

Report Type: Nominee Report

Year (Annual Report only):

Date of Appointment:

Date of Termination:

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Bondi, Pam

Attorney General, Department of Justice

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- Committee on the Judiciary
-

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Bondi, Pam [electronically signed on 01/03/2025 by Bondi, Pam in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Lauria, Jolene A, Certifying Official [electronically signed on 01/14/2025 by Lauria, Jolene A in Integrity.gov]

Other review conducted by

/s/ Tirrell, Joseph W, Ethics Official [electronically signed on 01/14/2025 by Tirrell, Joseph W in Integrity.gov]

U.S. Office of Government Ethics Certification

/s/ Huitema, David, Certifying Official [electronically signed on 01/14/2025 by Huitema, David in Integrity.gov]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO	
1	Ballard Partners	Tallahassee, Florida	Corporation	Consultant	1/2023	Present	
2	America First Policy Institute	Washington, District of Columbia	501 (c) 4	Consultant	4/2021	Present	
3	Newsmax Broadcasting LLC	Washington, District of Columbia	Corporation	Contributor	7/2023	12/2024	
4	Panza, Maurer, & Maynard, P.A.	Fort Lauderdale, Florida	Law Firm	Of Counsel	6/2021	Present	
5	SOMA Global	Tampa, Florida	Corporation	Advisory Board	3/2021	1/2024	
6	Renatus LLC	Humacao, Puerto Rico	Corporation	Consultant	6/2023	3/2024	
7	Make America Great Again Policies	Beverly, Massachusetts	Non-Profit	Board Member	5/2021	7/2023	
8	PB Advisory LLC	See Endnote	Tampa , Florida	LLC	Owner	5/2023	Present

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Ballard Partners	N/A		Government and Public Affairs Consulting	\$1,067,000
2	America First Policy Institute	N/A		Consulting Fees	\$520,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	SOMA Global-First Responder and Public Safety Technology Provider		N/A		Director Fees	\$8,000
4	CGI Investment Management Group LLC- Commercial Real Estate Investment Management: Cash Receivable	See Endnote	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
5	Panza, Maurer, & Maynard, P.A. (law firm)		N/A		Legal Services	\$203,738
5.1	Panza, Maurer, & Maynard, P.A. (law firm): Cash Receivable	See Endnote	N/A	\$15,001 - \$50,000		None (or less than \$201)
6	Curry Law Group		N/A		Referral Fee	\$2,083
7	State Policy Network - 8/20/24		N/A		Honorarium	\$5,000
8	Renatus LLC	See Endnote	N/A		Consulting compensated with shares of Digital World Acquisition Corp (DWAC)	\$2,969,563
9	State of Florida Retirement System, defined benefit plan (value not readily ascertainable): eligible for \$6,250/mo. at age 62		N/A			None (or less than \$201)
10	Ballard Partners, 401K Plan:		No			
10.1	JPMorgan Liquid Assets Money Market Fund Capital Shares (CJLXX)		Yes	\$15,001 - \$50,000		None (or less than \$201)
11	Trump Media & Technology Group (DJT)		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
12	Trump Media & Technology Group Warrants (DJTWW): vested		N/A	\$1,000,001 - \$5,000,000		None (or less than \$201)
13	PB Advisory LLC		N/A	None (or less than \$1,001)		
13.1	Newsmax Broadcasting LLC		N/A		Contributor Fees	\$27,600

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
13.2	bitnile.com - Risk on 360 Conference - 11/20/23	N/A		Honorarium	\$20,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	State of Florida Retirement System	Tallahassee, Florida	Filer will become eligible for and receive an annual lifetime pension payment for filer's 28 years of employment with the State of Florida upon reaching the required legal retirement age.	3/1991
2	Ballard Partners	Tallahassee, Florida	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	1/2023
3	CGI Investment Management Group LLC- Commercial Real Estate Investment Management	Coconut Grove, Florida	I am owed fees for consulting services ending May of 2022. The amount is fixed and is expected to be paid by March of 2025.	5/2022
4	Panza, Maurer, & Maynard, P.A. (law firm)	Fort Lauderdale, Florida	I am owed fees for legal services provided through resignation from her position as Of Counsel with the firm. The amount is fixed and is expected to be paid by January of 2025.	1/2025
5	PB Advisory LLC	Tampa , Florida	During my appointment to the position of Attorney General, PB Advisory LLC will remain dormant and will not advertise. I will not perform any services for the firm, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the firm while it is in an inactive status.	5/2023

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES	
1	Ballard Partners	Tallahassee, Florida	Services as Consultant	
2	America First Policy Institute	Washington, District of Columbia	Services as Consultant	
3	Newsmax Broadcasting LLC	Washington , District of Columbia	Services as Contributor	
4	SOMA Global	Tampa, Florida	Services as Advisory Board Member	
5	Panza, Maurer, & Maynard, P.A.	Fort Lauderdale, Florida	Legal Services - Of Counsel Attorney	
6	bitnile.com (Risk on 360 Conference)	Las Vegas, Nevada	Honorarium for Speaking	
7	Pfizer Inc.	New York, New York	Legal Services - client of Panza, Maurer & Maynard	
8	Aiden Torch Financial	Denver, Colorado	Consulting (Client of Ballard Partners)	
9	Florida Sheriff's Association	Tallahassee, Florida	Consulting (Client of Ballard Partners)	
10	Florida Sheriff's Risk Management Fund	Tallahassee, Florida	Consulting (Client of Ballard Partners)	
11	Safety Net DC	Washington , District of Columbia	Consulting (Client of Ballard Partners)	
12	Major County Sheriffs of America, Inc.	Sanford, Florida	Consulting (Client of Ballard Partners)	
13	iGas USA Inc.	Tampa, Florida	Consulting (Client of Ballard Partners)	
14	Renatus LLC	Humacao, Puerto Rico	Consulting	
15	PB Advisory LLC	See Endnote	Tampa , Florida	Owner

