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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. 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." 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.<sup>3</sup> 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." 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. Given the importance of the NHTH, you must not allow conflicts of interest to affect the contracting process.

<sup>1</sup> 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.

<sup>&</sup>lt;sup>3</sup> 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.

<sup>5</sup> Id.

<sup>&</sup>lt;sup>6</sup> 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. 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." Polaris staff marked "Yes" for the case referencing potential minors and deemed the "Level of Trafficking Indicators" as having "High Indicators." 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."<sup>11</sup> It also notes that there are no existing reports to law enforcement.<sup>12</sup> 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." 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." According to the records, the potential victim and her minor sister were being held by two potential traffickers. 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." Further, according to the records, the potential victim "[w]ishe[d] to report, not anonymously." However, the Polaris case file noted that the potential victim stopped communicating "due to safety concerns." The case file status is described as "unclear situation as [potential victim (PV)] stopped responding" and "Work Not Required." 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.

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

<sup>&</sup>lt;sup>8</sup> Exhibit 2. ("Signaler" indicates that someone other than the potential victim contacted the NHTH.)

<sup>9</sup> *Id*.

<sup>&</sup>lt;sup>10</sup> *Id*.

<sup>&</sup>lt;sup>11</sup> *Id*.

<sup>&</sup>lt;sup>12</sup> *Id*.

<sup>&</sup>lt;sup>13</sup> *Id*.

<sup>14</sup> Id

<sup>&</sup>lt;sup>15</sup> Notes on File with Committee Staff.

<sup>&</sup>lt;sup>16</sup> Exhibit 3.

<sup>&</sup>lt;sup>17</sup> *Id*.

<sup>&</sup>lt;sup>18</sup> *Id*.

<sup>&</sup>lt;sup>19</sup> *Id*.

<sup>&</sup>lt;sup>20</sup> *Id*.

<sup>&</sup>lt;sup>21</sup> Exhibit 3.

<sup>&</sup>lt;sup>22</sup> 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.<sup>23</sup> 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.<sup>24</sup>
- 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,

Charles E. Grassley

Chairman

Committee on the Judiciary

Church Leady

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

<sup>&</sup>lt;sup>24</sup> "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 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 noted in her own email to Ms. Wagner and others last Friday, she has made numerous protected whistleblower disclosures within the organization. The 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."

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."

https://ncdoi.gov/vp-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."

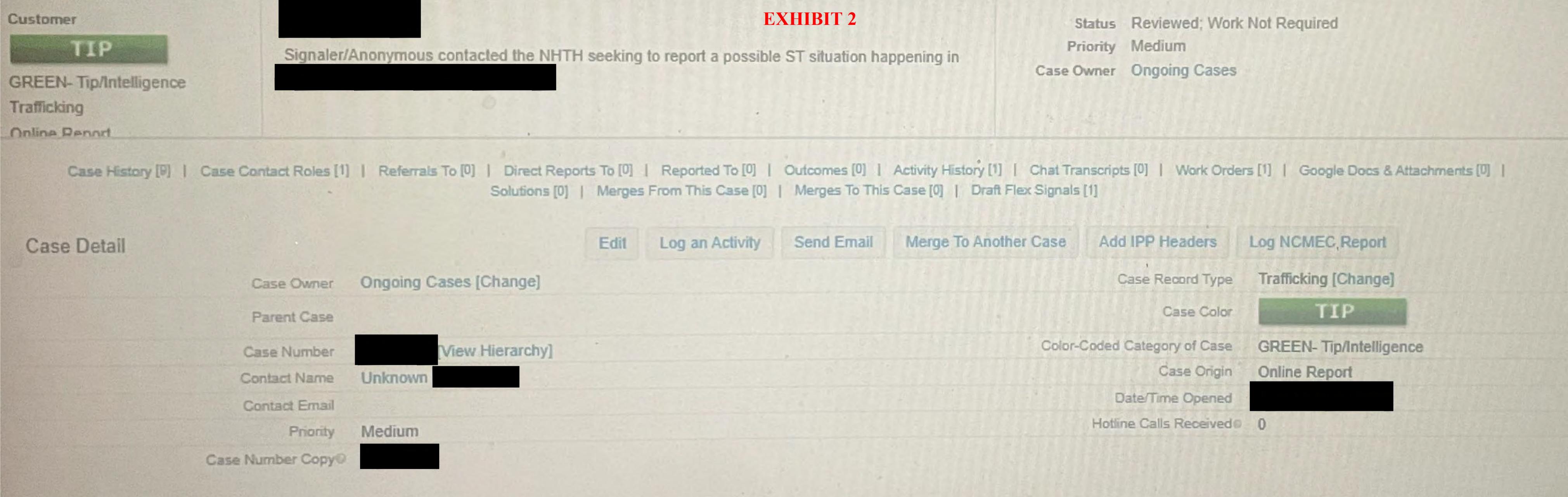
We are in communication with the HHS OIG regarding placement on administrative leave. In order to better understand Polaris's position in this matter, we request that you provide a more specific explanation as to why was placed on administrative leave.

