

## Senate Question for the Record from Senator Adam Schiff to Lisa Gilbert

1. *Ms. Gilbert: Can you describe the circumstances where it would be appropriate for Ms. Bondi, if confirmed, to recuse herself from working on or influencing department decisions vis-à-vis her prior representation of her corporate clients as a lobbyist?*

Public trust requires public officials to demonstrate unequivocally that they are serving the needs of the American people rather than favoring the powerful and corporate interests.

That's why it's so troubling that Ms. Bondi, in her Senate Questionnaire<sup>1</sup>, confirmation hearing,<sup>2</sup> and in written responses to Senators' Questions<sup>3</sup>, repeatedly refused to make a specific commitment to recuse herself from working on or influencing department decisions that could impact her former lobbying clients. Instead, Ms. Bondi deflected Senators' direct questions with a vague response that she would consult with an "appropriate" ethics official and act "consistent" with governing regulations.<sup>4</sup>

As I stated during the hearing, we believe that the complex net of Ms. Bondi's corporate conflicts coupled with the access she granted to corporate lobbyists while Attorney General of Florida creates an overall attitude towards corporate America and K-street which recusals are not sufficient to cure. We oppose her confirmation on these grounds. That said, if she is confirmed, Ms. Bondi should attempt to ameliorate the problem by recusing herself from all meetings, discussions, and decision-making that involves her 30 former lobbying clients<sup>5</sup>, her former law client Pfizer Inc.<sup>6</sup>, or Ballard Partners, the lobbying firm she was a partner in and registered lobbyist for.<sup>7</sup>

If there are meetings, discussions, or decisions related to:

- active or potential Department of Justice civil or criminal **inquiries, investigations, or cases** involving her **30 former lobbying clients**; or
- past, current, or potential Department of Justice or DOJ agency **contracts** with her **30 former lobbying clients**; or
- active or potential Department of Justice **inquiries or investigations** into her **former lobbying firm Ballard Partners**, Ms. Bondi should recuse herself.

Here are three specific examples:

1. Public Citizen's January 2025 report "Conflicted Justice"<sup>8</sup> revealed that one of Ms. Bondi's lobbying clients was IGT Global Services, a gambling company that sued 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>9</sup> If a similar lawsuit was filed by this or any other former lobbying client of Ms.

Bondi's, it would be appropriate for her to recuse herself from any involvement in DOJ's response.

2. Another example is Ms. Bondi's legal representation of Pfizer, Inc. In her Public Financial Disclosure Report, Ms. Bondi disclosed that she provided legal services to Pfizer, Inc. while working as Of Counsel to the law firm Panza, Maurer & Maynard.<sup>10</sup> Pfizer has been involved in five recent Department of Justice investigations, according to Public Citizen's Corporate Enforcement Tracker.<sup>11</sup> If these or subsequent similar matters involving Pfizer or Ms. Bondi's other former clients arise, it would be appropriate for Ms. Bondi to recuse herself from any involvement in DOJ's response.
3. A third example involves Ms. Bondi's work from January 2019-November 2019 and 2020-2025 as a lobbyist and partner at Ballard Partners.<sup>12</sup> Ballard Partners and a number of its associates, including Ms. Bondi, have been registered with the Department of Justice's Foreign Agents Registration Act (FARA) Unit to represent foreign governments or other foreign entities.<sup>13</sup> Should any FARA Unit inquiries or investigations arise alleging that Ballard Partners failed to register or properly disclose that involve Ms. Bondi's former clients, business partners, or firm, it would be appropriate for her to recuse herself from any involvement in DOJ's response.

A well-functioning Justice Department should be tough on corporate crime and work to improve the lives of our communities. The ability of the Attorney General to represent the interests of the American people must not be compromised by the appearance of a conflict of interest in DOJ decisions made about investigations, contracts, and policy. The American people depend on the Department of Justice to vigorously enforce our laws, hold corporate wrongdoers accountable, and protect the rule of law, without fear or favor.