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United States Senate

COMMITTEE ON THE JUDICIARY WASHINGTON, DC 20510-6275

May 5, 2025

VIA ELECTRONIC TRANSMISSION

The Honorable Robert F. Kennedy Jr. Secretary Department of Health and Human Services

Dear Secretary Kennedy:

On February 27, 2023, 36 Attorneys General (AGs), wrote to Congress expressing their concerns with the Polaris Project, which has been the sole contractor operating the National Human Trafficking Hotline (NHTH) since 2007.¹ This letter noted that Polaris, which is funded by taxpayer dollars, "is not reporting tips of adult trafficking to state law enforcement except under the limited circumstance where the victim self-reports and affirmatively consents to the Hotline making the report."² More recently, on April 15, 2025, 41 AGs sent you a letter regarding the notice of funding opportunity (NOFO) for the grant to operate the NHTH.³ This letter raised multiple concerns about Polaris's operation of the hotline.⁴ Specifically, the AGs stated that Polaris was "no longer sharing tips from concerned citizens and distressed family members with local law enforcement."5 These alleged failures by Polaris to report instances of human trafficking are deeply concerning and, if they are accurate, changes to the operation of the NHTH must be made.

Additionally, according to reports, Katherine Chon, the co-founder of Polaris, is a "senior adviser at [the Department of Health and Human Services (HHS)] and its director of the Office on Trafficking in Persons [OTIP]," the office awarding the grant.⁶ Given the importance of the NHTH, you must not allow conflicts of interest to affect the contracting process.

¹ Letter from the National Association of Attorneys General, to the Honorable Chuck Schumer, Senate Majority Leader, the Honorable Mitch McConnell, Senate Minority Leader, the Honorable Kevin McCarthy, Speaker of the House, and the Honorable Hakeem Jefferies, House Minority Leader (Feb. 27, 2023), https://legacy.myfloridalegal.com/webfiles.nsf/WF/CPAL-CPGMM7/\$file/Web%20Link.pdf.

² Id.

³ Letter from the National Association of Attorneys General, to the Honorable Robert F. Kennedy Jr., Secretary, Department of Health and Human Services (Apr. 15, 2025), https://oag.ca.gov/system/files/attachments/pressdocs/National%20Human%20Trafficking%20Hotline FINAL.pdf.

⁴ Id. 5 Id.

⁶ James Lynch, National Human Trafficking Hotline Accused of Failing to Share Tips with Law Enforcement (Apr. 29, 2025), National Review, https://www.nationalreview.com/news/national-human-trafficking-hotline-accused-of-failing-to-share-tipswith-law-enforcement/; Elizabeth Smart, America's National Human Trafficking Hotline is failing those who need it the most there should be federal reform, famous ex-victim says (Apr. 29, 2025), NY Post, https://nypost.com/2025/04/29/opinion/famousex-victim-elizabeth-smart-says-americas-national-human-trafficking-hotline-is-failing-those-who-need-it-the-most-there-shouldbe-federal-reform/.

Legally protected whistleblower disclosures provided to my office appear to confirm the allegations that Polaris is not reporting instances of potential human trafficking to law enforcement.⁷ For example, according to an internal Polaris case file, in March 2025, an anonymous "signaler" contacted the NHTH and reported a "possible [sex trafficking (ST)] situation."⁸ Polaris staff marked "Yes" for the case referencing potential minors and deemed the "Level of Trafficking Indicators" as having "High Indicators."⁹ The case file also noted that the estimated age range of potential victims were "15-17; 18-21; 22+," and that the potential victim indicated to the signaler she wanted police involvement.¹⁰ The case file further indicates that, according to the signaler, the potential victim is afraid "[s]he's going to be physically hurt by the pimp running this company. She's being forced to escort for sex and money."¹¹ It also notes that there are no existing reports to law enforcement.¹² The signaler also disclosed that the individual accused of trafficking the victim also forces other women, potentially minors, to engage in these types of acts.¹³ Unfortunately, according to the records obtained by my office, a member of Polaris's staff reviewed and labeled the file "Work Not Required."¹⁴ A whistleblower told my office that this means the case is closed and law enforcement has not been alerted.¹⁵

