

Polaris Project:
An Open-Source Investigation

Counter Trafficking Alliance (2023)

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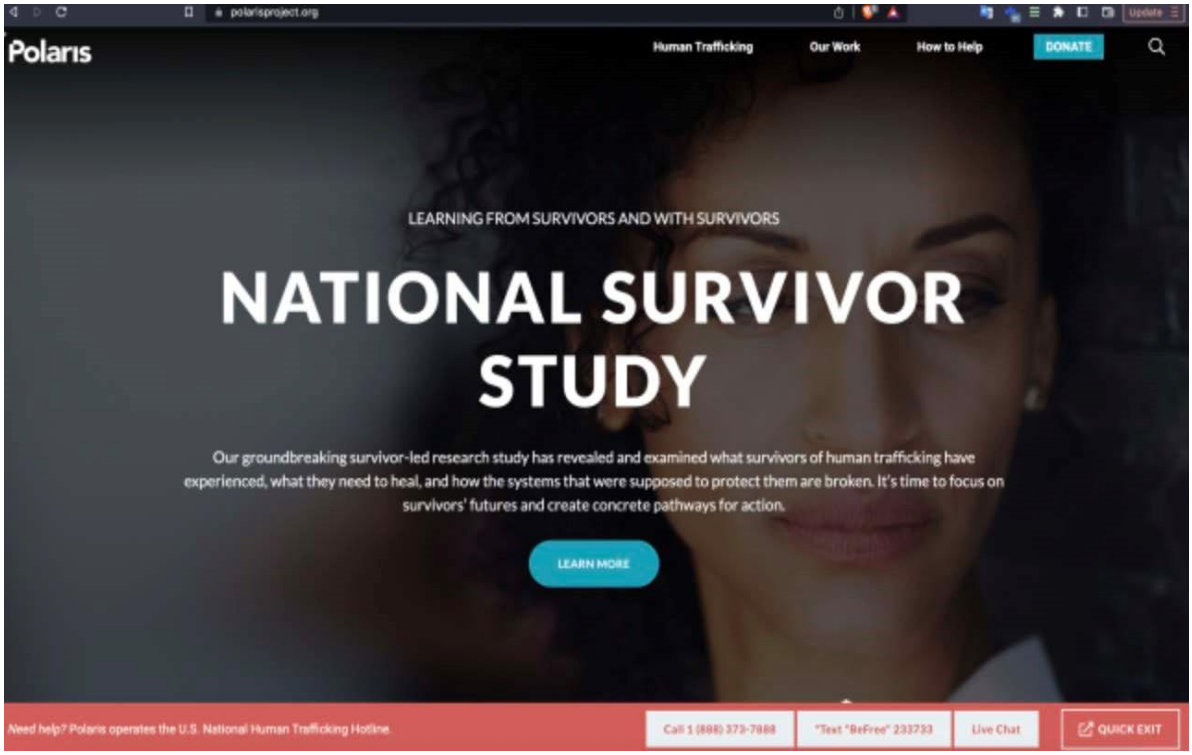
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1 Polaris Project: Profile Introduction

A trafficked victim narrowly escapes her pimp and begins her desperate search for help. She is alone – she has no friends to turn to, no family to call, and is too frightened to contact local law enforcement. There is no time to pause, and each passing minute is essential to her survival. If she does not act quickly, there is a high chance that someone would recognize her and bring her back to her pimp, who would certainly punish her severely for her escape.

What can she do? Who can she call? Where can she go for immediate help?

The number “1-888-373-7888” is a widely recognized hotline also known as the National Human Trafficking Hotline, serving as beacon of hope for victims and survivors. This hotline, which is operated by Polaris Project, was laminated to provide assistance, hope, and resources to those directly affected by human trafficking. Polaris established its presence through its close collaboration with government agencies and marketing of its hotline in settings such as bathroom stalls at the airport, or local salons Through a single message, ‘If in distress, call this number’.



Today, one would think that Polaris would be a reliable organization for immediate rescue and resources. However, recent real-life cases that were brought to Counter Trafficking Alliance's (CTA) attention forced the organization to reevaluate Polaris' intentions. These testimonies range from actual victims or families of victims who interfaced with the hotline, local organizations who attempted to collaborate with Polaris and reviews from previously employed staff members. As a result, this report was conceived.

The contents within this report were framed around a single question regarding Polaris Project's resource and money allocation and how it directly served — or failed to serve — victims and survivors. Counter Trafficking Alliance's mission is to eradicate all variances of human trafficking, and one of the methods to fulfill that mission is through investigative audits of similar organizations within the industry intended to meet the needs of trafficking victims, and to inform that grade to the public.

With so many other subjects at higher priority by the media, often survivor voices are muffled and silenced, without being given a platform to collectively speak on. Slight clues have intrigued us at Counter Trafficking Alliance, by being offered some traces of insight that the National Human Trafficking Hotline may not be so helpful as it advertises.

A spokesperson for Pathfinder Shelter, local to South Dakota, commented to news group, Kelo Land[1], an intriguing detail whilst explaining why they keep their doors open to any victim in need:

> *"...So that if anyone is being trafficked, there's a local number that you can call, not the national human trafficking hotline because for some survivors that just wasn't enough for them. Survivors need something local right away that they can get to..."*

What exactly could cause an erosion of confidence in a nationally promoted hotline?

[1] https://www.keloland.com/news/local-news/efforts-underway-to-stop-sex-trafficking-at-sturgis-rally/

1.1 Discovery

Polaris Project was started in 2002 by Derek Ellerman and Katherine Chon shortly before graduating college at Brown University. Upon learning about modern day slavery, it was beckoned upon them to do something about it. They incorporated themselves as Polaris Project, entered an entrepreneurship contest at their college and won second prize at $12,500. Soon after, they packed up a U-Haul and moved to Washington, D.C. to set up shop.

First, we must understand the core of Polaris' organization: the trafficking hotline. It is the lifeline which Polaris uses to establish its existence. Therefore, it is imperative for the hotline to operate at its most efficient – with trained and adequate staff members, easy access to services, and readily available assistance. If there is an increase in call volume or reports of trafficked victims, it is expected for Polaris to refine its operations to meet the needs of its core subjects.

Polaris describes its hotline in a Hotline Catalyst Program [2]report as a sound framework which was used in similar anti-trafficking hotline programs for Canada and Mexico:

"Hotlines are inherently complicated operations – requiring human trafficking, technology, data, advocacy, and policy acumen all working in sync to build a trusted resource that can both reach and serve survivors. When done well, the effect reaches far beyond the work done on individual cases, providing a focal point to catalyze a national anti-trafficking movement across all stakeholder sectors. Polaris's Hotline Catalyst Program offers specially designed, proven tools, trainings, practices, knowledge, and standards related to designing, developing, and operating effective, sustainable, and victim-centered national human trafficking hotlines.

Our methods have been tested and refined over a decade, through operating the world's premiere national human trafficking hotline in the United States, and we have been instrumental in providing consultation and support to new and existing hotlines in seven countries. Led by a team of Polaris global hotlines experts, Polaris works closely with each country partner to identify ambitious yet realistic goals for their hotline, craft a customized roadmap for getting there, provide guidance on how to adapt these practices to different country contexts, and scope out each step along the way. Our aim is to accelerate a country's learning curve, avoid any reinvention of the wheel, ensure efficient deployment of resources and ultimately, to achieve maximum impact and to get it right the first time."

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[2] **https://polarisproject.org/wp-content/uploads/2020/06/Polaris-2019-AnnualReport.pdf**



The Hotline Catalyst Program

Polaris — Freedom happens now.

www.polarisproject.org

ABOUT

Hotlines are inherently complicated operations – requiring human trafficking, technology, data, advocacy, and policy acumen all working in sync to build a trusted resource that can both reach and serve survivors. When done well, the effect reaches far beyond the work done on individual cases, providing a focal point to catalyze a national anti-trafficking movement across all stakeholder sectors. Polaris's Hotline Catalyst Program offers specially designed, proven tools, trainings, practices, knowledge and standards related to designing, developing, and operating effective, sustainable, and victim-centered national human trafficking hotlines.

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"The Canadian Centre to End Human Trafficking has benefited immeasurably from Polaris' profound expertise in human trafficking hotline operations. Polaris' capacity to deliver customized technical, HR, and strategic advisory services has enabled The Centre to plan with insight and focus on critical milestones throughout the design and development phase. In the course of working with Polaris, The Centre has been impressed with its professionalism, responsiveness, and adaptability to our needs and circumstances.

- Canadian Centre to End Human Trafficking (CCTEHT)

"Consejo Ciudadano has been operating a civil hotline for the inhabitants of Mexico City and its metropolitan area (18 million people) for more than 10 years. Working with Polaris has allowed us to consolidate the only national hotline in Mexico specialized in human trafficking, based on an existing service model since 2013, with the ability to reach victims and survivors and serve as a network of trust and security with coverage throughout the country. The experience, effectiveness and knowledge of Polaris are unparalleled. The program was designed together, specifically to meet the needs of our national hotline, our nation and, most importantly, the people we serve.

- Consejo Ciudadano de la Ciudad de Mexico

HOW IT WORKS

We meet our clients wherever they are in their hotline journeys. Some clients seek support setting up a brand new hotline; others are already operating a hotline, but not seeing the results they would like. We know firsthand the multitude of factors that go into building, evolving and growing a hotline.

Phase 1: Hotline Scoping Assessment

All of our partner engagements begin with a robust, comprehensive onsite assessment to examine the enabling environment, infrastructure, and institutional readiness for establishing an effective, victim-centered national human trafficking hotline, or helping an existing hotline scale its reach and impact. During the assessment, Polaris convenes workshops and interviews with key stakeholders to identify existing human, policy, technology, and institutional assets necessary for an effective human trafficking hotline, while surfacing areas for improvement. The assessment concludes with a post-assessment report detailing findings and key recommendations, and a detailed roadmap of future activities to help partners achieve their goals and maximize the hotline's impact. As appropriate, the report will also outline next steps in phase two, the project implementation.

Learn More: View the Human Trafficking Hotline Scoping Assessment At-A-Glance for more

Phase 2: Project Implementation

A Polaris team of global hotlines experts will deliver a highly customized, intensive training and consultation program and hotline development toolkit featuring topics related to designing, developing, operating and optimizing national human trafficking hotlines. Based on their needs and capacities identified during the assessment, the client will choose from a list of offerings which involve some combination of the following: one-on-one interviews, onsite and remote consultations and trainings, specially designed ready-to-use tools and solutions, technical support, assessments and evaluations, review and feedback on policies, protocols, and materials developed by the client, and implementation support.

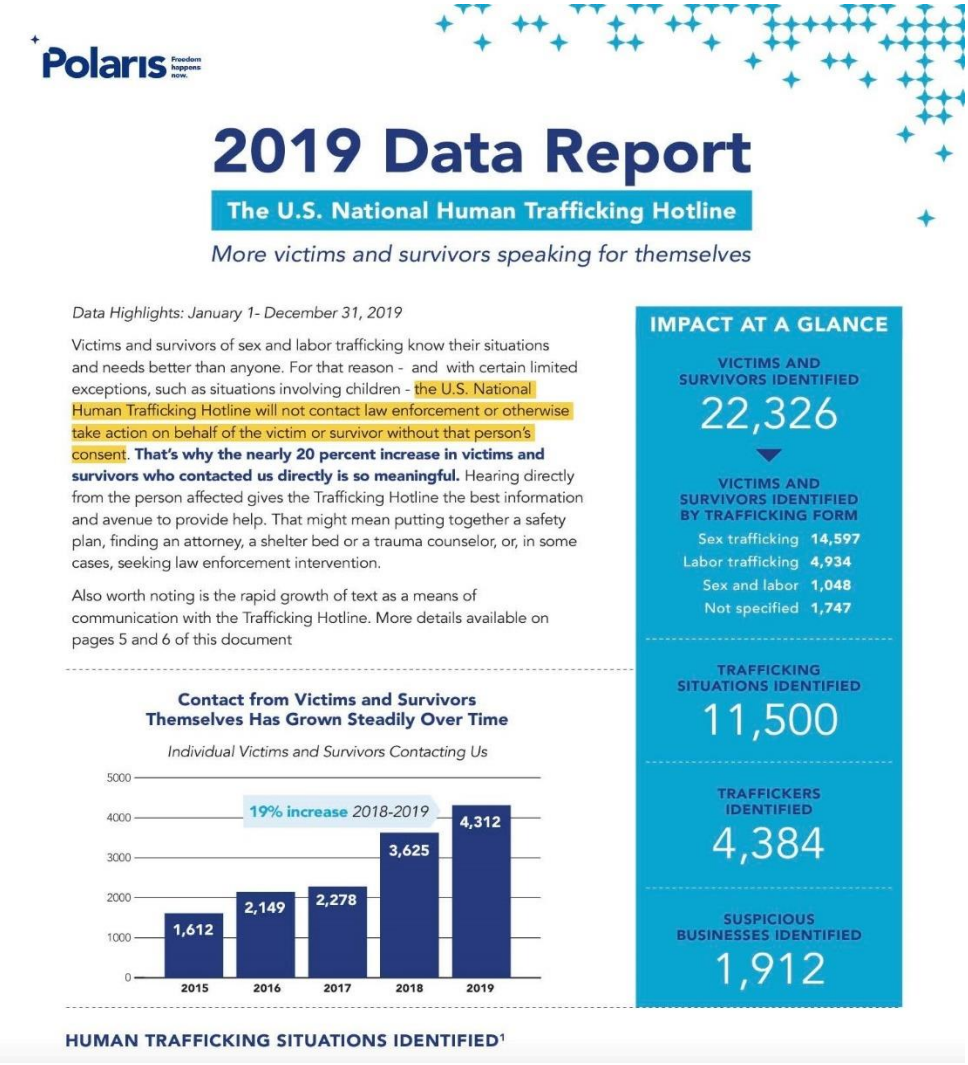
What is the user journey for the hotline? It is briefly described as the following:

1. A person (victim, officer, trafficker, family member, etc.) contacts the hotline through one of the available communication methods — phone call, text, email, online report, or webchat.
2. An advocate answers the call and may ask specific questions depending on the victim's status.
3. The advocate (supposedly) documents the report in a system for further action, if needed.

This alone is the only documentation available to describe the call journey. Polaris lacks transparency in the post-report process after a report is submitted, or if calls are created into cases to then allow follow-up action. Without clarity or direction, victims, and other callers, are left unclear on the expectations and/or outcomes.

It is noted in their 2019 report that the hotline will not contact law enforcement or otherwise take action on behalf of the victim or survivor without the person's consent. But possible actions if allowed to act include: putting together a safety plan, finding an attorney, shelter bed or a trauma counselor, and in some cases, seeking law enforcement intervention.

There does not appear to be a clear workflow of how a call is structured when a user calls in. The world needs reassurance that voices



Polaris

2019 Data Report

The U.S. National Human Trafficking Hotline

More victims and survivors speaking for themselves

Data Highlights: January 1- December 31, 2019

Victims and survivors of sex and labor trafficking know their situations and needs better than anyone. For that reason - and with certain limited exceptions, such as situations involving children - the U.S. National Human Trafficking Hotline will not contact law enforcement or otherwise take action on behalf of the victim or survivor without that person's consent. **That's why the nearly 20 percent increase in victims and survivors who contacted us directly is so meaningful.** Hearing directly from the person affected gives the Trafficking Hotline the best information and avenue to provide help. That might mean putting together a safety plan, finding an attorney, a shelter bed or a trauma counselor, or, in some cases, seeking law enforcement intervention.

Also worth noting is the rapid growth of text as a means of communication with the Trafficking Hotline. More details available on pages 5 and 6 of this document

Contact from Victims and Survivors Themselves Has Grown Steadily Over Time

Individual Victims and Survivors Contacting Us

IMPACT AT A GLANCE

VICTIMS AND SURVIVORS IDENTIFIED
22,326

VICTIMS AND SURVIVORS IDENTIFIED BY TRAFFICKING FORM

Sex trafficking	14,597
Labor trafficking	4,934
Sex and labor	1,048
Not specified	1,747

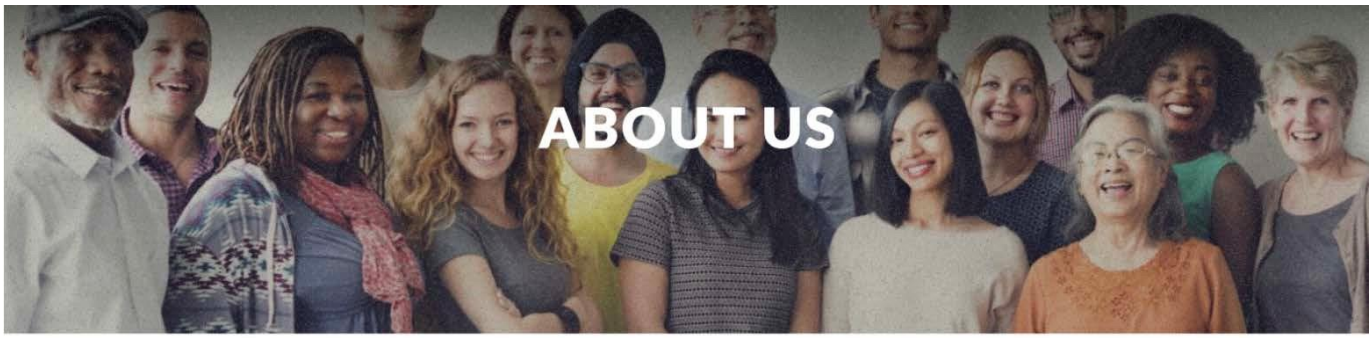
TRAFFICKING SITUATIONS IDENTIFIED
11,500

TRAFFICKERS IDENTIFIED
4,384

SUSPICIOUS BUSINESSES IDENTIFIED
1,912

HUMAN TRAFFICKING SITUATIONS IDENTIFIED[1]

are heard, and Polaris will take action to save, protect, and monitor these victims.



Mission and Vision

Named after the North Star, an historical symbol of freedom, Polaris is leading a survivor-centered, justice- and equity-driven movement to end human trafficking. Since 2007, Polaris has operated the U.S. National Human Trafficking Hotline, connecting victims and survivors to support and services, and helping communities hold traffickers accountable. Through that work, Polaris has built the largest known dataset on human trafficking in North America. The data and expertise gained from two decades of working on trafficking situations in real time informs strategies that hold traffickers accountable, support survivors on their healing journeys and address the vulnerabilities that enable the business of stealing freedom for profit.

1.2 Mission

"Since 2007, Polaris has operated the U.S. National Human Trafficking Hotline, connecting victims and survivors to support and services, and helping communities hold traffickers accountable. Through that work, Polaris has built the largest known dataset on human trafficking in North America. The data and expertise gained from two decades of real-time trafficking cases was intended to influence strategies that hold traffickers accountable, support survivors on their healing journeys and address the vulnerabilities that enable the business of stealing freedom for profit."

There are some indicators that there may have been some bumps in the road with their mission. Let's take a look at some springboard concerns that may bring about a national outcry.

1.3 A National Outcry

On February 27, 2023, the National Association of Attorneys General wrote a critical letter to congressional leaders, declaring an issue detected within the National Human Trafficking Hotline. The letter drafted was a bipartisan submission on behalf of 36 state and territory Attorney Generals.

Since 2007, by congressional-authorized funding, Polaris has operated the National Human Trafficking Hotline. There is dependency of this hotline, by state, to provide necessary information and tips that could aid arrests of human traffickers, as well as enable victim recovery and rescue.

It was expected that Polaris would forward these tips to law enforcement but in reality, they would only do so in “limited circumstances” where adult victims were “self-reporting” and “affirmatively” consenting to the report.

This leaves a major room for error in circumstances where family may call on behalf of an enslaved family member, or in circumstances where the victim is in a time restricted window. It’s also important to remember trafficking is a very psychologically challenging situation and often, victims are threatened and intimidated to the point of immense fear of repercussions, in the event of an official report.

**See next page for official NAAG letter.*

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PRESIDENT-ELECT
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February 27, 2023

The Honorable Chuck Schumer
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322 Hart Senate Office Bldg.
Washington, D.C. 20510

The Honorable Mitch McConnell
Senate Minority Leader
317 Russell Senate Office Bldg.
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The Honorable Kevin McCarthy
Speaker of the House
2468 Rayburn House Office Bldg.
Washington, D.C. 20515

The Honorable Hakeem Jeffries
House Minority Leader
2433 Rayburn House Office Bldg.
Washington, D.C. 20515

Re: National Human Trafficking Hotline reports

Dear Majority Leader Schumer, Minority Leader McConnell, Speaker McCarthy, and Minority Leader Jeffries,

It has recently come to our attention that the National Human Trafficking Hotline ("Hotline"), which Congress has funded for 15 years, 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. Not only do we believe this action contravenes one of Congress' intended functions of the Hotline, but we believe it disrupts the federal-state partnership to end human trafficking and help its victims.

By its own accounts, Polaris operates the Hotline to, among other things, "take tips of suspected human trafficking from community members."[1] The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services, which administers the grant under which Polaris operates the Hotline, specifically notes that it "takes tips about potential situations … and facilitates reporting to specialized human trafficking task forces, federal authorities, local law enforcement, and service providers throughout the country."[2]

[1] www.polarisproject.org/responding-to-human-trafficking/
[2] https://www.acf.hhs.gov/otip/victim-assistance/national-human-trafficking-hotline

ACF touts that since its inception, the Hotline has provided more than 15,000 tips to law enforcement[3] and Polaris reports that its most frequent request on human trafficking cases is to "Report a Trafficking Tip."[4] According to its own statistics, of the 10,360 cases identified by the Hotline in 2021, 6,546 were from citizens reporting a suspected trafficking situation.[5] In contrast, only 3,284 were calls requesting service referrals.[6] Of the 51,073 signals, meaning contacts by call, text, web message, chat or other form of communication, 13,277 of were from victims or survivors of trafficking.[7]

The National Human Trafficking Hotline website displays several ways that citizens may submit a tip, including via phone, text, chat, or online submission.[8] Congress and many states have taken steps to ensure that the Hotline information is widely disseminated so that citizens can report suspected trafficking directly to the National Hotline. Those tips are crucial to catching criminals, to recovering victims, to uncovering evidence of broader trafficking operations, and more. Those tips help local and state law enforcement to end trafficking and to help its victims.

This past summer, Mississippi Attorney General Lynn Fitch met with Catherine Chen, Chief Executive Officer of Polaris, to discuss her concerns about the lack of adult tips Mississippi was receiving from the Hotline. Ms. Chen explained that Polaris uses a victim-centered approach that takes into consideration the potential adverse consequences to victims. As further explained on its website, "Except in situations involving potential abuse of a minor or if we believe a person is in imminent danger, the Trafficking Hotline will not take action without the consent of the person in the situation."[9]

Many states also take a victim-centered approach to suspected instances of human trafficking. For instance, the Mississippi Attorney General's Office regularly conducts joint operations with local law enforcement across the State, which invariably include opportunities for victims to be connected with the appropriate services for recovery. In fact, the training provided to local law enforcement and prosecutors on human trafficking investigations and prosecution in Mississippi is centered on victim recovery, not victim arrests.

During last Summer's meeting, Ms. Chen informed General Fitch that the Hotline was beginning to transition away from serving as a tipline to concentrate more on connecting survivors with resources. We cannot stress enough how great a departure this is from our understanding of the current practices and purposes of the Hotline or how serious a detriment it will be to our work to stop trafficking and aid its victims.

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[3] *Id.*
[4] https://humantraffickinghotline.org/en/statistics
[5] *Id.*
[6] *Id.*
[7] *Id.*
[8] www.humantraffickinghotline.org/
[9] https://humantraffickinghotline.org/about-us/when-you-reach-us

Possibly more alarming, some states are reporting that they receive tips from the Hotline a month, sometimes two months, after a tip of suspected trafficking is reported to Polaris. If the Hotline is not promptly sharing tips with law enforcement, law enforcement cannot act to help victims of trafficking. Timely information is necessary for a quick recovery of victims of human trafficking and is paramount to the entire purpose of the Hotline. Polaris's current system of reporting is hurting the very victims Polaris purports to be central to their approach.

In the Trafficking Victims Prevention and Protection Reauthorization Act of 2022, just signed into law on January 5, 2023, Congress reauthorized $3.5 million for the Hotline each fiscal year through federal Fiscal Year 2028.

It appears to us that the Hotline is not performing the services it is already funded to perform. Without changes to Polaris's operating procedures, our state anti-trafficking initiatives gain little from participation in the National Hotline. As such, individual states may be forced to establish their own state hotlines, as some already have begun to do. A nationally-run hotline not only achieves cost-efficiencies, but also ensures a uniform approach and allows for the collection of cross-state information with regard to human trafficking tips.

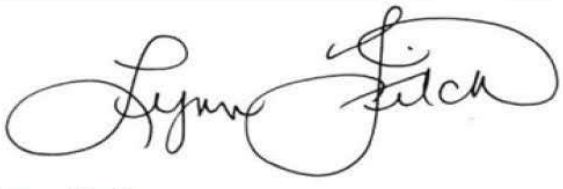
However, we cannot in good conscience continue to ask the public to share tips about trafficking in their communities if the Hotline will not give us, as law enforcement, the opportunity to address those tips. It serves no one well to do so, least of all the victims that could be helped by a tip phoned in by a good Samaritan who sees their suffering and tries to do the right thing.

We urge Congress to ensure that Polaris makes changes to its current and reported planned tip reporting policies to begin forwarding tips regarding suspected human trafficking of adults, in a prompt manner, to the corresponding state's law enforcement officials for their evaluation and response to ensure victim safety. The Hotline's creation and its multijurisdictional use is an acknowledgment that traffickers do not respect borders any more than they respect their victims. We cannot afford to lose the benefits of this federal-state partnership to end trafficking.

Sincerely,



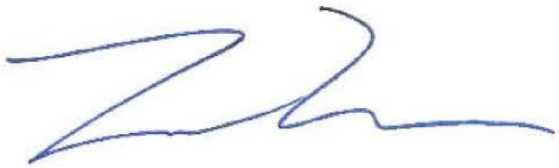
Kathleen Jennings
Delaware Attorney General



Lynn Fitch
Mississippi Attorney General



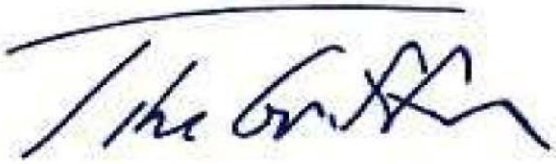
Steve Marshall
Alabama Attorney General



Treg R. Taylor
Alaska Attorney General



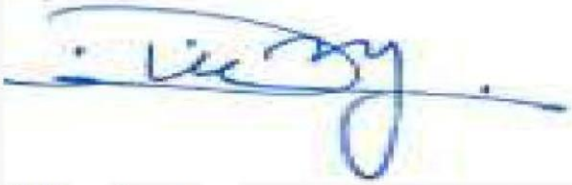
Kris Mayes
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Tim Griffin
Arkansas Attorney General



Rob Bonta
California Attorney General



William Tong
Connecticut Attorney General



Ashley Moody
Florida Attorney General



Christopher M. Carr
Georgia Attorney General



Raúl Labrador
Idaho Attorney General



Todd Rokita
Indiana Attorney General



Brenna Bird
Iowa Attorney General



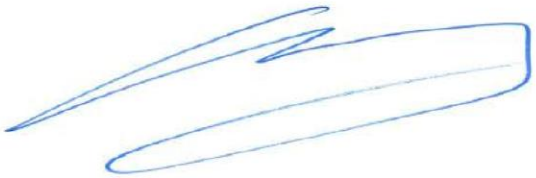
Daniel Cameron
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Jeff Landry
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Mike Hilgers
Nebraska Attorney General



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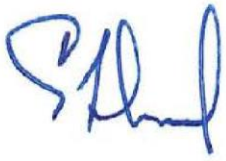
Raúl Torrez
New Mexico Attorney General



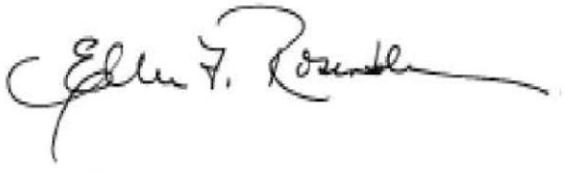
Drew H. Wrigley
North Dakota Attorney General



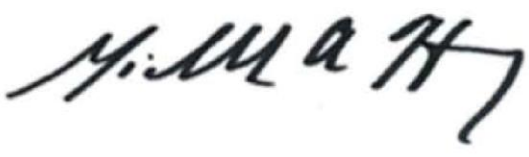
Dave Yost
Ohio Attorney General



Gentner Drummond
Oklahoma Attorney General



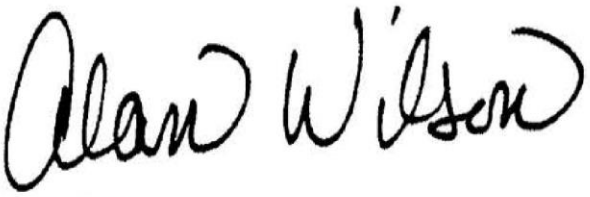
Ellen F. Rosenblum
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Alan Wilson
South Carolina Attorney General



Marty Jackley
South Dakota Attorney General



Jonathan Skrmetti
Tennessee Attorney General



Ken Paxton
Texas Attorney General



Carol Thomas Jacobs
U.S. Virgin Islands Attorney General



Sean D. Reyes
Utah Attorney General



Charity Clark
Vermont Attorney General



Jason S. Miyares
Virginia Attorney General



Joshua L. Kaul
Wisconsin Attorney General

cc: The Honorable Christopher H. Smith, sponsor, H.R. 6552 (117th Congress)
Catherine Chen, CEO, Polaris



If you have ever crossed paths with a National Human Trafficking Hotline sign that maybe hangs in bathroom stall, or is hung up in an airport hallway, one would read this sign and immediately think this is a promising offer for rescue, help, and/or immediate resources.

The usability for this hotline, and its portrayed purpose is crucial for law enforcement's work.

"Those tips are crucial to catching criminals, to recovering victims, to uncovering evidence of broader trafficking operations, and more. Those tips help local and state law enforcement to end trafficking and to help its victims.", stated the bipartisan letter to congress. Lynn Fitch, Attorney General of Missouri, met with the CEO of Polaris, Catherine Chen (appointed by Alejandro Mayorkas to the Homeland security Advisory Council) to discuss the infrequency of the hotline reporting adult victim tips to law enforcement.

"This past summer, Mississippi Attorney General Lynn Fitch met with Catherine Chen, Chief Executive Officer of Polaris, to discuss her concerns about the lack of adult tips Mississippi was receiving from the Hotline."

As we may interpret, time is of the essence with crime tips, but in the world of combating human trafficking, these types of crime tips could determine the timing of trafficker arrests, and the timing of victim recovery. This is why the immediate relay of this type of information is critical within the timing processes of investigation. Signatories of this attorneys general letter cited that law enforcement would sometimes get human trafficking tips one, maybe two months after the initial tip was reported.

"During last Summer's meeting, Ms. Chen informed General Fitch that the Hotline was beginning to transition away from serving as a tipline to concentrate more on connecting survivors with resources. We cannot stress enough how great a departure this is from our understanding of the current practices and purposes of the Hotline or how serious a detriment it will be to our work to stop trafficking and aid its victims."

A sharp pivot from Polaris' known objectives of servicing victims was discovered. Catherine Chen, CEO of Polaris, by admission to Mississippi's attorney general gave insight to why there seemed to be deficiencies in Polaris Project's performance to maintain the promises of their National Human Trafficking Hotline.

1.4 Forced to address the issue?

The National Association of Attorneys General issued their letter February 27, 2023. Two days later, on March 1, 2023, Polaris issued a press release [3]in what seems to be an attempt to clarify and "address" the National Human Trafficking Hotline's role in survivor services.

Polaris's Statement on Concerns Related to the National Human Trafficking Hotline

MARCH 1, 2023

Unfortunately, the concerns raised are based on a misunderstanding of the mission of the National Human Trafficking Hotline. The Trafficking Hotline is not primarily a law enforcement tip line but rather is authorized by Congress and funded by the U.S. Department of Health and Human Service to "assist victims of severe forms of trafficking in persons in communicating with service providers."

To serve this mission, the Trafficking Hotline must have the trust of victims and survivors we serve. To that end, the Trafficking Hotline does not report their situations to law enforcement without their consent. Instead, the Trafficking Hotline works with victims to determine what they need to begin to break free and rebuild their lives. This is important because traffickers take consent, choice, and freedom away from victims. To effectively support survivors is to return to them control over their own lives and choices. When and if victims and survivors choose to involve law enforcement, the Trafficking Hotline supports the process every step of the way.

The Trafficking Hotline reports all situations involving children to appropriate authorities as directed by state and federal protocols. The Trafficking Hotline will also report situations where immediate and escalating violence can be heard or observed.

Polaris is deeply committed to ensuring traffickers are held accountable and are stopped from being able to continue to victimize people. We actively partner with hundreds of law enforcement agencies all over the country to ensure countless traffickers are arrested and justice is served.

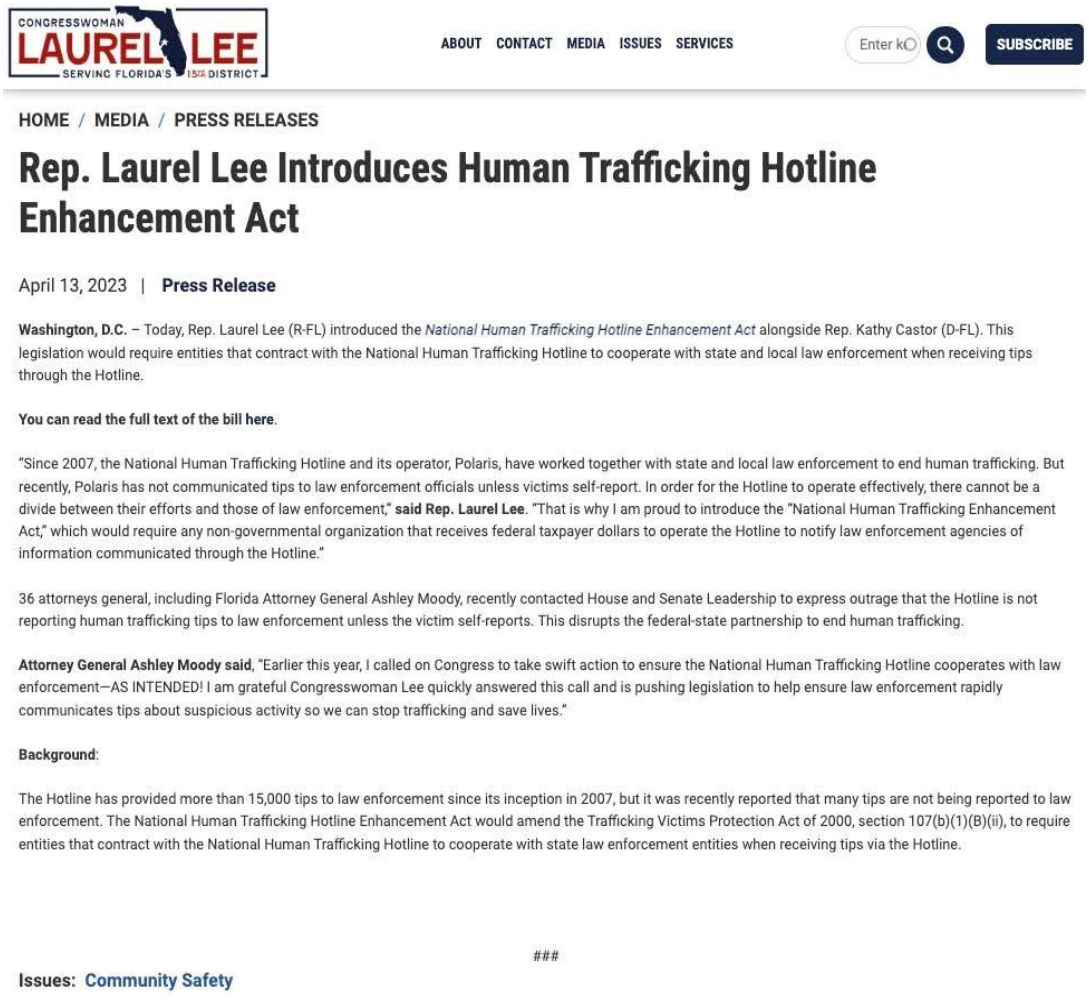
We look forward to continuing to engage our law enforcement partners, including the attorneys general's offices, as well as thousands of social service agencies, survivor leaders, and community leaders who we partner with, to ensure the Trafficking Hotline fulfills its mission to provide a safe and trusted place for victims and survivors to get connected to help.

As the CEO of Polaris admitted, *"...the Hotline was beginning to transition away from serving as a tipline to concentrate more on connecting survivors with resources."* Although, this is a strive away from what they initially committed to doing, as well as what the public interprets their federally funded services to be.

[3] https://polarisproject.org/press-releases/polariss-statement-on-concerns-related-tothe-national-human-trafficking-hotline/

This press release seems to be an attempt to damage control the public's perception along with other measures that were onset because of this discovery.

In swift timing, immediately after this call for transparency was issued regarding the National Human Trafficking Hotline, Florida representatives, Laurel Lee (R) and Kathy Castor (D), introduced the National Human Trafficking Hotline Enhancement Act[4], which would mend the gap between the hotline receiving human trafficking crime tips and obligating them to report them immediately to law enforcement (as the governing body perceived the hotline was operating in the first place).



CONGRESSWOMAN LAUREL LEE
SERVING FLORIDA'S 15TH DISTRICT

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Rep. Laurel Lee Introduces Human Trafficking Hotline Enhancement Act

April 13, 2023 | **Press Release**

Washington, D.C. – Today, Rep. Laurel Lee (R-FL) introduced the *National Human Trafficking Hotline Enhancement Act* alongside Rep. Kathy Castor (D-FL). This legislation would require entities that contract with the National Human Trafficking Hotline to cooperate with state and local law enforcement when receiving tips through the Hotline.

You can read the full text of the bill here.

"Since 2007, the National Human Trafficking Hotline and its operator, Polaris, have worked together with state and local law enforcement to end human trafficking. But recently, Polaris has not communicated tips to law enforcement officials unless victims self-report. In order for the Hotline to operate effectively, there cannot be a divide between their efforts and those of law enforcement," **said Rep. Laurel Lee**. "That is why I am proud to introduce the "National Human Trafficking Enhancement Act," which would require any non-governmental organization that receives federal taxpayer dollars to operate the Hotline to notify law enforcement agencies of information communicated through the Hotline."

36 attorneys general, including Florida Attorney General Ashley Moody, recently contacted House and Senate Leadership to express outrage that the Hotline is not reporting human trafficking tips to law enforcement unless the victim self-reports. This disrupts the federal-state partnership to end human trafficking.

Attorney General Ashley Moody said, "Earlier this year, I called on Congress to take swift action to ensure the National Human Trafficking Hotline cooperates with law enforcement—AS INTENDED! I am grateful Congresswoman Lee quickly answered this call and is pushing legislation to help ensure law enforcement rapidly communicates tips about suspicious activity so we can stop trafficking and save lives."

Background:

The Hotline has provided more than 15,000 tips to law enforcement since its inception in 2007, but it was recently reported that many tips are not being reported to law enforcement. The National Human Trafficking Hotline Enhancement Act would amend the Trafficking Victims Protection Act of 2000, section 107(b)(1)(B)(ii), to require entities that contract with the National Human Trafficking Hotline to cooperate with state law enforcement entities when receiving tips via the Hotline.

###

Issues: Community Safety

[4] https://laurellee.house.gov/media/press-releases/rep-laurel-leeintroduces-human-trafficking-hotline-enhancement-act

Catherine Chen explained to The Washington Post [5] that reporting every human trafficking call would hinder the caller's trust. She suggests that the proposed legislation obligating them to do so is "an existential threat."

"We believe law enforcement has to be part of the solution," she said. "But this idea that you can mandate that the hotline report every single bit of information whenever it is that law enforcement wants it fundamentally reverses the trust that we're trying to build with victims and survivors. And they will absolutely stop calling us."

A trafficking hotline could be forced to report to police. Victims may stop calling, advocates say.



By Brittany Shammas

Updated July 14, 2023 at 5:42 p.m. EDT | Published July 7, 2023 at 7:00 a.m. EDT

[5] https://www.washingtonpost.com/nation/2023/07/07/human-sex-traffickinghotline-victims-police/



Mississippi Attorney General Lynn Fitch has since communicated via Twitter[6] that any tips for suspicious activity should be forwarded to her office.

[6] https://twitter.com/LynnFitchAG/status/1679956715893329920?s=20

1.5 Federal Evaluation

It is worth noting that the Health and Human Services Department's Office of Planning, Research, & Evaluation (Administration for Children and Families) seems to be closing in on a 7-year evaluation of the National Human Trafficking Hotline[7]. The evaluation would result in describing the National Human Trafficking Hotline's: activities, procedures, staffing, outcomes for callers, partnerships between service providers and law enforcement, and to elaborate on key performance indicators (KPI's).