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



elligence

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

Reviewed; Work Not Required

Priority Medium

Ongoing Cases Case Owner

Information

### SAFETY INFORMATION

Signaler/Anonymous

#### SHARING PERMISSIONS

No permissions were shared

#### CURRENT SITUATION

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

#### NEXT STEPS

Assess fir safety

mer TIP EN-Tip/Intelligence cking

a Rennri

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

Signaler reports

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

demands?

#### **NEXT STEPS**

Internal PP Correspondence

- Assess fir safety
- Assess for updates
- · Gather PII

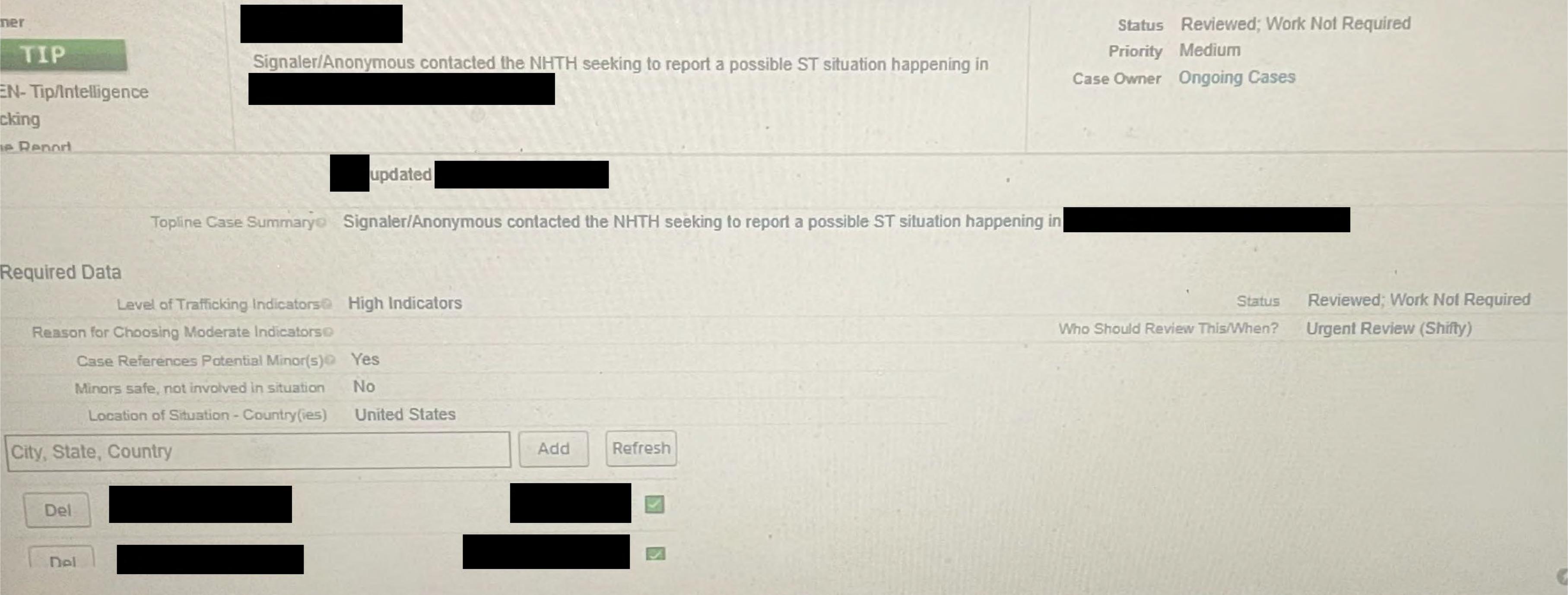
#### MESSAGING FOR PV (Name)