Another legally protected whistleblower disclosure to my office shows similar concerning behavior by Polaris and its staff. According to records provided to my office, in February 2025, a potential victim contacted the NHTH to report a "situation of [sex trafficking (ST)] involving herself and her minor sister."¹⁶ According to the records, the potential victim and her minor sister were being held by two potential traffickers.¹⁷ Additionally, the case file notes that both of the potential victims were United States citizens and that the "Level of Trafficking Indicators" was marked as having "High Indicators."¹⁸ Further, according to the records, the potential victim "[w]ishe[d] to report, not anonymously."¹⁹ However, the Polaris case file noted that the potential victim stopped communicating "due to safety concerns."²⁰ The case file status is described as "unclear situation as [potential victim (PV)] stopped responding" and "Work Not Required."²¹ According to legally protected disclosures to my office, that means Polaris staff failed to report this potential trafficking to law enforcement and no other action was taken.22

⁷ Letter from Tristan Leavitt, President, Empower Oversight to Megan Lundstrom, Chief Executive Officer, Polaris (Apr. 25, 2025), Exhibit 1; Exhibit 2; Exhibit 3;

⁸ Exhibit 2. ("Signaler" indicates that someone other than the potential victim contacted the NHTH.)

⁹ Id.

¹⁰ Id.

¹¹ Id.

¹² Id.

¹³ Id.

¹⁴ Id.

¹⁵ Notes on File with Committee Staff.

¹⁶ Exhibit 3.

¹⁷ Id.

¹⁸ Id. ¹⁹ Id.

²⁰ Id.

²¹ Exhibit 3.

²² Notes on File with Committee Staff.

As you are aware, Polaris has received millions in taxpayer dollars to run this hotline, and if the grant is renewed, will receive an additional \$9 million in funding.²³ It's imperative that HHS ensure the hotline is running efficiently and effectively to protect the countless victims of human trafficking. Additionally, for Congress to better understand HHS's oversight of the hotline and the Polaris Project, please provide answers to the following by May 19, 2025:

- 1. Does "Work Not Required" mean that law enforcement was not informed of the information?
- 2. What steps has HHS taken to address the complaints raised by the Attorneys General letters from 2023 and 2025? Provide all records.²⁴
- 3. What specific steps has HHS taken to oversee Polaris and ensure its properly reporting tips the hotline receives? Provide all records.
- 4. What steps has HHS taken to ensure the apparent conflicts of interest between Polaris and Ms. Chon do not affect the contracting process? Has Ms. Chon been walled off from these matters? If not, why not? If so, provide all recusal records.

Thank you for your prompt review and response. If you have any questions, please contact Tucker Akin with my Committee staff at (202) 224-5225.

Sincerely,

Chuck Grandy

Charles E. Grassley Chairman Committee on the Judiciary

 ²³ Simpler Grants.gov, *National Human Trafficking Hotline* (NHTH) (Mar. 28, 2025), Office on Trafficking in Persons), <u>https://simpler.grants.gov/opportunity/355255.</u>
 ²⁴ "Records" include any written, recorded, or graphic material of any kind, including letters, memoranda, reports,

²⁴ "Records" include any written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically created or stored information), calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether they resulted in final documents).

EXHIBIT 1

EMPOWER OVERSIGHT

Whistleblowers & Research



April 25, 2025

Megan Lundstrom Chief Executive Officer Polaris 1110 Vermont Ave NW, Suite 1000 Washington, D.C. 20005-3551

Dear Ms. Lundstrom:

Empower Oversight is a nonpartisan, nonprofit educational organization dedicated to enhancing independent oversight of government and corporate wrongdoing. We work to help insiders safely and legally report waste, fraud, abuse, corruption, and misconduct to the proper authorities.