We at Counter Trafficking Alliance eagerly await the outcome of this evaluation, should the results be published publicly.



[7] https://www.acf.hhs.gov/opre/project/evaluation-national-humantrafficking-hotline-program-2016-2021

A possible indication that at least one of these metrics does not reflect very well is where Polaris would be obligated to "...also provide time-sensitive tips to appropriate local, state, or federal law enforcement authorities." Through what we have learned in the bipartisan Attorney Generals' concern, submitted to congressional leadership, there seems to be inconsistency with at least that key performance indicator.

These points are only the beginning for us. There are many facets of concern with the hotline that is marketed as the top resource of the United States for human trafficking. In this report we will explore areas that we feel need to be addressed. These concerns affect the holistic landscape of the counter-trafficking industry and the victims/survivors they aim to help.

2 Testimonies and Grievances

In the introduction of this organizational profile, we explored a springboard of concerns regarding the federally funded National Human Trafficking Hotline. One of the most prominent concerns being that there seemed to be a disconnect between law enforcement and vital crime tips in relation to human trafficking. In this section we pivot to a related and troublesome scope: victims having trouble reaching the hotline.

We were connected to some individuals that had personal experiences calling into the hotline. Their experiences are weighed against the resources that are claimed to be allocated towards potential victims and survivors.

The ladies interviewed have been given aliases to protect their identities, and have given us permission to publish their stories.

2.1 Jessy Rescues Maria

**Denotes name replacement by alias name*

Jessy* is the rescuer of Maria*. Jessy is an active woman of faith. She participates in street outreach to support and feed the homeless. One day, one of her ministry partners, Jake*, made her aware of a young lady that was known to be in a dire situation of some form of abuse. Jessy went out to talk to the young lady, who had been panhandling at a shopping center, and learned her name by Maria.

Jessy described the state that she found Maria in: her clothes were worn down, she was wearing a tattered wig, she was skinny and malnourished, and even had a busted lip. Jake always made it known to Maria that if she ever needed food, a shower, or any basic necessities, she could reach out to him for help. Jessy spoke into her that day, and encouraged her for a better life by telling her of her worth and God’s plan for her, and Maria was very moved by those encouraging words and cried.

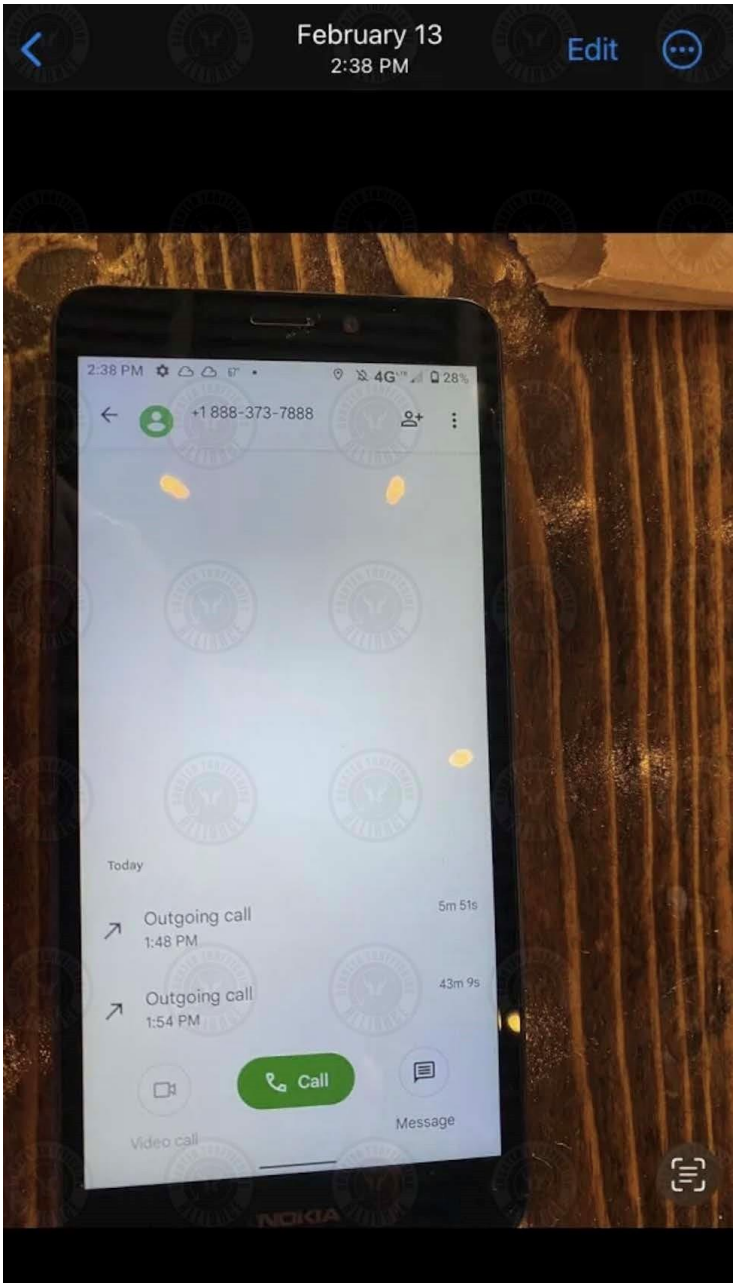
They parted ways for the day, and Jessy went home. That night, Jessy could not stop thinking about Maria’s condition, and how impacted and moved she was as soon as she was encouraged. Jessy felt compelled to outreach again. She had her fiancé drive her back to where she had once found Maria, and was shocked to see Maria panhandling again. Jessy greeted her, gave her some charitable gifts, and offered to buy Maria dinner at a local restaurant.

Maria refused the dinner on the account that she was required to stay out to panhandle for money. Confused, Jessy left Maria to do what she felt obligated to do and went home.

Jessy received a phone call from Jake, her ministry outreach partner, that Maria was with Jake and seeking emergency help. It was there where Maria admitted that she was being forced to panhandle by her relative and work for them in his workshop for extensive hours with no pay. She would get physically abused by her relative if she fell asleep from overnight hours in the workshop, or didn't collect the required quota while panhandling. Jake relayed this to Jessy and she decided to help. After providing Maria with safe, temporary shelter, Jake was told that Maria's abuser was searching for her. Jessy knew her priority was to get Maria to safety and find her a living situation as soon as possible. With her fiancé's agreement, she took Maria in, momentarily until something more long-term became opportune. After some time, allowing Maria to recuperate and rest, the search for rehabilitative aid began.

Jessy called the National Human Trafficking Hotline with the intention to receive aid and resources for Maria. Jessy and Maria both waited for a total of 48 minutes. Jessy made the first attempt, and despite the automated call prompt emphasizing large call volumes and wait times, both Jessy and Maria continued to stay on the line with hopes of finding housing. Finally, after 5 minutes, the queue music stopped, and Maria updated Jessy that it appeared they might get in touch with someone. Then the call was abruptly ended. Stunned, the ladies attempted a second time. Again, the prompt was heard, and the ladies are forwarded to a hold once more. This time the call hold lasted about 40 minutes, and once again, when the line appeared to be picked up, the call was terminated again. After nearly an hour of being on hold, they decided that their chances of getting in touch with Polaris were minimal. Instead, they looked for other resources.

Recording of outbound call (survivor and rescuer) to the National Human Trafficking Hotline available online



Call log outbound to the National Human Trafficking Hotline, correlated with recording above.

2.2 Christina Rescues

**Denotes name replacement by alias name*

Christina* manages a small non-profit dedicated to rescuing trafficking victims in need. Unfortunately, Christina does not receive external funding. The scenarios of her rescues vary, which also means that the resources can vary as well. These critical resources can be anything from food, clothes, shelter, therapy services, etc., and obtaining them is always a challenge.

Her experience exposes her to a wide range of victim circumstances. For example, in one instance, Christina got word of a mother escaping her pimp with her children in tow. She had close to nothing in her organization bank account. The rescued mother and her children needed a safe place to stay and were in dire need of food. Desperate for help and resources, Christina quickly thought to call The National Human Trafficking Hotline as they are promoted offering such services.

Christina called the number… and waited. She continued to wait for someone to answer for 47 minutes. Frustrated, she hung up and tried again, and finally a live representative answered. Christina's simple request was to obtain resources that would be locally available to her rescue. What she received next was an email with a few bullet points and three shelters nearby: no coordination, no meal vouchers provided, no mediative communication between resources… just an email to a rescuer in immediate need. While resources in a time of need are appreciated, the nature of this type of response seems incongruent.

---------- Forwarded message ---------
From: [redacted]>
Date: [redacted] 2022 at [redacted]
Subject: Fwd: National Human Trafficking Hotline - Case [redacted]
To: <[redacted]>

---------- Forwarded message ---------
From: [redacted]@humantraffickinghotline.org [redacted]@humantraffickinghotline.org>
Date: [redacted], 2022, [redacted]
Subject: National Human Trafficking Hotline - [redacted]
To: [redacted]

Hello,

Thank you for contacting the National Human Trafficking Hotline, operated by Polaris. The National Hotline is a national 24-hour call center that responds to cases of human trafficking. Human trafficking is defined as a situation in which an individual is compelled to work or engage in commercial sex through the use of force, fraud, or coercion. Force, fraud, or coercion need not be present if the individual engaging in commercial sex is under 18 years of age. The National Hotline accepts tips related to human trafficking and can assist survivors to obtain services and report their situation to the Hotline's trafficking-specific law enforcement contacts. Please be advised that the Hotline is mandated to report information about trafficking, harm, or abuse to individuals under the age of 18.

Below is some general information on safety planning suggestions. If you have any further questions or concerns, please contact the hotline and reference **Case No.** [redacted].

Safety Planning Information

Page 1 of 3

An email response from the National Human Trafficking Hotline to a call for help and resources 1 of 3

Safety planning can include risk assessments, preparations, and contingency plans to increase the safety of a human trafficking victim or an individual at-risk for human trafficking, as well as any agency or individual assisting a victim. Safety plans:

1. Assess the current risk and identify current and potential safety concerns;
2. Create strategies for avoiding or reducing the threat of harm;
3. Outline concrete options for responding when safety is threatened or compromised.

Safety planning is important while a victim is experiencing trafficking, during the process of leaving, and once the victim has left. Consider these tips for conducting safety planning with victims of human trafficking as well as those who may be considering suspicious jobs or relationships and may be at risk for human trafficking. We cannot guarantee an individual's safety or the prevention of trafficking after using these suggestions. Each individual is in the best position to assess his/her own current level of safety and safety planning should be tailored to his/her unique circumstance.

As discussed on our call here are the additional resources

MyPlan Safety Planning App https://www.myplanapp.org/home

An online or app-based tool to help with safety decisions if you, or someone you care about, is experiencing abuse in their intimate relationship. Can be operated via website or cell phone app. It uses a security pin to prevent abusers from being able to see contents of the app.

Setting Up Emergency Location Sharing https://www.theverge.com/2019/3/18/18267500/how-to-set-up-emergency-location-sharing-android-ios

Instructions for how to set up emergency location sharing services on apple and android cell phones. Can be used to both call 911 and send current location to pre-selected contacts in case of emergency.

Referred Services Providers:

- [redacted]
- [redacted]
- [redacted]

Additional Resources from Polaris and the National Hotline

The National Human Trafficking Hotline website is a source for statistics as well as information regarding local organizations, anti-trafficking efforts, and legislation. If you are interested in receiving regular updates from Polaris, please click here. For regular updates from the National Hotline, please click here.

We hope that this information is helpful. Please do not hesitate to contact the hotline if you have any questions or require additional information.

Sincerely,
The National Human Trafficking Hotline
Operated by Polaris
24-Hour National Hotline: 1-888-373-7888
Text INFO or HELP to: BeFree (233733)

[redacted]@humantraffickinghotline.org

An email response from the National Human Trafficking Hotline to a call for help and resources 2 of 3

www.humantraffickinghotline.org

If you are a victim of human trafficking and need immediate help or if you suspect a potential trafficking situation, call the National Human Trafficking Hotline at 1-888-373-7888 or send a text to BeFree (233733).

This electronic mail message may contain confidential and proprietary information. If the reader of this message is not the intended recipient, any disclosure, copying or distribution of this communication is strictly prohibited. If you have received this communication in error, please immediately delete this message and any attachments.

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An email response from the National Human Trafficking Hotline to a call for help and resources 3 of 3

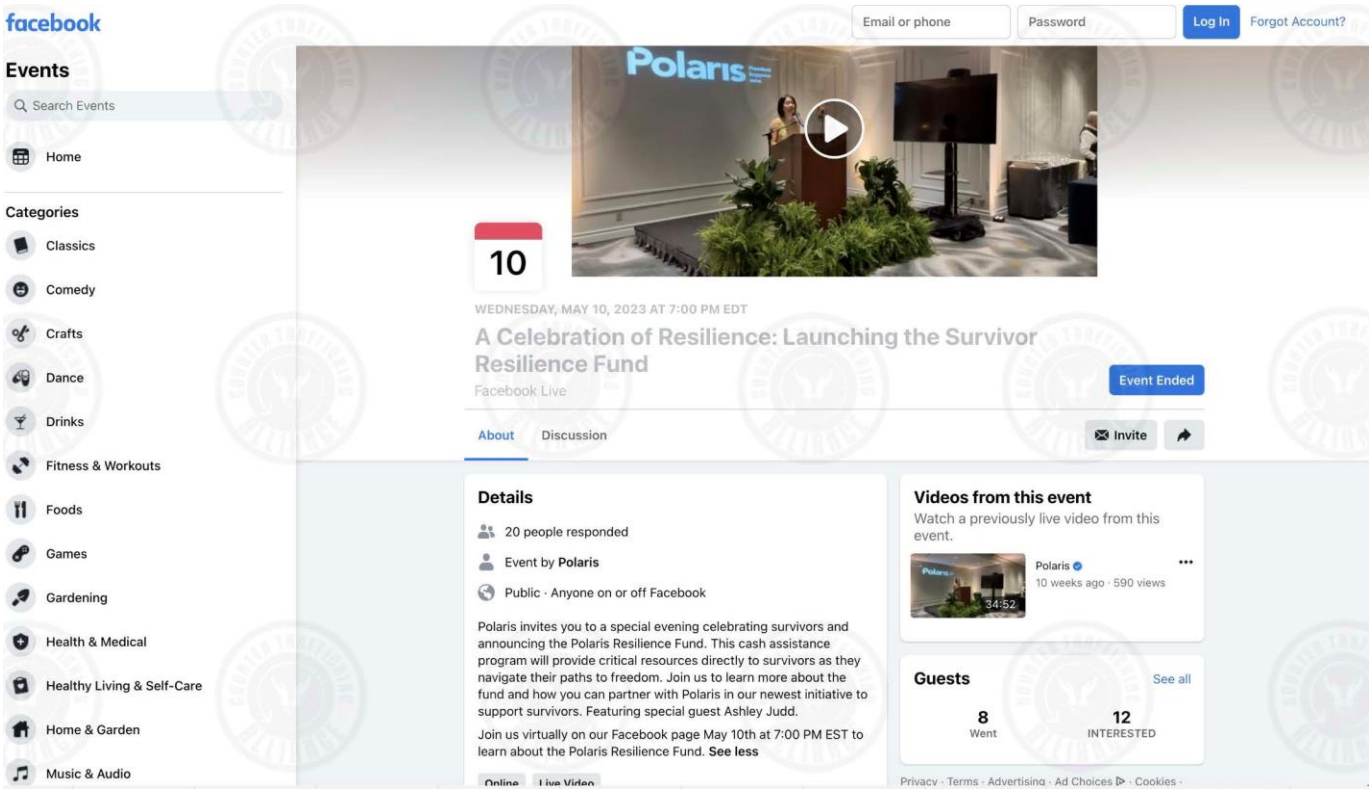
Christina had immediate, first-person contact with the trafficking victim. She needed immediate assistance with safety and housing, where time is of the essence.

A scenario like this also provokes a question. Why doesn't Polaris have a designated line or point of contact for service providers, like Christina? They are marketed for hope and help.

Service providers are on the front lines caring and rehabilitating survivors from the point of recovery. The hotline is the point of entry for victims as well as counter-trafficking professionals.

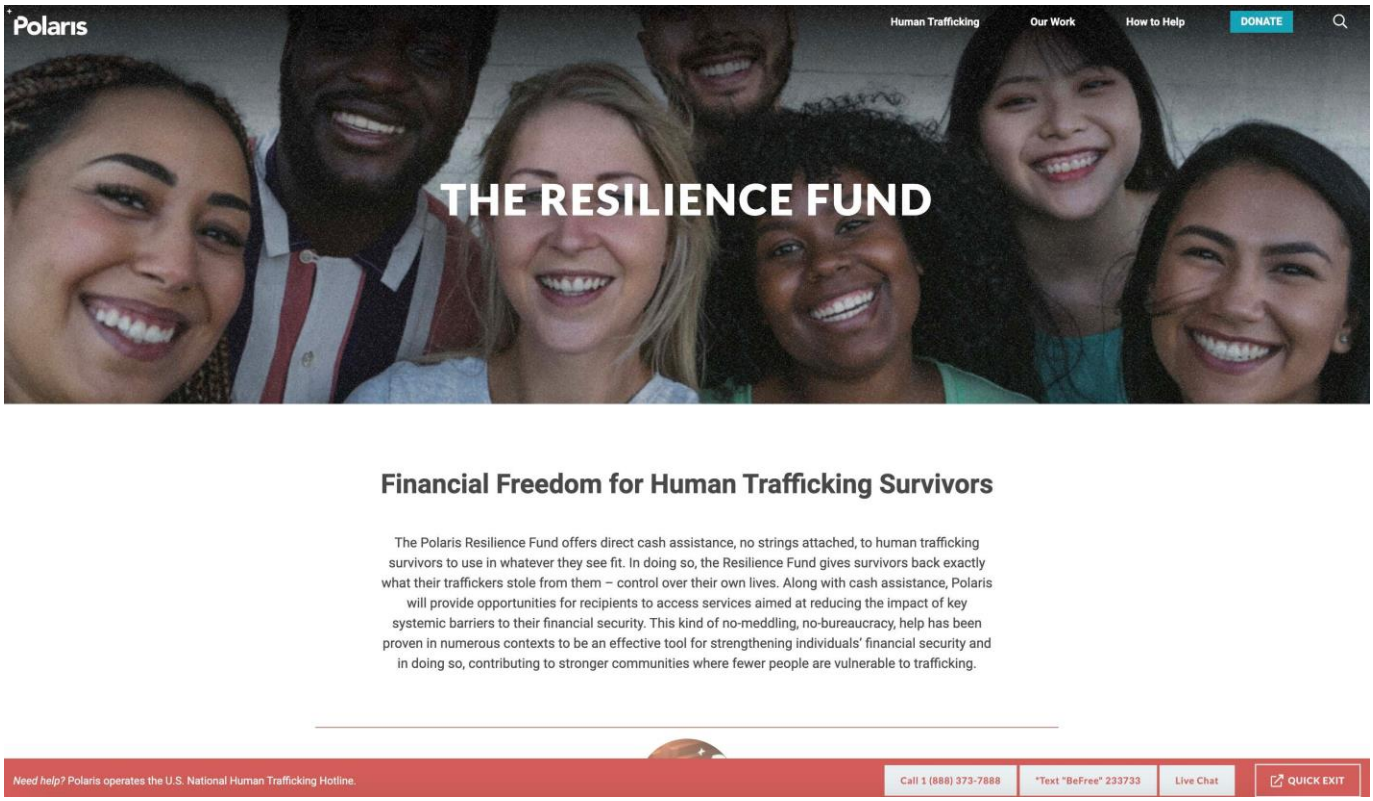
Another route presented itself to Christina, when an aftercare acquaintance made mention of the announcement of a new Survivor Resilience Fund, hosted by Polaris.

On May 10th, 2023, Polaris held an event to announce the "Polaris Resilience Fund", where actress, Ashley Judd, made a speech in support. This is supposed to be a cash-assisted program for survivors, to assist them through recovery.



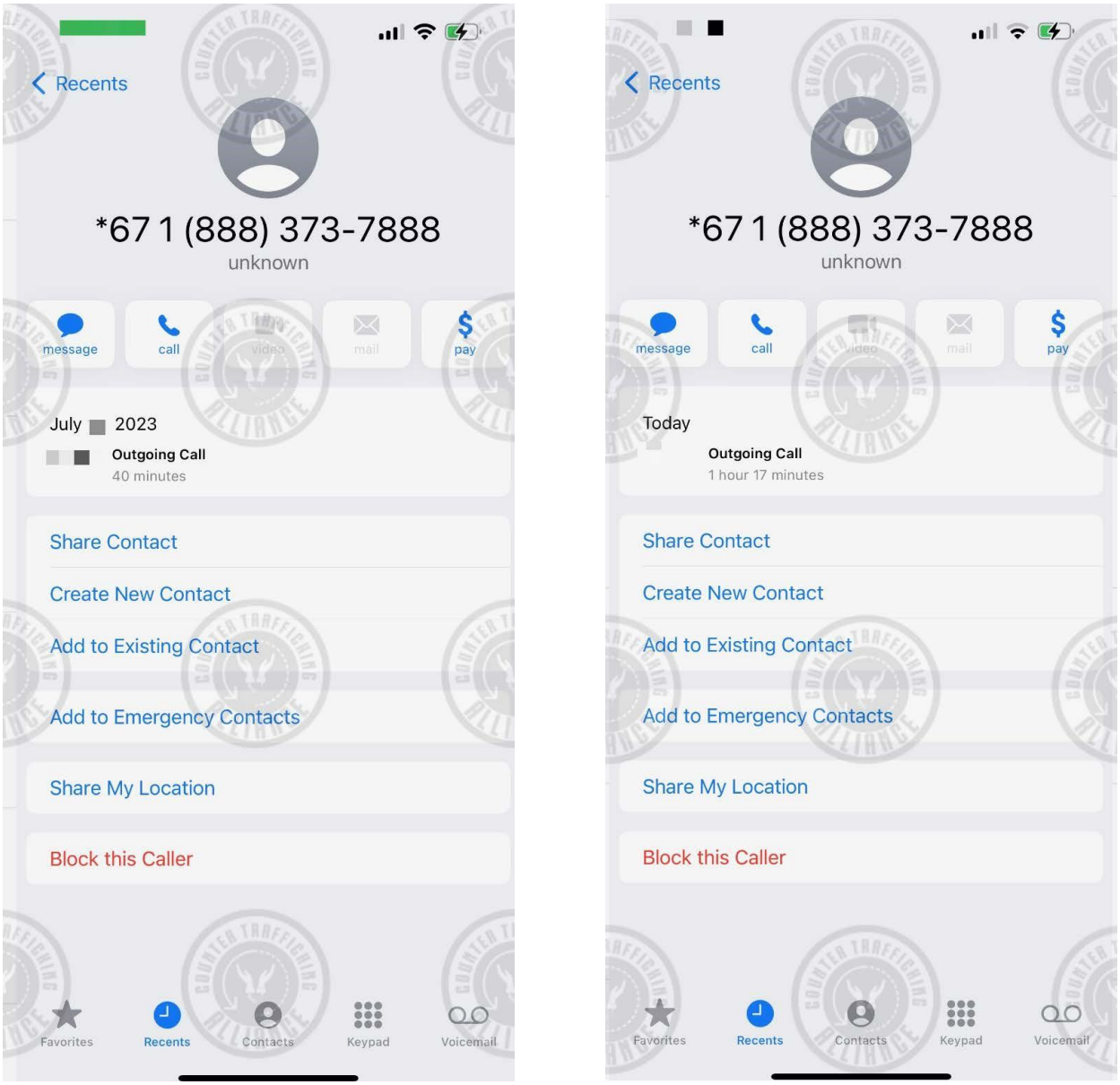
Facebook event announcing the launch of the Polaris Survivor Resilience Fund

Right now, there is no simple way to apply for this fund. This initiative is not promoted anywhere on their main page. By searching we found some information[8] describing the initiative, but still, no way to actually apply, at the moment we observed.



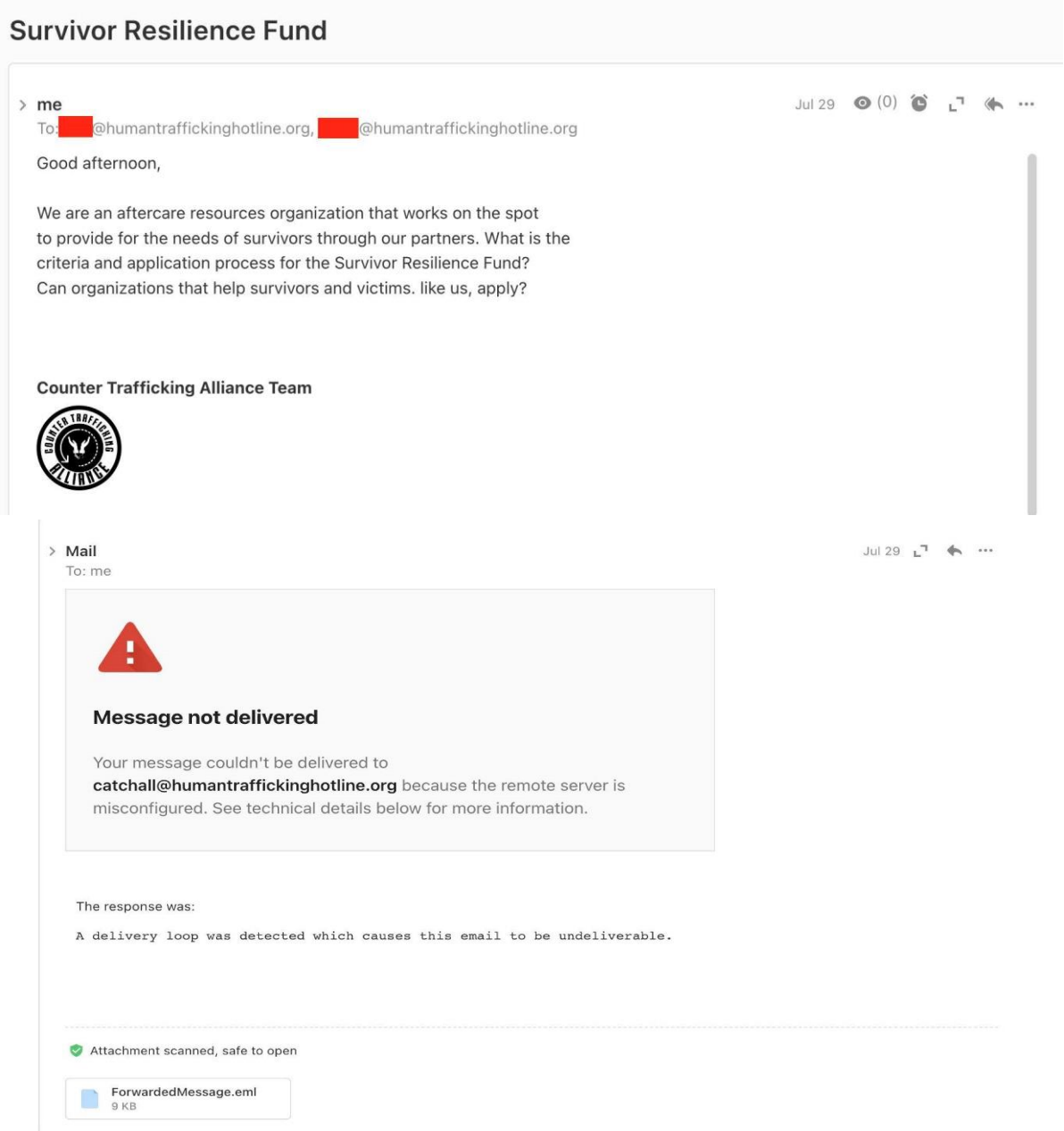
[8] https://polarisproject.org/the-resilience-fund/

Christina made one more effort to hopefully receive assistance from this newly announced fund. She was on hold for 40 minutes, until she could not hold on any longer. She tried again another day. After holding for over an hour, she got in contact with a hotline representative. Christina expressed her interest in receiving assistance and was told to send an email to one of their internal contacts. When she wanted more clarification about what the Survivor Resilience Fund process entailed, she recalled that the conversation was cut short.



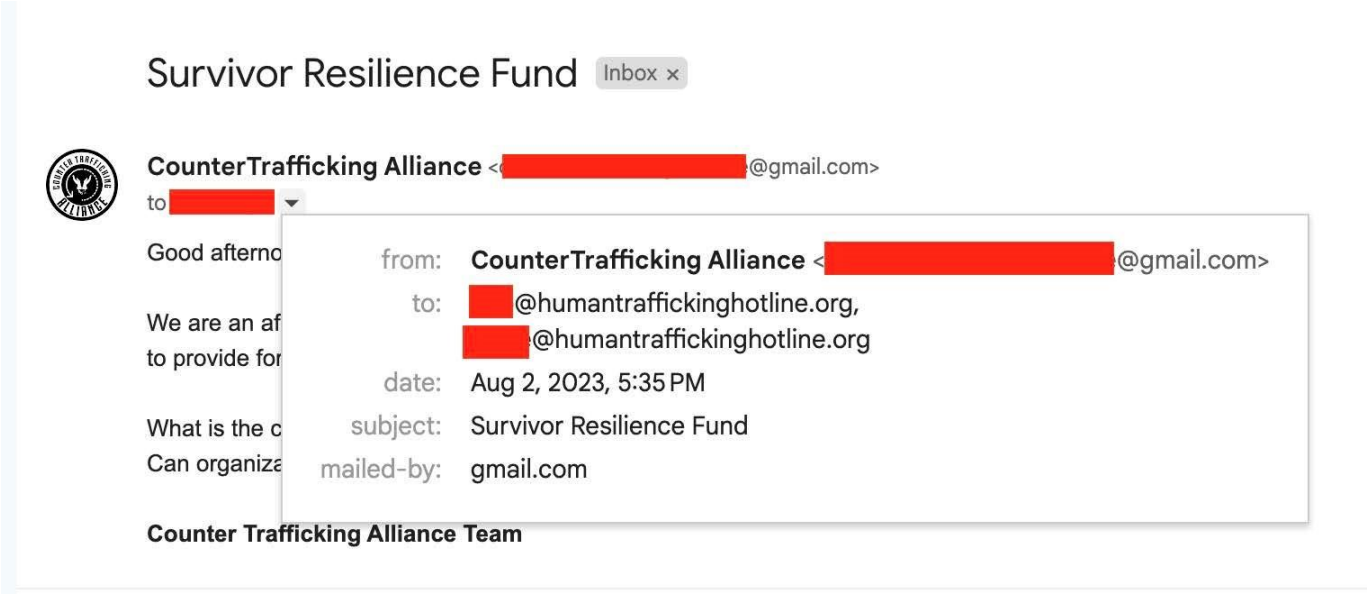
Attempt proofs for calling the National Human Trafficking Hotline

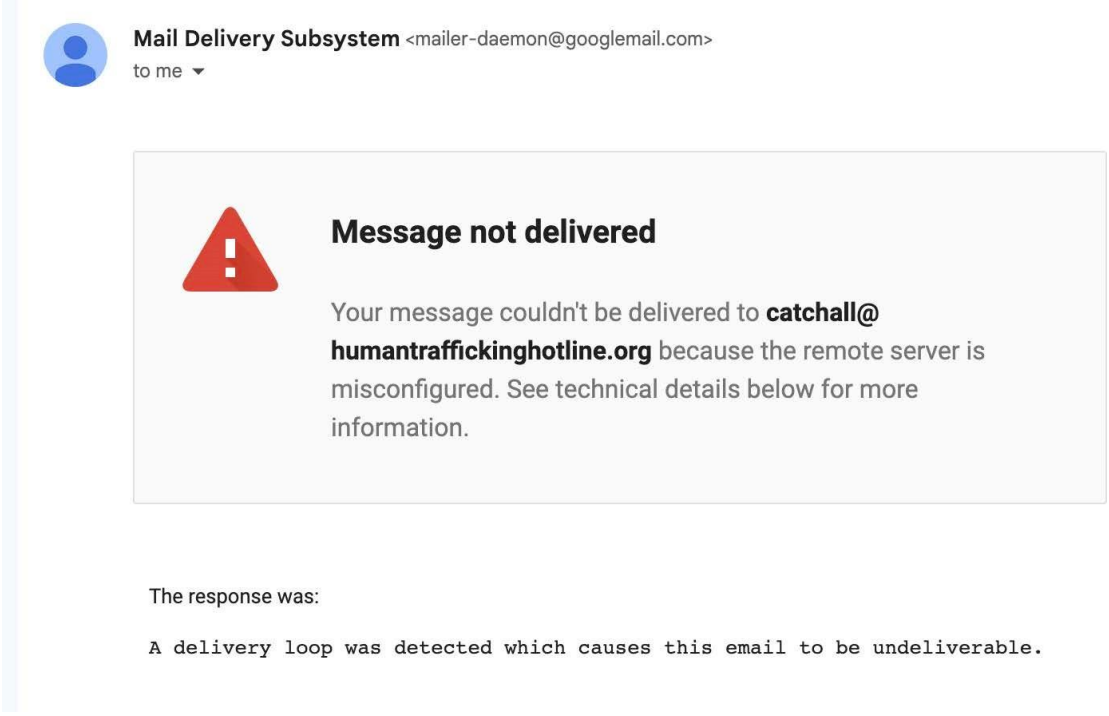
Counter Trafficking Alliance team was able to obtain two contact emails in relation to the Survivor Resilience Fund, when we asked via calling the National Human Trafficking Hotline. As we do actually service aftercare ministries and catalog their needs, we were a perfect use case to inquire on such a scenario. We sent a simple inquiry email, curious to know the criteria to apply for such a fund. To our disappointment, the message reported immediately "undeliverable". We tried sending the same email from two separate email servers and received the same result.



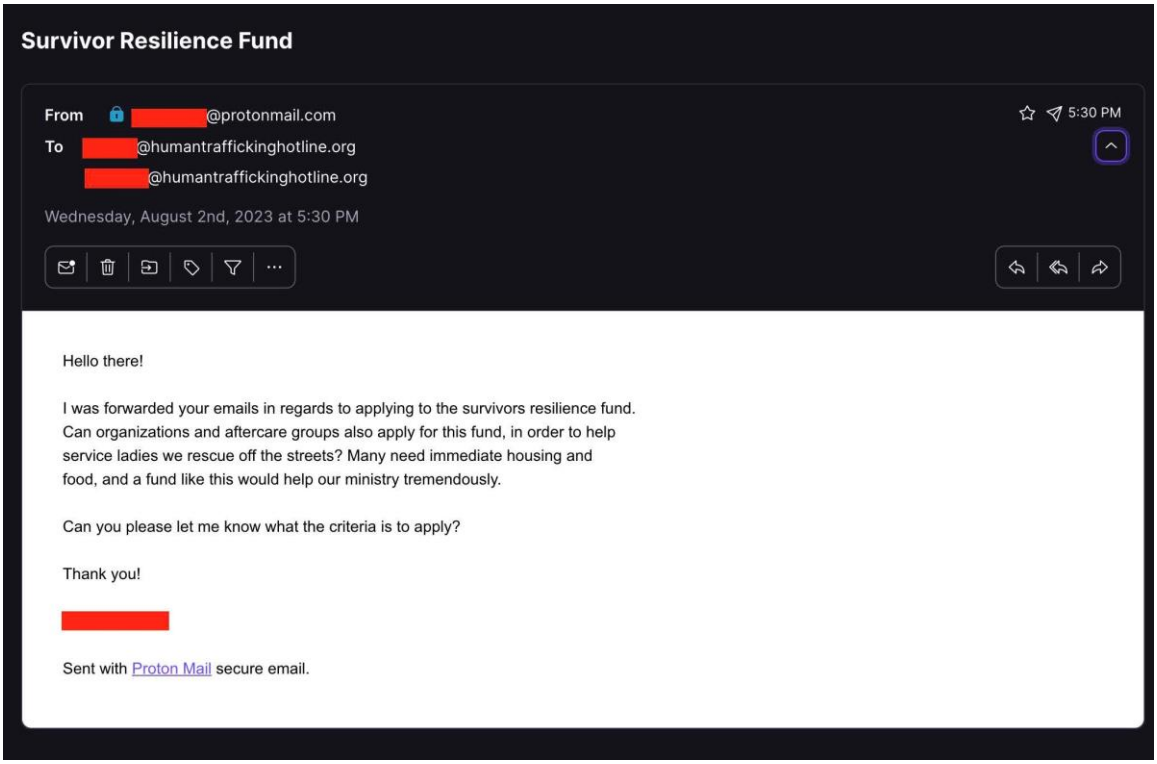
The email seems to prompt a "catchall" automatic rejection error, which is accompanied by a response message "A delivery loop was detected which causes this email to be undeliverable." Email attempt 1 of 3.

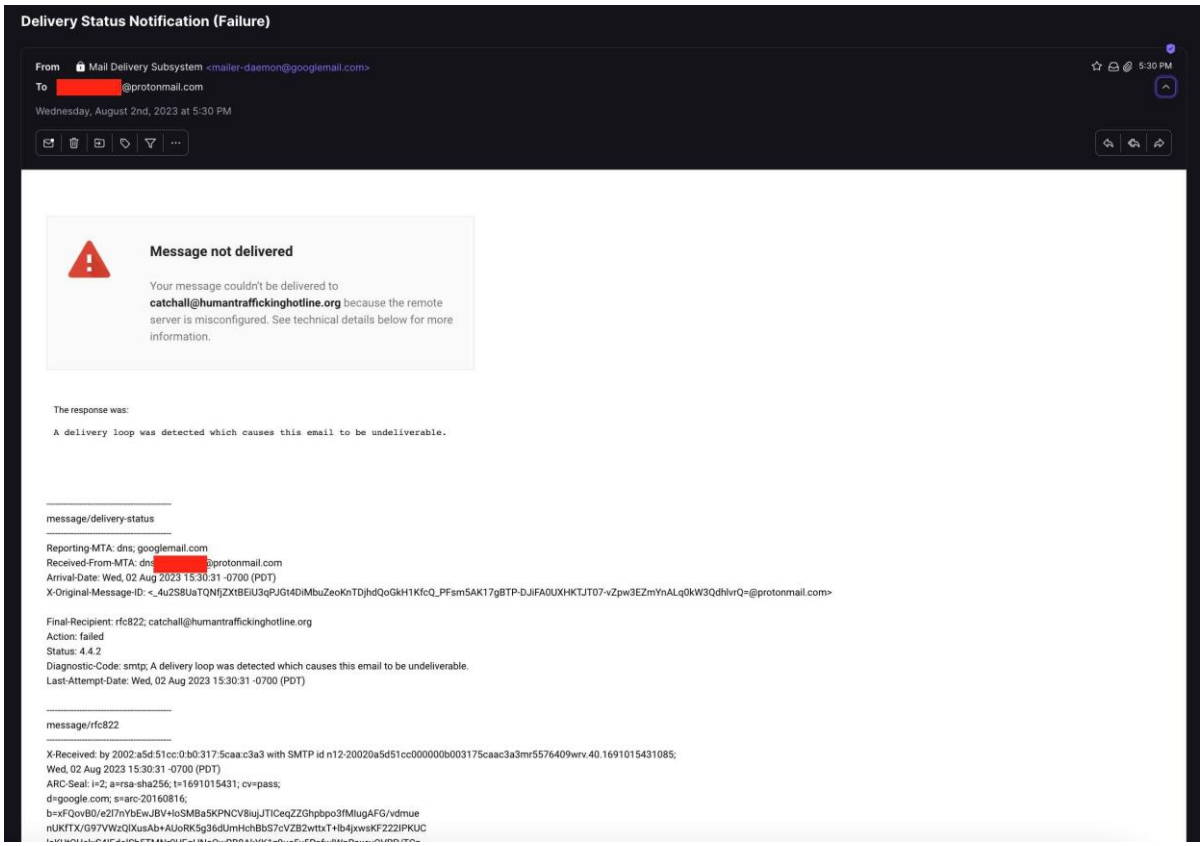
We tried from two other separate email servers just to receive the same result.