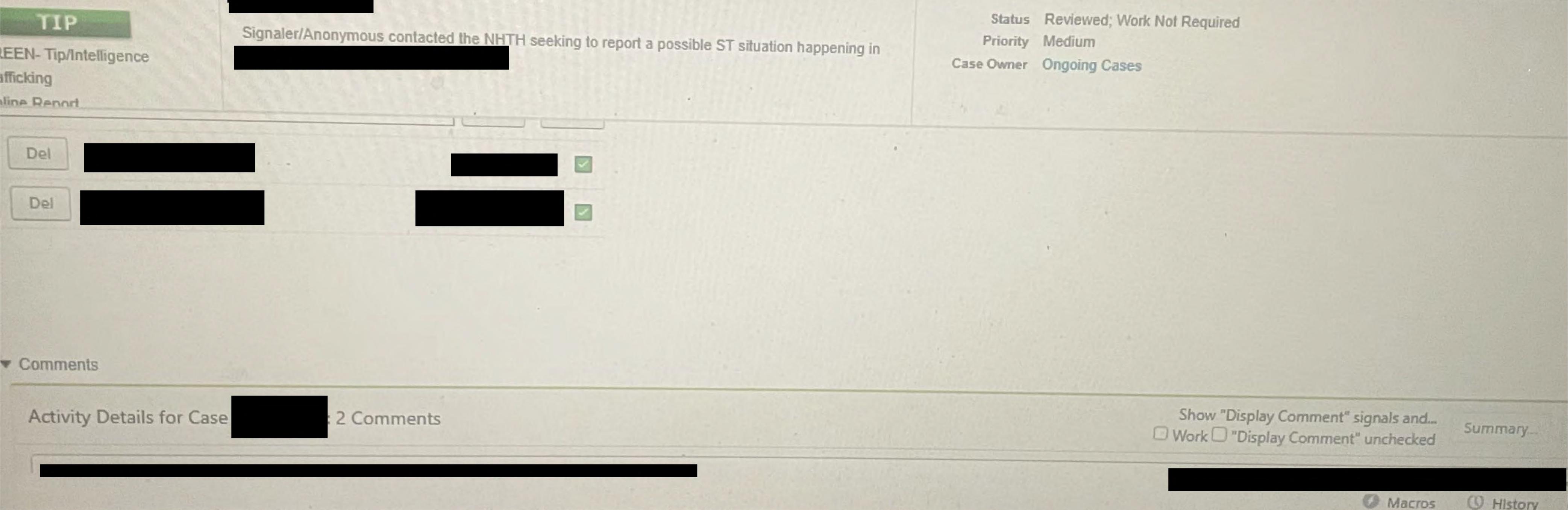
#### MESSAGING FOR SIGNALER (Name)