We represent **Exercise**, an employee of Polaris who was placed on administrative leave yesterday afternoon. Managing Director Heather Lynn Wagner described the move as "a temporary step . . . to ensure space for thoughtful review and care as [Polaris] navigate[s] some ongoing considerations." However, the substance of these "ongoing considerations" is unclear.

As a noted in her own email to Ms. Wagner and others last Friday, she has made numerous protected whistleblower disclosures within the organization. The second has also made numerous protected disclosures outside of the organization to various authorized governmental recipients, including the Department of Health and Human Services ("HHS") Office of Inspector General ("OIG") and Congress.

Association of Attorneys General, who wrote on April 15, 2025 to HHS Secretary Robert F. Kennedy Jr.: "Without [certain] tips, our law enforcement loses critical leads to dismantling trafficking operations. We also lose valuable leads to rescuing the victims of trafficking and helping them begin the road to recovery."¹

Your internal handbook details your "policy with respect to reporting good-faith concerns about the legality or propriety of Polaris actions or plans." It states: "This policy makes it clear that you can do so without fear of retaliation of any kind, including but not limited to discrimination or harassment."

¹ https://ncdoj.gov/wp-content/uploads/2025/04/National-Human-Trafficking-Hotline FINAL.pdf.

Additionally, 41 U.S.C. § 4712, which I helped enact into law as Judiciary Committee counsel to then-Ranking Member Chuck Grassley, states:

An employee of a contractor, subcontractor, grantee, subgrantee, or personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing to a [covered] person or body . . . information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant.

The covered entities for which protected disclosures are authorized include congressional committees, inspectors general, and "a management official or other employee of the contractor . . . [or] grantee . . . who has the responsibility to investigate, discover, or address misconduct."

We are in communication with the HHS OIG regarding placement on administrative leave. In order to better understand Polaris's position in this matter, we request that you provide a more specific explanation as to why was placed on administrative leave.

Thank you for your prompt attention to this matter.

Cordially,

/Tristan Leavitt/

Tristan Leavitt President Empower Oversight

cc: Chairman Charles E. Grassley Committee on the Judiciary U.S. Senate

GREEN- Tip/Intelligence Trafficking

TIP

Online Denort

Case History [9] | Case Contact Roles [1] | Referrals To [0] | Direct Reports To [0] | Outcomes [0] | Activity History [1] | Chat Transcripts [0] | Work Orders [1] | Google Docs & Attachments [0] | Solutions [0] | Merges From This Case [0] | Merges To This Case [0] | Draft Flex Signals [1]

Case Detail

Ongoing Cases [Change] Case Owner Parent Case View Hierarchy] Case Number Contact Name Unknown Contact Email Medium Priority Case Number Copy®

EXHIBIT 2

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Send Email Edit Log an Activity

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

Merge To Another Case

A Section of the

Add IPP Headers

Case Record Type

Case Color

Log NCMEC Report

Trafficking [Change]

Color-Coded Category of Case

Case Origin

Date/Time Opened

Hotline Calls Received 0

GREEN- Tip/Intelligence

TIP

Online Report



elligence

Information

SAFETY INFORMATION

Signaler/Anonymous

SHARING PERMISSIONS

No permissions were shared

CURRENT SITUATION

- Signaler reports

NEXT STEPS

Assess fir safety

Internal PP Correspondence

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in Signaler states
 Signaler states

7 - 2

Signaler states the PVs are forced to do whatever the PBs want

is being forced by PT to engage in CS and states she is going to be physically harmed by PT

Reviewed; Work Not Required Status Priority Medium Ongoing Cases Case Owner

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TIP

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Signaler reports

NEXT STEPS

Internal PP Correspondence®

- Assess fir safety
- Assess for updates
- Gather PII

MESSAGING FOR PV (Name)