Email attempt 2 of 3





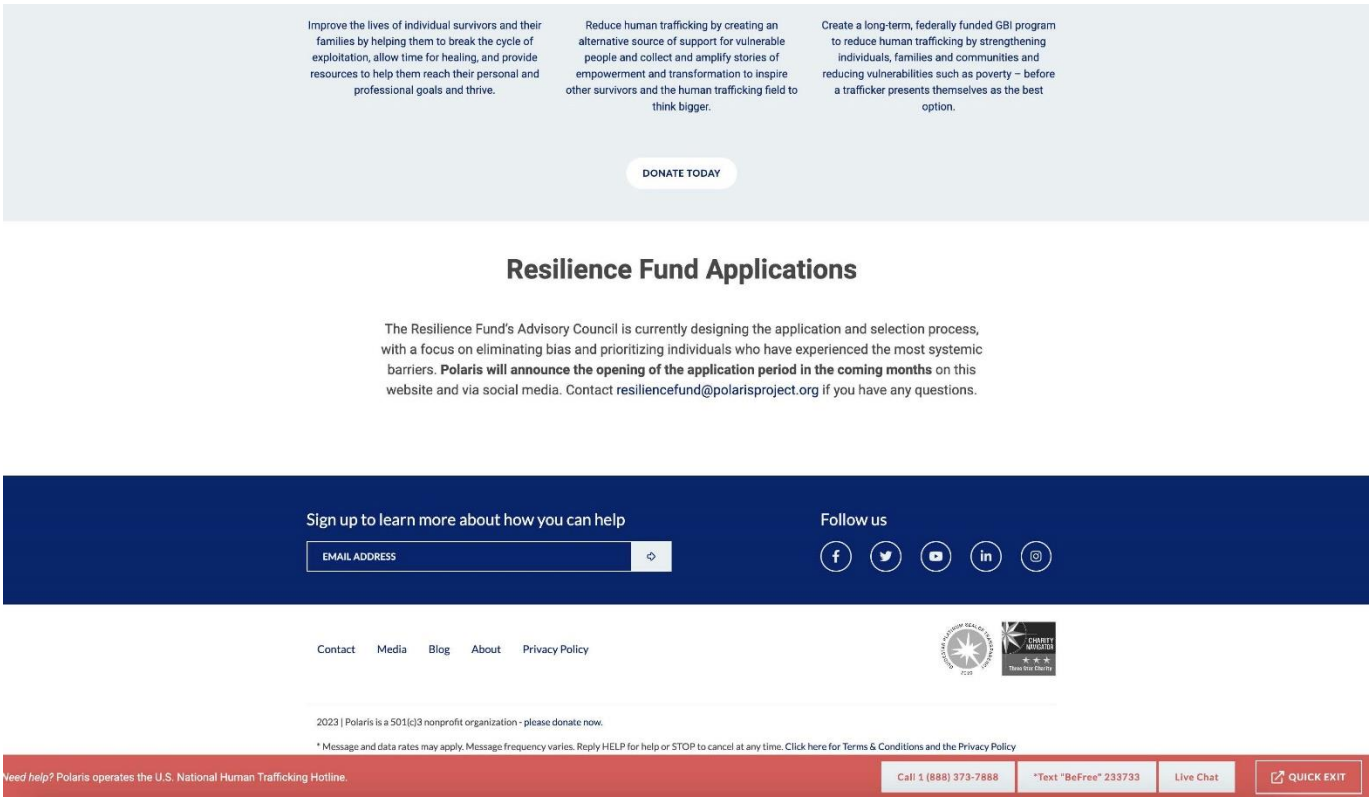
Email attempt 3 of 3

This is a grave concern that must be fixed, given the nuance of communication being had with survivors through that address.



Prior communication thread between a non-profit aftercare and The National Human Trafficking Hotline in 2022

Although the hotline directly gave us these two emails to inquire upon the Survivor Resilience Fund, we went ahead and searched for perhaps another contact email that would give us better results. With additional research we found a contact email on the Polaris website, and sent an inquiry with no response as of yet.



2.3 Alice and Her Forgotten Daughter

**Denotes name replacement by alias name*

Alice* is the mother of Janet*. Alice answers the phone, she is soft spoken and begins to recount her experience. There is pain behind her voice. She prefaces her daughter's story by explaining that she had no concept or knowledge of what human trafficking even was. She was in a season of worrying for her daughter, Janet. Janet went missing and would spend some time away from her family.

Alice called the National Human Trafficking Hotline and explained her worries for her daughter's safety at the time, giving them symptoms of her absence. The feedback Alice received from the hotline was that there was nothing that could have been done at the time if Janet would not willingly leave her trafficking situation. But in the case that she did, Alice could call the hotline back on her daughter's behalf.

Alice made a second contact with the National Human Trafficking hotline about a year later. Janet's trafficker had transported her through various states and had finally called her mother at a chance that she got away from him. Janet stressed to her mother that if her trafficker found her, he would kill her. Having been transported so often, Janet did not even know where she was when she called her mother. Immediately, Alice advised Janet to go find the nearest person and let them know she needed emergent help. Janet found a security guard and went into safety momentarily. Whilst Janet was being accommodated by the security guard and eventually the police, Alice was on the phone with the National Human Trafficking hotline. Police arrived on the scene and arrested the trafficking suspect. Alice trying to find resources for her daughter through the hotline found herself unsuccessful. The National Human Trafficking Hotline did not have resources for Janet in the area from which she was rescued.

The police questioned Janet for hours into the early morning. Janet was hungry and traumatized. The only thing offered to her during those long hours was a bag of chips. The police took her back to the same motel she was trafficked out of, and later arranged a contact from a homeless shelter to accommodate her. Alice, without any help or assistance, paid out of

pocket for Janet's travel. Janet then got home, thinking she could put this horrible experience behind her. But unexpectedly, her trafficker was bailed out days after his arrest. Shortly after his bail, Janet went missing.

In a panic, Alice called police and explained her daughter being forced to leave against her will. When an officer arrived, Alice explained that he was more-so trying to pacify her at that moment, without any prescribed actions or resolve. Because of this, Alice tried the Human Trafficking Hotline again.

At this point, Alice had called the hotline so often that they recognized her when she called in. Again, she sought help from this dedicated hotline, and they advised her to call back with any known new activity of her daughter. Alice tracked her daughter through Backpage.com (Website has since been seized by the FBI), and would call in her activity as advised to the Human Trafficking Hotline many times. Alice tracked every single movement as she would observe her daughter being featured in various ads day by day, state by state. Other intricate details were given to the National Human Trafficking Hotline, through some communication Alice would have with Janet such as license plate numbers, hotel names, hotel numbers, timestamps, etc.

One day when Alice called in to report more of her daughter's activity to the National Human Trafficking Hotline, including her daughter's latest ad on Backpage, she was then advised not to call in any longer. The hotline representative noted that they were turning this information over to the FBI. Frantic, Alice called the FBI to verify if a case opened on her daughter's behalf. No such case was started, according to the FBI. After checking thoroughly, it seemed to be that the hotline got her to stop calling in. Days later, Janet was thought to be murdered by her captors, causing devastation to Alice. All her attempted efforts to save her daughter to be overthrown into an unsolved mystery.

After some time since her daughter's tragic mystery, Alice decided to start a non-profit herself. Hoping that the hotline may have improved since her previous efforts to help her daughter, Alice tried again with future scenarios of rescue and needed resources. Sadly, Alice was faced with disappointment. She recounts holding for a representative to answer for unreasonably long periods of time.

Ultimately, the final time calling in to the National Human Trafficking Hotline for Alice was in the turn of trying to get a survivor to a safe place out of her state. The survivor was being pursued by her traffickers, so this was a pretty immediate ask. The National Human Trafficking Hotline attempted to place the victim within the same state, in a safe-house that was no longer operational.

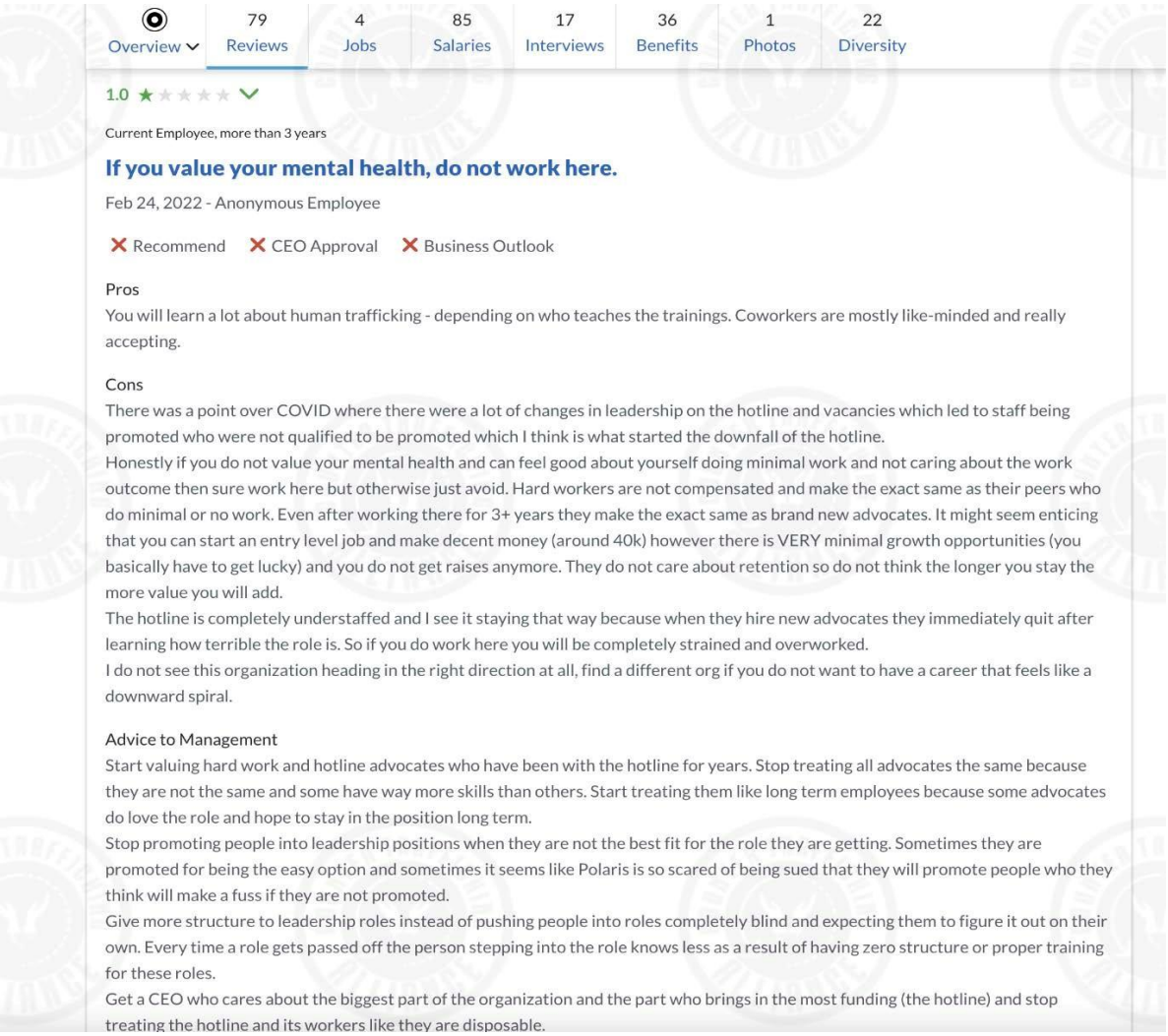
To this day, Alice is very confused about the internal operations within Polaris, who owns the National Human Trafficking Hotline. Aside from the many failures and insufficiencies to receive help through the hotline, one of her major concerns is the information she fed them. Where did it all go? How does the information get used or documented? Who obtains access and who else receives this information? Plagued with unanswered questions, Alice copes the loss of her daughter, hoping that a mother never experiences a similar fate.

2.4 Disgruntled Employees

Curious as to how operations were running internally, we took a look at career websites to see the conversations happening concerning the internal dialog at Polaris jobs.

Off the bat it was not an overall positive outlook. Current and former employees alike echoed multiple common denominators, amongst various ratings, that seemed to illustrate perpetual failures within Polaris' system of operations. Many repetitive themes consisted of:

Poor leadership, biased promotion, growth limitations, under-staffing, overworking, high turnovers, and low pay.



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

1.0 ★☆☆☆☆

Current Employee, more than 3 years

If you value your mental health, do not work here.

Feb 24, 2022 - Anonymous Employee

✗ Recommend ✗ CEO Approval ✗ Business Outlook

Pros

You will learn a lot about human trafficking - depending on who teaches the trainings. Coworkers are mostly like-minded and really accepting.

Cons

There was a point over COVID where there were a lot of changes in leadership on the hotline and vacancies which led to staff being promoted who were not qualified to be promoted which I think is what started the downfall of the hotline.

Honestly if you do not value your mental health and can feel good about yourself doing minimal work and not caring about the work outcome then sure work here but otherwise just avoid. Hard workers are not compensated and make the exact same as their peers who do minimal or no work. Even after working there for 3+ years they make the exact same as brand new advocates. It might seem enticing that you can start an entry level job and make decent money (around 40k) however there is VERY minimal growth opportunities (you basically have to get lucky) and you do not get raises anymore. They do not care about retention so do not think the longer you stay the more value you will add.

The hotline is completely understaffed and I see it staying that way because when they hire new advocates they immediately quit after learning how terrible the role is. So if you do work here you will be completely strained and overworked.

I do not see this organization heading in the right direction at all, find a different org if you do not want to have a career that feels like a downward spiral.

Advice to Management

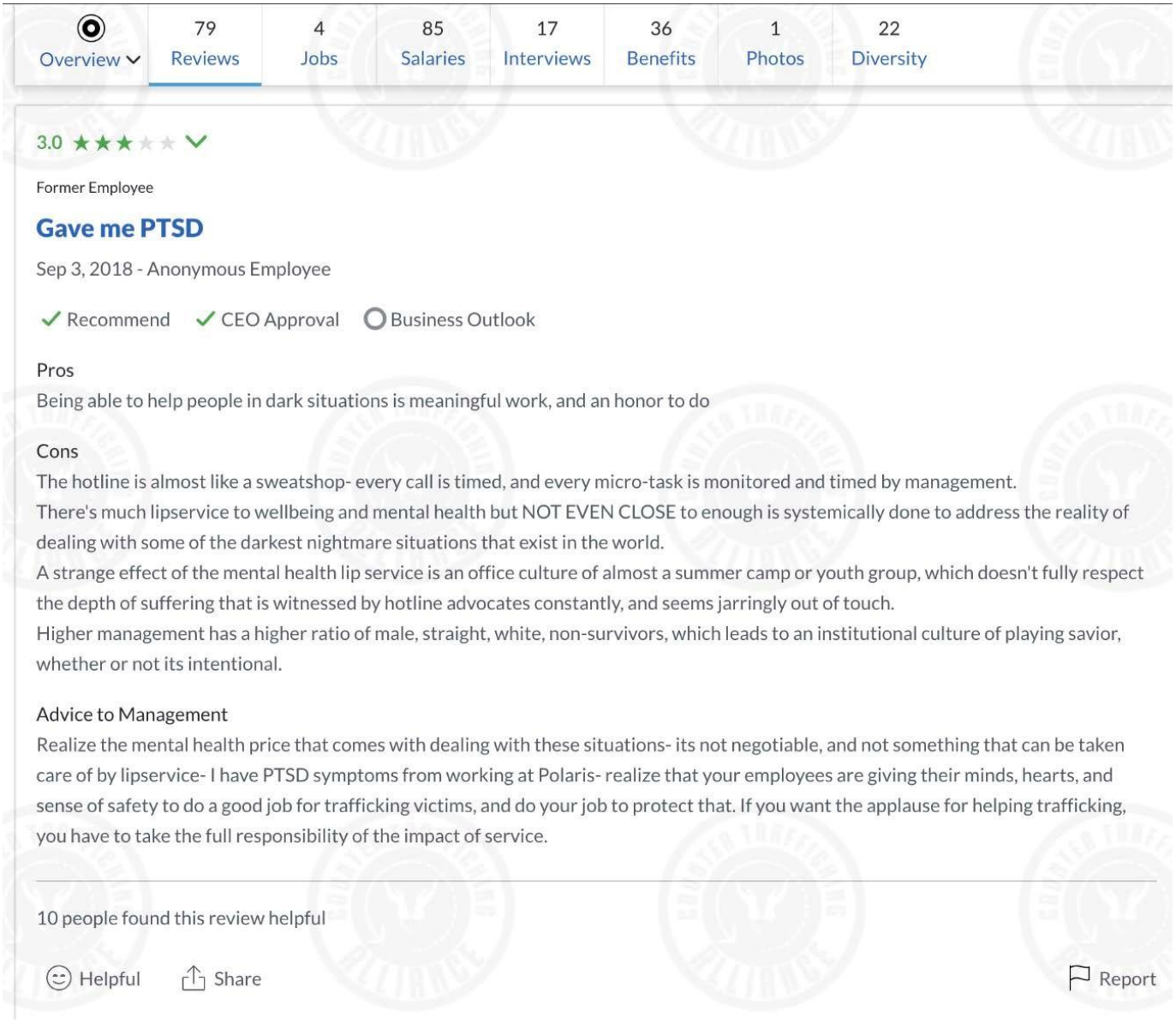
Start valuing hard work and hotline advocates who have been with the hotline for years. Stop treating all advocates the same because they are not the same and some have way more skills than others. Start treating them like long term employees because some advocates do love the role and hope to stay in the position long term.

Stop promoting people into leadership positions when they are not the best fit for the role they are getting. Sometimes they are promoted for being the easy option and sometimes it seems like Polaris is so scared of being sued that they will promote people who they think will make a fuss if they are not promoted.

Give more structure to leadership roles instead of pushing people into roles completely blind and expecting them to figure it out on their own. Every time a role gets passed off the person stepping into the role knows less as a result of having zero structure or proper training for these roles.

Get a CEO who cares about the biggest part of the organization and the part who brings in the most funding (the hotline) and stop treating the hotline and its workers like they are disposable.

"I do not see this organization heading in the right direction at all, find a different org if you do not want to have a career that feels like a downward spiral."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

3.0 ★★★☆☆

Former Employee

Gave me PTSD

Sep 3, 2018 - Anonymous Employee

✓ Recommend ✓ CEO Approval ○ Business Outlook

Pros

Being able to help people in dark situations is meaningful work, and an honor to do

Cons

The hotline is almost like a sweatshop- every call is timed, and every micro-task is monitored and timed by management.
There's much lipservice to wellbeing and mental health but NOT EVEN CLOSE to enough is systemically done to address the reality of dealing with some of the darkest nightmare situations that exist in the world.
A strange effect of the mental health lip service is an office culture of almost a summer camp or youth group, which doesn't fully respect the depth of suffering that is witnessed by hotline advocates constantly, and seems jarringly out of touch.
Higher management has a higher ratio of male, straight, white, non-survivors, which leads to an institutional culture of playing savior, whether or not its intentional.

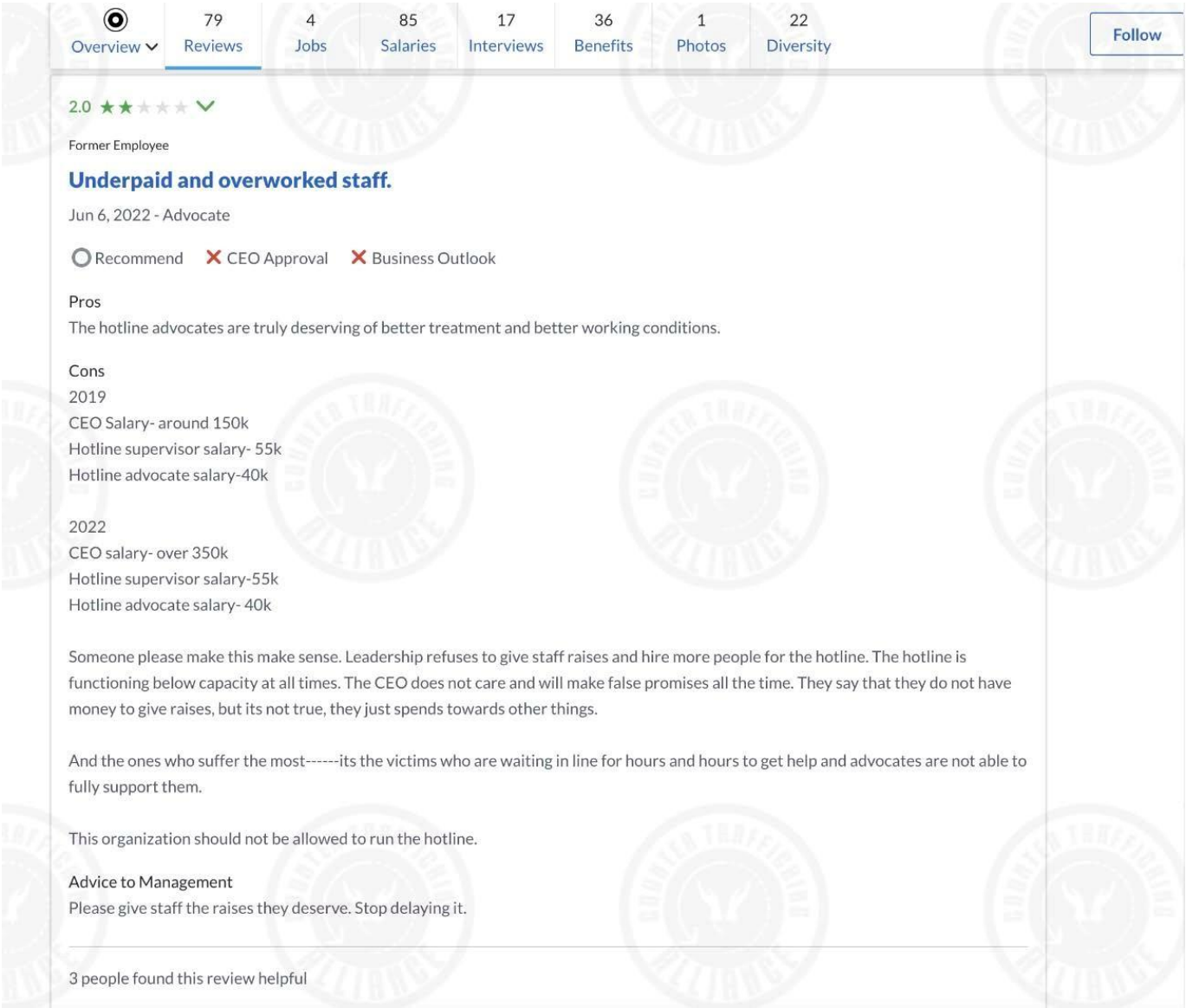
Advice to Management

Realize the mental health price that comes with dealing with these situations- its not negotiable, and not something that can be taken care of by lipservice- I have PTSD symptoms from working at Polaris- realize that your employees are giving their minds, hearts, and sense of safety to do a good job for trafficking victims, and do your job to protect that. If you want the applause for helping trafficking, you have to take the full responsibility of the impact of service.

10 people found this review helpful

Helpful Share Report

"The hotline is almost like a sweatshop- every call is timed, and every micro-task is monitored and timed by management. There's much lipservice to wellbeing and mental health but NOT EVEN CLOSE to enough is systemically done to address the reality of dealing with some of the darkest nightmare situations that exist in the world."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity | Follow

2.0 ★★☆☆☆

Former Employee

Underpaid and overworked staff.

Jun 6, 2022 - Advocate

○ Recommend ✕ CEO Approval ✕ Business Outlook

Pros

The hotline advocates are truly deserving of better treatment and better working conditions.

Cons

2019
CEO Salary- around 150k
Hotline supervisor salary- 55k
Hotline advocate salary-40k

2022
CEO salary- over 350k
Hotline supervisor salary-55k
Hotline advocate salary- 40k

Someone please make this make sense. Leadership refuses to give staff raises and hire more people for the hotline. The hotline is functioning below capacity at all times. The CEO does not care and will make false promises all the time. They say that they do not have money to give raises, but its not true, they just spends towards other things.

And the ones who suffer the most------its the victims who are waiting in line for hours and hours to get help and advocates are not able to fully support them.

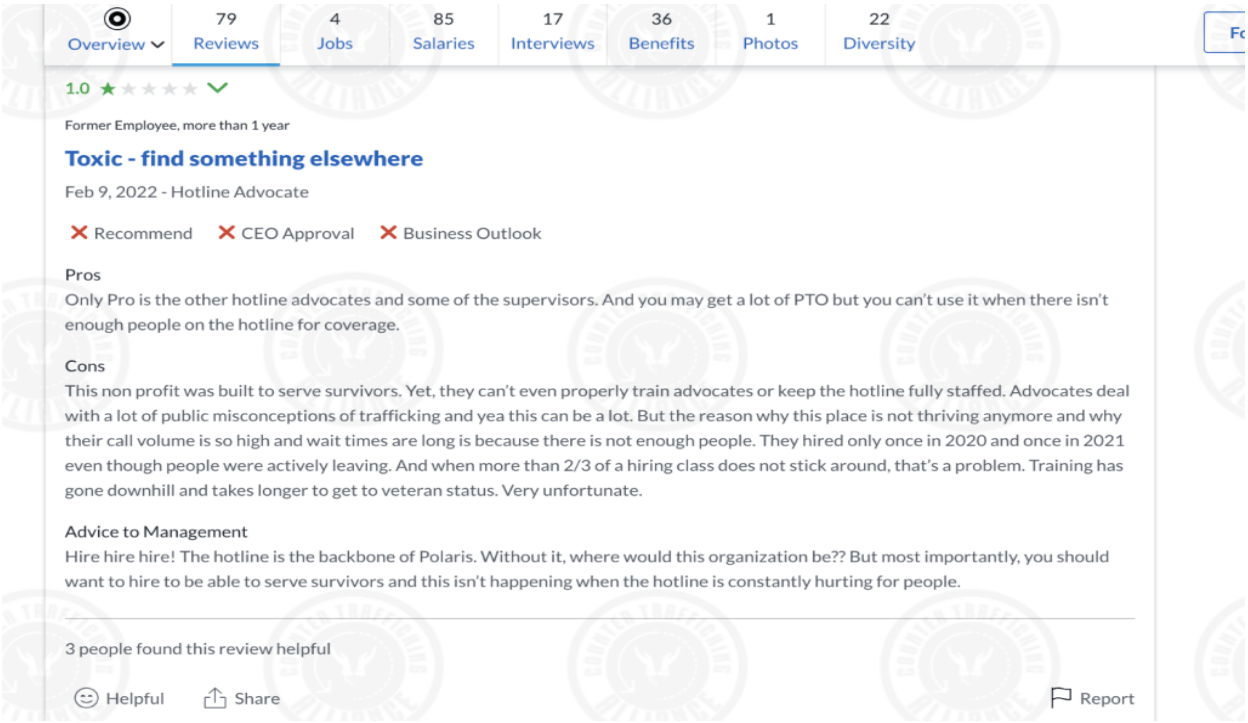
This organization should not be allowed to run the hotline.

Advice to Management

Please give staff the raises they deserve. Stop delaying it.

3 people found this review helpful

"Someone please make this make sense. Leadership refuses to give staff raises and hire more people for the hotline. The hotline is functioning below capacity at all times. The CEO does not care and will make false promises all the time. They say that they do not have money to give raises, but it's not true, they just spend towards other things. And the ones who suffer the most…it's the victims who are waiting in line for hours and hours to get help and advocates are not able to fully support the. This organization should not be allowed to run the hotline."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

1.0 ★

Former Employee, more than 1 year

Toxic - find something elsewhere

Feb 9, 2022 - Hotline Advocate

✕ Recommend ✕ CEO Approval ✕ Business Outlook

Pros

Only Pro is the other hotline advocates and some of the supervisors. And you may get a lot of PTO but you can't use it when there isn't enough people on the hotline for coverage.

Cons

This non profit was built to serve survivors. Yet, they can't even properly train advocates or keep the hotline fully staffed. Advocates deal with a lot of public misconceptions of trafficking and yea this can be a lot. But the reason why this place is not thriving anymore and why their call volume is so high and wait times are long is because there is not enough people. They hired only once in 2020 and once in 2021 even though people were actively leaving. And when more than 2/3 of a hiring class does not stick around, that's a problem. Training has gone downhill and takes longer to get to veteran status. Very unfortunate.

Advice to Management

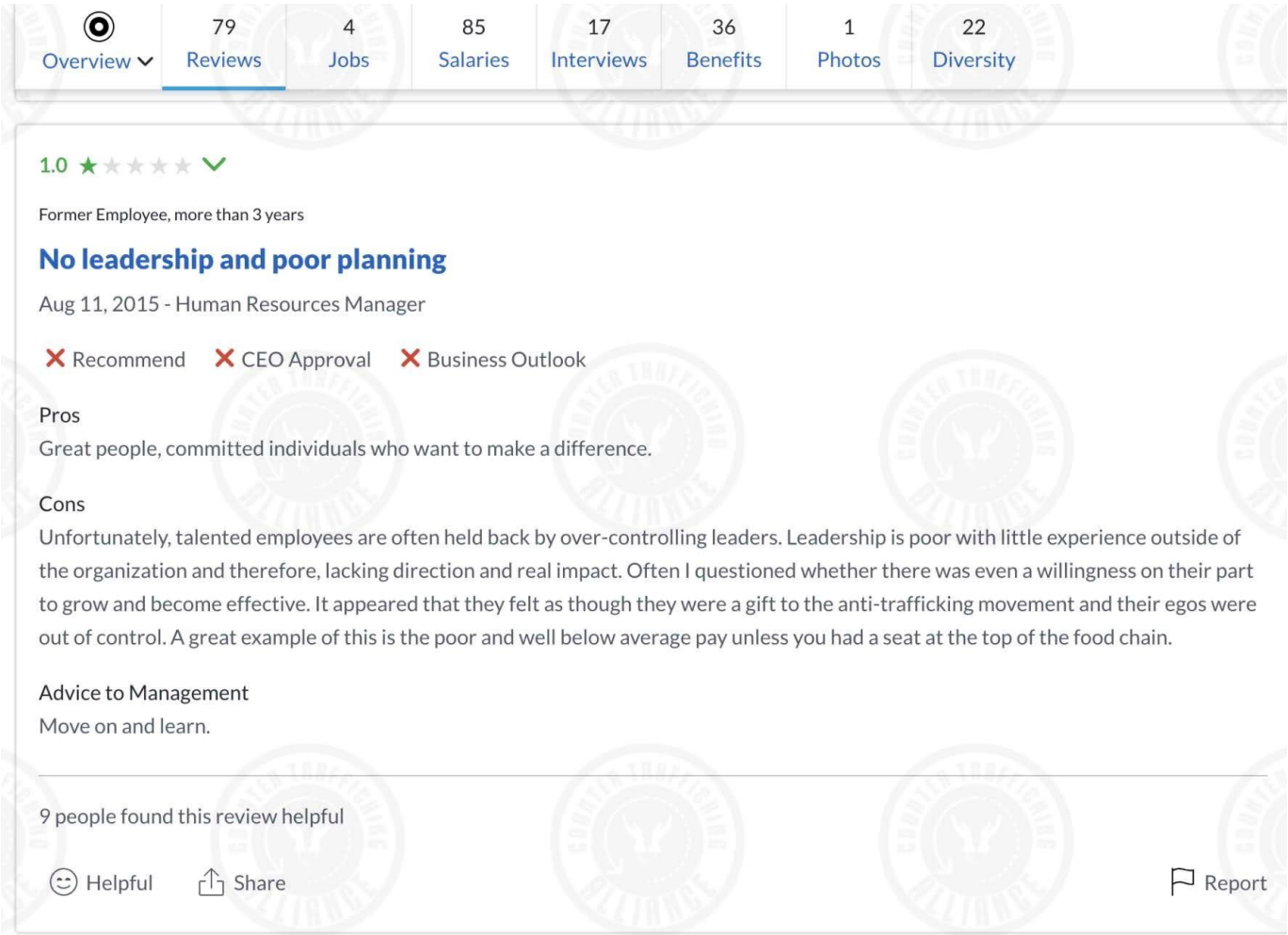
Hire hire hire! The hotline is the backbone of Polaris. Without it, where would this organization be?? But most importantly, you should want to hire to be able to serve survivors and this isn't happening when the hotline is constantly hurting for people.

3 people found this review helpful

Helpful Share Report

2022 Employee Review

"This non-profit was built to serve survivors. Yet, they can't even properly train advocates or keep the hotline fully staffed...the reason why this place is not thriving anymore and why their call volume is so high and wait times are long is because there is not enough people."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

1.0 ★☆☆☆☆

Former Employee, more than 3 years

No leadership and poor planning

Aug 11, 2015 - Human Resources Manager

✗ Recommend ✗ CEO Approval ✗ Business Outlook

Pros

Great people, committed individuals who want to make a difference.

Cons

Unfortunately, talented employees are often held back by over-controlling leaders. Leadership is poor with little experience outside of the organization and therefore, lacking direction and real impact. Often I questioned whether there was even a willingness on their part to grow and become effective. It appeared that they felt as though they were a gift to the anti-trafficking movement and their egos were out of control. A great example of this is the poor and well below average pay unless you had a seat at the top of the food chain.

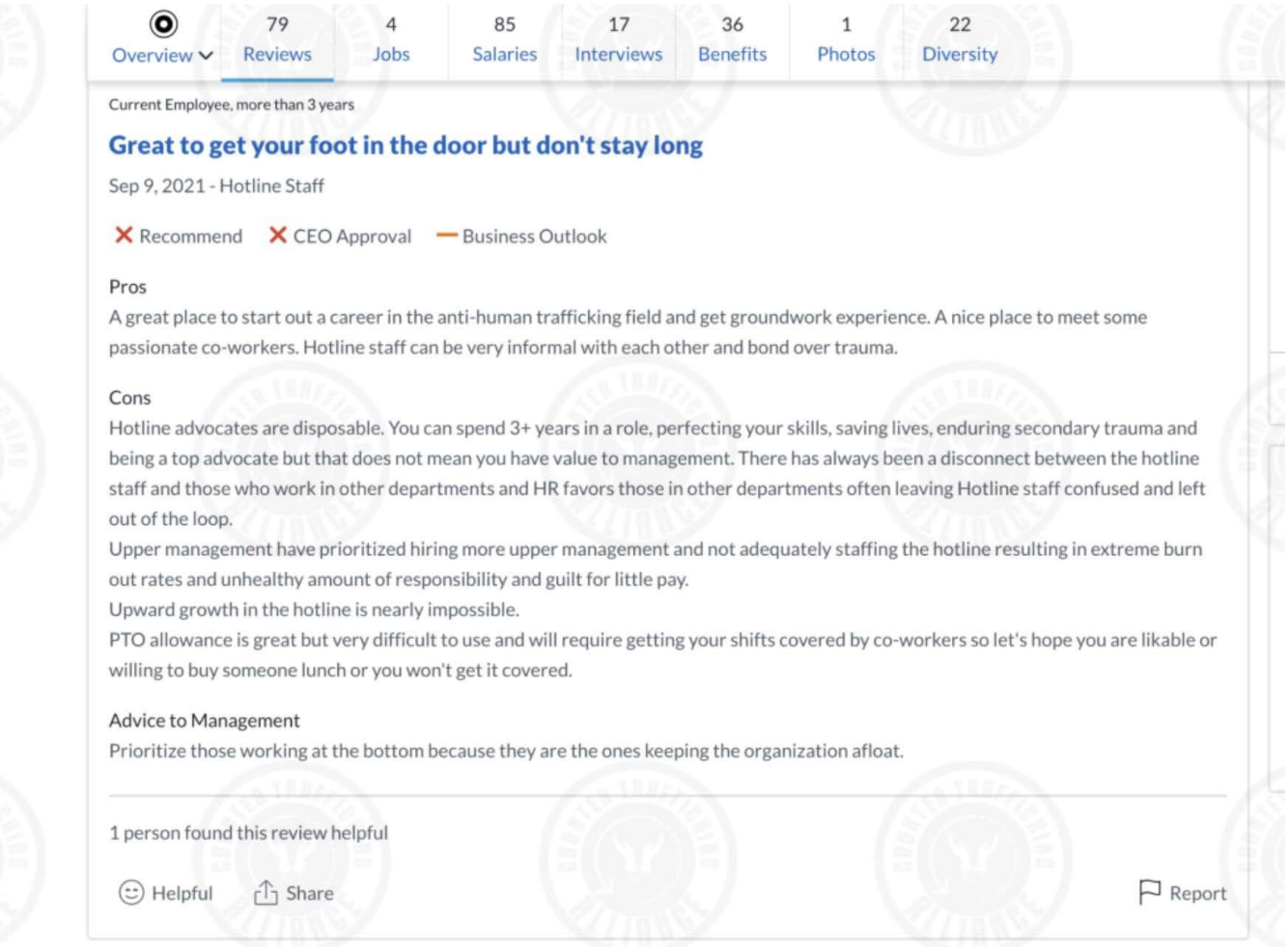
Advice to Management

Move on and learn.

9 people found this review helpful

Helpful Share Report

"Unfortunately, talented employees are often held back by overcontrolling leaders. Leadership is poor with little experience outside of the organization and therefore, lacking direction and real impact."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

Current Employee, more than 3 years

Great to get your foot in the door but don't stay long

Sep 9, 2021 - Hotline Staff

✕ Recommend ✕ CEO Approval — Business Outlook

Pros

A great place to start out a career in the anti-human trafficking field and get groundwork experience. A nice place to meet some passionate co-workers. Hotline staff can be very informal with each other and bond over trauma.

Cons

Hotline advocates are disposable. You can spend 3+ years in a role, perfecting your skills, saving lives, enduring secondary trauma and being a top advocate but that does not mean you have value to management. There has always been a disconnect between the hotline staff and those who work in other departments and HR favors those in other departments often leaving Hotline staff confused and left out of the loop.

Upper management have prioritized hiring more upper management and not adequately staffing the hotline resulting in extreme burn out rates and unhealthy amount of responsibility and guilt for little pay.

Upward growth in the hotline is nearly impossible.

PTO allowance is great but very difficult to use and will require getting your shifts covered by co-workers so let's hope you are likable or willing to buy someone lunch or you won't get it covered.

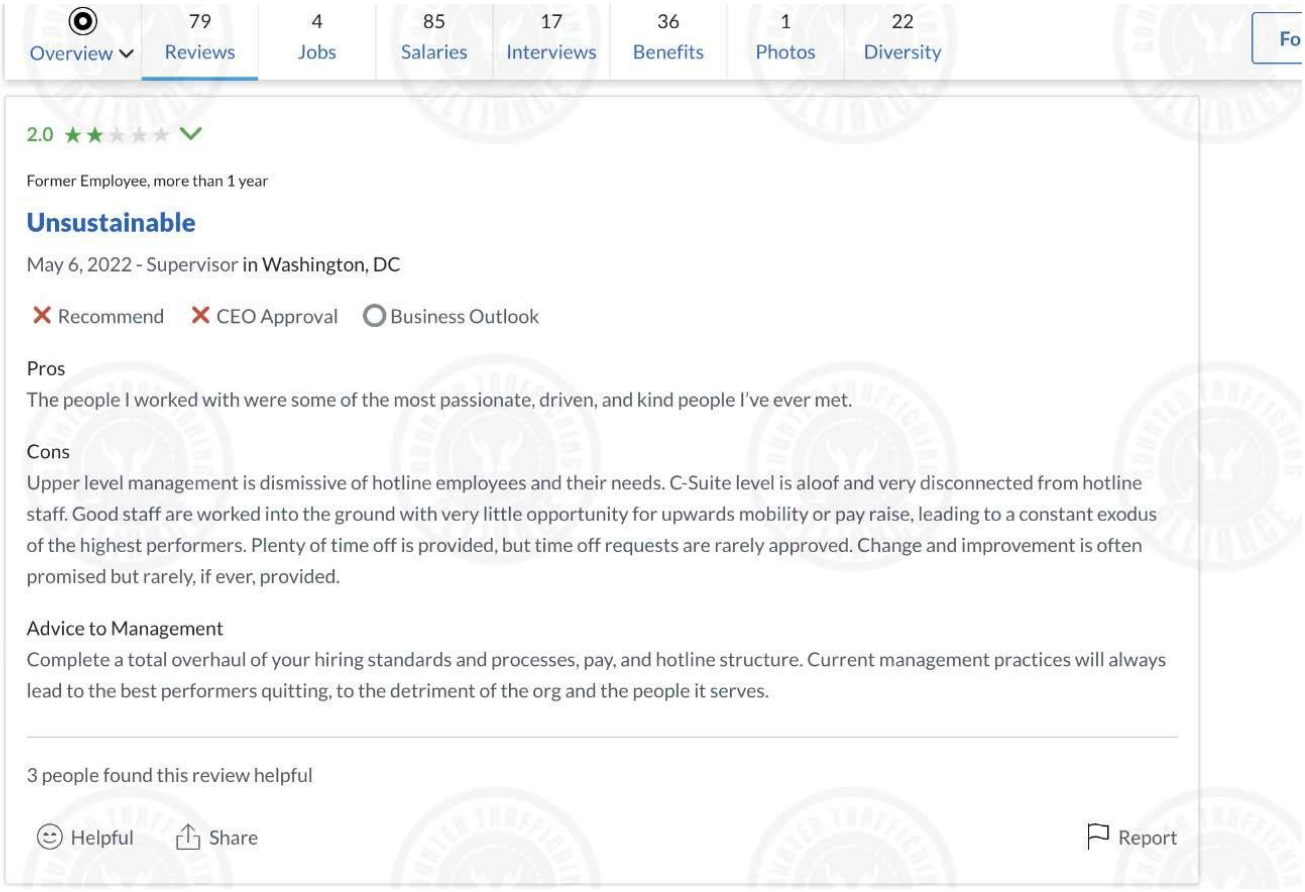
Advice to Management

Prioritize those working at the bottom because they are the ones keeping the organization afloat.