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Varner Commercial Property Consultants-Commercial Real Estate Services	N/A		Salary	
2	VW Preserve Lane LLC-Commercial Real Estate, Naples, FL	N/A	\$100,001 - \$250,000	Rent or Royalties	\$5,001 - \$15,000
3	VW Willow Lake LLC-Commercial Real Estate, North Charleston,SC	N/A	\$100,001 - \$250,000		None (or less than \$201)
4	VW Northwoods LLC-Commercial Real Estate, North Charleston,SC	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
5	VW Manager LLC-Commercial Real Estate Manager	N/A	\$1,000,001 - \$5,000,000	Rent or Royalties	\$100,001 - \$1,000,000
6	VW Equity 401k	No			
6.1	Fidelity Freedom Index 2040 Fund Institutional Premium Class Shares (FFIZX)	Yes	\$15,001 - \$50,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Residential Real Estate, Longboat Key, FL (1/3 interest))	N/A	\$100,001 - \$250,000	Rent or Royalties	\$5,001 - \$15,000
2	U.S. bank (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	U.S. bank (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
4	U.S. bank (cash)	N/A	\$15,001 - \$50,000		None (or less than \$201)
5	U.S. bank (cash)	N/A	\$1,000,001 - \$5,000,000		\$201 - \$1,000
6	Schwab Treasury Obligation Money Fund (TK: SNOXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Valley Bank		Mortgage on Personal Residence	\$1,000,001 - \$5,000,000	2021	3.5%	30 Years
2	Family Member Family Trust		Personal Loan	\$100,001 - \$250,000	2024	5%	1 Year
3	Valley Bank-Commerical Real Estate Mortgage	See Endnote	Filer's Spouse Personally Guarantees 50% of the total loan amount	\$1,000,001 - \$5,000,000	2023	5 Year U.S. T-Bill + 2.75%	5 Years

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

PART	#	ENDNOTE
1.	8	PB Advisory LLC will be inactive during nominee's tenure. The LLC is a pass through for income received from Newsmax and btnile.
2.	4	Account receivable for consulting services to be paid by March 2025.
2.	5.1	Filer is owed legal fees for professional services rendered. Full payment expected in January 2025.
2.	8	FILER RECEIVED SHARES AND WARRANTS OF DIGITAL WORLD ACQUISITION CORPORATION (DWAC) FROM RENATUS LLC TOGETHER WITH ALL OTHER SHAREHOLDERS ON THE MORNING OF THE MERGER CLOSING BETWEEN DWAC AND TRUMP MEDIA AND TECHNOLOGY GROUP. Share were converted to stock in TRUMP MEDIA AND TECHNOLOGY GROUP (DJT) upon closing of the merger with DWAC.
4.	15	PB Advisory LLC is owned by the nominee and is a pass through for income received from Newsmax and bitnile.
8.	3	Partial Guarantee of a loan

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in income was received during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, (1) that ended the reporting period with a value greater than \$1,000 or (2) from which more than \$200 in investment income was received during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 in income was received). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during the reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (note: certain PAS nominees and appointees are required to report all mortgages); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$480 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$192 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

5 U.S.C. § 13101 et seq., and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. Failure to provide the requested information may result in separation, disciplinary action, or civil action. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with 5 U.S.C. §§ 13107 and § 13122(b)(1) or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) when the disclosing agency determines that the records are arguably relevant to a proceeding before a court, grand jury, or administrative or adjudicative body, or in a proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding; (7) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another, a public financial disclosure report and any accompanying documents, including statements notifying an employee's supervising ethics office of the commencement of negotiations for future employment or compensation or of an agreement for future employment or compensation; (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of and at the request of an individual who is the subject of the record; (9) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to this system of records; (10) on the OGE Website and to any person, department or agency, any written ethics agreement, including certifications of ethics agreement compliance, filed with OGE by an individual nominated by the President to a position requiring Senate confirmation; (11) on the OGE Website and to any person, department or agency, any certificate of divestiture issued by OGE; (12) on the OGE Website and to any person, department or agency, any waiver of the restrictions contained in Executive Order 13989 or any superseding executive order; (13) to appropriate agencies, entities and persons when there has been a suspected or confirmed breach of the system of records, the agency maintaining the records has determined that there is a risk of harm to individuals, the agency, the Federal Government, or national security, and the disclosure is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm; and (14) to another Federal agency or Federal entity, when the agency maintaining the record determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in responding to a suspected or confirmed breach or in preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity, the Federal Government, or national security. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of ten hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE) 250 E Street, S.W., Suite 750, Washington, DC 20024-3249.

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