MESSAGING FOR SIGNALER (Name)

- Is
- Does

MESSAGING FOR SP/LE (Name)

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

is being forced by PT to engage in CS and states she is going to be physically harmed by PT

5. A.

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Do you have an update to provide the NHTH? Does PVs have any medical concerns or injuries? able to contact the NHTH for support? own weapons? What happens if PVs do not comply with

demands?



ner

TIP

EN-Tip/Intelligence cking Pennd a

updated

Topline Case Summary Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Required Data

Level of Trafficking Indicators High Indicators Reason for Choosing Moderate Indicators® Case References Potential Minor(s) Yes No Minors safe, not involved in situation United States Location of Situation - Country(ies)

City, State, Country

Del | Del



Add	Refresh

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases



Status Who Should Review This/When?

Reviewed; Work Not Required Urgent Review (Shifty)

TIP

EEN- Tip/Intelligence ifficking

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Activity Details for Case



Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in



Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

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Show "Display Comment" signals and ... Work "Display Comment" unchecked



TIP

GREEN- Tip/Intelligence

Trafficking

Online Renart

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Activity Details for Case

Online Report at

Type of Trafficking: Sex Total No. of Victims Described: 200 Estimated Age Range of Potential Victims: 15-17;18-21;22+ Potential Victim Asked for Help Leaving Situation: Yes Potential Victim Wants Police Involvement: Yes Submitter Can Share Hotline Info with Potential Victim: No Location of Trafficking - City: Location of Trafficking - State: -Trafficker Location/Contact Info:



Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

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TIP

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Online Report at

Type of Trafficking: Sex Total No. of Victims Described: 200 Estimated Age Range of Potential Victims: 15-17;18-21;22+ Potential Victim Asked for Help Leaving Situation: Yes Potential Victim Wants Police Involvement: Yes Submitter Can Share Hotline Info with Potential Victim: No Location of Trafficking - City: Location of Trafficking - State: -Trafficker Location/Contact Info:

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

with Unknown

(Completed)



istomer

TIP

REEN- Tip/Intelligence rafficking

Inline Denort

Victim Demographics: Adults, Minors

Potential Victim(s) Info:

Trafficker(s) Info:

Trafficking Assessment: There's a company called

Observed Timeline:

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in



Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

The second second

He uses pornstars as escort or so called "providers" for





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enort.

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Trafficking Assessment: There's a company called

Observed Timeline:

Existing Reports to LE: NO

She's going to be physically hurt by the pimp running this company. She's being forced to escort for sex and money.

He uses pornstars as escort or so called "providers" for the owner is named sexual services. Under the assumption of dinner dates or arm candy. The women are forced to do what the clients pay for.

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

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EN-Tip/Intelligence cking e Renort

TAXABLE PROPERTY.

Observed Timeline:

Existing Reports to LE: No

Safety Concerns: She's going to be physically hurt by the pimp running this company. She's being forced to escort for sex and money.

Additional Comments:

Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

the second second

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Signaler/Anonymous contacted the NHTH seeking to report a possible ST situation happening in

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y Summary for Case

Subject

eviewed, potential ST occurring online, no FFC details or details regarding minors provided, no work reg'd at this time

dit Online Report:

converted

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

Date/Time

Туре

Case Review

Conline Report



is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

Case Contact Roles [1] | Referrals To [0] | Direct Reports To [0] | Reported To [0] | Activity History [1] | Chat Transcripts [0] | Work Orders [1] | Google Docs & Attachments [0] | Solutions [0] | Merges From This Case [0] | Merges To This Case [0] | Draft Flex Signals [1] Real Provide

Edit

Case Owner

Ongoing Cases [Change]

Parent Case

Case Number

Contact Name

Contact Email

Priority

Case Number Copy®

ation

View Hierarchy]

Medium

EXHIBIT 3

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

Log an Activity

Send Email

Merge To Another Case

The second second second

Log NCMEC Report Add IPP Headers

Case Record Type

Trafficking [Change]

TIP

Case Color

Color-Coded Category of Case

Case Origin

Date/Time Opened

Hotline Calls Received 0

GREEN-Tip/Intelligence

Hotline

OM

is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister.