1 person found this review helpful

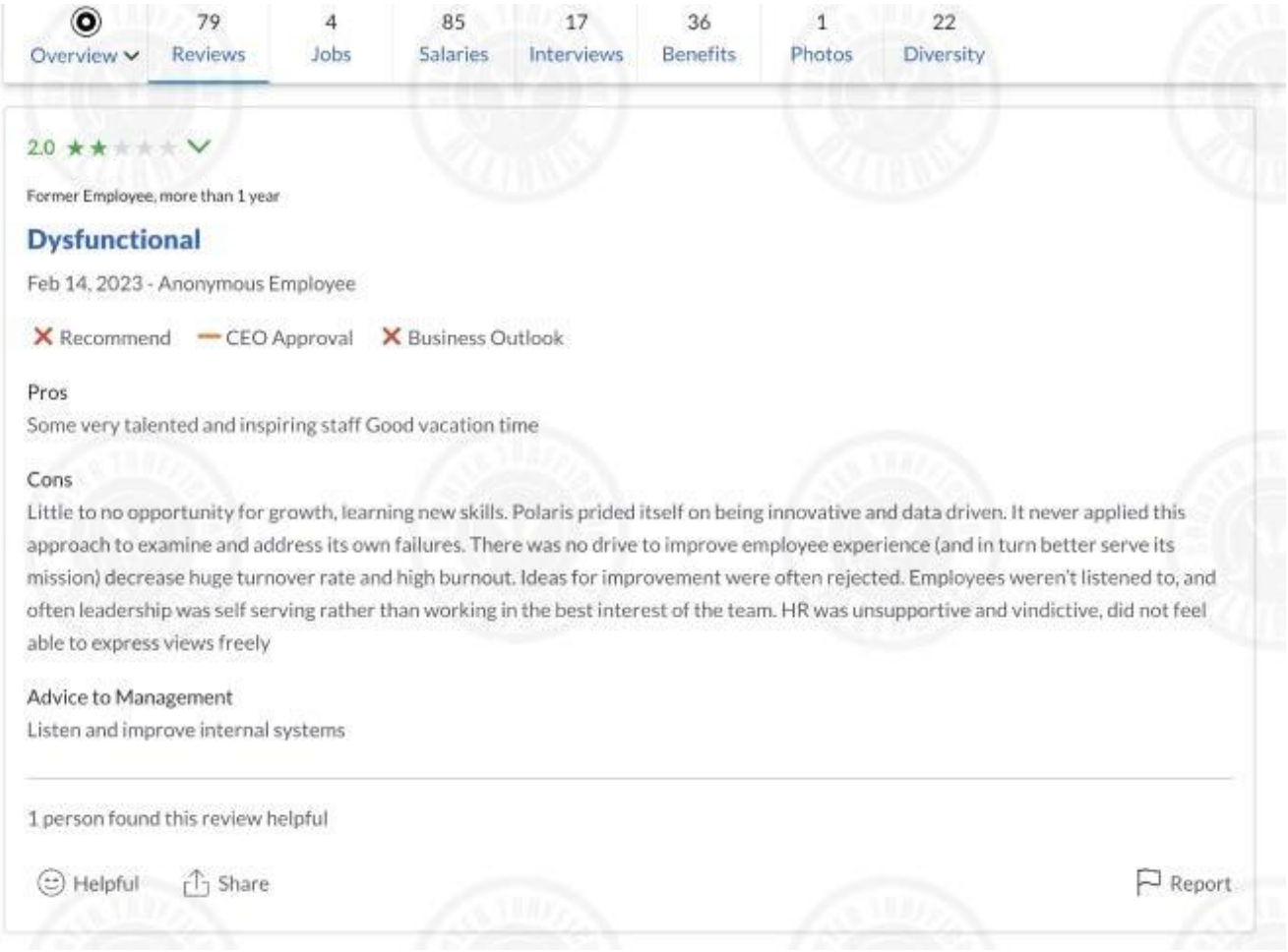
Helpful Share Report

"Hotline advocates are disposable. You can spend 3+ years in a role, perfecting your skills, saving lives, enduring secondary trauma and being a top advocate but that does not mean you have value to management. There has always been a disconnect between the hotline staff and those who work in other departments..."



"Upper level management is dismissive of hotline employees and their needs. C-Suite level is aloof and very disconnected from hotline staff. Good staff are worked into the ground with very little opportunity for upwards mobility or pay raise, leading to a constant exodus of the highest performers."

"Polaris prided itself on being innovative and data driven. It never applied this approach to examine and address its own failures."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

2.0 ★★☆☆☆

Former Employee, more than 1 year

Dysfunctional

Feb 14, 2023 - Anonymous Employee

✗ Recommend — CEO Approval ✗ Business Outlook

Pros

Some very talented and inspiring staff Good vacation time

Cons

Little to no opportunity for growth, learning new skills. Polaris prided itself on being innovative and data driven. It never applied this approach to examine and address its own failures. There was no drive to improve employee experience (and in turn better serve its mission) decrease huge turnover rate and high burnout. Ideas for improvement were often rejected. Employees weren't listened to, and often leadership was self serving rather than working in the best interest of the team. HR was unsupportive and vindictive, did not feel able to express views freely

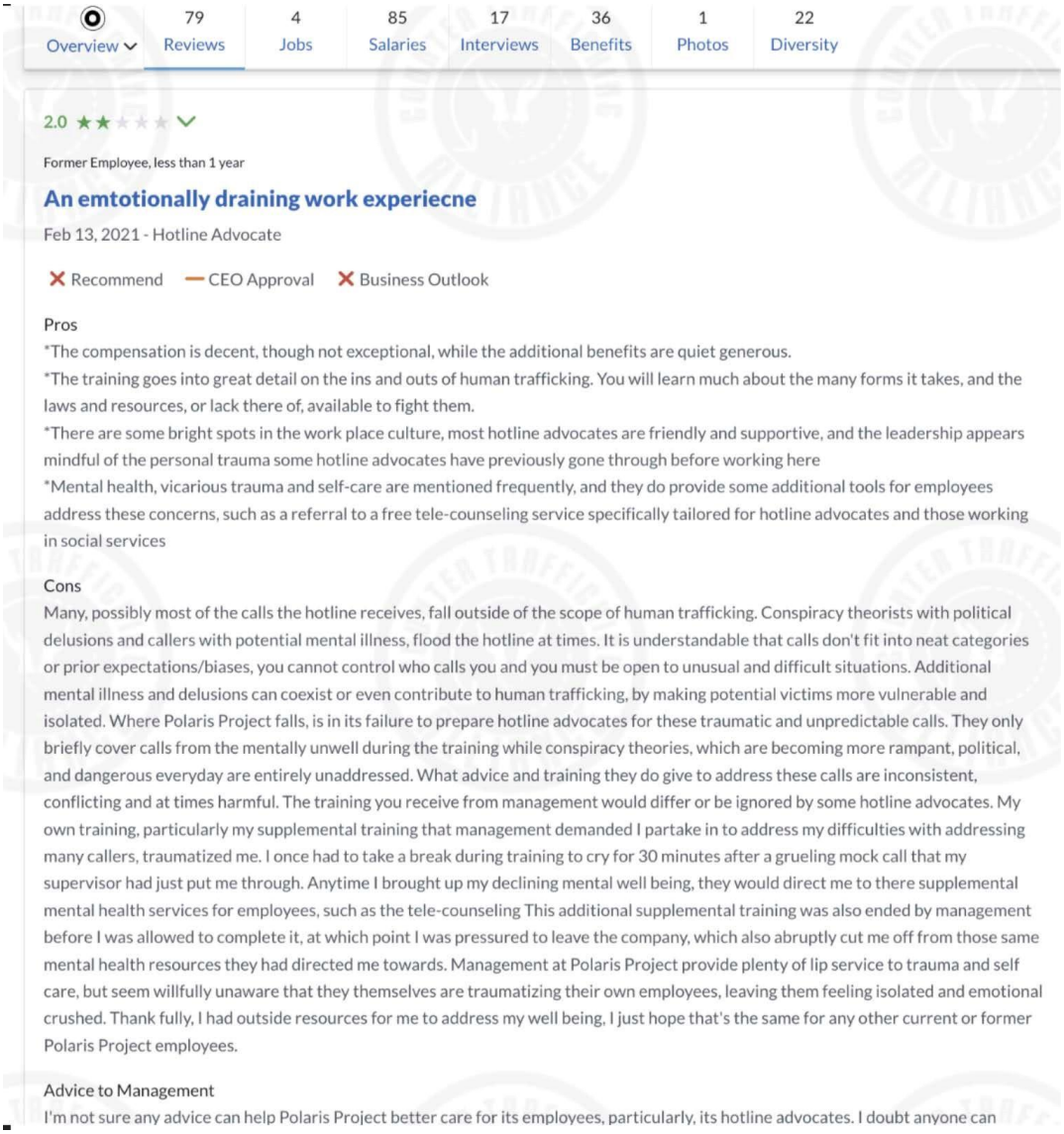
Advice to Management

Listen and improve internal systems

1 person found this review helpful

Helpful Share Report

"What advice and training they do give to address these calls are inconsistent, conflicting and at times harmful. The training you receive from management would differ or be ignored by some hotline advocates."



Overview | 79 Reviews | 4 Jobs | 85 Salaries | 17 Interviews | 36 Benefits | 1 Photos | 22 Diversity

2.0 ★★☆☆☆

Former Employee, less than 1 year

An emtotionally draining work experiecne

Feb 13, 2021 - Hotline Advocate

✕ Recommend — CEO Approval ✕ Business Outlook

Pros

*The compensation is decent, though not exceptional, while the additional benefits are quiet generous.

*The training goes into great detail on the ins and outs of human trafficking. You will learn much about the many forms it takes, and the laws and resources, or lack there of, available to fight them.

*There are some bright spots in the work place culture, most hotline advocates are friendly and supportive, and the leadership appears mindful of the personal trauma some hotline advocates have previously gone through before working here

*Mental health, vicarious trauma and self-care are mentioned frequently, and they do provide some additional tools for employees address these concerns, such as a referral to a free tele-counseling service specifically tailored for hotline advocates and those working in social services

Cons

Many, possibly most of the calls the hotline receives, fall outside of the scope of human trafficking. Conspiracy theorists with political delusions and callers with potential mental illness, flood the hotline at times. It is understandable that calls don't fit into neat categories or prior expectations/biases, you cannot control who calls you and you must be open to unusual and difficult situations. Additional mental illness and delusions can coexist or even contribute to human trafficking, by making potential victims more vulnerable and isolated. Where Polaris Project falls, is in its failure to prepare hotline advocates for these traumatic and unpredictable calls. They only briefly cover calls from the mentally unwell during the training while conspiracy theories, which are becoming more rampant, political, and dangerous everyday are entirely unaddressed. What advice and training they do give to address these calls are inconsistent, conflicting and at times harmful. The training you receive from management would differ or be ignored by some hotline advocates. My own training, particularly my supplemental training that management demanded I partake in to address my difficulties with addressing many callers, traumatized me. I once had to take a break during training to cry for 30 minutes after a grueling mock call that my supervisor had just put me through. Anytime I brought up my declining mental well being, they would direct me to there supplemental mental health services for employees, such as the tele-counseling This additional supplemental training was also ended by management before I was allowed to complete it, at which point I was pressured to leave the company, which also abruptly cut me off from those same mental health resources they had directed me towards. Management at Polaris Project provide plenty of lip service to trauma and self care, but seem willfully unaware that they themselves are traumatizing their own employees, leaving them feeling isolated and emotional crushed. Thank fully, I had outside resources for me to address my well being, I just hope that's the same for any other current or former Polaris Project employees.

Advice to Management

I'm not sure any advice can help Polaris Project better care for its employees, particularly, its hotline advocates. I doubt anyone can

These are just fractional examples of some grievances either by the industry or by victims needing to reach the hotline for it's heavily marketed resources. We sit back and wonder, if this is just by our own inquiry, searching for these testimonies for whoever was willing to speak up, how many other testimonies are out there that have gone unnoticed or are fearful to speak up?

Up to this point, we wonder how many victims may have been shorted, or lost due to this convoluted process? How many faced critical situations after trying to escape?

3 Overall Financial Expenditures

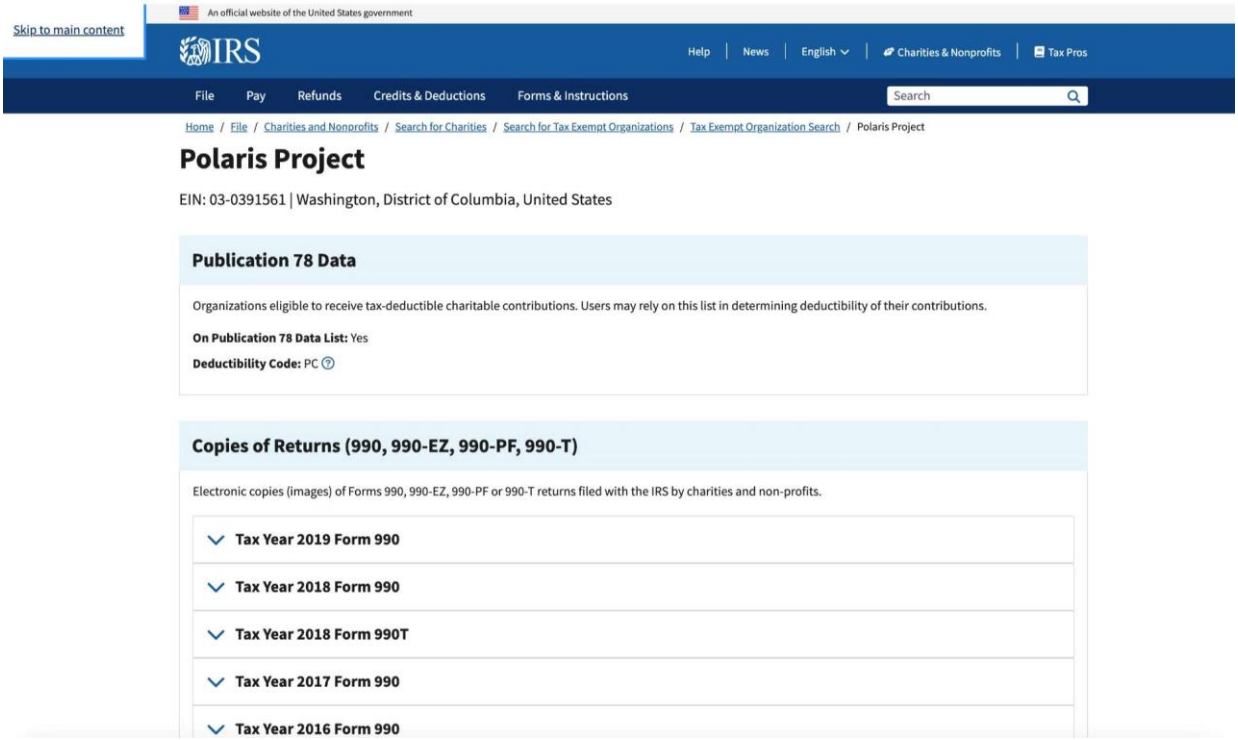
The financial expenditures of a non-profit organization is a health barometer and helpful insight to the many components they actualize, measured up against their mission statement.

The Counter Trafficking Alliance (CTA) research team were self-assigned to collect, dissect, review, and validate all resources and data in order to answer one question:

How are funds allocated to support Polaris, and most importantly, are the funds appropriately addressing services created to assist and ensure the safety of trafficking victims?

The Polaris 990 Tax Returns

To confirm the credibility of any organization and its commitment to its mission, the best place to begin is the organization's tax returns. We examined Polaris federal tax records year by year to detect a pattern to how these financial expenditures help trafficking victims or programs directly.



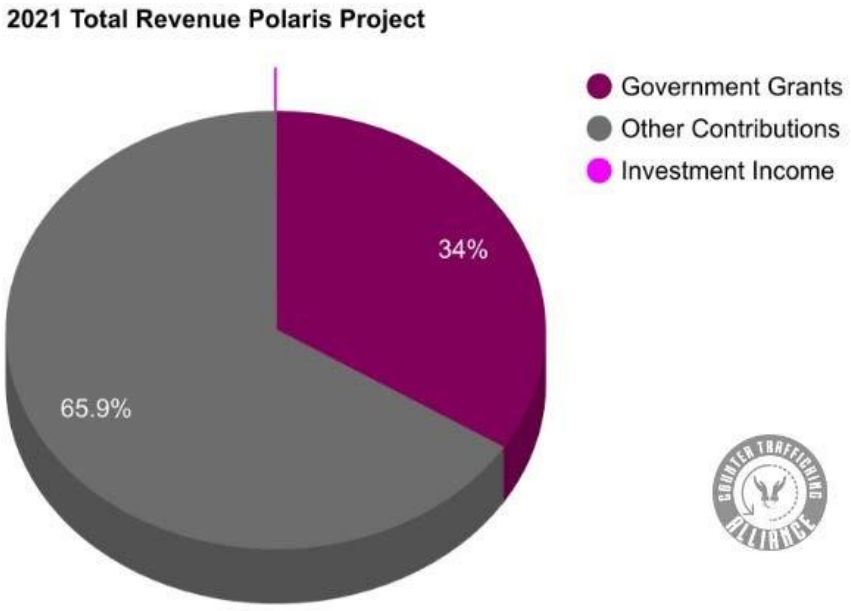
These returns are publicly made available through the Polaris website[9], alongside access through the IRS[10]. For forms we could not locate we utilized ProPublica[11], a site that catalogs non-profit tax returns. Surprisingly, copies of Polaris' tax records were only available up to the 2020 tax year, until recently in 2023 the 2021 tax returns were finally made available. After thoroughly reviewing the returns, we detected several concerning and questionable areas in the tax forms. Those sections are: Salaries, operational expenses, single donor contributions, funded programs, and miscellaneous discrepancies.

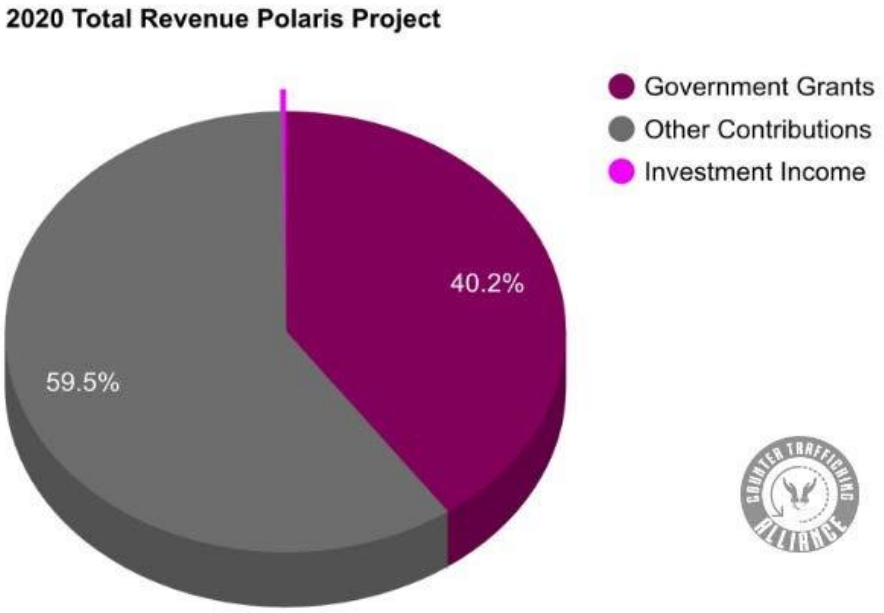
[9] https://polarisproject.org/financial-information/
[10] https://apps.irs.gov/app/eos/
[11] https://projects.propublica.org/nonprofits/

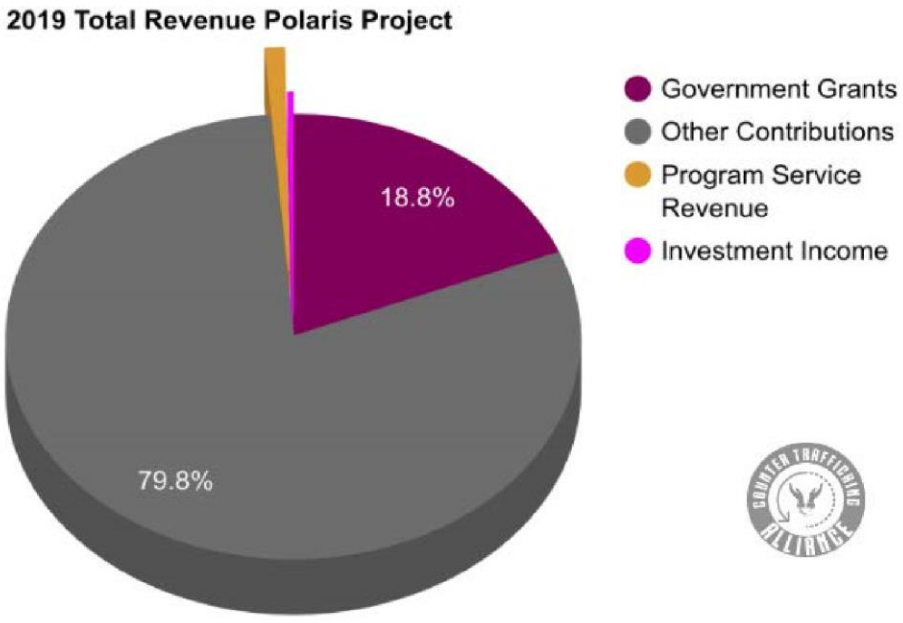
3.1 Total Revenue Breakdown

Below are depictions of Total Revenue for the last five years. This information is broken down on the "Statement of Revenue" within the 990 tax form. (Part VIII)

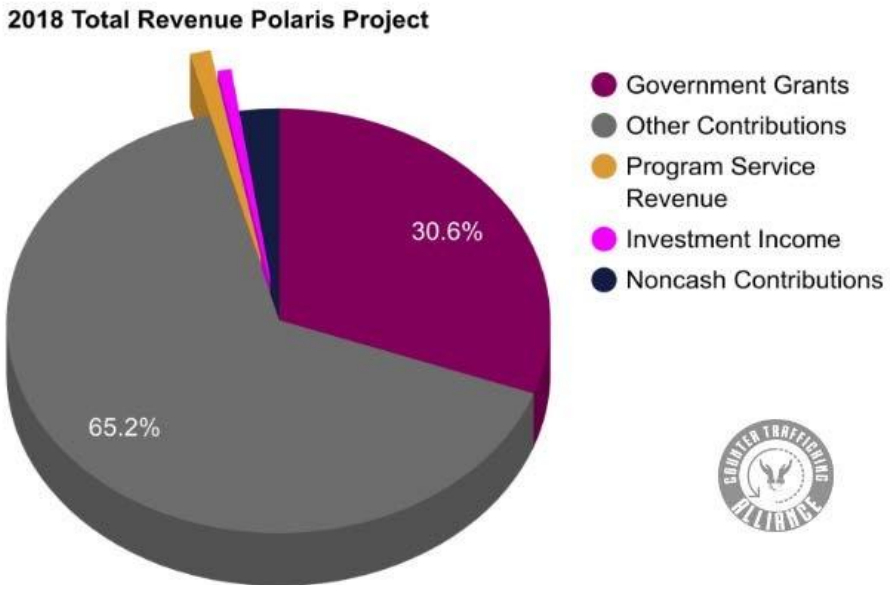
For 'Program Service Revenue' being 0 for both 2020 & 2021 we'd like to notate it could have been due to COVID-19 lockdowns. Based on these depictions, Polaris Project receives a majority of their revenue from "other contributions", though they aren't required to expand on what exactly that entails.

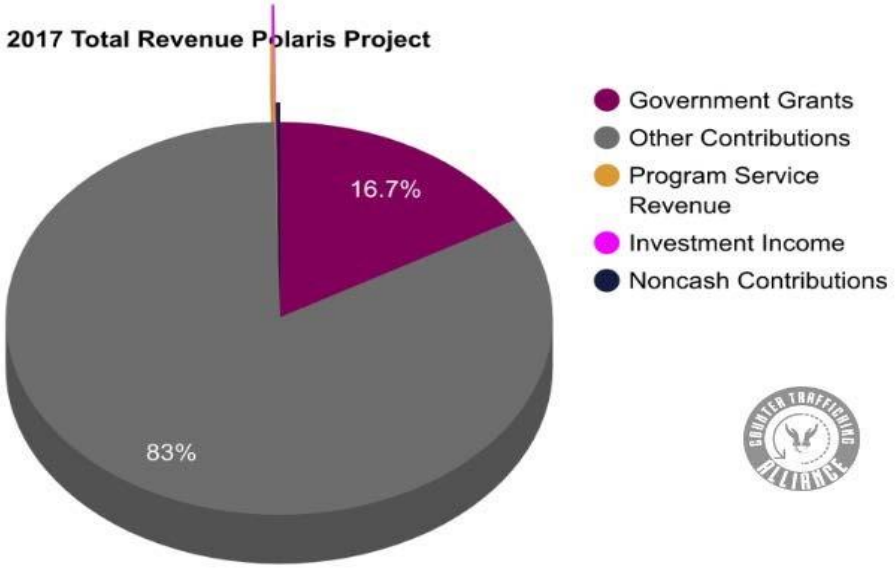






Interactive pie graph of data available on our website[12]





[12] https://countertraffickingalliance.com/watchdog/polaris-project-profile-financial-expenditures

3.2 Corporate Partnerships

Indicated in their 2019 Annual Report, Polaris receives much support from corporate partnerships. These can be valued at cash value and/ or by pro bono services. Below is a table illustrating such partnerships and their rating based on level of support.



Polaris | ANNUAL REPORT 2019

The Power of Corporate Partnerships

Polaris has developed dynamic corporate partnerships with major companies representing the travel, hospitality, financial, social media, tech, and other industries. Support from corporations includes financial and in-kind donations of goods and services to benefit victims and survivors, as well as collaborative and strategic initiatives to prevent and disrupt sex and labor trafficking. These impactful partnerships often include the creation of custom trainings for employees, targeted awareness efforts, sponsorship of key programmatic activities, and high-level consultation around business policies and practices to both further Polaris's mission and assist companies in achieving human rights objectives.

Sirius *$500,000+*
DELTA, Palantir, PayPal

Vega *$250,000 - $499,999*
BCG, LATHAM & WATKINS LLP

Capella *$100,000 - $249,999*
airbnb, amazon web services, Southwest, BANK OF AMERICA, twilio, Clear Channel Outdoor

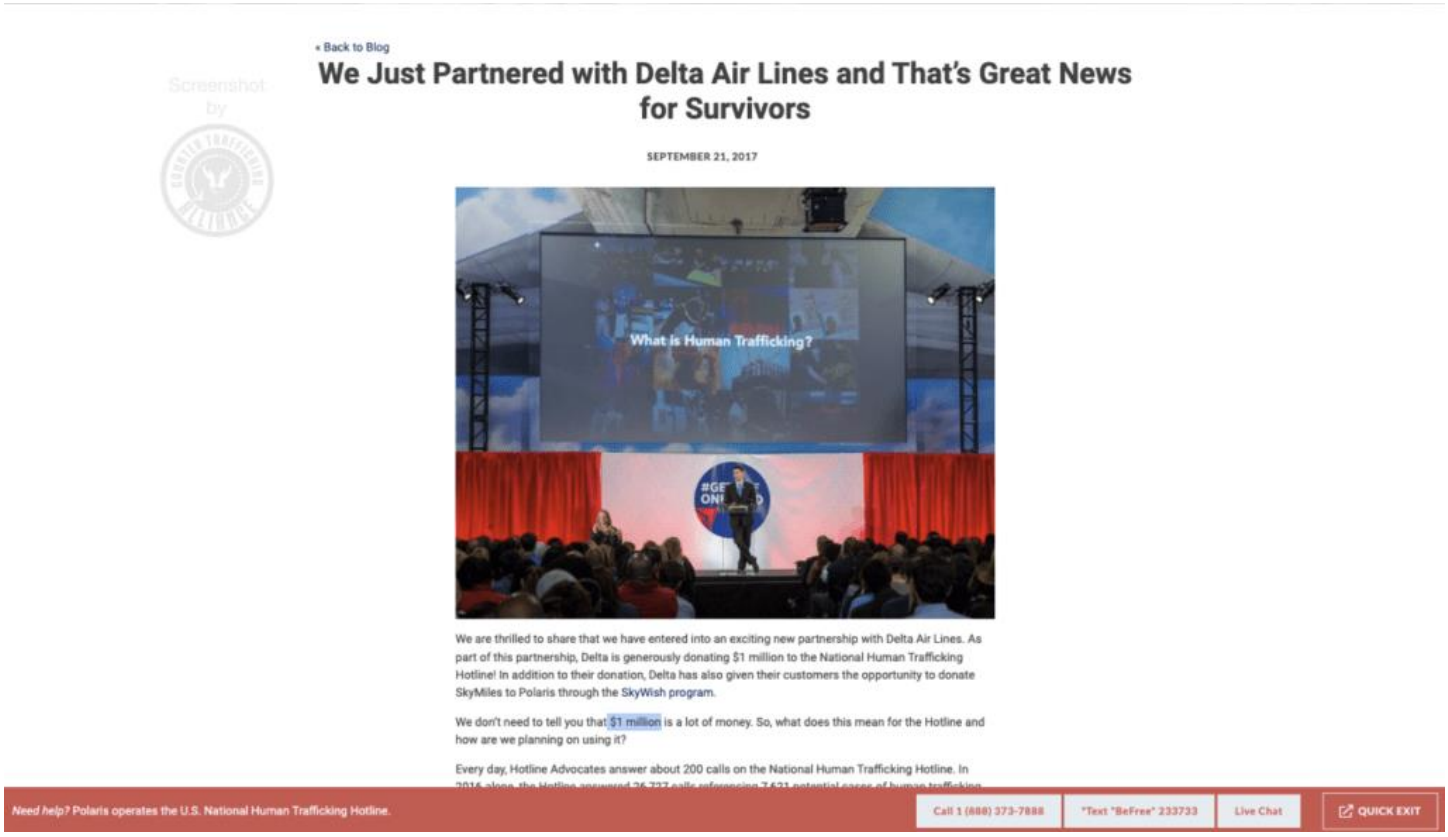
Antares *$50,000 - $99,999*
ArcBest, match group, COVINGTON, Marriott International, THOMSON REUTERS

Regulus *$25,000 - $49,999*
bumble, CHOICE HOTELS, HYATT, Uber, WYNDHAM HOTELS & RESORTS

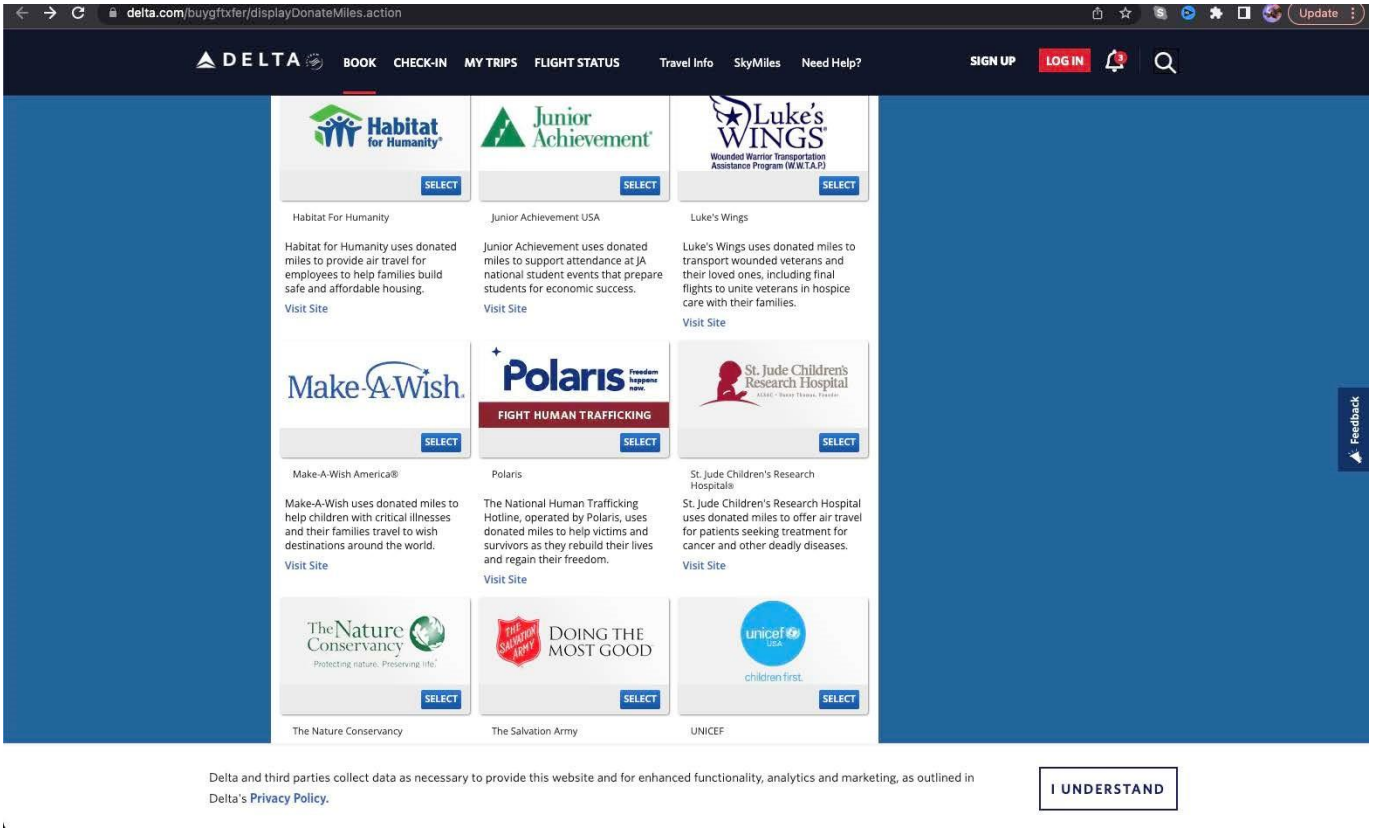
Ahara *$10,000 - $24,999*
ACAMS, AHLA, EPOCH, Google, lyft, MARCUM, pagerduty, PIERCE ATWOOD

Partnership values are comprised of cash and/or in-kind annually
Polaris is named after the North Star that guided slaves to freedom in the United States and thus our Corporate Partnership levels are named for the stars that can be seen from Earth, beginning at the brightest, continually lighting our way as we fight slavery in the modern world

Given these partnerships, it becomes a daunting task to reconcile what category of revenue this belongs under. We would consider this to be "Non-cash Contributions", a category within "Total Revenue". However, 990 filings over the years do not seem to reflect this transparently.



For example, in 2017 Polaris Project announced their partnership with Delta Airlines. Along with a $1 million dollar donation, Delta also opened the opportunity for their customers to donate their SkyMiles via their SkyWish Program.



Helpful insights could include their continual partnerships value amount, annually. Most importantly, transparency offered to how these services help victims and survivors directly would be ideal.

3.3 A quick 990 'Functional Expenses' understanding

We will be reviewing several parts of Polaris Project's 990 forms, however, in doing so let's just take a moment to understand the meaning behind 'Functional Expenses' (Part IX).

Functional Expenses is a bird's eye view one would make to know how an organization allocates their money to accomplish their said mission. Those allocations would be put towards whatever functions (may it be rent, salaries, overhead, etc.) that make an organization functional towards that mission.

The three types of 'functions'
There are three categories of functional expenses.

Part IX	Statement of Functional Expenses				
	Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
	Check if Schedule O contains a response or note to any line in this Part IX . . . . . ☐				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.		**(A)** Total expenses	**(B)** Program service expenses	**(C)** Management and general expenses	**(D)** Fundraising expenses

Program service expenses This can be thought of as 'charity'. Costs and expenses that are associated with any programs or services that contribute towards fulfilling that organization's declared charitable mission. A portion of one expense can be categorized under this, such as salaries, materials, advertising, travel, etc.

Part IX	Statement of Functional Expenses				
	Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
	Check if Schedule O contains a response or note to any line in this Part IX . . . . . ☐				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.		**(A)** Total expenses	**(B)** Program service expenses	**(C)** Management and general expenses	**(D)** Fundraising expenses

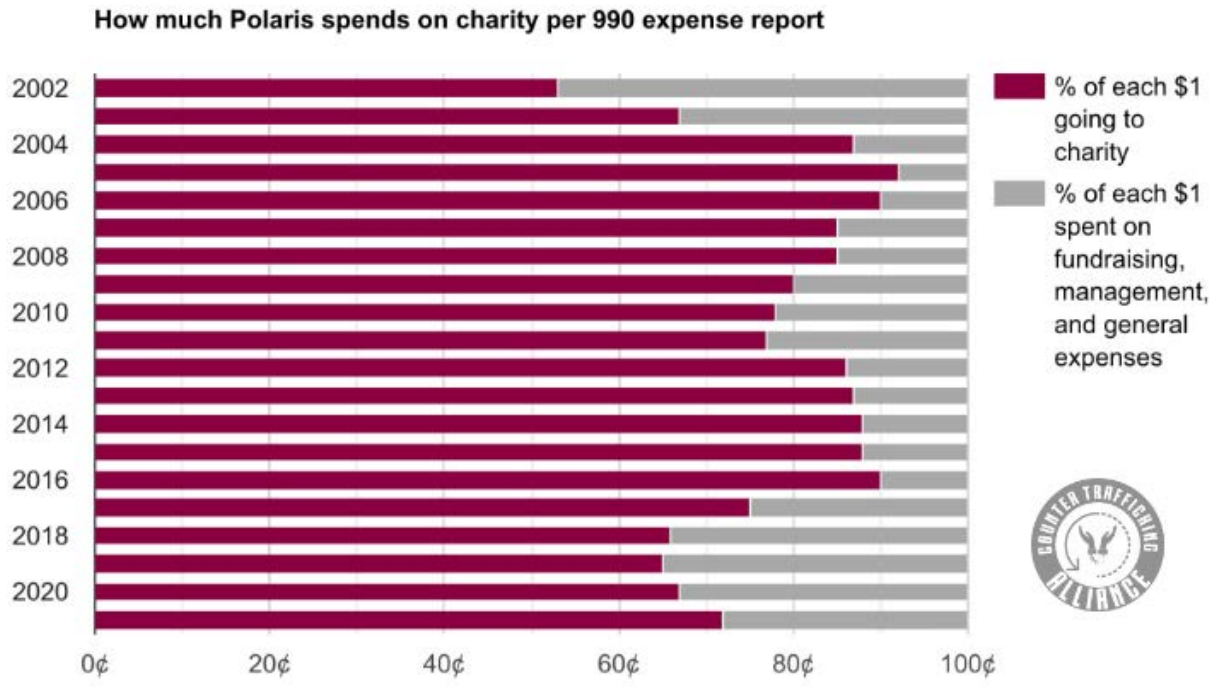
Management and general expenses You can think of this categorical expense as 'overhead'. Costs and expenses that contribute toward functions and operations of the organization but, are do not necessarily directly contributive towards the organization's mission. Some examples that could file under this category are items like office supplies, office utilities, salaries, or office rent, etc.

Part IX	Statement of Functional Expenses				
	Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
	Check if Schedule O contains a response or note to any line in this Part IX . . . . . ☐				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.		**(A)** Total expenses	**(B)** Program service expenses	**(C)** Management and general expenses	**(D)** Fundraising expenses

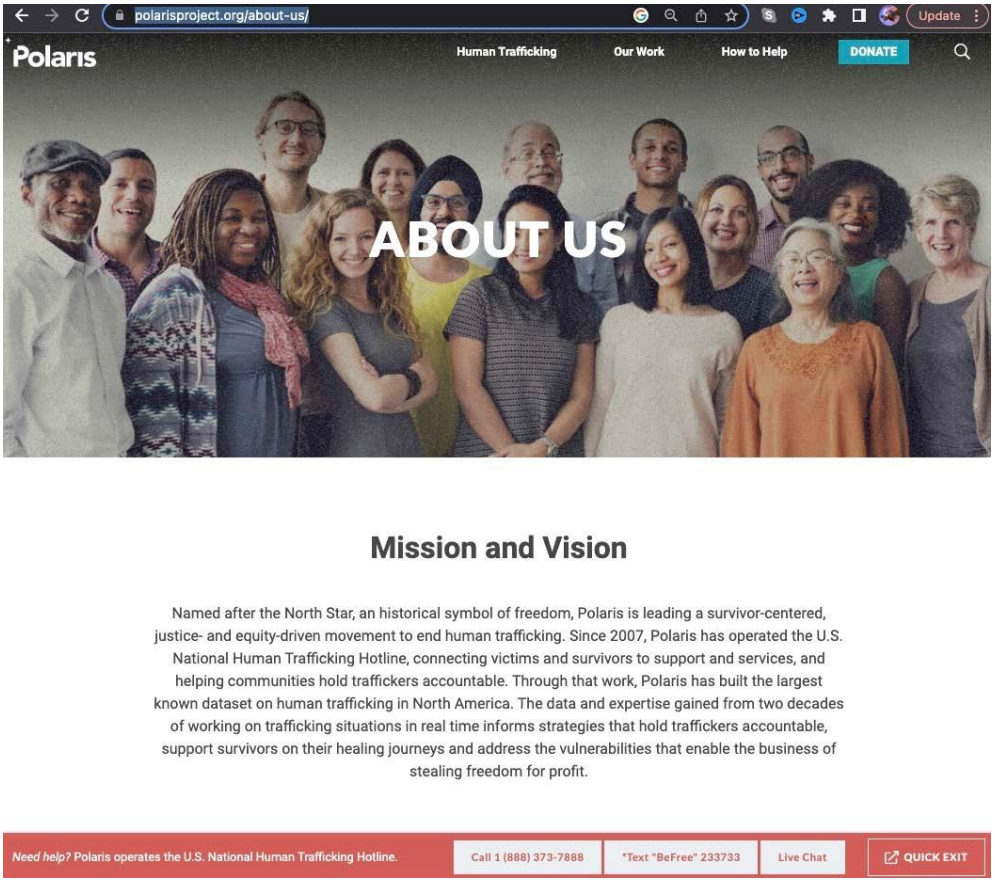
Fundraising expenses These are costs and expenses that are directly related to the organization raising money. Some examples of this expense can be event costs, advertising, salaries, etc.

