

United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

May 2, 2025

The Honorable Pam Bondi
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

Dear Attorney General Bondi:

I write to raise serious concerns regarding your potential conflict of interest related to the GEO Group's expanding role in the Trump Administration's immigration detention efforts. The GEO Group is a major private prison contractor whose largest source of revenue is from contracts with U.S. Immigration and Customs Enforcement (ICE).¹ While the GEO Group has been securing multimillion-dollar contracts with the Department of Homeland Security (DHS) and (ICE), the Department of Justice (DOJ), under your leadership, is actively coordinating the broader immigration enforcement infrastructure from which the GEO Group stands to profit. With DOJ's outsized role implementing President Trump's immigration enforcement and mass deportation agenda and the GEO Group securing long-term, multimillion-dollar contracts in recent weeks,² I call on you to recuse yourself from any and all DOJ activities, communications, or policy decisions related to immigration detention, enforcement, and contracting that could directly or indirectly benefit the GEO Group or impact its federal contracts.

In multiple memoranda at the start of the Trump Administration, DOJ leadership directed agency resources, personnel, and components away from critical national security and public safety missions and toward civil immigration efforts.³ To advance these initiatives, DOJ has directed the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), the United States Marshals Service (USMS), and the Bureau of Prisons (BOP) to share biometric data with DHS, to coordinate joint enforcement efforts, to reassign staff with no immigration experience to hastily assembled immigration-focused working groups, and to prioritize immigration enforcement.⁴

¹ Nick Schwellenback and René Kladzyk, *Private Prison Giant Hired ICE Detention Chief*, Project on Gov't Oversight (Jan. 17, 2025), <https://www.pogo.org/investigations/private-prison-giant-hired-ice-detention-chief>.

² *The GEO Group Awarded 15-Year Contract by U.S. Immigration and Customs Enforcement for Company-Owned, 1,000-Bed Delaney Hall Facility in New Jersey*, THE GEO GROUP (Feb. 27, 2025), <https://investors.geogroup.com/news-releases/news-release-details/geo-group-awarded-15-year-contract-us-immigration-and-customs>; *The GEO Group Announces Contract Modification for Company-Owned, 1,328-Bed Karnes ICE Processing Center*, THE GEO GROUP (Mar. 10, 2025), <https://investors.geogroup.com/news-releases/news-release-details/geo-group-announces-contract-modification-company-owned-1328-bed>.

³ Memorandum from the Off. of the Deputy Att'y Gen. Emil Bove to All Employees in the U.S. Dep't of Justice, *Interim Policy Changes Regarding Charging, Sentencing, And Immigration Enforcement* (Jan. 21, 2025), <https://assets.aila.org/files/7ee3a6c0-8ca6-4806-9ffb-96c53b01a954/25012912.pdf?1738188120>.

⁴ *Id.*; Press Release, DHS Spokesperson, Statement from a DHS Spokesperson on Directive Expanding Immigration Law Enforcement to Some Department of Justice Officials, Dep't of Homeland Sec. (Jan. 23, 2025), <https://www.dhs.gov/news/2025/01/23/statement-dhs-spokesperson-directive-expanding-immigration-law>.

This level of DOJ involvement in immigration enforcement is significant, and it makes your previous lobbying on behalf of the GEO Group all the more concerning.⁵ The GEO Group wields significant influence in the private prison industry, not only dominating the U.S. market, but also maintaining a global footprint across Australia, South Africa, and the United Kingdom and operating nearly 100 facilities with around 79,000 beds and 18,000 employees.⁶ During your confirmation hearing before the Senate Judiciary Committee, when asked if you would recuse yourself from any matters involving your past clients, such as the GEO Group, you said you “[would] consult with the career ethics officials within the Department of Justice and make the appropriate decision.”⁷ Yet, within weeks of President Trump assuming office, then-Acting Deputy Attorney General Emil Bove removed the Department’s senior career ethics official and replaced him with two political appointees with limited experience.⁸ This marks a dramatic break from past Democratic and Republican administrations, which rightly entrusted a senior career DOJ official, not political appointees, with critical decisions on ethics, recognizing that politicizing this role would endanger both the Department’s integrity and its employees.⁹