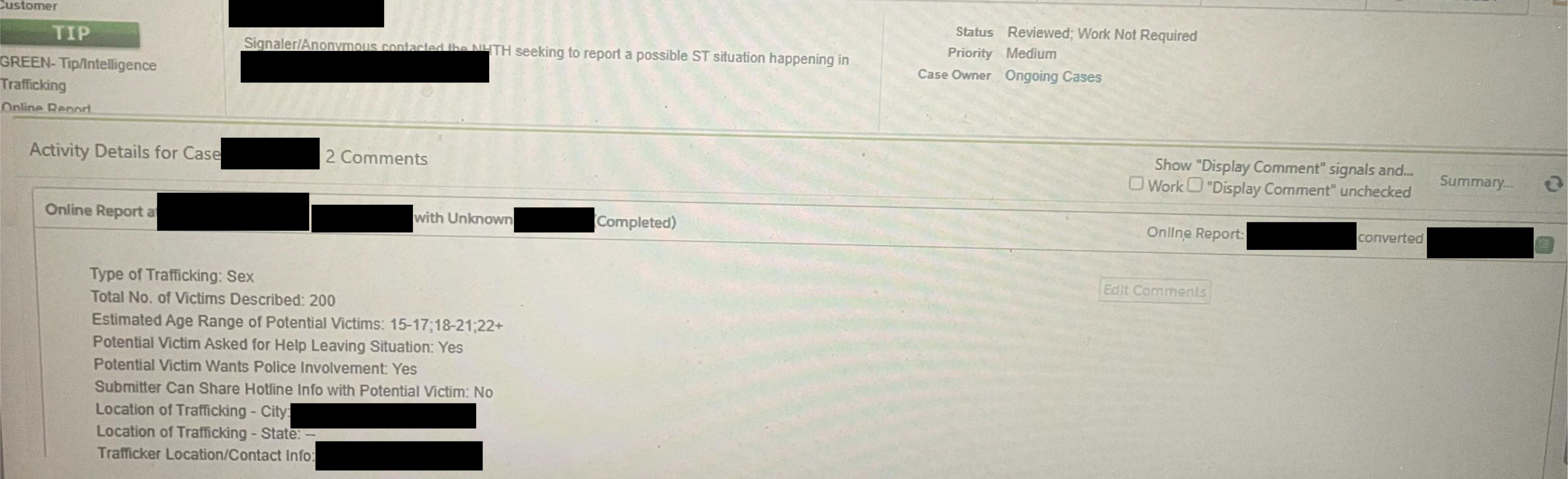
- Do you have an update to provide the NHTH?
- Does PVs have any medical concerns or injuries?
- able to contact the NHTH for support?
- own weapons?
- What happens if PVs do not comply with

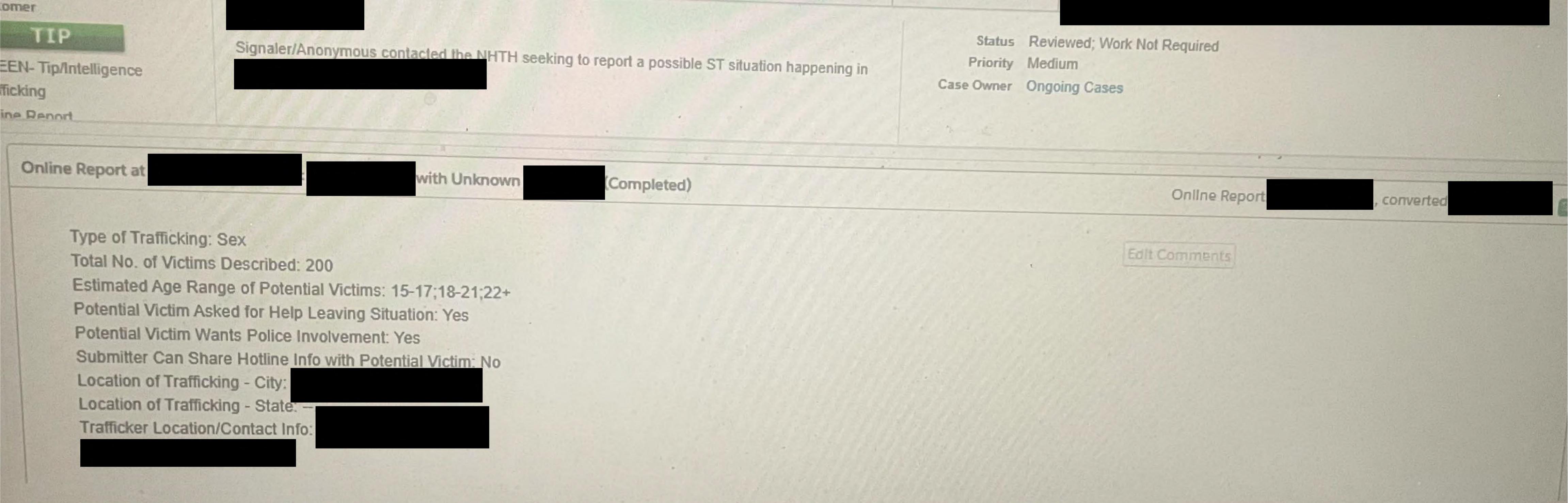
#### MESSAGING FOR SP/LE (Name)