Understanding these three categories of functional expenses will be valuable as we progress through this review.

3.4 How much Polaris claims to spend on charity



An investigation by Counter Trafficking Alliance found that Polaris Project claims to have spent approximately $60,230,125, or on average, 76¢ on the dollar to program services (charitable programs and services) in the last eight years (2014-2021), and on average 79¢ on the dollar for all 19 years in operation.



As a reminder the mission of Polaris Project is stated on their website,

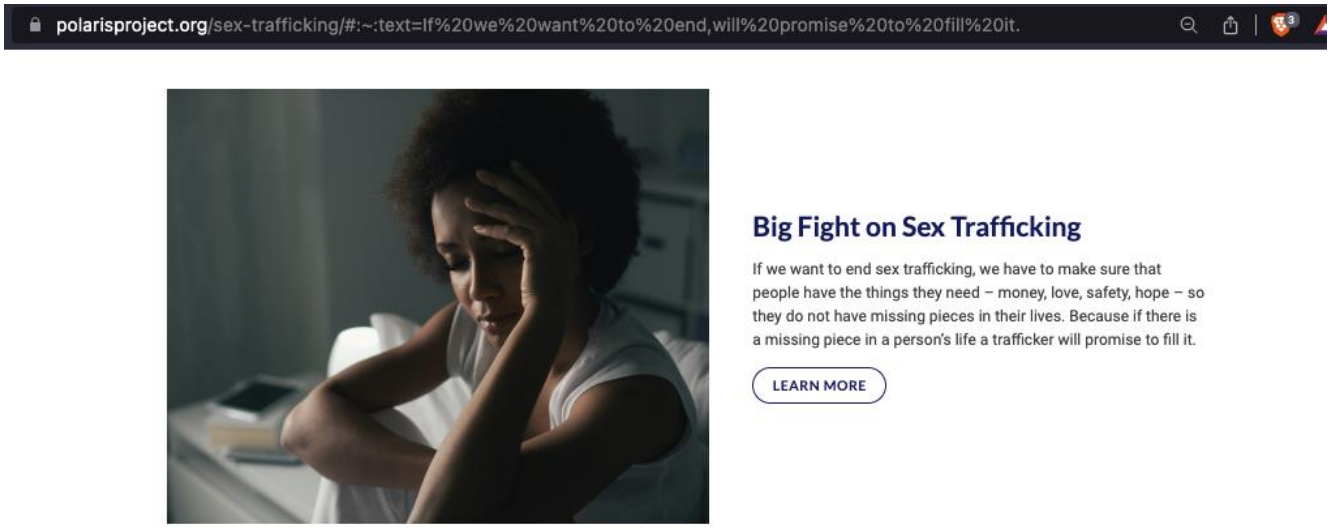
> *"...Since 2007, Polaris has operated the U.S. National Human Trafficking Hotline**, connecting victims and survivors to support and services, and helping communities hold traffickers accountable**..."*

With this being reminded, we would expect the average 76¢ on the dollar to do just that, connect victims and survivors to support services, as well as help communities hold traffickers accountable.

We just explored through some testimonies and grievances that would illustrate otherwise. At least some survivors and aftercare professionals are not getting the sufficient resources they call in for. Also illustrated in our introduction, from what we can observe of the bipartisan Attorney General's letter to congressional leadership, there

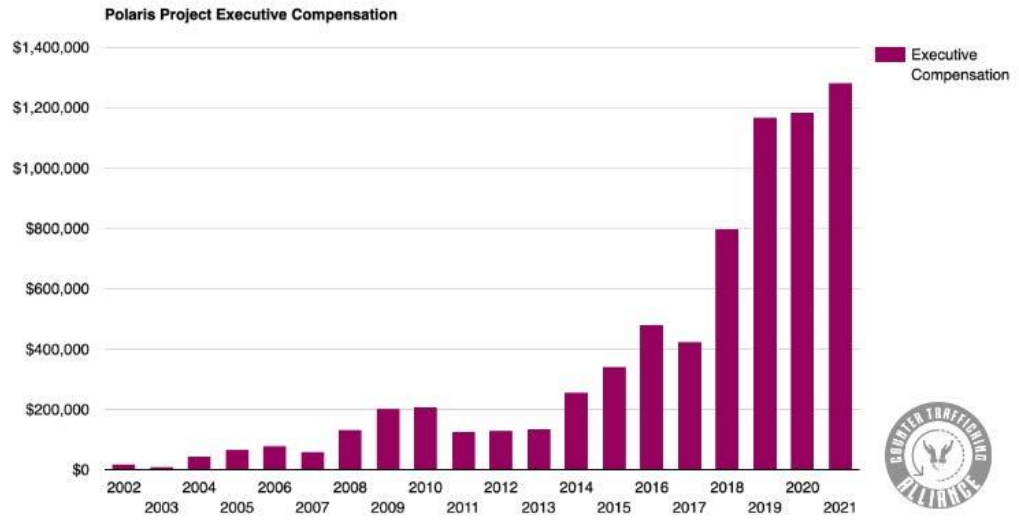
are tangible concerns with crime tips not being shared with law enforcement in at least 36 states (36 Attorneys General signatures) that would be vital to human trafficking investigations.

The other portion of their Program Services is the data repository and reporting. Keep in mind that this would include salaries and compensation, however, if there is at least some evidence of their measures failing, and the need for it to require the eyes of congressional leadership, our question ensues how exactly their average 76¢ on the dollar achieves their mission?



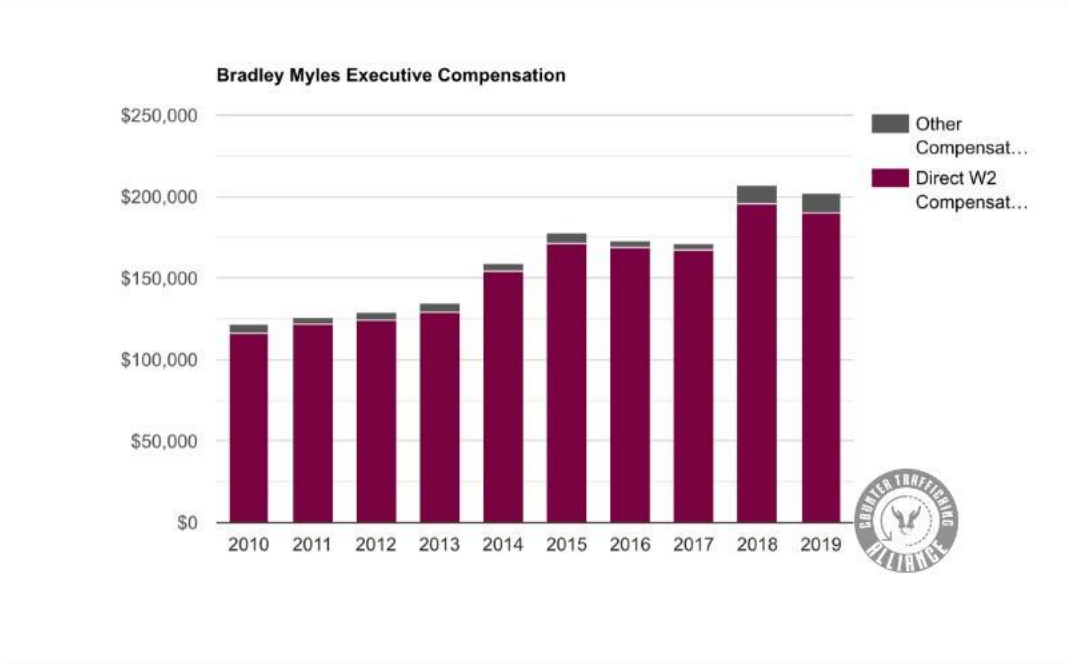
"If we want to end sex trafficking, we have to make sure that people have the things they need – money, love, safety, hope – so they do not have missing pieces in their lives. Because if there is a missing piece in a person's life a trafficker will promise to fill it."

3.5 Salaries



Executive compensation totaled out to $4,653,283 for the last eight years (2014-2021), $4,435,377 of that total compensation is seen between 2018 and 2021 (a spike). Odd that it would spike during the COVID ladened years, where donations and charity received plummeted.

According to their tax returns, C-level executives were compensated surprisingly well. For instance, the graph below highlights Bradley Myles, the former Polaris CEO, from 2010 to 2019, and his compensation over the course of his tenure. He received significant bumps in his pay each year, 2018 being his highest ever.



Though this steady trend raises questions regarding pay, what is more imperative is whether Bradley Myles' leadership and the state of the organization justified his increase each year?

While we have no way of knowing official reasons for the steep raise, we can reference year 2018 overview[13] and see that year was in the red once again. What organization would authorize a pay raise during a deficit?

[13] https://projects.propublica.org/nonprofits/organizations/30391561

FISCAL YEAR ENDING DEC.

2018

PDF

990

990-T

Audit

Total Revenue $5,579,310

Total Functional Expenses $10,529,290

Net income -$4,949,980

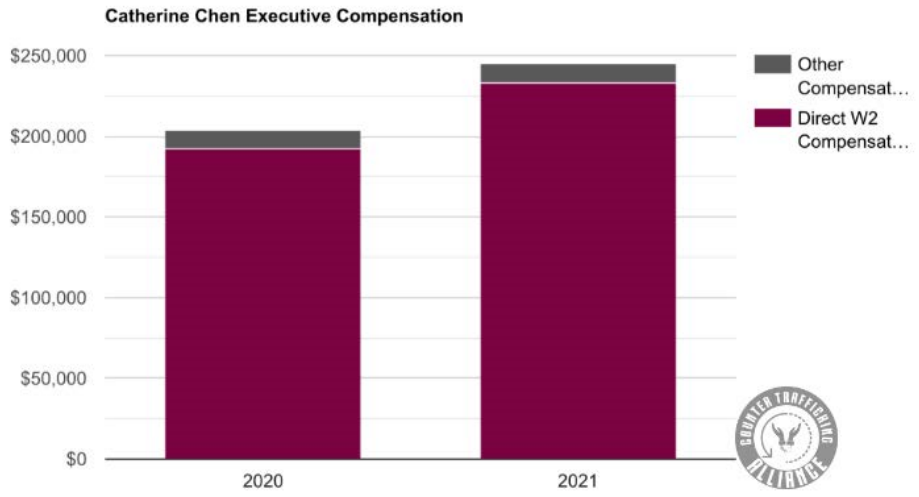
Notable sources of revenue		**Percent of total revenue**
Contributions	$5,474,139	98.1%
Program services	$65,170	1.2%
Investment income	$40,001	0.7%
Bond proceeds	$0	
Royalties	$0	
Rental property income	$0	
Net fundraising	$0	
Sales of assets	$0	
Net inventory sales	$0	
Other revenue	$0	

Notable expenses		**Percent of total expenses**
Executive compensation	$797,375	7.6%
Professional fundraising fees	$0	
Other salaries and wages	$4,433,330	42.1%

Other

Total Assets	$6,854,045
Total Liabilities	$1,551,533
Net Assets	$5,302,512

The trajectory continues. Proceeded by Catherine Chen, who became the CEO & Executive Director in 2020, she also continued this trend of an ascending salary.



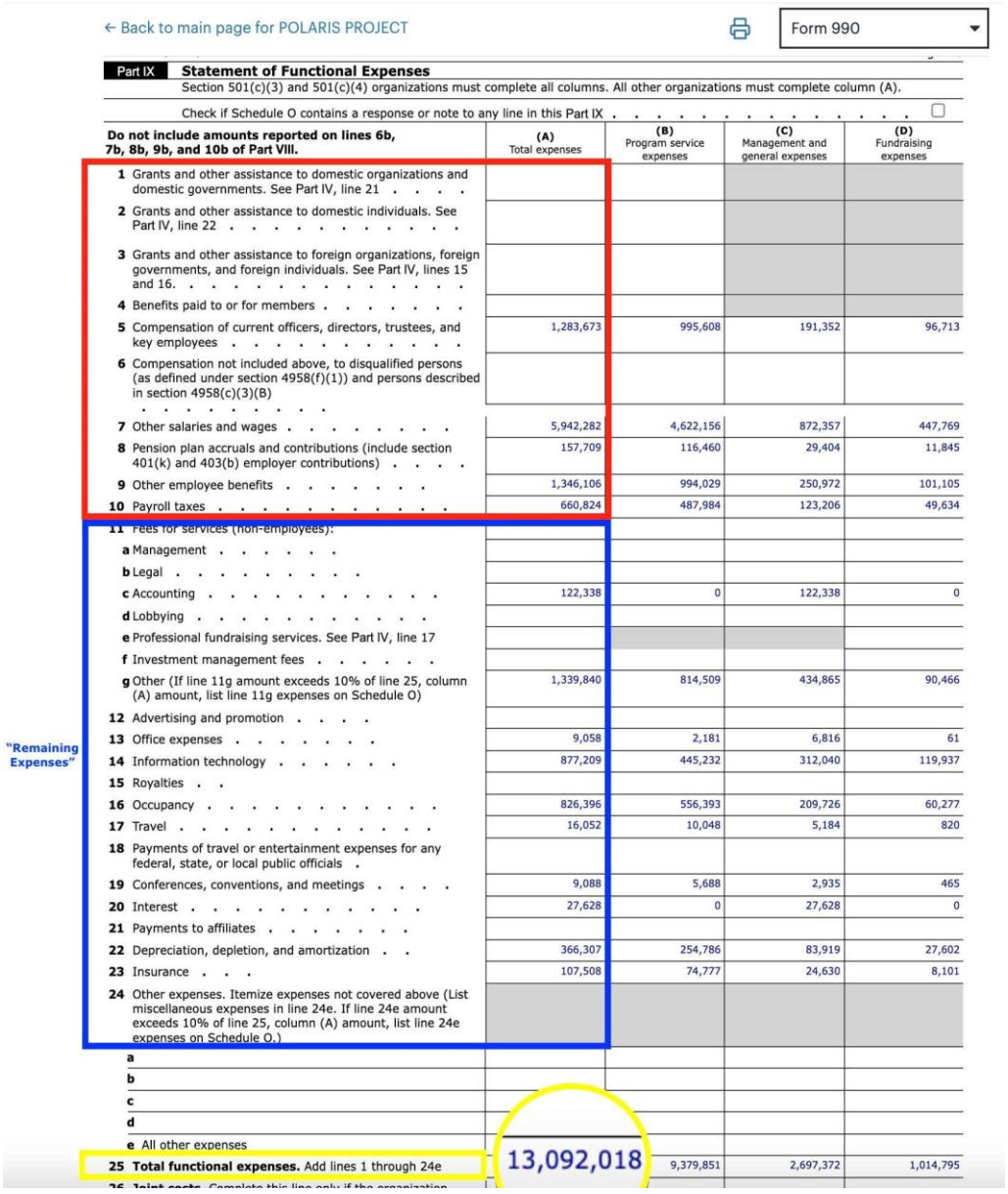
*2021, Chen received a salary increase of **over 40k**.*

Let's step back to understand salaries, wages, and other expenses within the Functional Expenses to put this in more perspective.

Part IX	**Statement of Functional Expenses**				
	Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
	Check if Schedule O contains a response or note to any line in this Part IX . . . . . ☐				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.		**(A)** Total expenses	**(B)** Program service expenses	**(C)** Management and general expenses	**(D)** Fundraising expenses

Knowing that salaries, wages, and benefits can be categorized three different functional ways (program services, management and general expenses, and fundraising expenses), our curiosity lead us to look at these salaries and wages in proportion to the absolute total amount of all functional expenses, despite category.

Here is a visual example of how we will target these figures.



← Back to main page for POLARIS PROJECT

Form 990

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

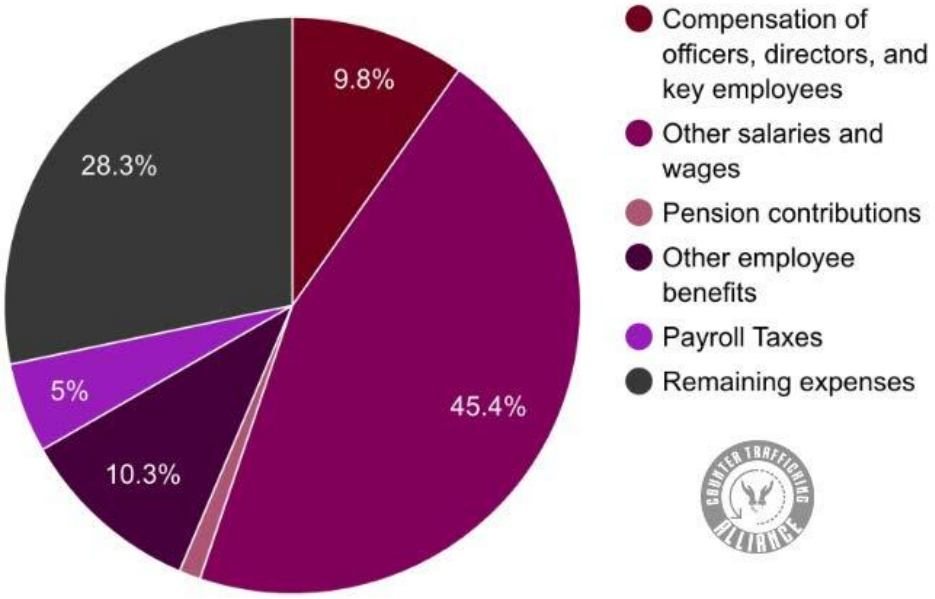
Check if Schedule O contains a response or note to any line in this Part IX . . . . . ☐

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21				
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16.				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees	1,283,673	995,608	191,352	96,713
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages	5,942,282	4,622,156	872,357	447,769
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	157,709	116,460	29,404	11,845
9 Other employee benefits	1,346,106	994,029	250,972	101,105
10 Payroll taxes	660,824	487,984	123,206	49,634
11 Fees for services (non-employees):				
a Management				
b Legal				
c Accounting	122,338	0	122,338	0
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees				
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	1,339,840	814,509	434,865	90,466
12 Advertising and promotion				
13 Office expenses	9,058	2,181	6,816	61
14 Information technology	877,209	445,232	312,040	119,937
15 Royalties				
16 Occupancy	826,396	556,393	209,726	60,277
17 Travel	16,052	10,048	5,184	820
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings	9,088	5,688	2,935	465
20 Interest	27,628	0	27,628	0
21 Payments to affiliates				
22 Depreciation, depletion, and amortization	366,307	254,786	83,919	27,602
23 Insurance	107,508	74,777	24,630	8,101
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a				
b				
c				
d				
e All other expenses				
25 **Total functional expenses.** Add lines 1 through 24e	13,092,018	9,379,851	2,697,372	1,014,795

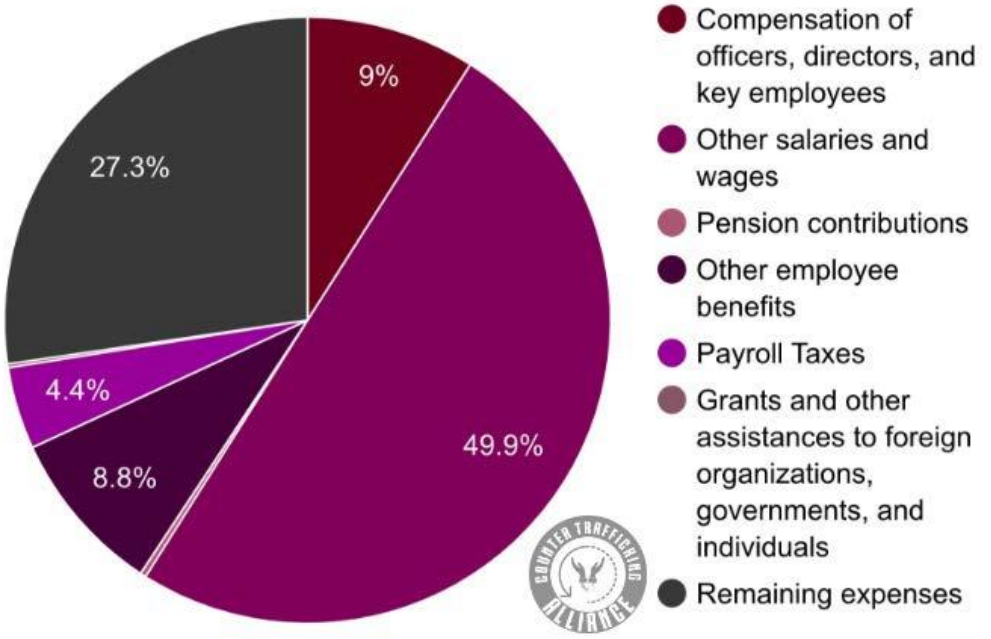
"Remaining Expenses"

With this example, we translated this inquiry for the last five years. Out of all functional expenses, on average, nearly 8% went to 'Executive compensation', 47% went to 'Other salaries and wages', 1% went to 'Pension contributions', 11% went to 'Other employee benefits', 5% went to 'Payroll taxes', 32% went to Remaining expenses. Less than 1% went to Grants whether foreign or domestic.

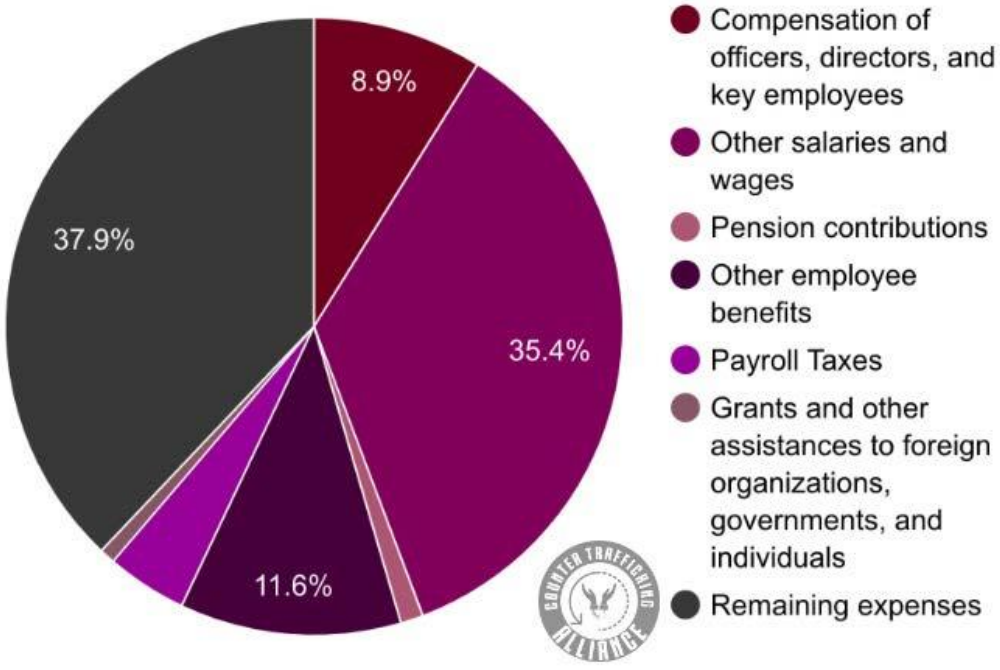
2021 Functional Expenses Polaris Project

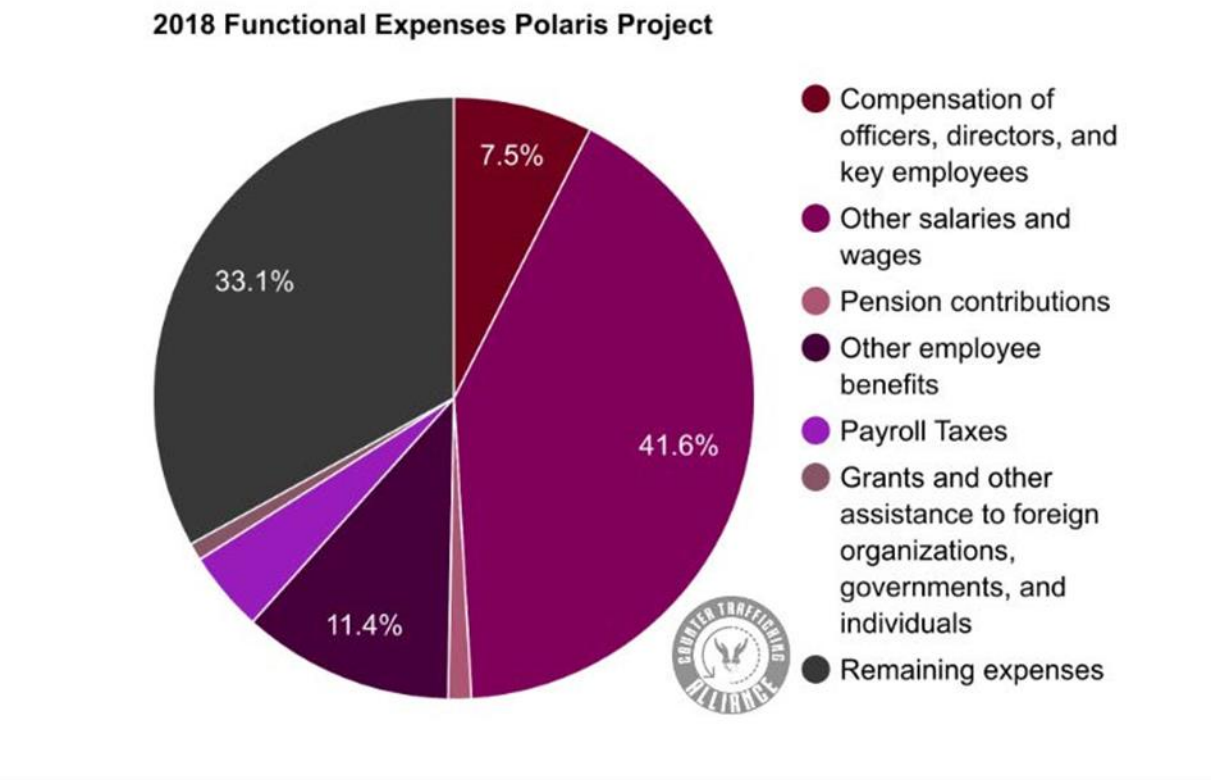


2020 Functional Expenses Polaris Project



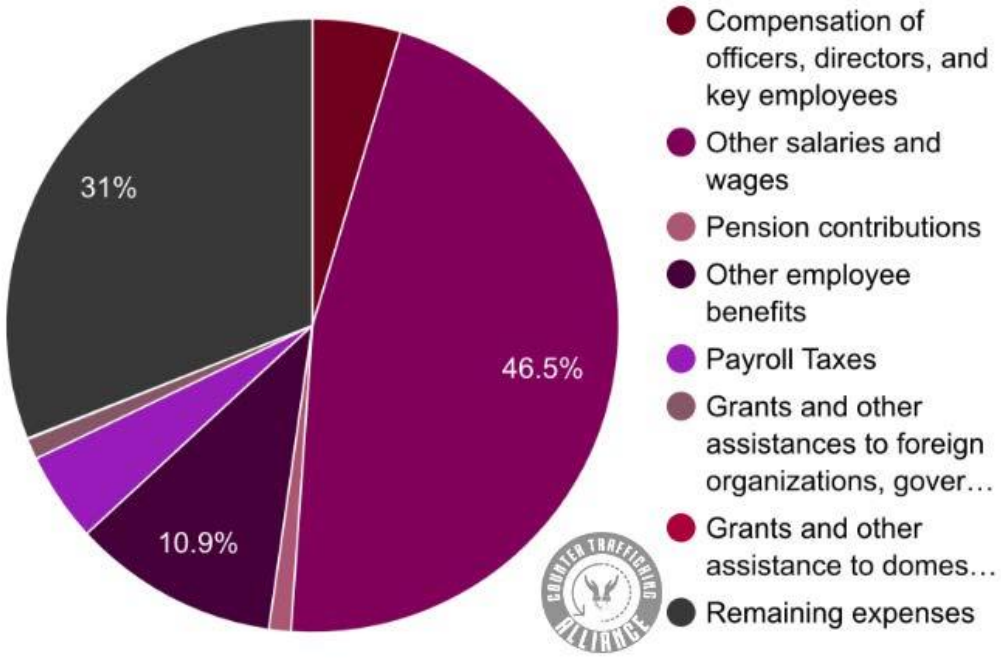
2019 Functional Expenses Polaris Project





Recalling 2018 being a deficit year, notice Polaris spent nearly half of all expenses on employee compensation.

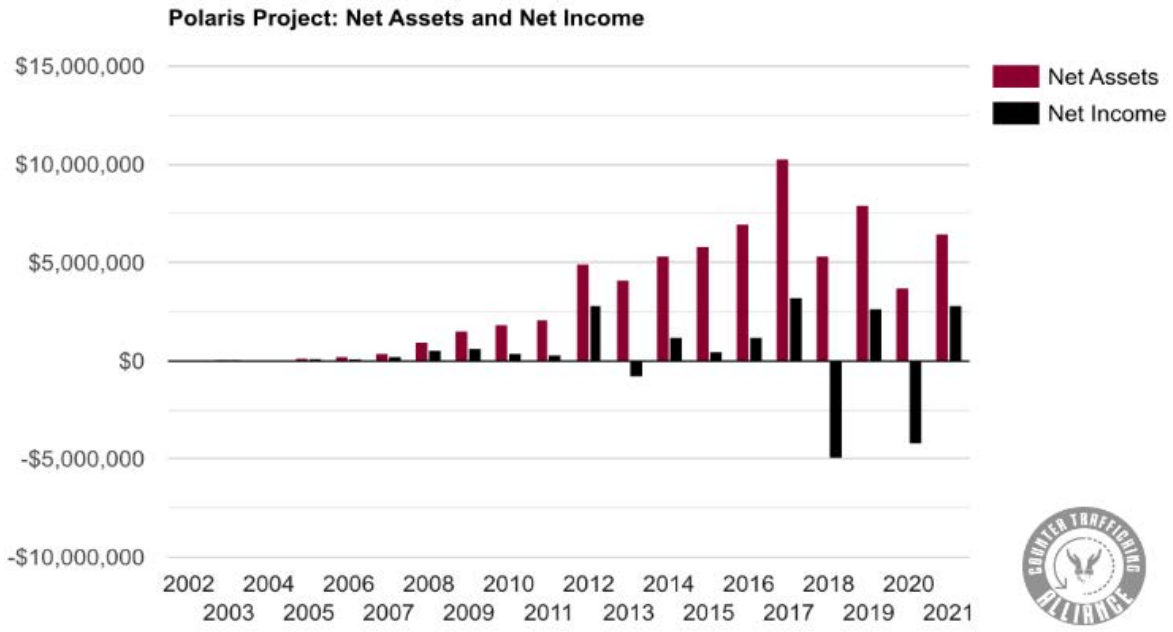
2017 Functional Expenses Polaris Project



3.6 Organizational financial health

Let's look at the organization's performance over the years and the health of its financial statements.

In the graph below, the 'Total Revenue' documented in Polaris' tax returns since its inception is illustrated, along with its Functional Expenses and Net Income. Nonprofits, such as Polaris, rely primarily on public donations to generate revenue, and secondarily, rely on grants to supplement other areas of the organization, primarily to support program services. Generally, an organization that is financially solvent would have a positive Total Revenue and Net Income. When Net Income is negative or the margin is relatively small, it signifies that the organization's functional expenses are either too high or the revenue margin is not wide enough to offset the functional expense.



For instance, in 2013 Polaris' total revenue was $5,647,686 and their functional expenses were $6,450,639. As a result, their net income was negative. Despite being in the red, CEO of that year, Bradley Myles actually increased in salary compared to 2012. This type of volatile performance raises questions over the health of this nonprofit, especially with its exuberant executive salaries.

3.7 Operational & Program Expenses

Aside from the salaries and inconsistent profit margins, Polaris has mentioned repeatedly in their mission statement, that it is known for two things: The National Human Trafficking Hotline, and their data analytics. Below are reported program expenses. The program expenses lack intricate clarity, as the explanations, if offered, are vague.

There are various program service break-downs in the "Statement of Program Service Accomplishments" in some federal tax documents' various years. This statement describes the organization's program service accomplishments for each of its three largest program services, as measured by expenses. For this example, we are going to look at tax year 2020…

990 Tax Return 2020

For 2020 Polaris listed on line 4a, $969,813 for "Learning, Innovations and Data Systems", which we assume correlates to their "Data Driven Movement", as stated in their 2020 Annual Report.

POLARIS PROJECT 03-0391561

Form 990 (2020) Page 2

Part III **Statement of Program Service Accomplishments**

Check if Schedule O contains a response or note to any line in this Part III X

1 Briefly describe the organization's mission:
POLARIS WORKS TO END SEX AND LABOR TRAFFICKING AND RESTORE FREEDOM TO SURVIVORS.

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? . . . . . ☐ Yes ☒ No
If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? . . . . . ☐ Yes ☒ No
If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code:) (Expenses $ 969,813. including grants of $) (Revenue $)
LEARNING, INNOVATION AND DATA SYSTEMS: THE PROGRAM DEVELOPS A DATA DRIVEN UNDERSTANDING OF HUMAN TRAFFICKING, GENERATES RESEARCH AND DATA PRODUCTS FOR USE BY THE ANTI-TRAFFICKING FIELD, AND SUPPORTS POLARIS'S MONITORING AND EVALUATION TO ENSURE PROGRAMS HAVE THEIR INTENDED IMPACT.

4b (Code:) (Expenses $ 4,848,627. including grants of $) (Revenue $)
NATIONAL HUMAN TRAFFICKING HOTLINE: POLARIS CONTINUED OPERATING IN THE U.S NATIONAL HUMAN TRAFFICKING HOTLINE (NHTH), WITH FUNDING FROM THE U.S DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE ON TRAFFICKING IN PERSONS (OTIP), THE TEXAS STATE GOVERNOR'S OFFICE, AND PRIVATE DONATIONS. THE NHTH PROVIDES VICTIMS AND SURVIVORS OF HUMAN TRAFFICKING ACCESS TO CRITICAL SUPPORT AND SERVICES TO GET HELP AND STAY SAFE, 24-7, IN MORE THAN 200 LANGUAGES ACROSS FIVE MODES OF COMMUNICATION - PHONE, CHAT, TEXT, WEBFORM, AND EMAIL.

4c (Code:) (Expenses $ 1,235,519. including grants of $) (Revenue $)
STRATEGIC INITIATIVE ON LABOR TRAFFICKING: THE STRATEGIC INITIATIVE ON LABOR TRAFFICKING WORKS TO END LABOR TRAFFICKING OF MIGRANT WORKERS IN THE AGRICULTURAL SECTOR BETWEEN MEXICO AND THE U.S. IN MEXICO POLARIS'S WORK INCLUDES SUPPORT FOR THE EXPANSION OF MEXICO'S FIRST NATIONAL HUMAN TRAFFICKING HOTLINE AND BUILDING A SOURCE COUNTRY WORKER DATA PLATFORM TO COLLECT INFORMATION DIRECTLY FROM AGRICULTURAL WORKERS ABOUT THEIR WORKING CONDITIONS AND EXPERIENCES WITH EXPLOITATION, WHICH WILL ULTIMATELY PROVIDE STRATEGIC RECOMMENDATIONS ON WAYS TO ADDRESS THE ROOT CAUSES OF LABOR TRAFFICKING BOTH IN MEXICO AND FROM MEXICO TO THE UNITED STATES.

4d Other program services (Describe on Schedule O.)
(Expenses $ 1,807,906. including grants of $) (Revenue $)

4a (Code: _____) (Expenses $ 969,813. including grants of $ _____) (Revenue $ _____)
LEARNING, INNOVATION AND DATA SYSTEMS: THE PROGRAM DEVELOPS A DATA DRIVEN UNDERSTANDING OF HUMAN TRAFFICKING, GENERATES RESEARCH AND DATA PRODUCTS FOR USE BY THE ANTI-TRAFFICKING FIELD, AND SUPPORTS POLARIS'S MONITORING AND EVALUATION TO ENSURE PROGRAMS HAVE THEIR INTENDED IMPACT.

Polaris Project 990 filing year 2020

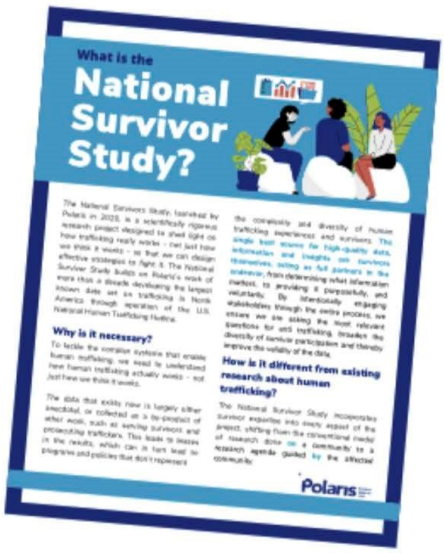
PROGRAM ACCOMPLISHMENTS

Polaris Is Leading a Data-Driven Movement

After building and sharing the largest known data set on trafficking in North America through the Trafficking Hotline, Polaris kicked off a first-of-its-kind research project in full partnership with survivors.

National Survivor Study

Launched in 2020, this project will illuminate how trafficking really works so we can sharpen the tools to end it. Unlike traditional research studies done *on* a community, this scientifically rigorous study aims to build survivors' power, created and carried out *with* survivors to determine what information matters. Flipping disparate power dynamics between survivors and the research process, Polaris has engaged diverse communities and will use a mixed-methods approach, both quantitative and qualitative, to survey 500-1,000 survivors. The first findings are expected in early 2022.



2020 Annual Report

The listing for line 4b has a $4,848,627 expense for the National Human Trafficking Hotline. Something worth noting are their mentioned contributors and collaborators. It is indicated that the National Human Trafficking hotline, that is promoted as the go-to resource for trafficking victims, had some funding from the U.S. Department of Health and Human Services, Office On Trafficking In Persons, and The Texas State Governor's Office.

4b (Code:) (Expenses $ 4,848,627. including grants of $) (Revenue $)
NATIONAL HUMAN TRAFFICKING HOTLINE: POLARIS CONTINUED OPERATING IN THE U.S NATIONAL HUMAN TRAFFICKING HOTLINE (NHTH), WITH FUNDING FROM THE U.S DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE ON TRAFFICKING IN PERSONS (OTIP), THE TEXAS STATE GOVERNOR'S OFFICE, AND PRIVATE DONATIONS. THE NHTH PROVIDES VICTIMS AND SURVIVORS OF HUMAN TRAFFICKING ACCESS TO CRITICAL SUPPORT AND SERVICES TO GET HELP AND STAY SAFE, 24-7, IN MORE THAN 200 LANGUAGES ACROSS FIVE MODES OF COMMUNICATION - PHONE, CHAT, TEXT, WEBFORM, AND EMAIL.

Polaris Project 990 filing year 2020

Finally in section 4c, there lists a mission focus on labor trafficking at an expense of $1,235,519.

