

EMPOWER OVERSIGHT

Whistleblowers & Research



May 28, 2025

VIA ELECTRONIC TRANSMISSION: FOIAREQUEST@HHS.GOV

Department of Health and Human Services
Freedom of Information Act Office
Hubert H. Humphrey Building, Room 729H
200 Independence Avenue, SW
Washington, D.C. 20201

**RE: Request for Records Related to
National Human Trafficking Hotline**

Dear FOIA Officer:

INTRODUCTION

Empower Oversight Whistleblowers & Research ("Empower Oversight") is a nonpartisan, nonprofit educational organization, which is dedicated to enhancing independent oversight of government and corporate wrongdoing. The organization works to help insiders safely and legally report waste, fraud, abuse, corruption, and misconduct to the proper authorities, and seeks to hold those authorities accountable to act on such reports by, among other means, publishing information concerning the same.

BACKGROUND

The Department of Health and Human Services ("HHS") is responsible for the administration of the National Human Trafficking Hotline. The hotline is funded through a grant from HHS's Administration for Children & Families. Since 2007, HHS has contracted with the Polaris Project to provide this critical public safety service. For this, Polaris has received millions in funding. And now, through a notice of funding posted on January 16, 2025, HHS is once

again considering whether to renew this grant to Polaris or to bring on a new partner to run the hotline. The deadline for grant applications is May 30, 2025.¹

However, in a May 5, 2025, letter to the HHS Secretary Senate Judiciary Chairman Charles Grassley revealed that a whistleblower represented by Empower Oversight has made protected disclosures to Congress revealing deep and systemic problems with how Polaris has administered the program to date.² Examples of the problems are included in Chairman Grassley's letter. And as the letter notes, additional complaints over Polaris have come from bipartisan coalitions of large numbers of state Attorneys General who sent letters in 2023 and 2025.³ The whistleblower information in Chairman Grassley's letter reveals that the problems run deeper than even the Attorneys General were aware. The Attorneys General were concerned over a lack of reporting to local law enforcement of tips from third parties about the sex trafficking of adult victims. But the whistleblower information reveals that at least in some instances, even information concerning the sex trafficking of minors is not being reported. The problem is widespread and alarming.

In addition, it has come to light that Polaris co-founder Katherine Chon may have potential oversight of this grant award as Director of HHS's Office on Trafficking in Persons. There are legitimate concerns over this potential conflict of interest.

RECORDS REQUEST

Accordingly, pursuant to the Freedom of Information Act ("FOIA") (5 U.S.C. § 552), for the period from January 1, 2007, through the present, Empower Oversight requests the following records:

1. All records of communications, including calendar entries, invites, responses, notes, and emails, or email attachments between Katherine Chon and other HHS employees with the keywords "Polaris" or "National Human Trafficking Hotline."
2. All records of communications, including calendar entries, invites, responses, notes, and emails, or email attachments between Katherine Chon and Polaris employees or management.

DEFINITIONS

"COMMUNICATION(S)" means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more persons, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, voice-mail messages, text messages, Slack messages, meeting minutes, discussions, releases, statements, reports, publications, and any recordings or reproductions thereof.

¹ <https://www.grants.gov/search-results-detail/355255>.

² https://www.grassley.senate.gov/imo/media/doc/grassley_to_hhs_-_national_human_trafficking_hotline.pdf.

³ <https://www.naag.org/wp-content/uploads/2023/02/State-Attorney-General-Letter-to-Congress-Polaris.pdf>;
https://www.naag.org/wp-content/uploads/2025/04/National-Human-Trafficking-Hotline_FINAL.pdf.

“DOCUMENT(S)” or “RECORD(S)” mean any kind of written, graphic, or recorded matter, however produced or reproduced, of any kind or description, whether sent, received, or neither, including drafts, originals, non-identical copies, and information stored magnetically, electronically, photographically, or otherwise. As used herein, the terms “DOCUMENT(S)” or “RECORD(S)” include, but are not limited to, studies, papers, books, accounts, letters, diagrams, pictures, drawings, photographs, correspondence, telegrams, cables, text messages, emails, memoranda, notes, notations, work papers, intra-office and inter-office communications, communications to, between and among employees, contracts, financial agreements, grants, proposals, transcripts, minutes, orders, reports, recordings, or other documentation of telephone or other conversations, interviews, affidavits, slides, statement summaries, opinions, indices, analyses, publications, questionnaires, answers to questionnaires, statistical records, ledgers, journals, lists, logs, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, tapes, discs, microfilm, and all other records kept, regardless of the title, author, or origin.

“PERSON” means individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

“REFERS,” “REFERRING TO,” “REGARDS,” “REGARDING,” “RELATES,” “RELATING TO,” “CONCERNS,” “BEARS UPON,” or “PERTAINS TO” mean containing, alluding to, responding to, commenting upon, discussing, showing, disclosing, explaining, mentioning, analyzing, constituting, comprising, evidencing, setting forth, summarizing, or characterizing, either directly or indirectly, in whole or in part.

“INCLUDING” means comprising part of, but not being limited to, the whole.

INSTRUCTIONS

The words “and” and “or” shall be construed in the conjunctive or disjunctive, whichever is most inclusive.

The singular form shall include the plural form and vice versa.

The present tense shall include the past tense and vice versa.

In producing the records described above, you shall segregate them by reference to each of the numbered items of this FOIA request.

If you have any questions about this request, please contact Bobby Cheren by e-mail at bcheren@empowr.us.

FEE WAIVER REQUEST

Empower Oversight agrees to pay up to \$25.00 in applicable fees but notes that it qualifies as a “representative of the news media” and requests a waiver of any fees that may be associated with processing this request, in keeping with 5 U.S.C. § 552 (a)(4)(A)(iii).

Empower Oversight is a non-profit educational organization as defined under Section 501(c)(3) of the Internal Revenue Code, which helps insiders safely and legally report waste, fraud, abuse, corruption, and misconduct to the proper authorities, and seeks to hold those authorities accountable to act on such reports by, among other means, publishing information concerning the same.

Further, the information that Empower Oversight seeks is in the public interest because it is likely to contribute significantly to the public’s understanding of HHS’s administration of the National Human Trafficking Hotline.

Empower Oversight is committed to government accountability, public integrity, and transparency. In the latter regard, the information that that Empower Oversight receives that tends to explain the subject matter of this FOIA request will be disclosed publicly via its website, and copies will be shared with other news media for public dissemination.

For ease of administration and to conserve resources, we ask that documents be produced in a readily accessible electronic format. Thank you for your time and consideration. Please do not hesitate to contact me with any questions.

Cordially,
/Tristan Leavitt/
Tristan Leavitt
President