were Concerned That Private Equity Firms Were Placing Executives On Boards Of Companies Within The Same Sector, So They "Could Influence Those Companies To Act In Ways That Maximize Gains For All — Instead Of Competing Vigorously." "Federal investigators are examining whether private equity firms' practice of placing executives on boards of companies in the same sector harms competition, said the people, who asked not to be named discussing a confidential inquiry. Antitrust enforcers are concerned that board directors with seats on rivals in the same sector could influence those companies to act in ways that maximize gains for all — instead of competing vigorously to provide the best services or lowest prices to consumers." [Pensions & Investments, 10/28/22]

**DOJ Was Sending Civil Investigative Demands, "Which Are Similar To Subpoenas," To Blackstone And Other Firms.** "The Justice Department's antitrust division has sent so-called civil investigative demands, which are similar to subpoenas, to Blackstone, Apollo and KKR on this matter, the people said. The firms are among a swath of large and small private equity companies that have been sent the letters in the past month, said the people." [Pensions & Investments, 10/28/22]

The Investigation Was "Part Of An Aggressive Push By The Biden Administration To Rein In Corporate Consolidation And Reinvigorate Dormant Antitrust Powers." "The probe is part of an aggressive push by the Biden administration to rein in corporate consolidation and reinvigorate dormant antitrust powers. A 1914 merger law, the Clayton Act, forbids so-called interlocking directorates, where individuals or entities sit on the boards of companies that directly compete. But for decades, that law has been sporadically enforced." [Pensions & Investments, 10/28/22]