SAFETY INFORMATION

SHARING PERMISSIONS

CURRENT SITUATION



NEXT STEPS

PP Correspondence

. Access for PVe' safety

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

is a self-identified PV of ST and is contacting the NHTH from states that she and her sister are both being held by

> is an adult, female, and a USC minor, female, and a USC;13 years old is an adult, female, and a USC an adult, male, and a USC

in order to report a situation of ST involving herself and her minor sister, at:



is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

NEXT STEPS

-

spondence

- Assess for PVs' safety
- Assess for PVs' needs
- Assess for PVs' location

MESSAGING FOR PV

- currently safe?
- Where are you located? -
- Do you need assistance with extraction?

MESSAGING FOR SIGNALER (Name)

MESSAGING FOR SP/LE (Name)



Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

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GREEN-Tip/Intelligence Trafficking

TIP

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Topline Case Summaryo

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Required Data

Level of Trafficking Indicators®	High Indicators
Reason for Choosing Moderate Indicatorso	
Case References Potential Minor(s)	Yes
Minors safe, not involved in situation	No
Location of Situation - Country(ies)	United States

City, State, Country



is a self-identified PV of ST and is contacting the NHTH from n order to report a situation of ST involving herself and her minor sister,

is a self-identified PV of ST and is contacting the NHTH from

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Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

in order to report a situation of ST involving herself and her minor sister,

Status Who Should Review This/When?

Reviewed; Work Not Required Urgent Review (Shifty)

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TIP

GREEN-Tip/Intelligence Trafficking

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Activity Details for Case

SMS Report at

-88-

POTENTIAL VICTIM

Adult -

- Female .
- USC

Minor 12

is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

: 2 Comments



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(Completed)

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

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GREEN-Tip/Intelligence Trafficking

TIP

Hoffine





POTENTIAL TRAFFICKER

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is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

 Status
 Reviewed; Work Not Required

 Priority
 Medium

 Case Owner
 Ongoing Cases

Yes at

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Edit Comments



GREEN-Tip/Intelligence Trafficking

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TIP

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3.44

POTENTIAL TRAFFICKER

- Adult -
- Female -
- USC .
- Adult .
- Male .
- USC .

SUSPICIOUS BUSINESS

• N/A

is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

16



TIP

GREEN- Tip/Intelligence Trafficking

Hoffine



SUSPICIOUS BUSINESS

N/A .

PV WISHES

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Wishes to report, not anonymously 8

SITUATION INFORMATION

and her minor sister,

states that she and her sister are both being held by

Signaler stopped responding due to safety concerns.

is a self-identified PV of ST and is contacting the NHTH from In order to report a situation of ST involving herself and her minor sister,

is a self-identified PV of ST and is contacting the NHTH from

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

in order to report a situation of ST involving herself

* * *

at:

TIP

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GREEN- Tip/Intelligence Trafficking

Hoffine



SITUATION INFORMATION

is a self-identified PV of ST and is contacting the NHTH from

and her minor sister,

states that she and her sister are both being held by

Signaler stopped responding due to safety concerns. .

ACTION TAKEN

Discussed anonymous reporting -

is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

in order to report a situation of ST involving herself

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at

and

GREEN-Tip/Intelligence Trafficking

TIP

Hotline



4 4

Activity Summary for Case





is a self-identified PV of ST and is contacting the NHTH from in order to report a situation of ST involving herself and her minor sister,

reviewed, vague situation information provided, unclear situation as PV stopped responding, no work reg'd at this time

Status Reviewed; Work Not Required Priority Medium Case Owner Ongoing Cases

Date/Time



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Туре

SMS Report