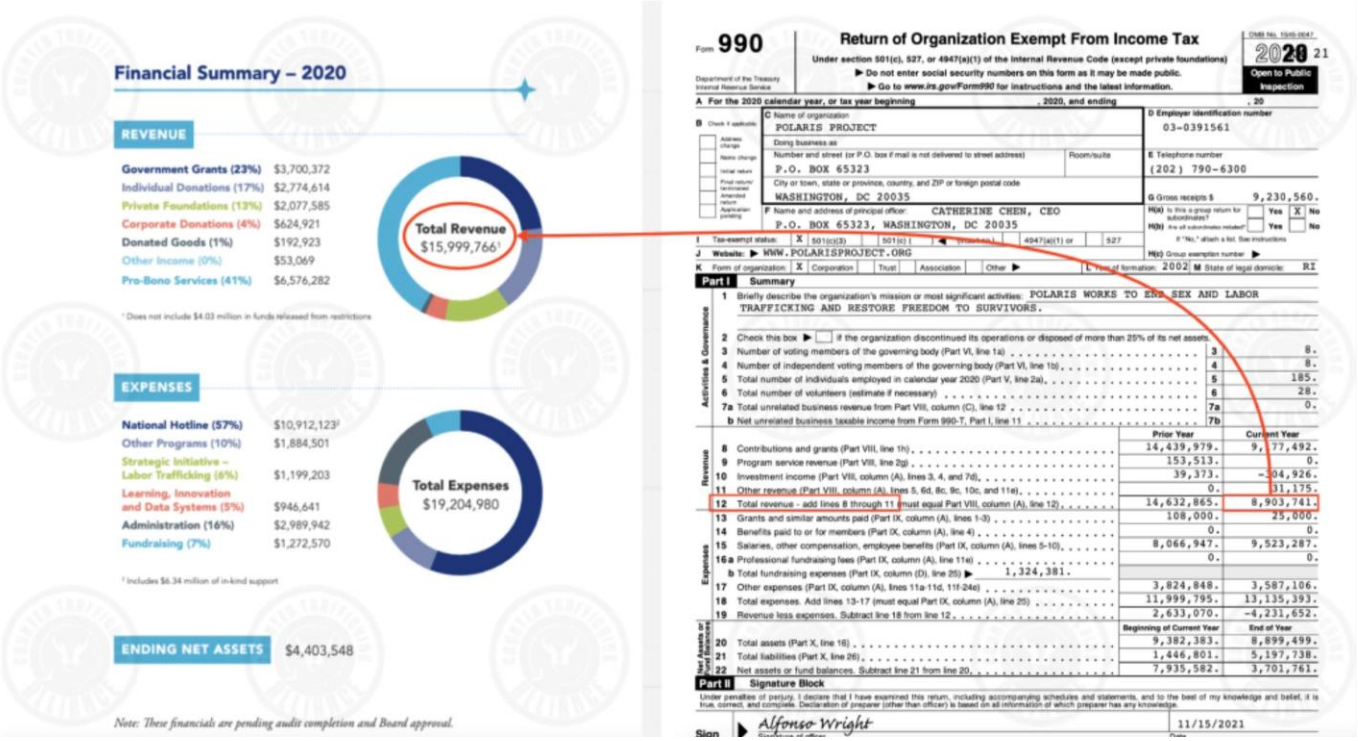
4c (Code:) (Expenses $ 1,235,519. including grants of $) (Revenue $)
STRATEGIC INITIATIVE ON LABOR TRAFFICKING: THE STRATEGIC INITIATIVE ON LABOR TRAFFICKING WORKS TO END LABOR TRAFFICKING OF MIGRANT WORKERS IN THE AGRICULTURAL SECTOR BETWEEN MEXICO AND THE U.S. IN MEXICO POLARIS'S WORK INCLUDES SUPPORT FOR THE EXPANSION OF MEXICO'S FIRST NATIONAL HUMAN TRAFFICKING HOTLINE AND BUILDING A SOURCE COUNTRY WORKER DATA PLATFORM TO COLLECT INFORMATION DIRECTLY FROM AGRICULTURAL WORKERS ABOUT THEIR WORKING CONDITIONS AND EXPERIENCES WITH EXPLOITATION, WHICH WILL ULTIMATELY PROVIDE STRATEGIC RECOMMENDATIONS ON WAYS TO ADDRESS THE ROOT CAUSES OF LABOR TRAFFICKING BOTH IN MEXICO AND FROM MEXICO TO THE UNITED STATES.

Polaris Project 990 filing year 2020

3.8 Curious Discrepancies

Upon our analysis, some observations grew curious as we identified a few differences between their publicized 2020 Annual Report and their 990 federal tax filing.

In one instance, we see that their annual report details that they reported **$8,903,741** in Total Revenue for the year 2020, including contributions and grants, program service revenue, and investment income. On their annual report, it details that they had a total revenue of **$15,999,766**. A simple question: Why the major difference?



Polaris Annual Report Year 2020 compared to 990 tax filing Year 2020

Recounting a few sections above, we reviewed a ‘Total Revenue’ breakdown and covered our curiosity with Corporate Partnerships. As we've pointed out the Total Revenue discrepancy above, between the actual 2020 990 tax filing and the 2020 Polaris Annual Report (left image), we want to direct your eyes to a line item, 'Pro-Bono Services'. It seems to be a significant figure, $6,576,282, indicated in their revenue summary, whilst it is not clear if this portion is accounted for within any of the official 'Total Revenue' categories within the actual 990 filing for 2020.

Financial Summary – 2020

REVENUE

Government Grants (23%)	$3,700,372
Individual Donations (17%)	$2,774,614
Private Foundations (13%)	$2,077,585
Corporate Donations (4%)	$624,921
Donated Goods (1%)	$192,923
Other Income (0%)	$53,069
Pro-Bono Services (41%)	$6,576,282



[1] Does not include $4.03 million in funds released from restrictions

EXPENSES

National Hotline (57%)	$10,912,123[2]
Other Programs (10%)	$1,884,501
Strategic Initiative – Labor Trafficking (6%)	$1,199,203
Learning, Innovation and Data Systems (5%)	$946,641
Administration (16%)	$2,989,942
Fundraising (7%)	$1,272,570



[2] Includes $6.34 million of in-kind support

ENDING NET ASSETS $4,403,548

Note: These financials are pending audit completion and Board approval.

Polaris Annual Report Year 2020

When we look at the "Statement of Revenue" within the 2020 tax forms, we do not see a value connected to the 'pro-bono- amount.

Form 990 (2020) Page 9

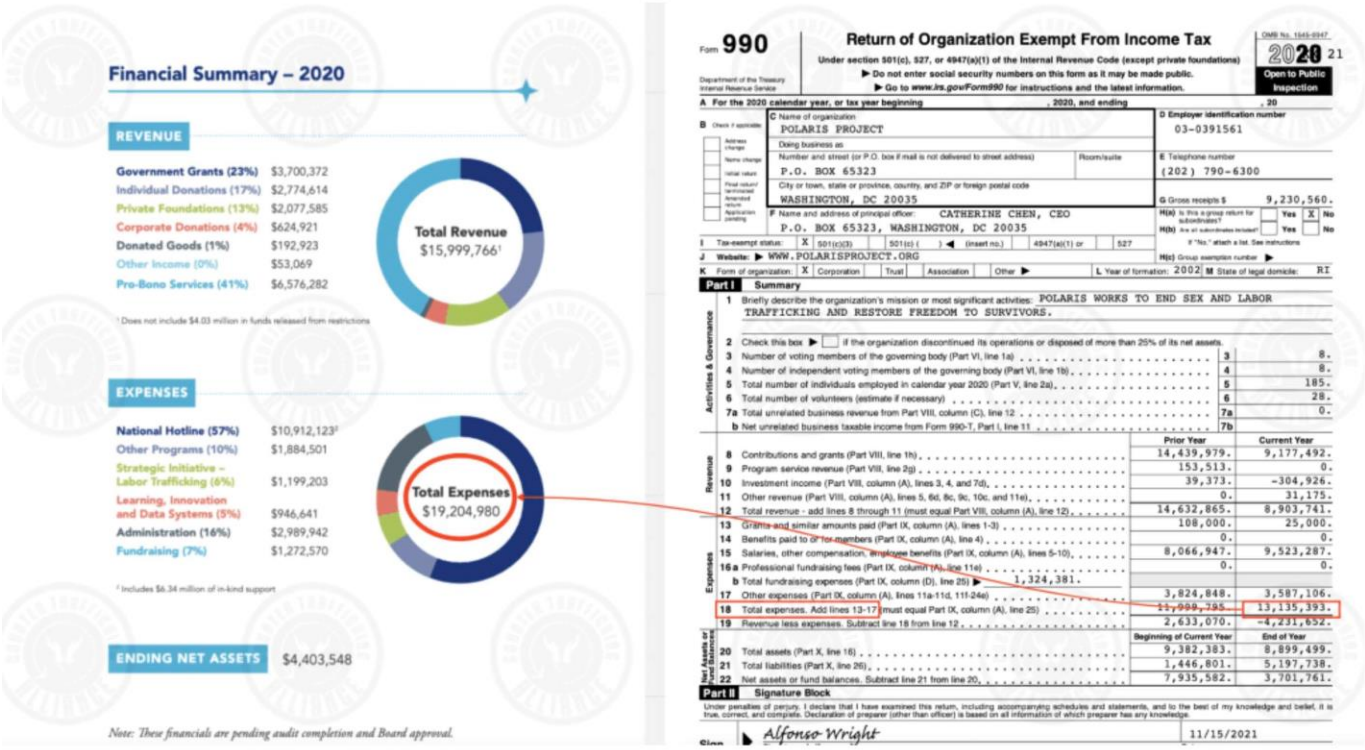
Part VIII **Statement of Revenue**

Check if Schedule O contains a response or note to any line in this Part VIII . . . . . ☐

		(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514
Contributions, Gifts, Grants and Other Similar Amounts	derated campaigns . . 1a				
	embership dues . . 1b				
	indraising events . . 1c				
	elated organizations 1d				
	overnment grants (contributions) 1e	3,700,372			
	All other contributions, gifts, grants, and similar amounts not included above 1f	5,477,120			
	g Noncash contributions included in lines 1a - 1f:$ 1g				
	h **Total.** Add lines 1a-1f . . . . . ▶	9,177,492			

Is this amount accounted for in the tax forms?

The same discrepancy inquiry applies with the Total Expenses, $13,135,393 is reported in the 990 tax form, while $19,204,980 is detailed on the 2020 Polaris Annual Report.



Financial Summary – 2020

REVENUE

Government Grants (23%)	$3,700,372
Individual Donations (17%)	$2,774,614
Private Foundations (13%)	$2,077,585
Corporate Donations (4%)	$624,921
Donated Goods (1%)	$192,923
Other Income (0%)	$53,069
Pro-Bono Services (41%)	$6,576,282

[1] Does not include $4.03 million in funds released from restrictions

Total Revenue $15,999,766[1]

EXPENSES

National Hotline (57%)	$10,912,123[2]
Other Programs (10%)	$1,884,501
Strategic Initiative – Labor Trafficking (6%)	$1,199,203
Learning, Innovation and Data Systems (5%)	$946,641
Administration (16%)	$2,989,942
Fundraising (7%)	$1,272,570

[2] Includes $6.34 million of in-kind support

Total Expenses $19,204,980

ENDING NET ASSETS $4,403,548

Note: These financials are pending audit completion and Board approval.

Form **990** Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

▶ Do not enter social security numbers on this form as it may be made public.

▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047 — 2020 21 — Open to Public Inspection

Department of the Treasury Internal Revenue Service

A For the 2020 calendar year, or tax year beginning , 2020, and ending , 20

B Check if applicable: Address change; Name change; Initial return; Final return/terminated; Amended return; Application pending

C Name of organization: POLARIS PROJECT

Doing business as:

Number and street (or P.O. box if mail is not delivered to street address): P.O. BOX 65323 — Room/suite:

City or town, state or province, country, and ZIP or foreign postal code: WASHINGTON, DC 20035

D Employer identification number: 03-0391561

E Telephone number: (202) 790-6300

G Gross receipts $: 9,230,560.

F Name and address of principal officer: CATHERINE CHEN, CEO
P.O. BOX 65323, WASHINGTON, DC 20035

H(a) Is this a group return for subordinates? Yes X No

H(b) Are all subordinates included? Yes No

I Tax-exempt status: X 501(c)(3) 501(c) ( ) ◀ (insert no.) 4947(a)(1) or 527

J Website: ▶ WWW.POLARISPROJECT.ORG

H(c) Group exemption number ▶

K Form of organization: X Corporation Trust Association Other ▶ L Year of formation: 2002 M State of legal domicile: RI

Part I Summary

1 Briefly describe the organization's mission or most significant activities: POLARIS WORKS TO END SEX AND LABOR TRAFFICKING AND RESTORE FREEDOM TO SURVIVORS.

2 Check this box ▶ ☐ if the organization discontinued its operations or disposed of more than 25% of its net assets.

3 Number of voting members of the governing body (Part VI, line 1a)	3	8.
4 Number of independent voting members of the governing body (Part VI, line 1b)	4	8.
5 Total number of individuals employed in calendar year 2020 (Part V, line 2a)	5	185.
6 Total number of volunteers (estimate if necessary)	6	28.
7a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0.
b Net unrelated business taxable income from Form 990-T, Part I, line 11	7b	

	Prior Year	Current Year
8 Contributions and grants (Part VIII, line 1h)	14,439,979.	9,177,492.
9 Program service revenue (Part VIII, line 2g)	153,513.	0.
10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)	39,373.	-304,926.
11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	0.	31,175.
12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	14,632,865.	8,903,741.
13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)	108,000.	25,000.
14 Benefits paid to or for members (Part IX, column (A), line 4)	0.	0.
15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	8,066,947.	9,523,287.
16a Professional fundraising fees (Part IX, column (A), line 11e)	0.	0.
b Total fundraising expenses (Part IX, column (D), line 25) ▶ 1,324,381.		
17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	3,824,848.	3,587,106.
18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	11,998,795.	13,135,393.
19 Revenue less expenses. Subtract line 18 from line 12	2,633,070.	-4,231,652.

	Beginning of Current Year	End of Year
20 Total assets (Part X, line 16)	9,382,383.	8,899,499.
21 Total liabilities (Part X, line 26)	1,446,801.	5,197,738.
22 Net assets or fund balances. Subtract line 21 from line 20	7,935,582.	3,701,761.

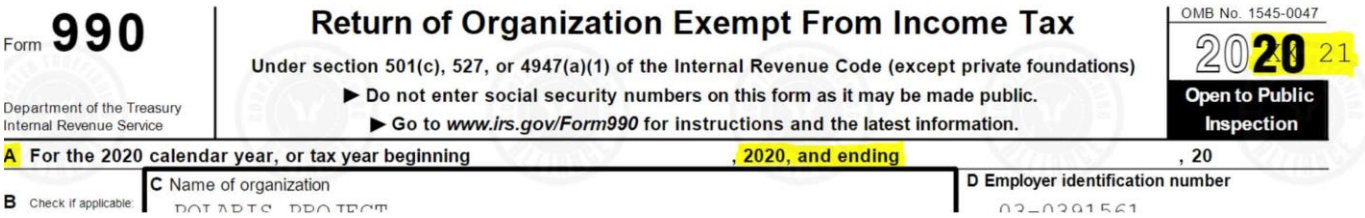
Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign ▶ Alfonso Wright 11/15/2021

Polaris Annual Report Year 2020 compared to 990 tax filing Year 2020

Worth pointing out: There is a crossed out "2020" on the front of the 990 form, with an 'x' and '21' overriding the year. As you can see notated on Part A, it notates the tax filing year for 2020. This was the 990 made available on the Polaris website.



Form **990** Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

▶ Do not enter social security numbers on this form as it may be made public.

▶ Go to *www.irs.gov/Form990* for instructions and the latest information.

OMB No. 1545-0047 — 2020 21 — Open to Public Inspection

Department of the Treasury Internal Revenue Service

A For the 2020 calendar year, or tax year beginning , 2020, and ending , 20

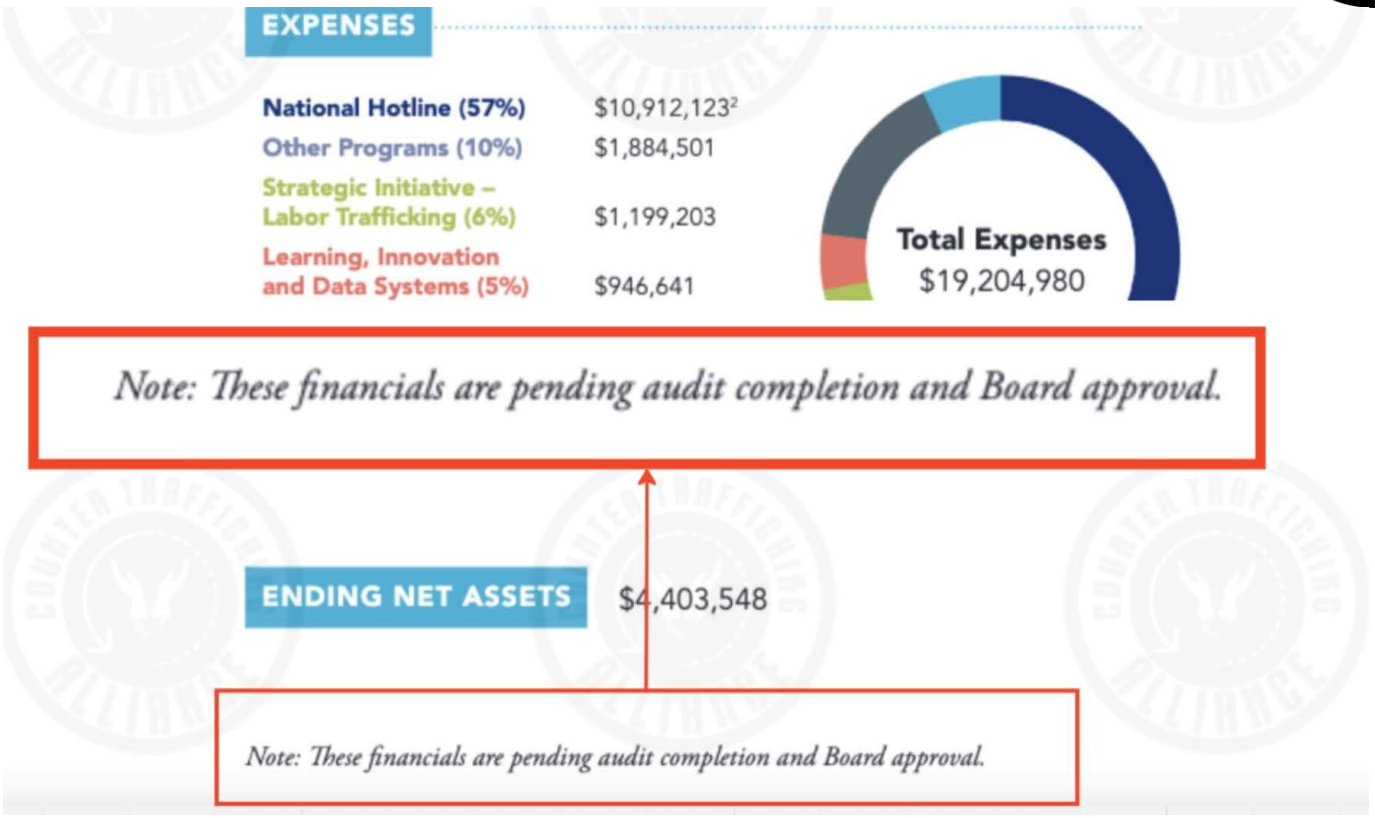
B Check if applicable:

C Name of organization

D Employer identification number

Polaris Project 990 filing year 2020

We would like to indicate that at the bottom of this financial summary notates that the financials "are pending audit completion and Board approval." Since 2020, no other amended federal tax forms can be found.

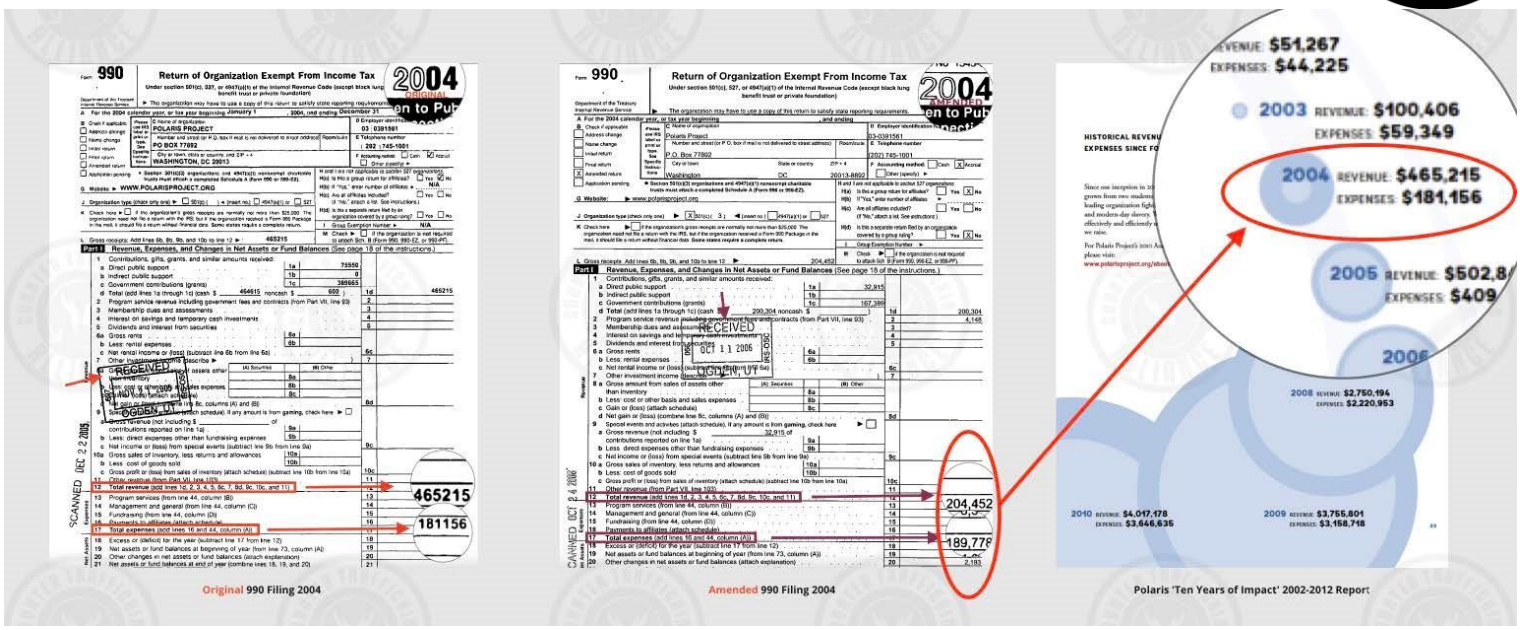


Polaris Annual Report Year 2020

We will take a look at another example of some possibly deceptive reporting out to the public. In 2012, Polaris published a ten-year retrospective[14] look at the growth of their organization.

Reporting on historical finances, Polaris listed out the latest decade's worth of revenue and expenses. The figures reported for 2004 were not accurate.

[14] https://polarisproject.org/wp-content/uploads/2019/12/Polaris-Ten-Years-of-Impact.pdf



Polaris Annual Report Year 2004 compared to 990 tax filing Year 2004

As you can see, the **original** tax filing for 2004 reported Total Revenue at **$465,215** and
Total Expenses at **$181,156**. Polaris amended this filing in October of 2006. The **amended** Total Revenue was updated to **$204,452** for 2004, and Total Expenses amended to **$189,778**. The ten year retrospective was published many years since the amended filings, to which it still published the original revenue and expenses figures, rather than the amended ones.

Stay on mission...

On top of Polaris Project's mission to connect victims and survivors to resources, the other side of their mission statement highlights their faculty of data that consists of what is documented from calls to their hotline.

"...Through that work, Polaris has built the largest known dataset on human trafficking in North America. The data and expertise gained from two decades of working on trafficking situations in real time informs strategies that hold traffickers accountable, support survivors on their healing journeys and address the vulnerabilities that enable the business of stealing freedom for profit." --Polaris Project About Us Section

We have mentioned the concern with crime tips not being properly shared with law enforcement in our introduction. There are also criticisms that loom around the quality of data that Polaris reports. We will explore this more within the 'Data Repository' section of this organizational profile.

These financial expenditures are only an emphasis within Polaris Project's Key Performance Indicators. Our analysis seems to only scratch the surface on many questions that could be asked in regards to how these expenditures positively impact victims and survivors of human trafficking. Can some unexplained inconsistencies be a somewhat of an answer to so many grievances, both internally and externally?

4 Why is this Number Everywhere?

The National Human Trafficking Hotline (NHTH), a well known, and highly distributed phone number. We see the posters donning the number with assurance of help to victims. But, how is it adhered everywhere? Did they partner with every local business, federal agency, and NGO to distribute the posters? No, the distribution of the NHTH number starts with the endorsement by a very important and foundational piece of legislation. Although, the relationship with the federal agencies was long fostered before the existence of the Hotline.



4.1 Victims of Trafficking and Violence Act

In 1999, Representative Chris Smith introduced legislation that would be considered the first of its kind. It legally defined trafficking and opened doors to the preventative funding we see today. Named Victims of

Trafficking and Violence Act[15] (TVPA), this bill passed in October of 2000, after a year of amending and voting. As Chris Smith recalls in an interview with "colleague" Katherine Chon[16],

"Much of the TVPA was opposed by the administration at that time….Bill Clinton. And then he signed it. So, all's well that ends well."

-Chris Smith

Over the years the bill had been re-authorized and amended a total of 8 times and became known more popularly as the Trafficking Victims Protection Act (TVPA).

When it was first passed in 2000, it authorized the then President (Bill Clinton) to establish a hand-picked Interagency Task Force that would be chaired by the Secretary of State. It also authorized the Secretary of State to establish, within the Department of State, an Office to Monitor and Combat Trafficking, that would then provide assistance to the Task Force. It created new crimes regarding trafficking, that included the option of restitution to victims, and gave non-citizen trafficking victims an opportunity to gain citizenship.

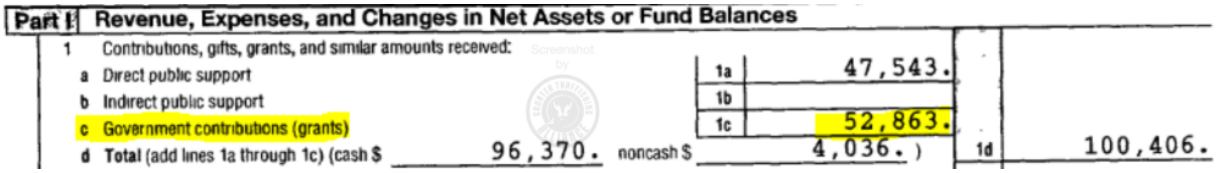
[15] https://www.congress.gov/bill/106th-congress/house-bill/3244?s=4&r=1&q=%7B%22search%22%3A%5B%22Trafficking+Victims+Protection+Reauthorization+Act%22%5D%7D

[16] https://archive.storycorps.org/interviews/chris-smith-and-katherine-chon/#transcript

4.2 Trafficking Victims Protection Reauthorization Act

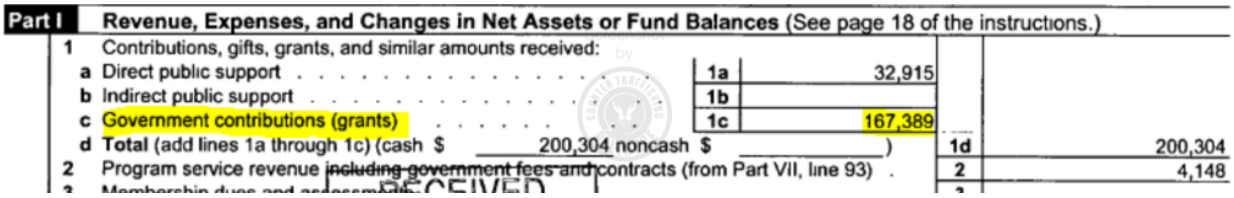
With the passing of this bill came the opportunity to amend and expand trafficking legislation. In 2003, the Trafficking Victims Protection Reauthorization Act[17] (TVPRA) was signed into law. A bill that authorized more than $200 million over two years to combat human trafficking by: creating grants, programs, and operations foreign and domestic.

The 2003 legislation seemed to be the genesis of the partnership between the federal government and Polaris Project. Prior to 2003, the organization had not received any government funding. The TVPRA's authorized $200 Million gave Polaris the opportunity to receive $52,863 in government grants in 2003, their second year in operation. In 2004, that amount tripled and then some, with a total of $167,389 in government funding. This was likely the authorized funding that was then rewarded to Polaris Project to establish Polaris Project Japan (rebranded as Lighthouse[18] and then dissolved in 2022).



Part I	Revenue, Expenses, and Changes in Net Assets or Fund Balances			
1	Contributions, gifts, grants, and similar amounts received:			
a	Direct public support	1a	47,543.	
b	Indirect public support	1b		
c	Government contributions (grants)	1c	52,863.	
d	Total (add lines 1a through 1c) (cash $ 96,370. noncash $ 4,036.)			1d 100,406.

2003 tax form



Part I	Revenue, Expenses, and Changes in Net Assets or Fund Balances (See page 18 of the instructions.)			
1	Contributions, gifts, grants, and similar amounts received:			
a	Direct public support	1a	32,915	
b	Indirect public support	1b		
c	Government contributions (grants)	1c	167,389	
d	Total (add lines 1a through 1c) (cash $ 200,304 noncash $)			1d 200,304
2	Program service revenue ~~including government fees and contracts~~ (from Part VII, line 93)			2 4,148

2004 tax form

[17] https://www.govinfo.gov/content/pkg/PLAW-108publ193/pdf/PLAW-108publ193.pdf
[18] https://lhj.jp/news/20211116.php

2003 Polaris Project launches a victim outreach program to uncover trafficking locations, target trafficking networks, and connect victims to services. The D.C. Government awards a federal grant to support this program.

2004 After Polaris Project films shocking video footage of sex trafficking taking place right on the streets of downtown Washington, D.C., one of the nation's first community-wide Human Trafficking Task Forces is launched. This coordination triples the success rates of prosecutions.

Polaris Project Japan opens, supported through a grant from the U.S. Department of State.



Polaris "Ten Years of Impact" report

4.3 Polaris begins lobbying

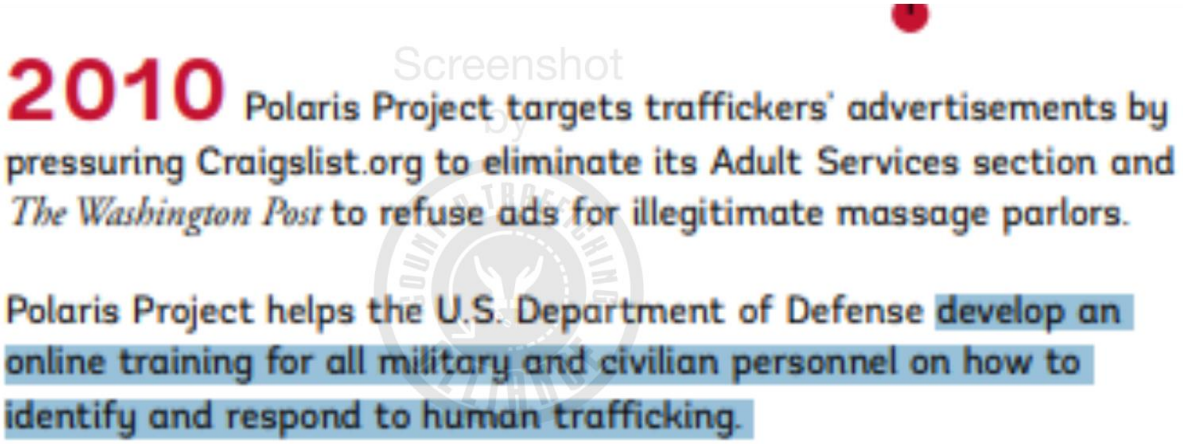
With a new vested interest in the TVPA, we begin to see lobbying expenditures within the Polaris 2005 tax forms. That year, the Trafficking Victims Protection Reauthorization Act of 2005 was passed, and while the authorized funding was less than 200 million, the government grant total that year saw an 88% increase. Over the next 14 years Polaris spends a total of $91,242 in direct lobbying to influence the legislative body. Below is a table comparison of government grant amounts and total lobbying expenditures over the years.

Years	Government Grant	Lobbying Expenditures
2003	$52,863.00	$0
2004	$167,389.00	$0
2005	$315,333.00	$6,250.00
2006	$321,884.00	$6,800.00
2007	$590,696.00	$11,846.00
2008	$939,274.00	$11,233.00
2009	$1,006,597.00	$18,066.00
2010	$2,221,441.00	$20,730.00
2011	$1,350,197.00	$6,148.00
2012	$1,297,434.00	$7,064.00
2013	$1,520,541.00	$12,339.00
2014	$1,434,224.00	$4,490.00
2015	$1,408,362.00	$14,232.00
2016	$2,151,093.00	$10,545.00
2017	$2,081,043.00	$639.00
2018	$1,749,402.00	$825.00
2019	$2,755,893.00	$1,000.00
2020	$3,700,372.00	$0
2021	$4,930,218.00	$0
Total	$29,994,256.00	$132,207.00

**Total lobbying expenditure figures are a total of grassroots lobbying and direct lobbying*

4.4 Polaris and government grants

In the 2007 grant amount, we see an additional 83% increase in funding when compared to 2006. This is due to Polaris being selected to operate the National Human Trafficking Resource Center. Another sharp increase comes in 2010 when Polaris is selected to develop online training for all military and civilian personnel on how to identify and respond to human trafficking, by the Department of Defense. It is also important to note that every year since its creation, Polaris Project has increased executive compensation each year, save 2017.

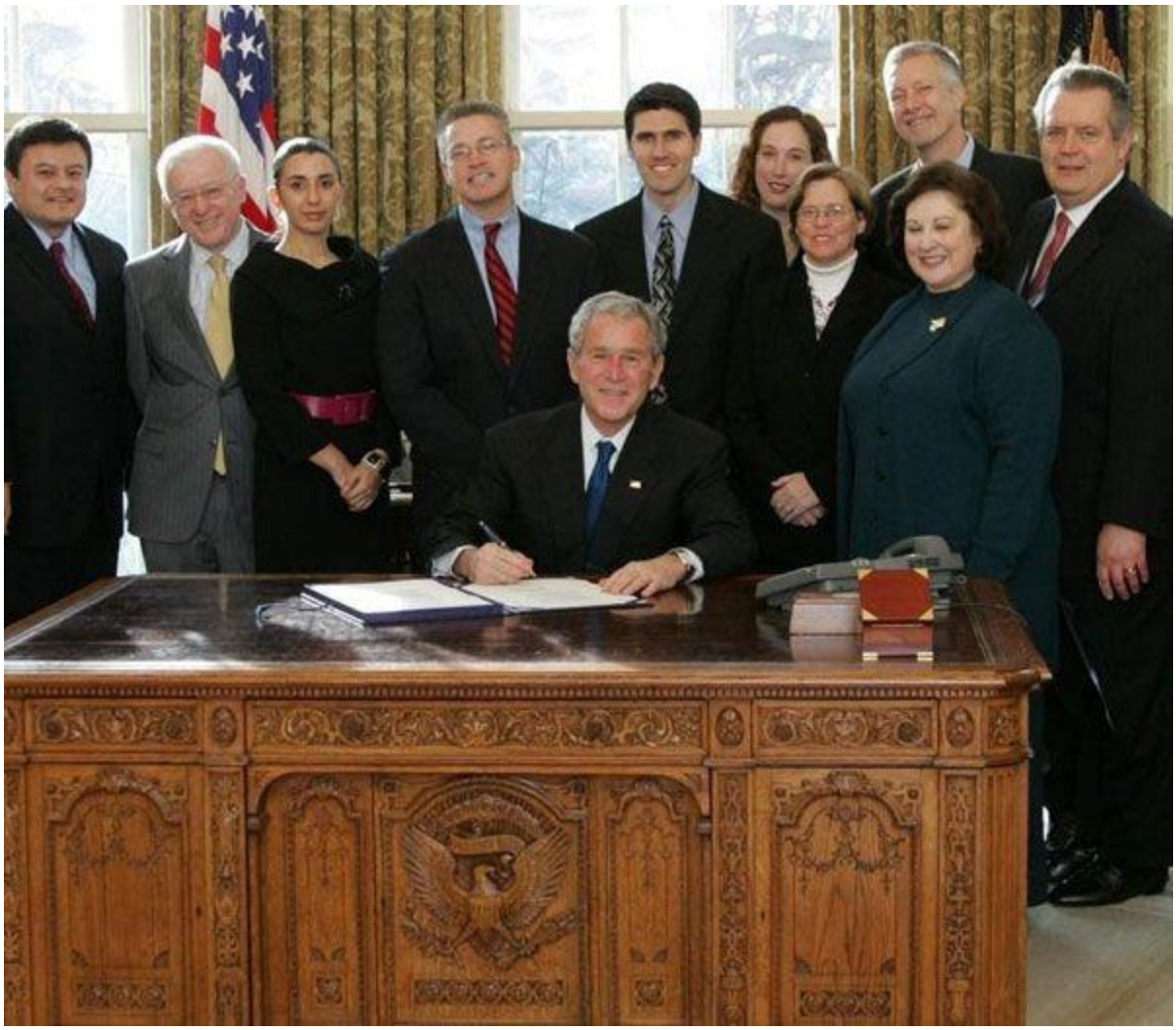


In 2008, the TVPRA was renewed again with the William Wilberforce Trafficking Victims Protection Reauthorization Act[19]. Introduced by

[19] https://www.congress.gov/bill/110th-congress/house-bill/7311?q=%7B%22search%22%3A%5B%22William+Wilberforce+Trafficking+Victims+Protection+Reauthorization+Act+of+2008%22%5D%7D&s=2&r=1

Representative Howard L. Berman in December 2008, it was signed into law by President George W. Bush just two weeks later. With Polaris' own Bradley Myles pictured in the oval office below. The authorized funding for that year was about $102 million to fight human trafficking. That year, Polaris is awarded an 83% increase in government grant funding once again.

20



[20] https://2001-2009.state.gov/r/pa/ei/pix/b/113508.htm

4.5 Legislation endorses the hotline

When the TVPR bill was resurrected again, it was called the Violence Against Women Reauthorization Act of 2013[21]. This bill authorized $8 million for fiscal years 2014 through 2017 for the Department of Health and Human services, where Polaris receives annual grant awards for the hotline. For this policy, much like the 2008 reauthorized bill, Polaris worked closely with legislators to influence policy. The Director of Policy at Polaris was quoted in a press release regarding the passed bill saying,

"After almost two years of urging action on this bill, we are thrilled to see the House of Representatives support this critical tool that provides vital services to survivors and curtails human trafficking at home and abroad."

-Mary Ellison, Director of Policy, Polaris Project [22]

Within **this** bill was the legislation that made it possible for the NHTH phone number to be distributed, almost everywhere, in very little time. The legislation made a requirement that the hotline number had to be distributed to all federal government agencies so that they may publicize the number for others that are seeking help. The year the bill was passed Polaris Project spent $9,246 in direct lobbying and the two years prior, a total of $9,918 in direct lobbying. Unfortunately, it doesn't appear the victims are getting the help that they need from the NHTH based on the testimonies within this report. But with this much legislative, and monetary support, one must ask, why not? Calling into question the quality of help, with such robust funding, you would expect the NHTH to be able to help every caller. Almost $30 million in **just** federal funding over the last 23 years and the Hotline is failing American victims.

The next TVPRA was introduced and passed in 2015. This bill was introduced as the Justice for Victims of Trafficking Act of 2015 [23]by Senator John Cornyn in January of 2015. It was passed by former President Obama

[21] https://www.congress.gov/bill/113th-congress/senate-bill/47/amendments?s=5&r=1&q=%7B%22search%22%3A%5B%22Trafficking+Victims+Protection+Reauthorization+Act+of+2013%22%5D%7D

[22] https://polarisproject.org/press-releases/congress-passes-long-awaited-anti-human-trafficking-bill/

[23] https://www.congress.gov/bill/114th-congress/senate-bill/178?q=%7B%22search%22%3A%5B%22The+Justice+for+Victims+of+Trafficking+Act+of+2015%22%5D%7D&s=10&r=1

on May of 2015. In a Press Release[24] from Polaris Project in February of 2015, the Director of National Programs was quoted saying,

> *"Polaris welcomes the new funding provided in Senator Cornyn's bill, which would bolster a myriad of services for victims and survivors of human trafficking."*
>
> *-Kelli Sorensen, Director of National Programs, 2015*

While the new funding was praised, the amount in government grants received by Polaris decreased by 2 percent that year. But with another $10,545.00 in lobbying done in 2016, another increase in government grants is seen at a 52 percent increase.

4.6 The Stop Exploitation Through Trafficking Act

In 2015, the $14k in lobbying can be attributed to legislation also mentioned in the Press Release that did not get signed into law.

> *"The Stop Exploitation Through Trafficking Act sends a clear message to state governments that safe harbor legislation protecting child victims of human trafficking must be included in their response to this crime. Senator Klobuchar's bill also recognizes the critically important role of the National Human Trafficking Resource Center (NHTRC) hotline by backing it with the force of law."*
>
> *-Kelli Sorenson, Director of National Programs, 2015*

The Stop Exploitation Through Trafficking Act [25]amended the TVPA of 2000 to solidify NHTH's funding through the HHS.