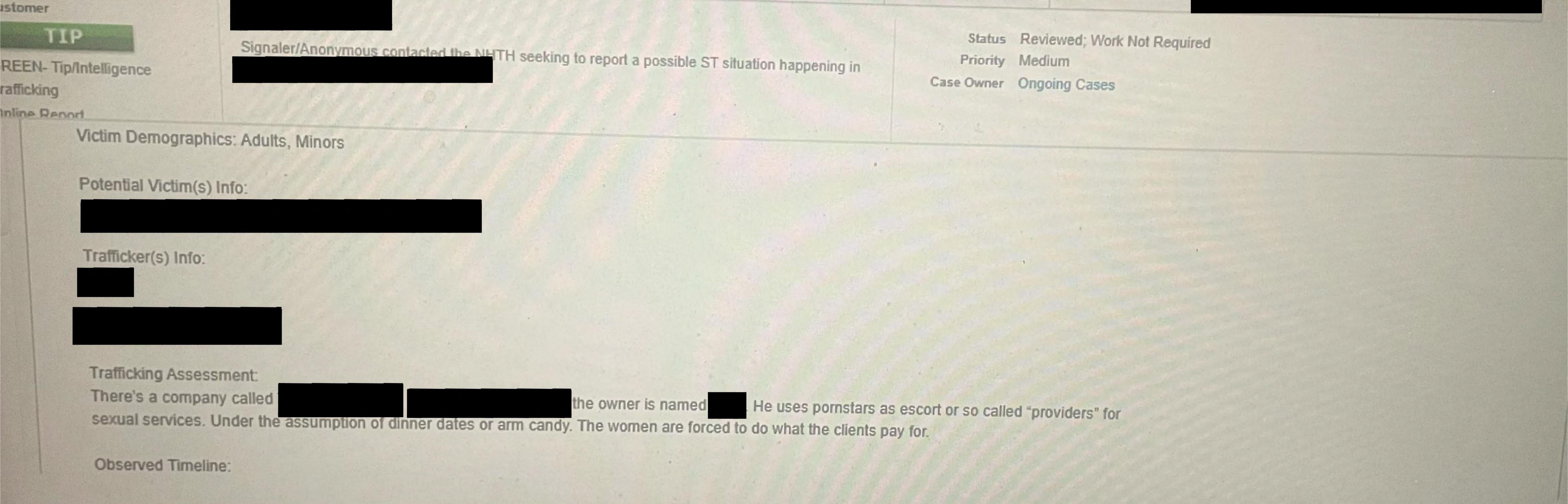
60 Mar.











Tip/Intelligence

enort.

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

He uses pornstars as escort or so called "providers" for Trafficking Assessment: the owner is named There's a company called sexual services. Under the assumption of dinner dates or arm candy. The women are forced to do what the clients pay for,

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.

mer

TIP

EN-Tip/Intelligence

e Renort

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

Observed Timeline:

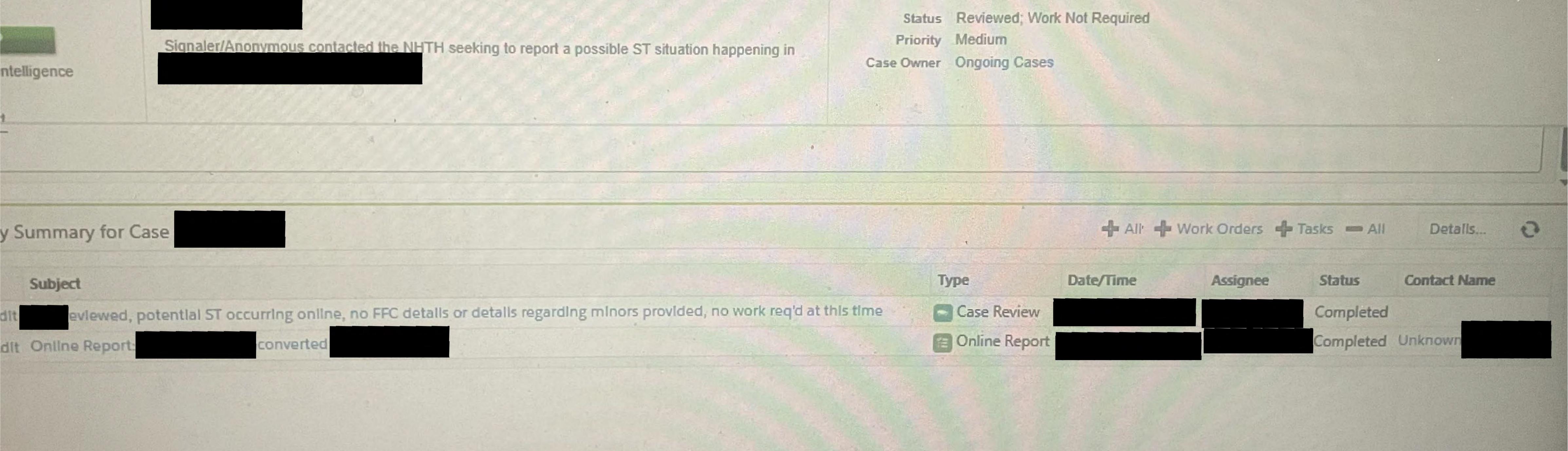
Existing Reports to LE:

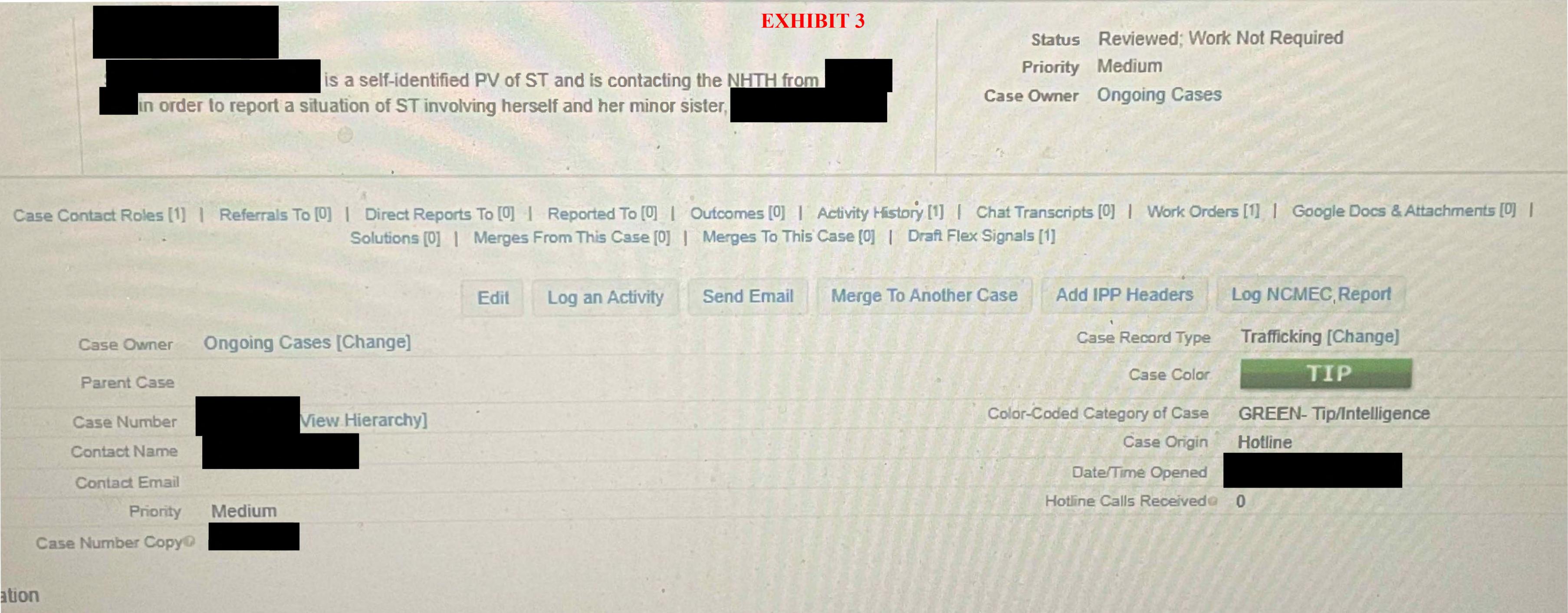
No

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:





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.

Status Reviewed; Work Not Required

Priority Medium

Case Owner Ongoing Cases

## SAFETY INFORMATION

SHARING PERMISSIONS

### CURRENT SITUATION

- 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
- a minor, female, and a USC;13 years old
- is an adult, female, and a USC
- an adult, male, and a USC
- Signaler stopped responding due to safety concerns.

