

EMPOWER OVERSIGHT

Whistleblowers & Research



August 5, 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 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.

However, complaints over Polaris have come from bipartisan coalitions of large numbers of state Attorneys General who sent letters in 2023 and 2025.¹ 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.

On May 5, 2025, Senate Judiciary Committee Chairman Charles Grassley wrote to Secretary Kennedy, detailing problems with Polaris's administration of the hotline.² Chairman Grassley's letter asked Secretary Kennedy what steps HHS had taken to ensure that apparent conflicts of interest between HHS Office on Trafficking in Persons ("OTIP") Director Katherine Chon, who co-founded Polaris and led the organization for nearly a decade, do not affect the current process of selecting a recipient for the most recent grant to run the hotline. The appearance of these conflicts of interest is heightened by recent revelations that after she left Polaris for HHS, Chon married her successor as the head of Polaris, Bradley Myles. Accordingly, on May 28, 2025, Empower Oversight submitted a Freedom of Information Act ("FOIA") request for Ms. Chon's communications regarding Polaris or with Polaris employees directly.

Empower Oversight then learned that the Office on Trafficking in Persons ("OTIP") has been in contact with state attorney general offices regarding the administration of the hotline. This information raises the question of whether Ms. Chon is involved in defending Polaris's administration of the hotline. Accordingly, on June 3, 2025, Empower Oversight submitted a second FOIA request for OTIP's communications with state attorney general offices.

Ms. Chon should not be involved in overseeing the administration of the hotline by Polaris. One of the key components of Ms. Chon's resume is her founding of Polaris. If Polaris is removed from the administration of the hotline, it would unmistakably reflect poorly on her professional history. Furthermore, Ms. Chon's husband continued to lead Polaris even after she departed. She has a clear interest in seeing that Polaris continues to administer the hotline. It is unclear how Ms. Chon would have received clearance from ethics officials at HHS to continue participating in the administration of the hotline.

RECORDS REQUEST

Accordingly, pursuant to FOIA (5 U.S.C. § 552), Empower Oversight requests the following records:

1. For the period from January 1, 2007, through the present, all records of communications, including calendar entries, invites, responses, notes, and emails, or email attachments between Katherine Chon and HHS employees with the keywords "Polaris" or "National Human Trafficking Hotline."
2. For the period from January 1, 2013, through the present, all records of communications, including calendar entries, invites, responses, notes, and emails, or email attachments between Katherine Chon and Polaris employees or management.

¹ <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.

² [https://www.grassley.senate.gov/imo/media/doc/grassley to hhs - national human trafficking hotline.pdf](https://www.grassley.senate.gov/imo/media/doc/grassley%20to%20hhs%20-%20national%20human%20trafficking%20hotline.pdf).

3. For the period from January 1, 2013, through the present, all records of communications, including calendar entries, invites, responses, notes, and emails, or email attachments, concerning Katherine Chon's apparent or actual conflict of interest in interacting with Polaris or dealing with the administration of the National Human Trafficking Hotline.
4. For the period from January 1, 2023, through the present, all records of communications, including calendar entries, invites, responses, notes, and emails, or email attachments, between OTIP and state attorneys general offices, including all records of communications which reference "Polaris," "National Human Trafficking Hotline," or "Hotline."

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.

"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.

"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 [REDACTED].

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