[24] https://polarisproject.org/press-releases/senate-should-pass-key-anti-human-trafficking-legislation/
[25] https://www.congress.gov/bill/114th-congress/senate-bill/166/text/is?s=4&r=2&q=%7B%22search%22%3A%5B%22The+Stop+Exploitation+Through+Trafficking+Act%22%5D%7D

NATIONAL HUMAN TRAFFICKING HOTLINE. —Beginning in fiscal year 2017 and each fiscal year thereafter, of amounts made available for grants under paragraph (2), the Secretary of Health and Human Services shall make grants for a national communication system to assist victims of severe forms of trafficking in persons in communicating with service providers. The Secretary shall give priority to grant applicants that have experience in providing telephone services to victims of severe forms of trafficking in persons.

- S. 166 Stop Exploitation Through Trafficking Act of 2015, Section 4

Regrettably for Polaris Project, this bill did not proceed introduction.

4.7 Reauthorizations of TVPA

But in 2018, another opportunity to increase funding came with the reauthorization of appropriations in The Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act[26]. Although Polaris spent little to nothing on lobbying in 2017 and beyond, this bill authorized $3.5 million in funding to the National Human Trafficking Hotline from 2018 through 2021.

In 2022 the Human Trafficking Prevention Act of 2022 [27]was introduced and passed to direct the Secretary of Transportation to post "the contact information of the NHTH in the restrooms of each aircraft, airport, over-the-road bus, bus station, passenger train, and passenger railroad station operating within the United States."

Now in 2023 we have several bills hitting the floor amending the TVPA. One of them called the International Trafficking Victims Protection Reauthorization

[26] https://www.congress.gov/bill/115th-congress/house-bill/2200/text?s=9&r=1&q=%7B%22search%22%3A%5B%22The+Frederick+Douglass+Trafficking+Victims+Prevention+and+Protection+Reauthorization+Act+of+2018%22%5D%7D

[27] https://www.congress.gov/bill/117th-congress/house-bill/7181/text?s=1&r=16&q=%7B%22search%22%3A%5B%22The+Trafficking+Victims+Protection+Act%22%5D%7D

Act[28], amends the TVPRA of 2008 to require the Secretary to provide information on how to contact the NHTH, to foreign mission members, and international organization employees. With this in mind, the U.S. Government has a responsibility to ensure the NHTH is living up to it's mission and reporting standards. Victims domestically and globally depend on it.

[28] https://www.congress.gov/bill/118th-congress/senate-bill/920/text?s=4&r=1&q=%7B%22search%22%3A%5B%22The+Trafficking+Victims+Protection+Act%22%5D%7D

5 Grants and Partnerships

If you have been to an airport restroom lately, you have probably caught a glimpse of a subliminal sign posted within the bathroom stall. They would offer a sense of hope and resource to those that may be entrapped in captivity.



Outside of places of travel, the National Human Trafficking Hotline is offered widely. It is a staple phone number offered within any discussion on the topic of human trafficking---often times it is thought of as an ultimate resolve.

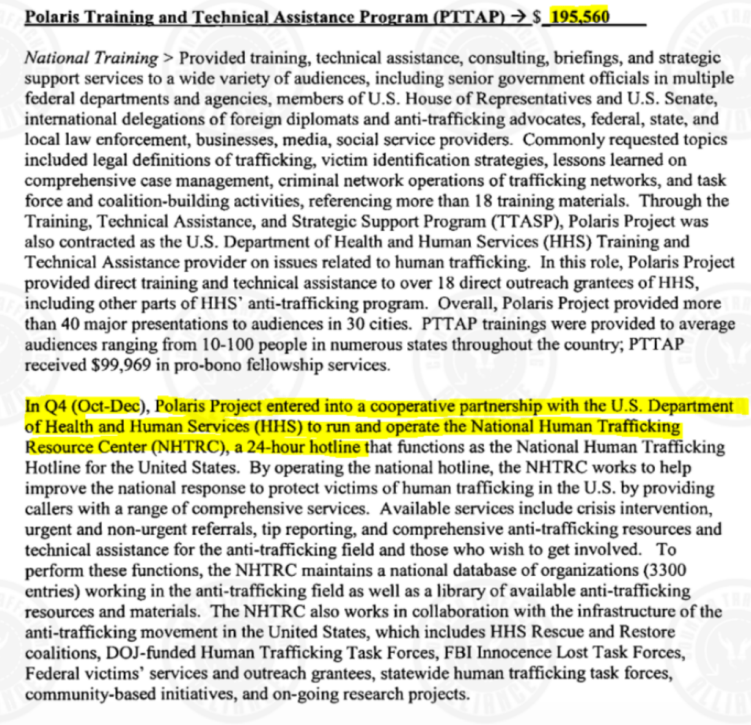
Today, it is promoted amongst various governmental agencies.



A high-level overview of the year-over-year finances illustrates our curiosity into a world renown Human Trafficking resource organization, and the go-to hotline promoted in the United States for potential human trafficking victims to call.

5.1 The HHS partnership

According to a statement included with a 990 tax filing in 2007, Polaris provided training and consulting services to various governmental professionals and departments. Through provided training for TTASP (Training, Technical Assistance and Strategic Support Program) and to the HHS (U.S. Department of Health and Human Services), Polaris entered into an official partnership with the HHS to run and operate the National Human Trafficking Resource Center and 24-hour hotline (dedicated to the United States).



Polaris Training and Technical Assistance Program (PTTAP) → $ 195,560

National Training > Provided training, technical assistance, consulting, briefings, and strategic support services to a wide variety of audiences, including senior government officials in multiple federal departments and agencies, members of U.S. House of Representatives and U.S. Senate, international delegations of foreign diplomats and anti-trafficking advocates, federal, state, and local law enforcement, businesses, media, social service providers. Commonly requested topics included legal definitions of trafficking, victim identification strategies, lessons learned on comprehensive case management, criminal network operations of trafficking networks, and task force and coalition-building activities, referencing more than 18 training materials. Through the Training, Technical Assistance, and Strategic Support Program (TTASP), Polaris Project was also contracted as the U.S. Department of Health and Human Services (HHS) Training and Technical Assistance provider on issues related to human trafficking. In this role, Polaris Project provided direct training and technical assistance to over 18 direct outreach grantees of HHS, including other parts of HHS' anti-trafficking program. Overall, Polaris Project provided more than 40 major presentations to audiences in 30 cities. PTTAP trainings were provided to average audiences ranging from 10-100 people in numerous states throughout the country; PTTAP received $99,969 in pro-bono fellowship services.

In Q4 (Oct-Dec), Polaris Project entered into a cooperative partnership with the U.S. Department of Health and Human Services (HHS) to run and operate the National Human Trafficking Resource Center (NHTRC), a 24-hour hotline that functions as the National Human Trafficking Hotline for the United States. By operating the national hotline, the NHTRC works to help improve the national response to protect victims of human trafficking in the U.S. by providing callers with a range of comprehensive services. Available services include crisis intervention, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved. To perform these functions, the NHTRC maintains a national database of organizations (3300 entries) working in the anti-trafficking field as well as a library of available anti-trafficking resources and materials. The NHTRC also works in collaboration with the infrastructure of the anti-trafficking movement in the United States, which includes HHS Rescue and Restore coalitions, DOJ-funded Human Trafficking Task Forces, FBI Innocence Lost Task Forces, Federal victims' services and outreach grantees, statewide human trafficking task forces, community-based initiatives, and on-going research projects.

HHS training—What expertise?

"By operating the national hotline, the NHTRC works to help improve the national response to protect victims of human trafficking in the U.S. by providing callers with a range of comprehensive services. Available services include crisis intervention, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved."

5.2 Polaris and Clinton partnership

Emergence of this proposed initiative occurred publicly in 2009, announced by the fifth annual Clinton Global Initiative. Better defined by one of their partners, Seeds of Peace[29],

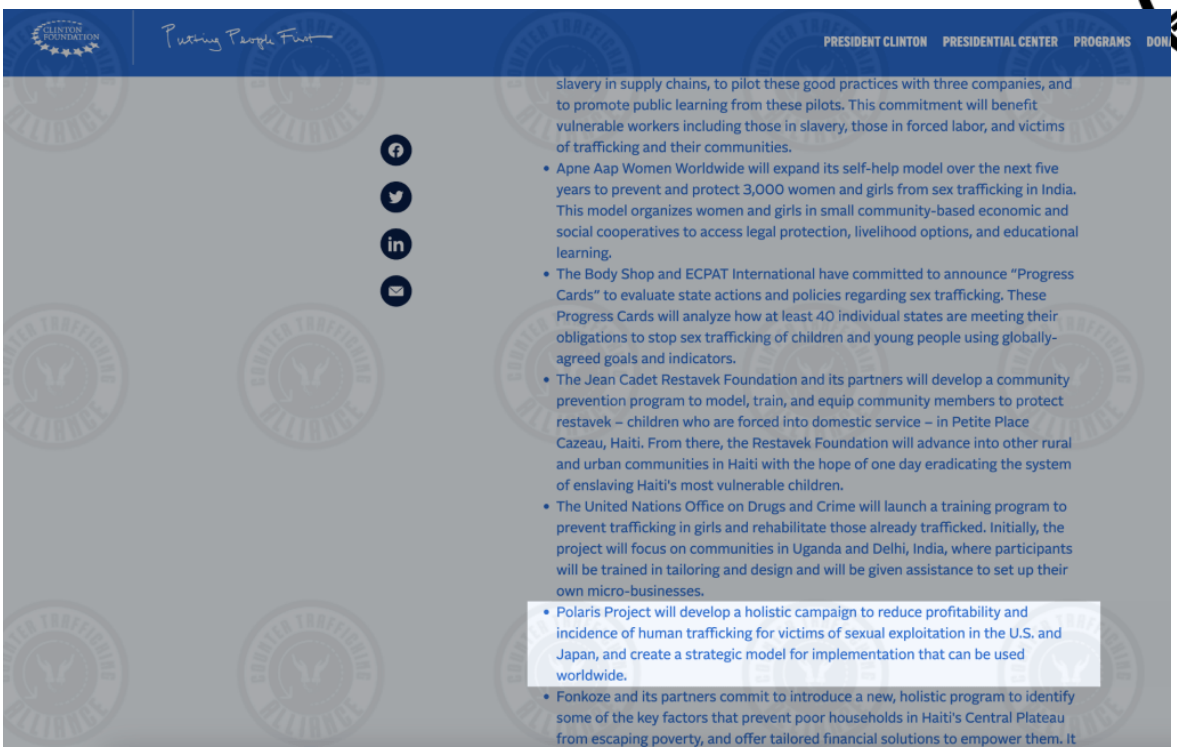
"The Clinton Global Initiative (CGI) is a membership-based organization that brings together leaders from across the business, government, and nonprofit sectors to drive action on global challenges.

Established in 2005 by President Bill Clinton, CGI convenes global leaders to create and implement innovative solutions to the world's most pressing challenges. CGI Annual Meetings have brought together 190 sitting and former heads of state, more than 20 Nobel Prize laureates, and hundreds of leading CEOs, heads of foundations and NGOs, major philanthropists, and members of the media..."

The 2009 Clinton Global Initiative press release[30] announced the partnerships and commitments for the annual meeting. The initiative theme aimed to end human trafficking, where Polaris project was listed as one of those commitments.



[29] https://www.seedsofpeace.org/team/clinton-global-initiative/
[30] https://www.clintonfoundation.org/press-and-news/general/press-release-president-clinton-hosts-third-day-of-clinton-global-initiative/



"Polaris Project will develop a holistic campaign to reduce profitability and incidence of human trafficking for victims of sexual exploitation in the U.S. and Japan, and create a strategic model for implementation that can be used worldwide."

Executive Director and CEO of Polaris Project, and former Director of the U.S. State Department's trafficking in persons office, Mark P. Lagon, made a comment to alternative news outlet, 3BL CSR[31] Wire on the announced commitment,

"As a new initiative, this commitment will focus on increasing public-private partnerships between NGOs, private businesses, and governments in the United States, Japan, and other '4D Nations' -- demand-creating, migration destination, developed democracies. These strategic partnerships and active best-practice sharing will not only directly impact the scope of human trafficking in these countries, but also ultimately serve as models to share with the developing world."

[31] https://www.csrwire.com/press_releases/27723-polaris-project-recognized-during-2009-clinton-global-initiative-annual-meeting

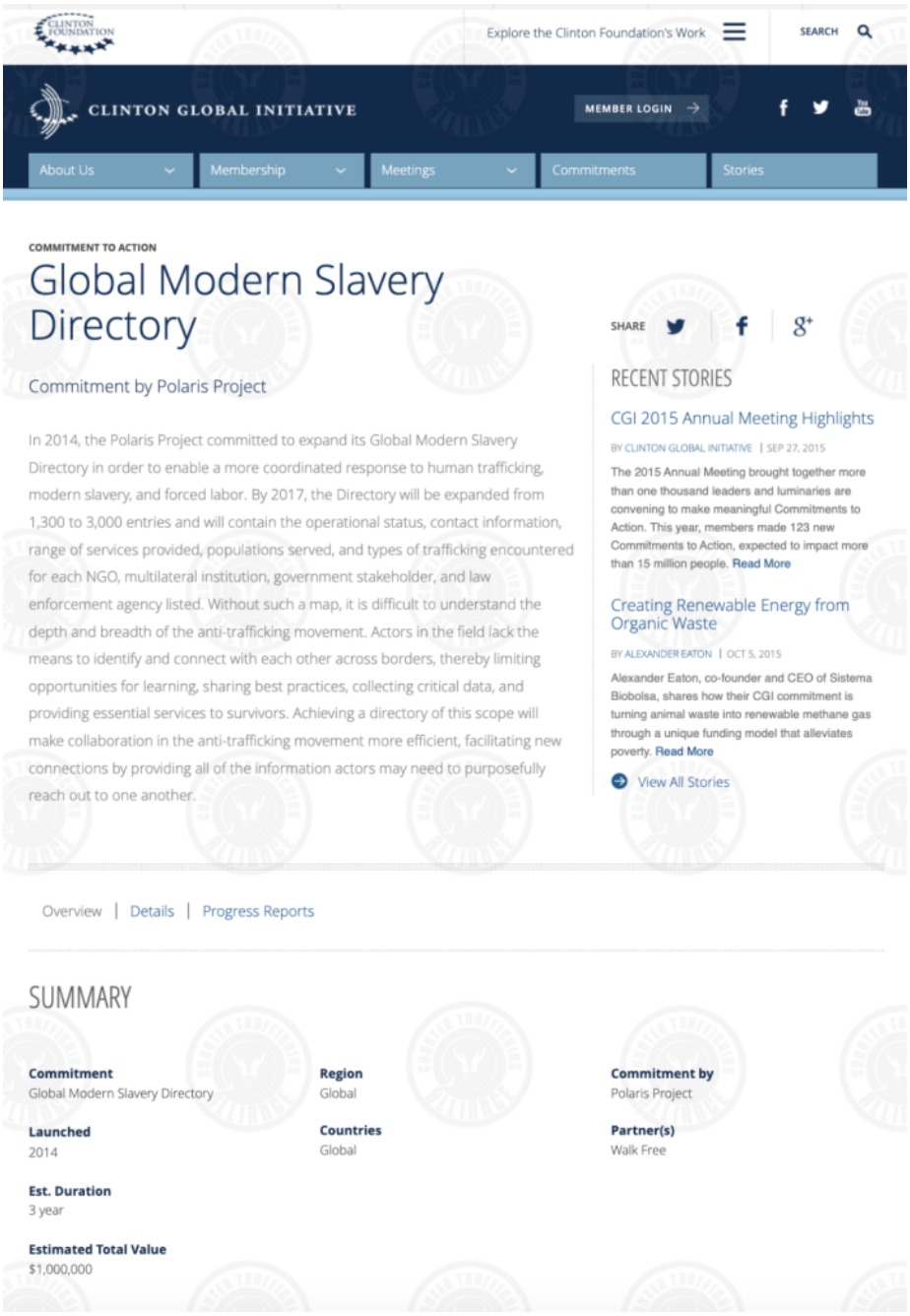


2009 Clinton Global Initiative Polaris Commitment: Building an Anti-Trafficking Approach Replicable Worldwide

The project was valued at 3.3 million[32] and included partners like LexisNexis Group (whom Mark Lagon goes to work for the following year, 2010), and National Centre for Missing and Exploited Children.

[32] https://archive.li/hE42j

Polaris illustrated continuous partnership with the Clinton Global Initiative. In 2014, another commitment was made to build a Global Modern Slavery Directory. This directory announced it's objective to be a global cross matrix lookup for all resources in pertinence to human trafficking.



Now, it is important to note the scandal surrounding the CGI. In 2017, the CGI announced it would end operations. This was due to scandal surrounding donations. A report from Observer reads,

> *The Clinton Foundation's long list of wealthy donors and foreign government contributors during the 2016 elections provoked critics to allege conflicts of interests. But as soon as Clinton lost the election...Foreign governments began pulling out of annual donations, signaling the organization's clout was predicated on donor access to the Clintons, rather than its philanthropic work.*
>
> *-Observer[33], 1/15/2017*

Since 2022[34], Clinton Global Initiative is back in action. But the stain of the scandal echoes. This is important because, the relationship between the Polaris crew and the Clinton Foundation seemed to work in close tandem. In fact, several Board Members of Polaris Project worked very closely with the Clintons.



Polaris co-founder, Katherine Chon, pictured with former President, Bill Clinton in 2005.

[33] https://archive.ph/Wr7co
[34] https://deadline.com/2022/09/clinton-global-initiative-returns-with-lineup-of-international-activists-political-leaders-and-celebrity-philanthropists-1235120346/#!

According to tax forms, Catherine "Kiki" McLean served as Board Member on Polaris Project from 2012-2018. McLean currently serves as Treasurer [35] to Democratic Governors Association, and has been since 2021. However, her early career[36] consisted of working on the 1992 Clinton-Gore campaign, and she served as Senior Advisor to the Hillary Clinton for President Campaign. In a Mediaite article[37] McLean is described as "friend of the Clinton Family".

Dem Strategist To CNN: Conservatives Who Suggest Clinton 'Faked' Concussion 'Are Just Stupid'

By **Andrew Kirell** | Jan 3rd, 2013, 10:07 am

74 comments

reddit



Democratic strategist and friend of the Clinton family **Catherine "Kiki" McLean** did not mince words last night on CNN's *Piers Morgan Tonight*, outright labeling the conservative pundits and politicians who were skeptical of Secretary of State **Hillary Clinton**'s concussion to simply be "stupid" people who "need a new hobby."

[35] https://democraticgovernors.org/updates/dga-announces-kiki-mclean-to-continue-to-serve-as-treasurer/
[36] https://democraticgovernors.org/updates/dga-announces-new-treasurer-kiki-mclean/
[37] https://www.mediaite.com/tv/dem-strategist-to-cnn-conservatives-who-suggest-clinton-faked-concussion-are-just-stupid/

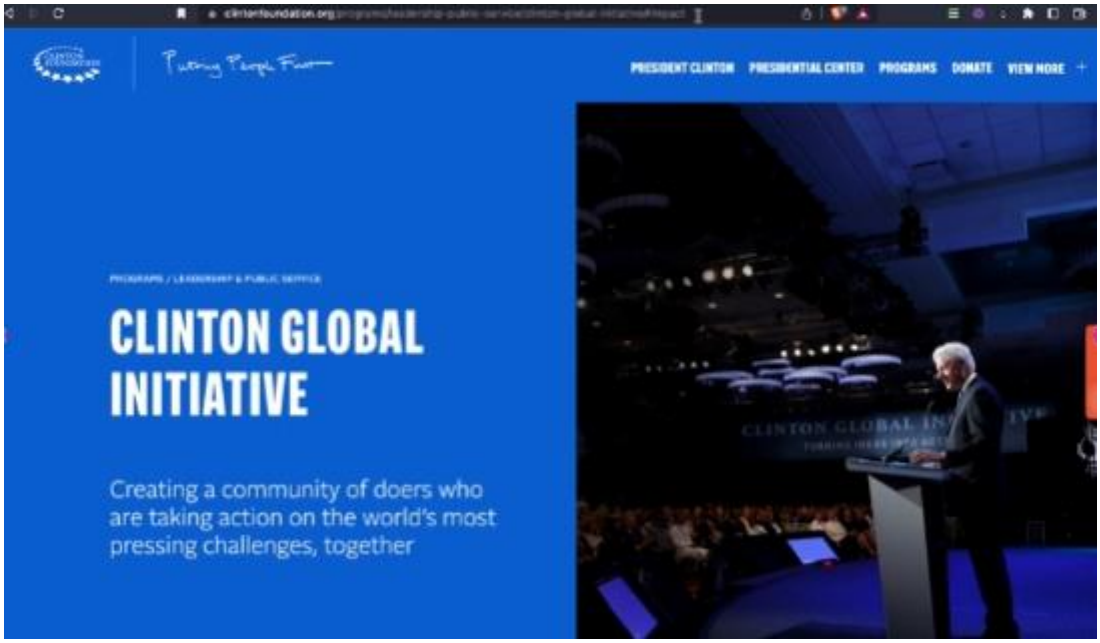
Another former Board Member who served the Clintons is Steve Rosenthal[38]. From 2016 until 2018 Rosenthal is listed as a Board Member, around the same time as McLean. Rosenthal served the administration of President Bill Clinton as a Deputy to the U.S. Secretary of Labor. Rosenthal is no stranger to scandal either. In 2007, Rosenthal's America Coming Together (ACT) PAC, funded by George Soros, was found to have violated federal election law[39] with donations by the Federal Election Commission.



We expand on conflicts of interest within Polaris' network in a later portion of this organizational highlight, but for now we'd like to point out that years

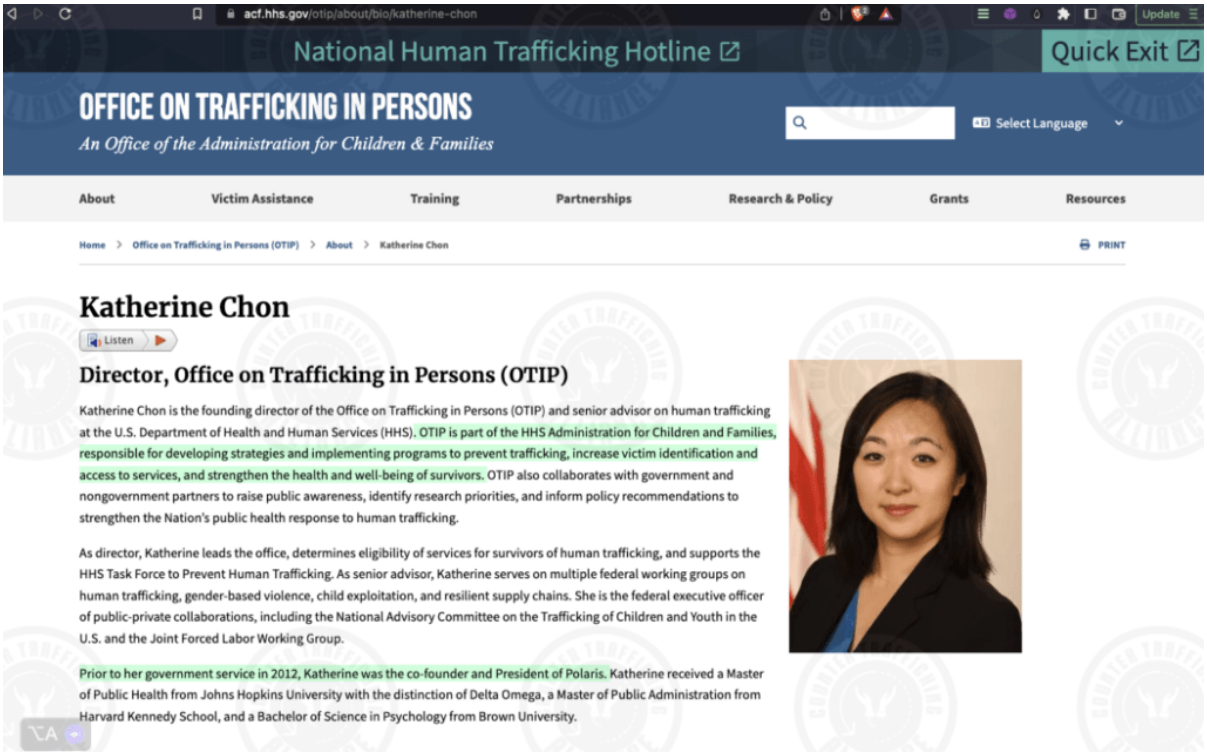
[38] https://www.influencewatch.org/person/steve-rosenthal/
[39] https://www.politico.com/story/2007/08/soros-linked-group-hit-with-huge-fine-005555

since the initiatives, they have been removed from the Clinton Foundation website. When the original URL for the Polaris initiative is entered, it redirects to a main landing page for the Clinton Global Initiative.



5.3 Health and Human Services Grants

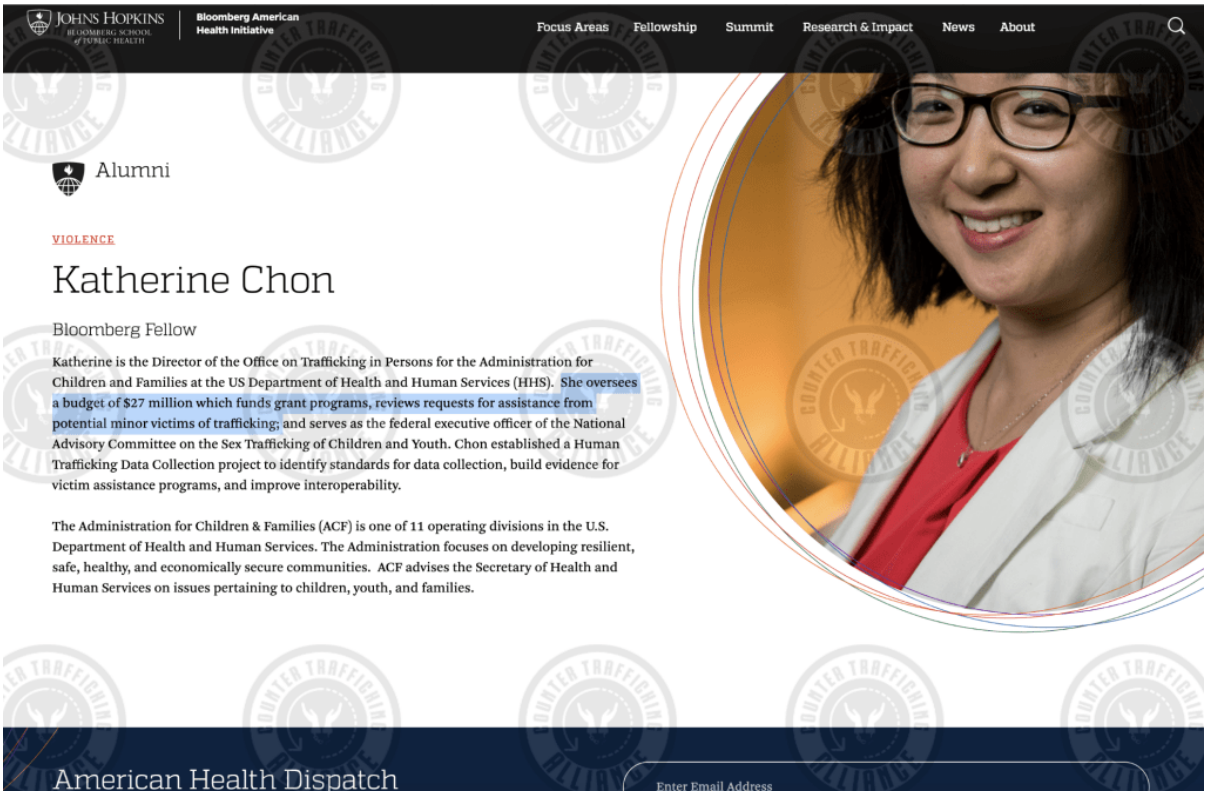
One interesting change that came about is when original co-founder, Katherine Chon, left Polaris in 2012 to work for the U.S. Department of Health and Human Services as the Director of Office on Trafficking in Persons (OTIP). We will need to emphasize the importance of this Director role further down this report.



U.S. Department of Health and Human Services[40]

[40] https://www.acf.hhs.gov/otip/about/bio/katherine-chon

This then becomes more curious as she is described in her role by John Hopkins University [41]to oversee "a budget of $27 million which funds grant programs, reviews requests for assistance from potential minor victims of trafficking..."--- Does this become a conflict of interest? The former co-founder of one of the most gargantuan anti-trafficking organizations in the world is assigned a high position at the United States Health and Human Services Trafficking in Persons, who then decides how and where these organizational grants get allocated?



[41] https://americanhealth.jhu.edu/people/katherine-chon

Polaris has since gotten approximately $3.5 million per year by funding of the H.H.S., according to The Washington Post[42] since 2007. Below the grant for 2020[43] is listed, confirming the 3.5 million to the NHTH.

Federal Grant Title:	National Human Trafficking Hotline
Federal Agency Name:	Administration for Children and Families IOAS OTIP (HHS-ACF-OTIP)
Grant Categories:	Income Security and Social Services
Type of Opportunity:	Discretionary
Funding Opportunity Number:	HHS-2020-ACF-IOAS-OTIP-TV-1807
Type of Funding:	Cooperative Agreement
CFDA Numbers:	93.598
CFDA Descriptions:	Information not provided
Current Application Deadline:	July 13th, 2020
Original Application Deadline:	July 13th, 2020
Posted Date:	April 29th, 2020
Creation Date:	April 29th, 2020
Archive Date:	August 12th, 2020
Total Program Funding:	$3,500,000
Maximum Federal Grant Award:	$3,500,000
Minimum Federal Grant Award:	$3,500,000
Expected Number of Awards:	1
Cost Sharing or Matching:	No
Last Updated:	April 29th, 2020

However, the 2021 and 2020 tax forms indicate the government grant amounts above 3.5 million. Where are the additional grant awards coming from? Could any additional OTIP grants be going to Polaris?

[42] https://www.washingtonpost.com/nation/2023/07/07/human-sex-trafficking-hotline-victims-police/
[43] https://www.federalgrants.com/National-Human-Trafficking-Hotline-79607.html

Form 990 (2020) POLARIS PROJECT 03-0391561 Page 9

Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII . . . . . ☐

				(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
Contributions, Gifts, Grants and Other Similar Amounts	1a	Federated campaigns	1a				
	b	Membership dues	1b				
	c	Fundraising events	1c				
	d	Related organizations	1d				
	e	Government grants (contributions)	1e	3,700,372.			
	f	All other contributions, gifts, grants, and similar amounts not included above	1f	5,477,120.			
	g	Noncash contributions included in lines 1a-1f	1g	$			
	h	**Total.** Add lines 1a-1f ▶		9,177,492.			

2020 Government Grants

Form 990 (2021) Page 9

Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII . . . . . ☐

				(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
Contributions, Gifts, Grants, and Other Similar Amounts	1a	Federated campaigns	1a				
	b	Membership dues	1b				
	c	Fundraising events	1c				
	d	Related organizations	1d				
	e	Government grants (contributions)	1e	4,930,218.			
	f	All other contributions, gifts, grants, and similar amounts not included above	1f	9,552,215.			
	g	Noncash contributions included in lines 1a–1f	1g	$			
	h	**Total.** Add lines 1a–1f ▶		14,482,433.			
			Business Code				

2021 government grants

Polaris Training and Technical Assistance Program (PTTAP) → $ 195,560

National Training > Provided training, technical assistance, consulting, briefings, and strategic support services to a wide variety of audiences, including senior government officials in multiple federal departments and agencies, members of U.S. House of Representatives and U.S. Senate, international delegations of foreign diplomats and anti-trafficking advocates, federal, state, and local law enforcement, businesses, media, social service providers. Commonly requested topics included legal definitions of trafficking, victim identification strategies, lessons learned on comprehensive case management, criminal network operations of trafficking networks, and task force and coalition-building activities, referencing more than 18 training materials. Through the Training, Technical Assistance, and Strategic Support Program (TTASP), Polaris Project was also contracted as the U.S. Department of Health and Human Services (HHS) Training and Technical Assistance provider on issues related to human trafficking. In this role, Polaris Project provided direct training and technical assistance to over 18 direct outreach grantees of HHS, including other parts of HHS' anti-trafficking program. Overall, Polaris Project provided more than 40 major presentations to audiences in 30 cities. PTTAP trainings were provided to average audiences ranging from 10-100 people in numerous states throughout the country; PTTAP received $99,969 in pro-bono fellowship services.

In Q4 (Oct-Dec), Polaris Project entered into a cooperative partnership with the U.S. Department of Health and Human Services (HHS) to run and operate the National Human Trafficking Resource Center (NHTRC), a 24-hour hotline that functions as the National Human Trafficking Hotline for the United States. By operating the national hotline, the NHTRC works to help improve the national response to protect victims of human trafficking in the U.S. by providing callers with a range of comprehensive services. Available services include crisis intervention, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved. To perform these functions, the NHTRC maintains a national database of organizations (3300 entries) working in the anti-trafficking field as well as a library of available anti-trafficking resources and materials. The NHTRC also works in collaboration with the infrastructure of the anti-trafficking movement in the United States, which includes HHS Rescue and Restore coalitions, DOJ-funded Human Trafficking Task Forces, FBI Innocence Lost Task Forces, Federal victims' services and outreach grantees, statewide human trafficking task forces, community-based initiatives, and on-going research projects.

2007

Below is a list of expenses toward the hotline since its inception according to tax records. Expenses also include employee compensation.

Training, Technical Assistance, and Strategic Support Program (TTASP) → $599,026

National Training > Through this program, in 2008, Polaris Project continued to be the national training and technical assistance provider for the U.S. Department of Health and Human Services (HHS) Anti-Trafficking in Persons Division (ATIP). In this role, Polaris Project is available to provide direct training, technical assistance, and strategic support services to various parts of the HHS anti-trafficking program, including direct outreach grantees, Rescue and Restore coalitions, regional intermediary grantees, and victims' services providers Training and technical assistance methods include offering presentations and trainings, materials review, phone consultations, and direct intensive on-site technical assistance Trainings were provided to average audiences ranging from 10-100 people. Polaris Project provided training, technical assistance, consulting, briefings, and strategic support services to 5,321 individuals throughout the year from a wide variety of audiences including senior government officials in multiple federal departments and agencies; international delegations of foreign diplomats and anti-trafficking advocates, federal, state, and local law enforcement, businesses, media; and service providers. Commonly requested topics for these services included legal definitions of human trafficking, the Federal law on human trafficking, victim identification strategies, lessons learned on comprehensive case management, criminal network operations of human trafficking networks, and task force and coalition-building activities. As part of this program, our organization remained an active participant in the Federal Innocence Lost Working Group, and an advisor to numerous Federally-funded research studies on trafficking in the United States. The TTASP program also received $58,764 in pro-bono in-kind fellowship services

Operation of the National Human Trafficking Resource Center (NHTRC) Hotline > During the full year of 2008, Polaris Project continued our cooperative agreement with the U S Department of Health and Human Services (HHS), Anti-Trafficking in Persons Division (ATIP) to run and operate the National Human Trafficking Resource Center (NHTRC) hotline, which is the preeminent hotline on human trafficking for the United States, reached by calling 1-888-373-7888. The NHTRC works to help improve the national response to protect victims of human trafficking in the U.S by providing victims with a range of comprehensive services Available services include: crisis intervention, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved To perform these functions, the NHTRC maintains a National Contacts Database with over 3,000 entries to refer callers to as well as a library of available anti-trafficking resources and materials. The NHTRC also works in collaboration with the infrastructure of the anti-trafficking movement in the United States which includes HHS Rescue and Restore Coalitions, DOJ-funded Human Trafficking Task Forces, FBI Innocence Lost Task Forces, Federal victims' services and outreach grantees, statewide human trafficking task forces, community-based initiatives and on-going research projects. During 2008, the NHTRC hotline received and processed 5,748 calls that identified over 1,900 potential victims of human trafficking nationwide. This call volume is more than a 200%

2008

Training, Technical Assistance, and Strategic Support Program (TTASP) → $737,117

National Training and Technical Assistance > In 2009, Polaris Project continued to function as the national training and technical assistance provider for the U.S. Department of Health and Human Services (HHS) Anti-Trafficking in Persons Division (ATIP). In this role, Polaris Project was available to provide direct training, technical assistance, and strategic support services to a variety of anti-trafficking programs, mostly based in the United States, including direct outreach grantees, Rescue and Restore coalitions, regional intermediary grantees, and victims' services providers throughout the United States. Training and technical assistance methods included offering presentations and trainings, materials reviews, phone consultations, and direct intensive on-site technical assistance. During this period, Polaris Project provided technical assistance services to a total audience of 6,681 through more than 230 different efforts. Audience types included: service providers from diverse fields; community members and coalitions; foreign diplomats and anti-trafficking advocates; members of local and state government and senior federal officials; armed service personnel; educators and school administrators; legal professionals and faith-based advocates. As a part of this program, Polaris Project also remained active in several local and federal law enforcement task forces and working groups and numerous Federally-funded research studies on trafficking in the United States.

2009

Operation of the National Human Trafficking Resource Center (NHTRC) Hotline > During the full year of 2009, Polaris Project continued our cooperative agreement with the U.S. Department of Health and Human Services (HHS), Anti-Trafficking in Persons Division (ATIP) to run and operate the National Human Trafficking Resource Center (NHTRC), the toll-free, national hotline on human trafficking in the United States. The NHTRC works to help improve the national response to protect victims of human trafficking in the by providing victims with a range of comprehensive services. Available services include: crisis response, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved. The NHTRC

4a (Code _____) (Expenses $ 914,431. including grants of $ _____) (Revenue $ _____)
TRAINING, TECHNICAL ASSISTANCE, AND STRATEGIC SUPPORT PROGRAM (TTASP): IN 2010, POLARIS PROJECT CONTINUED TO FUNCTION AS THE NATIONAL TRAINING AND TECHNICAL ASSISTANCE PROVIDER FOR THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ANTI-TRAFFICKING IN PERSONS DIVISION (ATIP) AND OPERATED THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC) HOTLINE. THE NHTRC IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF HUMAN TRAFFICKING BY PROVIDING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, WITH THE GOAL OF EQUIPPING STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE.