### NEXT STEPS

PP Correspondence

. Accese for PVe' eafetu

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

espondence

#### **NEXT STEPS**

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

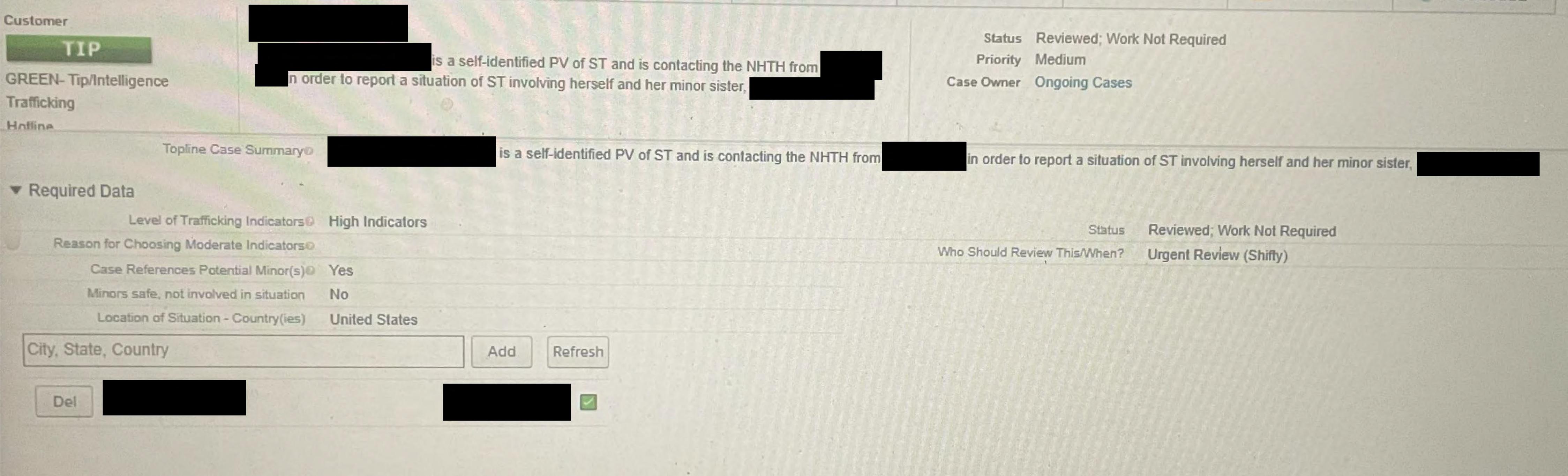
#### MESSAGING FOR PV

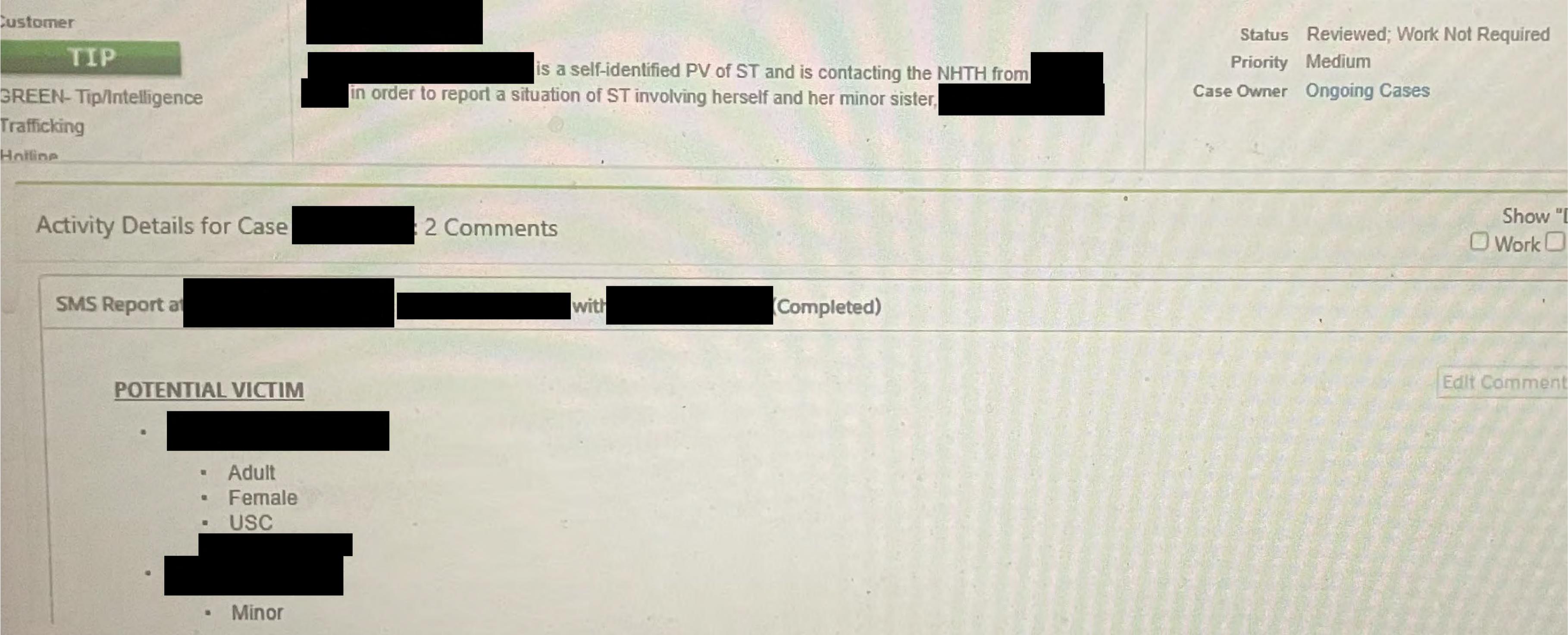
- Arn
  - Are currently safe?
- Where are you located?
- Do you need assistance with extraction?

MESSAGING FOR SIGNALER (Name)

MESSAGING FOR SP/LE (Name)

updated





Customer

TIP

GREEN-Tip/Intelligence

Trafficking

Hoffine

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

## POTENTIAL VICTIM

- Adult
- · Female
- · USC
- - Minor
  - Female
  - · USC

## POTENTIAL TRAFFICKER

Edit Comments

Customer

TIP

GREEN- Tip/Intelligence

Trafficking

Hollina

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

## POTENTIAL TRAFFICKER

- - Adult
  - FemaleUSC
- .
- Adult
- Male
- USC

## SUSPICIOUS BUSINESS

· N/A

TIP Status Reviewed; Work Not Required is a self-identified PV of ST and is contacting the NHTH from GREEN-Tip/Intelligence in order to report a situation of ST involving herself and her minor sister, Priority Medium Trafficking Case Owner Ongoing Cases Hoffina SUSPICIOUS BUSINESS N/A PV WISHES Wishes to report, not anonymously SITUATION INFORMATION 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, states that she and her sister are both being held by at: Signaler stopped responding due to safety concerns.

Customer

GREEN- Tip/Intelligence in order to report a situation of ST involving herself and her minor sister,

Hoffine

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

## 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