Given the removal of critical safeguards designed to ensure that the actions of Department officials are ethical, I can no longer be sure you have properly recused yourself from matters related to the GEO Group. With DOJ fully integrated into the Administration’s immigration enforcement agenda and GEO securing long-term, multimillion-dollar contracts as a result, you cannot credibly claim neutrality on enforcement matters. The ethical considerations are too great to ignore.

The Committee has a constitutional obligation to perform oversight of the Department and its components. In order to assess the impartiality of DOJ decision-making under your leadership, please respond to the following questions by May 16, 2025:

1. Have you recused yourself from any DOJ activity related to immigration enforcement that may impact the GEO Group’s business interests? If not, will you recuse yourself?

[enforcement](#); Memorandum from the Off. of the Att’y Gen. Pam Bondi to All Employees in the U.S. Dep’t of Justice, *General Policy Regarding Charging, Plea Negotiations, and Sentencing* (Feb. 5, 2025), <https://www.justice.gov/ag/media/1388541/dl?inline>.

⁵ Matt Sledge, *Pam Bondi, Trump’s New AG Pick, Lobbied for Private Prisons and Amazon*, THE INTERCEPT (Nov. 22, 2024), <https://theintercept.com/2024/11/22/trumps-new-ag-pick-lobbied-for-private-prisons-and-amazon/>.

⁶ Alexandra Berzon, Allison McCann, and Hamed Aleaziz, *Private Prisons Are Ramping Up Detention of Immigrants and Cashing In*, NEW YORK TIMES (Mar. 7, 2025), <https://www.nytimes.com/2025/03/07/us/politics/private-prisons-immigrants-detention-trump.html>; *The GEO Group Announces Contract for Company-Owned 1,800-Bed North Lake Facility in Michigan*, BUSINESS WIRE (Mar. 20, 2025), <https://www.businesswire.com/news/home/20250319968696/en/The-GEO-Group-Announces-Contract-for-Company-Owned-1800-Bed-North-Lake-Facility-in-Michigan>.

⁷ *The Nomination of the Honorable Pamela Jo Bondi to be Attorney General of the United States: Nomination Hearing Before the S. Comm. on the Judiciary*, 119th Cong., at 01:13:50 (Jan. 15, 2025), <https://www.judiciary.senate.gov/committee-activity/hearings/the-nomination-of-the-honorable-pamela-jo-bondi-to-be-attorney-general-of-the-united-states>.

⁸ Ben Penn, *Trump DOJ Assigns Sensitive Ethics Power to Political Aids*, BLOOMBERG LAW (Feb. 16, 2025), <https://news.bloomberglaw.com/us-law-week/trump-doj-delegates-sensitive-ethics-powers-to-political-aides> (describing the contents of a January 27 memo from Emil Bove).

⁹ *Id.*

2. Did you consult with any career ethics officials—as you pledged you would under oath—regarding your prior representation of the GEO Group before participating in any DOJ activities connected to immigration detention, contracts, or enforcement? If so, please provide the Committee with the names of those officials and any records or materials related to these meetings.
3. Have any waivers or ethics authorizations been issued to permit your participation in matters involving the GEO Group or other former clients? If so, please provide the Committee with copies of these records.
4. Has the GEO Group, its representatives, or its affiliates engaged with you or your staff since your confirmation as Attorney General?
5. What safeguards are currently in place to ensure you and other officials within DOJ leadership are not making policy decisions that could financially benefit these individuals' former clients?

Thank you for your time. I look forward to hearing from you.

Sincerely,



Richard J. Durbin
Ranking Member

cc: The Honorable Charles E. Grassley
Senate Committee on the Judiciary