2010

4a (Code _____) (Expenses $ 989,243. including grants of $ _____) (Revenue $ 67,550.)
NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC): IN 2011, POLARIS PROJECT CONTINUED TO FUNCTION AS THE NATIONAL TRAINING AND TECHNICAL ASSISTANCE PROVIDER FOR THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ANTI-TRAFFICKING IN PERSONS DIVISION AND OPERATED THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC) HOTLINE. THE NHTRC IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF HUMAN TRAFFICKING BY CONNECTING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, WITH THE GOAL OF EQUIPPING STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE.
2011

4a (Code _____) (Expenses $ 1,685,884. including grants of $ _____) (Revenue $ 57,500.)
NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC): IN 2012, POLARIS PROJECT CONTINUED TO FUNCTION AS THE NATIONAL TRAINING AND TECHNICAL ASSISTANCE PROVIDER FOR THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ANTI-TRAFFICKING IN PERSONS DIVISION AND OPERATED THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC) HOTLINE. THE NHTRC IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF HUMAN TRAFFICKING BY CONNECTING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, WITH THE GOAL OF EQUIPPING STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE.
2012

4a (Code _____) (Expenses $ 3,350,999. including grants of $ _____) (Revenue $ 113,075.)
NATIONAL HOTLINE: IN 2013, POLARIS PROJECT CONTINUED TO FUNCTION AS THE NATIONAL TRAINING AND TECHNICAL ASSISTANCE PROVIDER FOR THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ANTI-TRAFFICKING IN PERSONS DIVISION AND OPERATED THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC) HOTLINE. THE NHTRC IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF HUMAN TRAFFICKING BY CONNECTING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, WITH THE GOAL OF EQUIPPING STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE. IN ADDITION TO OPERATING THE NHTRC, POLARIS PROJECT RECEIVES TIPS AND COMMUNICATES WITH VICTIMS THROUGH A TEXTING SERVICE, AND FIELD CALLS FROM CALLS OUTSIDE THE U.S.
2013

4a (Code _____) (Expenses $ 2,507,237. including grants of $ _____) (Revenue $ 174,810.)
NATIONAL HOTLINE: IN 2014, POLARIS PROJECT CONTINUED TO FUNCTION AS THE NATIONAL TRAINING AND TECHNICAL ASSISTANCE PROVIDER FOR THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ANTI-TRAFFICKING IN PERSONS DIVISION AND OPERATED THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC) HOTLINE. THE NHTRC IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF HUMAN TRAFFICKING BY CONNECTING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, WITH THE GOAL OF EQUIPPING STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE. IN ADDITION TO OPERATING THE NHTRC, POLARIS PROJECT RECEIVES TIPS AND COMMUNICATES WITH VICTIMS THROUGH A TEXTING SERVICE, AND FIELD CALLS FROM CALLS OUTSIDE THE U.S.
2014

4a (Code _____) (Expenses $ 2,340,547 including grants of $ _____) (Revenue $ 53,044)
NATIONAL HOTLINE IN 2015, POLARIS PROJECT CONTINUED TO FUNCTION AS THE NATIONAL TRAINING AND TECHNICAL ASSISTANCE PROVIDER FOR THE U S DEPARTMENT OF HEALTH AND HUMAN SERVICES ANTI TRAFFICKING IN PERSONS DIVISION AND OPERATED THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER (NHTRC) HOTLINE THE NHTRC IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF HUMAN TRAFFICKING BY CONNECTING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, WITH THE GOAL OF EQUIPPING STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE IN ADDITION TO OPERATING THE NHTRC, POLARIS PROJECT RECEIVES TIPS AND COMMUNICATES WITH VICTIMS THROUGH A TEXTING SERVICE, AND FIELDS CALLS FROM OUTSIDE THE U S
2015

4a	(Code See Additional Data	) (Expenses $	3,010,459	including grants of $		) (Revenue $	12,600)

2017

Form 990, Part III, Line 4a:

NATIONAL HOTLINE IN 2017, POLARIS PROJECT CONTINUED TO OPERATE THE NATIONAL HUMAN TRAFFICKING HOTLINE (NHTH), WITH FUNDING FROM THE U S DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE ON TRAFFICKING IN PERSONS (OTIP) THE NATIONAL HOTLINE IMPROVES THE NATIONAL RESPONSE TO PROTECT VICTIMS OF TRAFFICKING BY CONNECTING VICTIMS WITH A RANGE OF COMPREHENSIVE SERVICES IN THE UNITED STATES, AND EQUIPS STAKEHOLDERS WITH THE MOST COMPREHENSIVE TOOLS AND APPROACHES NECESSARY TO ENHANCE COMMUNITY NETWORKING, COORDINATION, AND RESPONSE IN ADDITION TO OPERATING THE NHTH, POLARIS PROJECT RECEIVES TIPS AND COMMUNICATES WITH VICTIMS THROUGH A TEXTING SERVICE, AND FIELDS CALLS FROM OUTSIDE THE U S

4b (Code _____) (Expenses $ 3,141,504. including grants of $ _____) (Revenue $ _____)

ATTACHMENT 1

4a

FORM 990, PART III - PROGRAM SERVICE, LINE 4B

NATIONAL HOTLINE - IN 2018, POLARIS CONTINUED OPERATING THE NATIONAL HUMAN TRAFFICKING HOTLINE (NHTH), WITH FUNDING FROM THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE ON TRAFFICKING IN PERSONS (OTIP), THE TEXAS STATE GOVERNOR'S OFFICE, AND PRIVATE DONATIONS. THE NATIONAL HOTLINE PROVIDES VICTIMS AND SURVIVORS OF HUMAN TRAFFICKING ACCESS TO CRITICAL SUPPORT AND SERVICES TO GET HELP AND STAY SAFE, 24-7, IN MORE THAN 200 LANGUAGES ACROSS FIVE MODES OF COMMUNICATION -- PHONE, CHAT, TEXT, WEBFORM, AND EMAIL. CORE HOTLINE FUNCTIONS INCLUDE CRISIS RESPONSE AND SAFETY PLANNING, COLLECTING AND REPORTING TIPS, PROVIDING REFERRALS TO A NATIONAL NETWORK OF SERVICE PROVIDERS, AND SUPPORTING CALLERS IN SITUATIONS OR INDUSTRIES AT HIGH RISK FOR TRAFFICKING. THE NATIONAL HOTLINE IS THE CENTRAL HUB OF THE COUNTRY'S NATIONAL COORDINATED RESPONSE TO SUPPORT SURVIVORS OF TRAFFICKING AND IS A CLEARINGHOUSE FOR NATIONAL DATA AND TRENDS.

2018

Form 990, Part III, Line 4b:

NATIONAL HOTLINE - IN 2019, POLARIS CONTINUED OPERATING THE NATIONAL HUMAN TRAFFICKING HOTLINE (NHTH), WITH FUNDING FROM THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE ON TRAFFICKING IN PERSONS (OTIP), THE TEXAS STATE GOVERNOR'S OFFICE, AND PRIVATE DONATIONS. THE NATIONAL HOTLINE PROVIDES VICTIMS AND SURVIVORS OF HUMAN TRAFFICKING ACCESS TO CRITICAL SUPPORT AND SERVICES TO GET HELP AND STAY SAFE, 24-7, IN MORE THAN 200 LANGUAGES ACROSS FIVE MODES OF COMMUNICATION -- PHONE, CHAT, TEXT, WEBFORM, AND EMAIL. CORE HOTLINE FUNCTIONS INCLUDE CRISIS RESPONSE AND SAFETY PLANNING, COLLECTING AND REPORTING TIPS, PROVIDING REFERRALS TO A NATIONAL NETWORK OF SERVICE PROVIDERS, AND SUPPORTING CALLERS IN SITUATIONS OR INDUSTRIES AT HIGH RISK FOR TRAFFICKING. THE NATIONAL HOTLINE IS THE CENTRAL HUB OF THE COUNTRY'S NATIONAL COORDINATED RESPONSE TO SUPPORT SURVIVORS OF TRAFFICKING AND IS A CLEARINGHOUSE FOR NATIONAL DATA AND TRENDS.

2019

4b (Code:) (Expenses $ 4,848,627. including grants of $) (Revenue $)

NATIONAL HUMAN TRAFFICKING HOTLINE: POLARIS CONTINUED OPERATING IN THE U.S NATIONAL HUMAN TRAFFICKING HOTLINE (NHTH), WITH FUNDING FROM THE U.S DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE ON TRAFFICKING IN PERSONS (OTIP), THE TEXAS STATE GOVERNOR'S OFFICE, AND PRIVATE DONATIONS. THE NHTH PROVIDES VICTIMS AND SURVIVORS OF HUMAN TRAFFICKING ACCESS TO CRITICAL SUPPORT AND SERVICES TO GET HELP AND STAY SAFE, 24-7, IN MORE THAN 200 LANGUAGES ACROSS FIVE MODES OF COMMUNICATION - PHONE, CHAT, TEXT, WEBFORM, AND EMAIL.

2020

4b (Code:) (Expenses $ 4,006,790 including grants of $) (Revenue $)

See Additional Data

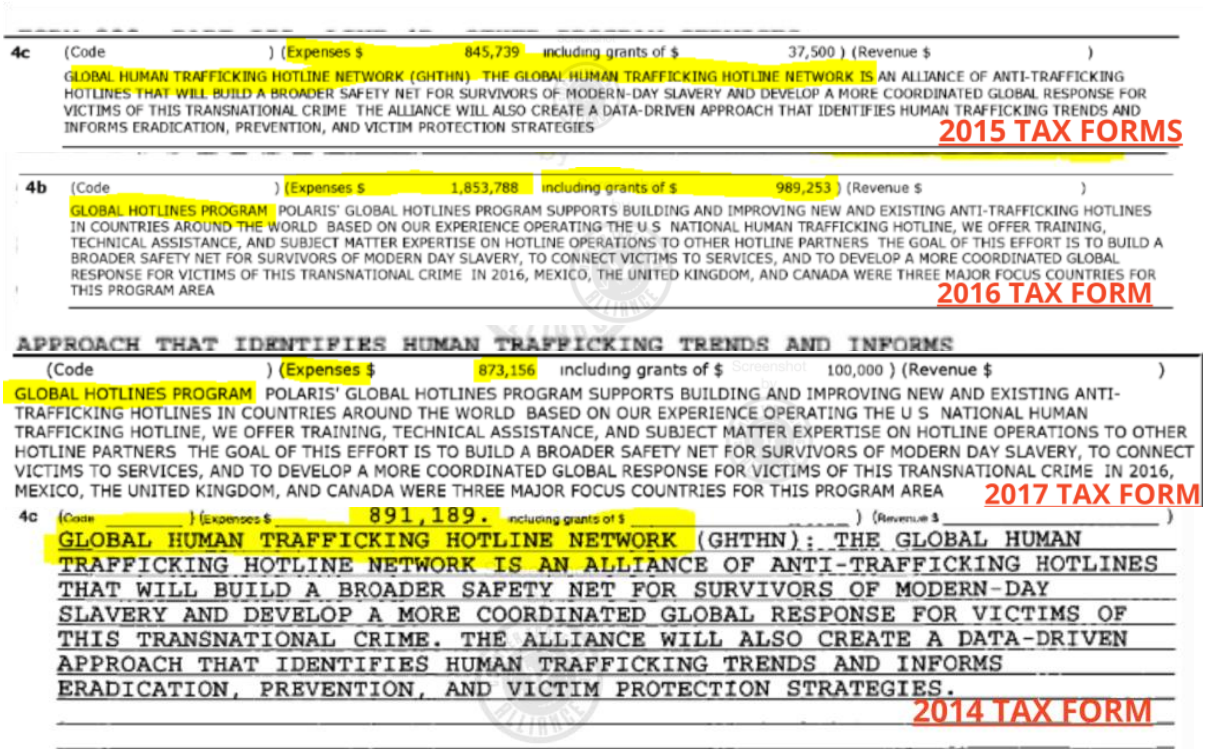
The conflicts surrounding the scandalous board members and partnerships highlight a valid concern, and increase in measure when looking at the big picture. Continuing to expand, we transition to an initiative Polaris had to become a global resource. An initiative that, after millions of dollars and years of action, fizzled out.

5.4 Google partnership

In 2013, Polaris Project was awarded $3 million to partner with Liberty Asia and LaStrada International and build an alliance of hotlines around the world.

> *Google is funding the effort on the heels of a summit it hosted on illicit networks in July, where the Internet giant found most illegal groups were involved in human trafficking in some way. Jared Cohen, director of Google Ideas, says despite hotlines that exist around the world to fight human trafficking, there isn't great coordination between them.*
>
> *-U.S. News article "A Global Human Trafficking Hotline is Launching out of D.C. with Help from Google"*[44]

While the goal is admirable, did they follow through? Studying the tax forms submitted by Polaris Project the Research Team found the Global Hotline listed in tax forms 2013-2017. However, after 2017 there is no mention of the program and no explanation as to why it ended.



[44] https://www.usnews.com/news/blogs/washington-whispers/2013/04/09/a-global-human-trafficking-hotline-is-launching-out-of-dc-with-help-from-google

Over the course of the 4 years the program is listed, Polaris allocated a total of $4,803,062 in expenses, a hefty sum.

5.5 Other partnerships

The Polaris Project has partnered with other organizations and coalitions in the past. Currently listed on their website[45] are Alliance to End Slavery and Trafficking (ATEST) and Migration That Works.



[45] https://polarisproject.org/partnerships

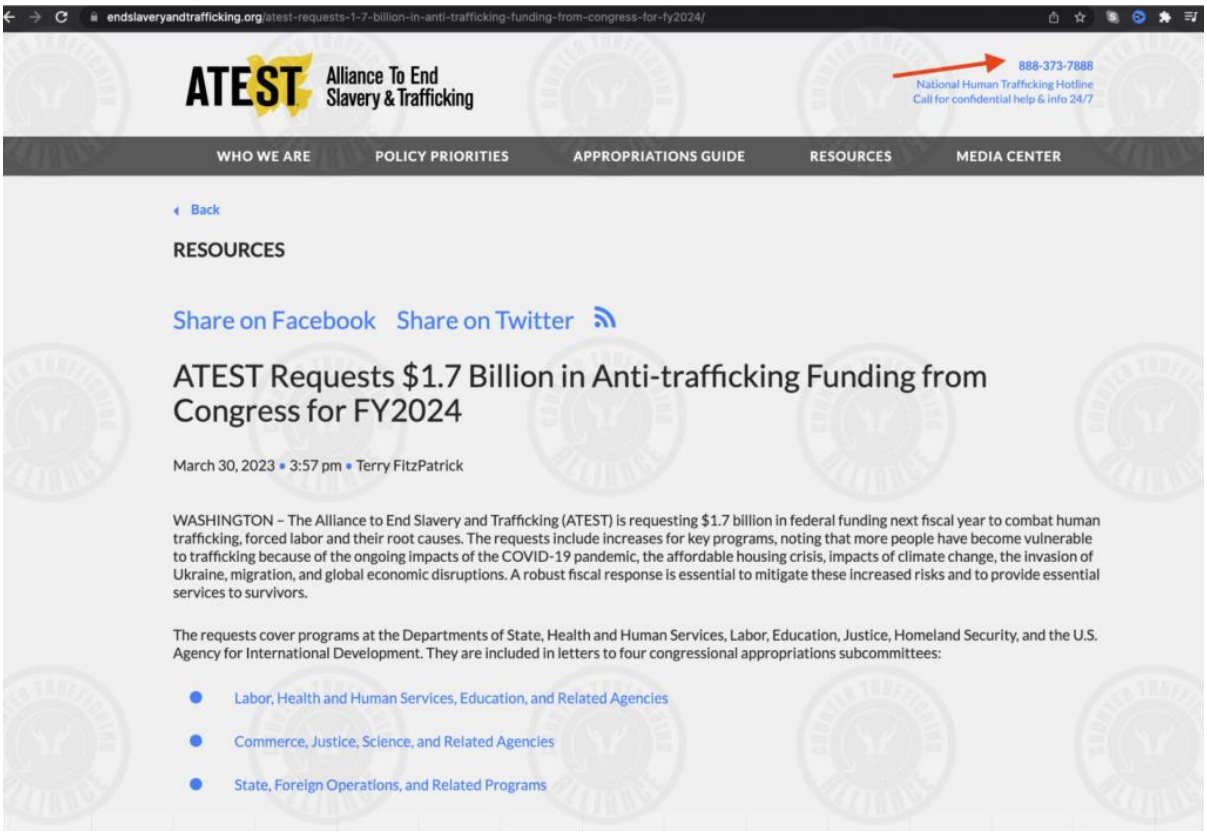
Alliance to End Slavery and Trafficking (ATEST) has been transparent about the funds that are being requested by governmental entities. For example, in 2021 ATEST requested the following[46] funding, from various governmental arms.

We understand the fiscal challenges our nation faces, however we cannot lose sight of the needless human tragedies occurring within and beyond our borders. Trafficking is a national security, criminal justice, and civil and human rights issue that will define our generation. We can only hope to eradicate it within our lifetime by dedicating the necessary resources to end this scourge.

Summary of ATEST FY21 Requests				
Department	**Program**	**FY19 Enacted**	**Authorized Funding**	**FY21 Request**
Department of Justice	Office of Justice Programs / State and Local Law Enforcement Assistance: Victim Services Grants & Human Trafficking Task Forces	$85,000,000	$98,000,000	$96,000,000
	Office of Justice Programs / State and Local Law Enforcement Assistance: Minor Victim Services Grants		$8,000,000	$10,000,000
	Legal Activities / Civil Rights Division: Human Trafficking Prosecution Unit	$5,300,000		$8,000,000
	Federal Bureau of Investigation: Salaries and Expenses			$15,000,000
	National Institute of Justice / Prevalence Methodology & Study			$7,000,000
Department of Labor	International Labor Affairs Bureau	$86,130,000		$130,040,000
Department of Health and Human Services	Office on Trafficking in Persons (OTIP): Foreign National Victims	$19,000,000	$24,000,000	$19,000,000
	Office on Trafficking in Persons (OTIP): U.S. Citizens and Lawful Permanent Residents	$7,755,000		$19,000,000
	The National Human Trafficking Hotline	$1,750,000	$3,500,000	$3,500,000
	Runaway and Homeless Youth Act	$127,420,000	$152,420,000	$165,000,000

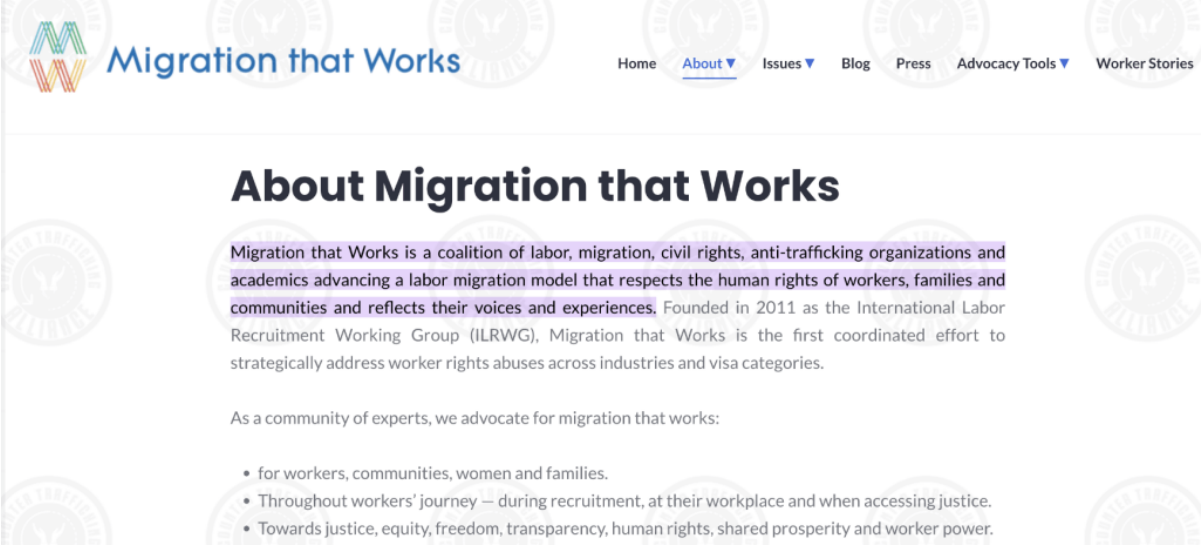
[46] https://endslaveryandtrafficking.org/wp-content/uploads/2018/10/OMBLetterFY20_ATEST_FINAL.pdf

Very recently, ATEST requested[47] an ample $1.7 BILLION to combat trafficking, and listed outer United States reasons for the request such as the "Ukraine Invasion" and "Climate Change".



[47] https://endslaveryandtrafficking.org/atest-requests-1-7-billion-in-anti-trafficking-funding-from-congress-for-fy2024/

Migration that Works claims to advocate for migrants and their aspirational work status, and equity. Much of their content surrounds different measures to enrich a migrant's journey of labor, here in the United States (For example, under their 'Issues' sections, there are several labor issues they highlight in regard to migrant work). Their 'About' section mentions collaborative efforts with 'anti-trafficking' organizations.



This prompts curiosity as we would suspect that much of this migration would stem from the very problematic and convoluted activities of our current open-borders. We would hope **this** particular coalition would **highlight the suspected perils of missing migrant children**.

Taken directly from House Oversight Committee governmental website, on April of 2023,

> *"The Subcommittee on National Security, the Border, and Foreign Affairs today held a hearing titled "Oversight of the Office of Refugee Resettlement's Unaccompanied Alien Children Program."* [48] *Subcommittee members discussed how unprecedented levels of illegal border crossings, incentivized by the Biden Administration's policies, have overwhelmed the Department of Health and Human Services' (HHS) Office of Refugee Resettlement (ORR) and endangered migrant children. Robin Dunn Marcos, Director of ORR, was unable to answer basic questions about HHS's handling of unaccompanied alien children (UAC), which has prioritized the speedy release of UAC over their safety."*

[48] https://oversight.house.gov/release/grothman-announces-hearing-to-examine-the-office-of-refugee-resettlements-unaccompanied-alien-children-program/

In this memo, it is indicated that the HHS-Office of Refugee Resettlement Director could not answer why 85,000 migrant children could not be accounted for within the last two years.

Nowhere on the Migration That Works website does it highlight any of these concerns. Migrant children, especially unaccompanied minors, are susceptible to getting taken advantage of, whether they are entered into forced labor or sexual exploitation.

An investigation by the New York Times [49]exposed that migrant children have been discovered to have been entered into the U.S. workforce, violating labor laws.

"Arriving in record numbers, they're ending up in dangerous jobs that violate child labor laws — including in factories that make products for well-known brands like Cheetos and Fruit of the Loom."

Surely Migration that Works, alongside with the Polaris Project would share and address these concerns on their platform and network of advocates?

Appended to the forced child labor are impairing concerns of children experiencing sexual abuse, while in U.S. government custody.

Table 1: Allegations of sexual abuse reported to DOJ[1], by type of incident, FY 2015

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Total
Allegations Reported to ORR*	N/A[2]	33	38	40	59	70	81	126	123	152	116	162	1000
Allegations Reported to DOJ**	10	7	17	19	17	10	26	26	27	38	30	52	279
Staff-on-Minor	3	2	3	0	0	0	5	1	3	1	2	4	24
Non-staff Adult-on-Minor	0	0	1	1	1	0	0	0	0	0	1	0	4

Table 2: Allegations of sexual abuse reported to DOJ, by type of incident, FY 2016

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Total
Allegations Reported to ORR*	124	108	90	97	75	85	81	85	120	107	120	134	1226
Allegations Reported to DOJ**	46	39	29	37	22	26	27	28	22	26	27	19	348
Unknown Perpetrator	0	0	0	0	0	1	0	0	0	2	0	0	3
UAC-on-UAC	35	32	24	28	13	20	20	27	17	21	23	16	276
Non-UAC Minor-on-UAC†	3	0	1	2	0	0	0	0	0	1	0	0	7
Allegations with an Adult Reported to DOJ	8	7	4	7	9	5	7	1	5	2	4	3	62
Staff-on-Minor	8	7	3	6	8	5	7	1	4	2	3	2	56
Non-staff Adult-on-Minor	0	0	1	1	1	0	0	0	0	0	1	1	5

HOUSE.GOV "Sexual Assaults by Date of Incident, FY2015-18," NadUAC-001213

[49] https://www.nytimes.com/2023/02/25/us/unaccompanied-migrant-child-workers-exploitation.html

At a congressional hearing in 2019, Representative Ted Deutch, D-FL, made public, data from the Department of Health and Human Services that illustrated there were a total of 4,597 sexual allegations reported to the Office of Refugee Resettlement (ORR) between the years 2015-2018. Of which 178 of these sexual assault allegations were made against shelter staff, and 1,303 were referred to the Department of Justice.

Table 2: Allegations of sexual abuse reported to DOJ, by type of incident, FY 2017

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Total
Allegations Reported to ORR*	135	140	142	172	106	76	41	36	45	49	58	69	1069
Allegations Reported to DOJ**	40	39	35	45	18	21	13	6	11	11	10	15	264
Unknown Perpetrator	0	0	0	0	0	0	0	0	0	0	0	0	0
UAC-on-UAC	32	34	33	37	13	16	5	4	7	7	7	13	208
Non-UAC Minor-on-UAC†	2	0	0	0	0	0	0	0	1	0	0	0	3
Allegations with an Adult Reported to DOJ	6	5	2	8	5	5	8	2	3	4	3	2	53
Staff-on-Minor	6	5	2	7	5	5	8	2	1	4	2	2	49
Non-staff Adult-on-Minor	0	0	0	1	0	0	0	0	2	0	1	0	4

Table 2: Allegations of sexual abuse reported to DOJ, by type of incident, FY 2018

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Total
Allegations Reported to ORR*	41	70	90	117	84	109	145	161	208	236	--	--	1261
Allegations Reported to DOJ**	7	9	11	38	25	34	65	77	86	60	--	--	412
Unknown Perpetrator	0	0	0	0	0	0	0	0	0	0	--	--	0
UAC-on-UAC	6	5	9	34	20	29	59	63	76	48	--	--	349
Non-UAC Minor-on-UAC†	0	1	0	0	2	1	2	1	1	0	--	--	8
Allegations with an Adult Reported to DOJ	1	3	2	4	3	4	4	13	9	12	--	--	55
Staff-on-Minor	1	2	2	4	2	4	4	10	8	12	--	--	49
Non-staff Adult-on-Minor	0	1	0	0	1	0	0	3	1	0	--	--	6

NadUAC-001215

Although, these statistics reach back dating from 2015-2018, it is very evident that these very serious issues still persist, if not increased, due to border policies.

UPDATE: Gov. Abbott Asks VP Harris To Shut Down Federal Facility For Migrant Children at Freeman Coliseum In San Antonio

Texas Public Radio | By Dominic Anthony Walsh, María Méndez , Bri Kirkham
Published April 9, 2021 at 12:07 PM CDT



Dominic Anthony Walsh / Texas Public Radio

Gov. Greg Abbott, center, at a press conference at Bexar County's Freeman Coliseum.

2021, In a follow up, Gov. Greg Abbott requested that a facility for migrant children be shut down due to 'abuse and neglect" accusations. Headline from Texas Public Radio[50].

[50] https://www.tpr.org/border-immigration/2021-04-08/texas-investigates-migrant-child-abuse-claims-at-freeman-coliseum-following-gov-abbotts-calls-to-shut-down-this-facility

Once again we beckon the question, would this not be a topic of concern for the advocacy of Polaris to take under?

Which brings us full circle to highlight the irony: Remember, Katherine Chon, the co-founder of Polaris, has since 2012 held a director-level position within the Health and Human Services Department within the Office on Trafficking in Persons (OTIP). Her bio on the HHS website says,

> *"As senior advisor, Katherine serves on multiple federal working groups on human trafficking, gender-based violence,* ***child exploitation****, and resilient supply chains.* ***She is the federal executive officer*** *of public-private collaborations, including the* ***National Advisory Committee on the Trafficking of Children and Youth in the U.S.*** *and the* ***Joint Forced Labor Working Group****. "*

She claims to be a champion of children who are exploited and trafficked yet, she speaks no concern for how the border crisis and ORR are creating a cesspool of child exploitation.



DHS.gov

Enters Catherine Chen, the current CEO of Polaris. Catherine was appointed by Secretary Alejandro Mayorkas to the Homeland Security Advisory Council. Quoted by DHS themselves, "She is a veteran anti-trafficking strategist who has spent two decades building innovative social justice programs and pushing for policy change to address the root causes of sex and labor trafficking."

Currently, there is no mention on the Polaris Project website addressing the unaccompanied minor's crisis. At the behest of public concern, two individuals that are associated with an HHS-funded organization have the

obligation to communicate their concern and strategy about this daunting matter.

Thus far we have demonstrated valid concerns orbiting around the practices and strategies of Polaris. There seems to exist insufficiencies within internal workplace processes, thus reflecting on the lack of immediate help victims call for when dialing the hotline, down to questionable business practices of fiscal responsibilities.

The initial objective of Polaris was to "create a strategic model for implementation that can be used worldwide." We find it imperative that as much as an organization portrays its objectives, that communication and transparency to the public is necessary, especially when tax dollars are being allocated annually to said organization.

If a simple sign in a bathroom stall sows hope to a victim only to be met at insufficiency, we ought to question what the causes and effects are.

6 Conflict of interest?

Within the financial descriptions on the Polaris Project's tax submissions, a page labeled 'Schedule O' breaks down protocols that prevent a conflict of interest within the organization. It reads, "Procedures include the duty to disclose, determine whether a conflict of interest exists, and address any real or potential conflicts. Polaris implements this practice before every significant discussion and board vote."

Pt VI, Line 12c: POLARIS HAS A DETAILED ETHICS AND CONFLICT OF INTEREST POLICY DESCRIBED IN ITS ORGANIZATIONAL POLICY MANUAL. IT WAS LAST UPDATED BY THE BOARD OF DIRECTORS IN 2009. BOARD BYLAWS WERE LAST UPDATED IN 2014. PROCEDURES INCLUDE THE DUTY TO DISCLOSE, DETERMINE WHETHER A CONFLICT OF INTEREST EXISTS, AND ADDRESSING ANY REAL OR POTENTIAL CONFLICTS. POLARIS IMPLEMENTS THIS PRACTICE BEFORE EVERY SIGNIFICANT DISCUSSION AND BOARD VOTE. AN INTERESTED PERSON IS EXPECTED TO DISCLOSE CONFLICTS IN ALL OTHER SITUATIONS. IF A CONFLICT OR PERCEIVED CONFLICT OF INTEREST OCCURS, THE INTERESTED PERSON RECUSES HIMSELF/HERSELF FROM VOTING ON THE RELATED MATTER.

Screenshot by

While it is good that Polaris has a conflict-of-interest policy while working closely with large corporations, and government entities, do they follow it? A vote on a conflict of interest is hardly a stronghold against corruption, when many of the voting members are those heads of government, and business tycoons.

6.1 Mark Lagon



For instance, Mark Lagon[51], a former Ambassador at Large to Combat Trafficking in Persons, the very office established by legislation to manage and grow anti-trafficking efforts through grants, was also the CEO of Polaris Project, from February 2009 to February 2010. This appointment came just one month after the end of his former position as, Ambassador for the Department of state. With a hefty first year salary at $134,768, and a spot at the top of the list as the "highest paid executive", who can say no? During the one year and one month tenure at Polaris Project, Lagon made a total of $187,214 in compensation.

[51] https://archive.ph/BQljB

(A) Name and Title	(B) Average hours per week	(C) Position (check all that apply)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
Katherine Chon President	36.5	X		X	X			47,500	0	0
Derek Ellerman Chairperson	16.	X		X	X			20,500	0	0
Carolyn Bartholomew Treasurer	3.	X		X				0	0	0
Sarah Devine Secretary	3.	X		X				0	0	0
Thom Lockerby Board Member	3.	X						0	0	0
Mei-Mei Ellerman Board Member	3.	X						0	0	0
Mark Lagon Executive Director	52.				X	X		134,768	0	0

2009 Tax documents

(A) Name and Title	(B) Average hours per week (describe hours for related organizations in Schedule O)	(C) Position (check all that apply)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
DEREK ELLERMAN CHAIRPERSON	15.00	X		X				0.	0.	0.
KATHERINE CHON PRESIDENT & SECRETARY	35.00	X		X				35,080.	0.	0.
THOMAS LOCKERBY TREASURER	3.00	X		X				0.	0.	0.
CAROLYN BARTHOLOMEW BOARD MEMBER	3.00	X						0.	0.	0.
MEI-MEI ELLERMAN BOARD MEMBER	3.00	X						0.	0.	0.
SARAH DEVINE (01/10 THRU 09/10) BOARD MEMBER	3.00	X						0.	0.	0.
BRADLEY MYLES (FROM 05/10) EXEC. DIR. & CEO	60.00			X				116,435.	0.	5,713.
MARK LAGON (01/10 THRU 04/10) EXEC. DIR. & CEO	51.00			X				49,926.	0.	2,520.

2010 Tax documents

Did anyone vote on this conflict of interest? On Lagon's own LinkedIn, his role as Ambassador at Large, would lead the Office to Combat Human Trafficking's "Programmatic Assistance to NGO's".

Ambassador at Large to Combat Trafficking in Persons
U.S. Department of State
May 2007 - Jan 2009 · 1 year 9 months

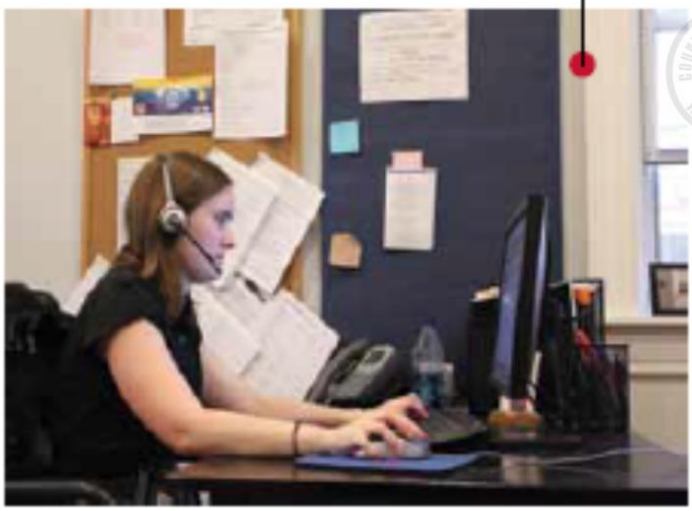
Leading State Department's office to combat human trafficking, with a global report assessing efforts of all countries, diplomatic coordination, global advocacy, and programmatic assistance to NGOs and international organizations fighting trafficking

We know for a fact Lagon and Polaris would have a close working relationship. Seeing as how Polaris Project was elected to launch the National Human Trafficking Hotline by the very department Lagon headed in 2007.

2007 Polaris Project joins as a founding member of the Alliance to End Slavery and Trafficking (ATEST) to strengthen U.S. laws and federal resources to fight trafficking.

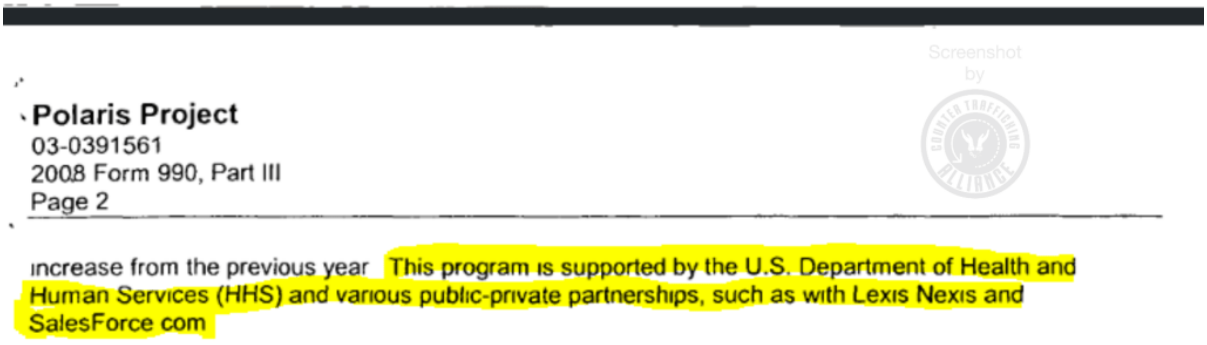
Polaris Project launches an innovative state ratings map that assesses trafficking legislation nationwide.

The U.S. Department of Health and Human Services selects Polaris Project to run the National Human Trafficking Resource Center and operate the nation's 24-hour hotline devoted solely to human trafficking.



When Polaris Project launched the resource center that would become the National Human Trafficking Hotline, they worked in tandem with Lexis Nexis and Sales Force as listed in the 2008 & 2009 return below. Lexis Nexis announced the partnership in 2009 on their website[52].

Operation of the National Human Trafficking Resource Center (NHTRC) Hotline > During the full year of 2008, Polaris Project continued our cooperative agreement with the U S Department of Health and Human Services (HHS), Anti-Trafficking in Persons Division (ATIP) to run and operate the National Human Trafficking Resource Center (NHTRC) hotline, which is the preeminent hotline on human trafficking for the United States, reached by calling 1-888-373-7888. The NHTRC works to help improve the national response to protect victims of human trafficking in the U.S by providing victims with a range of comprehensive services Available services include: crisis intervention, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved To perform these functions, the NHTRC maintains a National Contacts Database with over 3,000 entries to refer callers to as well as a library of available anti-trafficking resources and materials. The NHTRC also works in collaboration with the infrastructure of the anti-trafficking movement in the United States which includes HHS Rescue and Restore Coalitions, DOJ-funded Human Trafficking Task Forces, FBI Innocence Lost Task Forces, Federal victims' services and outreach grantees, statewide human trafficking task forces, community-based initiatives and on-going research projects. During 2008, the NHTRC hotline received and processed 5,748 calls that identified over 1,900 potential victims of human trafficking nationwide. This call volume is more than a 200%



Polaris Project
03-0391561
2008 Form 990, Part III
Page 2

increase from the previous year This program is supported by the U.S. Department of Health and Human Services (HHS) and various public-private partnerships, such as with Lexis Nexis and SalesForce com

[52] https://www.relx.com/media/press-releases/archive/27-05-2009

Operation of the National Human Trafficking Resource Center (NHTRC) Hotline > During the full year of 2009, Polaris Project continued our cooperative agreement with the U.S. Department of Health and Human Services (HHS), Anti-Trafficking in Persons Division (ATIP) to run and operate the National Human Trafficking Resource Center (NHTRC), the toll-free, national hotline on human trafficking in the United States. The NHTRC works to help improve the national response to protect victims of human trafficking in the by providing victims with a range of comprehensive services. Available services include: crisis response, urgent and non-urgent referrals, tip reporting, and comprehensive anti-trafficking resources and technical assistance for the anti-trafficking field and those who wish to get involved. The NHTRC

Screenshot by

continued to maintain the National Contacts database which was expanded and moved online, and the web-based Call Tracking Database which was revised to improve data quality and add increased reporting functionality. In May of 2009, the NHTRC launched a website (www.TraffickingResourceCenter.org) to provide increased access to training materials and NHTRC services. This program is also supported by a variety of in-kind resources and public private partnerships with Lexis Nexis and Salesforce.com. The NHTRC also continued to work in collaboration with the infrastructure of the anti-trafficking movement in the U.S. which includes HHS Rescue and Restore Coalitions, DOJ-funded Human Trafficking Task Forces, FBI Innocence Lost Task Forces, Federal victims' services and outreach grantees, statewide human trafficking task forces, community-based initiatives and on-going research projects. During 2009, the NHTRC hotline received and responded to 7,637 calls and 748 emails which referenced nearly 1,000 potential victims of human trafficking nationwide.

"Polaris Project deeply values the working partnership LexisNexis has forged with us. In advancing the Polaris-run National Human Trafficking Resource Center, through innovative analytics solutions from LexisNexis, we are together advancing the Rule of Law in the name of the most disempowered."

- Mark Lagon

One would think the CEO of Polaris would have contact and correspondence, during their employment, with Lexis Nexis while establishing the private partnership. We can only speculate the closed-door benefits and details of the partnership but, whatever they may be, Mark Lagon had to have made quite the impression since, in March of 2010, a month after his departure from Polaris Project, Lagon was hired as a Senior Advisor.

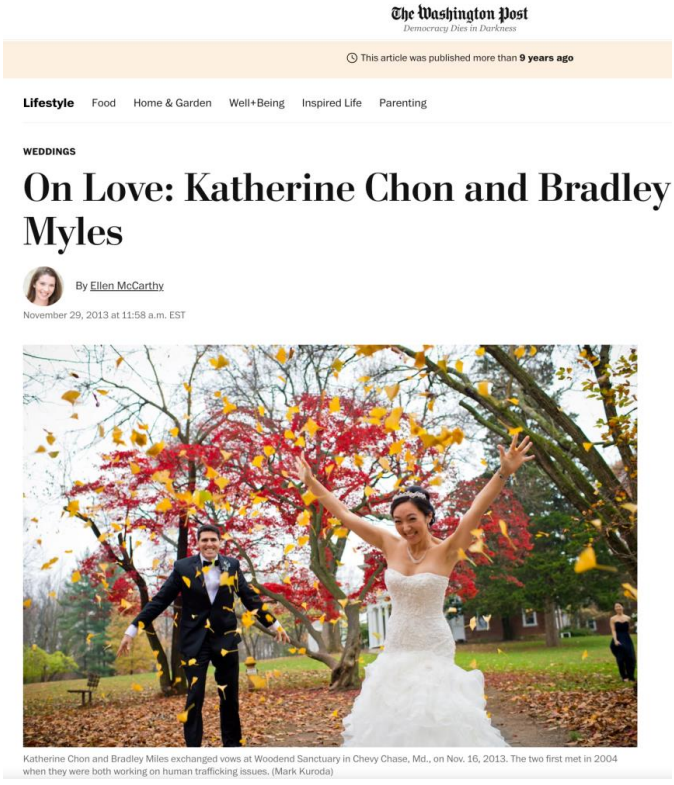


6.2 Myles and Chon romantic relations

In addition to the already concerning conflicts of interest at play, it is important to note that upon the departure of Lagon, Bradley Myles took over as CEO. Myles is the Husband of Polaris Project founder, Katherine Chon. There are obvious conflicts of interests that arise, seeing as how Katherine Chon, is and was the Director of the Office on Trafficking in Persons, while Myles was the CEO of Polaris Project. Meaning, her office was responsible for awarding the funding that would fuel the programs (and salaries) within Polaris Project. But that isn't the only concerning conflict of interest between the two. The establishment of the relationship was within the organization.



In a Washinton Post[53] article published in 2013, they were the center of a piece titled 'On Love: Katherine Chon and Bradley Myles'. In this article, the newlyweds told the story of how they met and became husband and wife. Chon details how she met Bradley at a 2004 networking dinner, and then again at an event hosted by Polaris. That year, Myles began to volunteer with Polaris Project and by April of 2005, secured his first position as National Program Coordinator. One year and seven months later, Myles is promoted to National Program Director, in October of 2006. By late 2007, according to the WP, Myles was told by his therapist that while he was "superficially friendly", he "rarely let people into his life enough to be truly open and vulnerable". When disclosing this to Chon, her response to that, as his Executive Director, was to suggest that they "spend time together".



The Washington Post
Democracy Dies in Darkness

This article was published more than **9 years ago**

Lifestyle Food Home & Garden Well+Being Inspired Life Parenting

WEDDINGS

On Love: Katherine Chon and Bradley Myles

By Ellen McCarthy

November 29, 2013 at 11:58 a.m. EST

Katherine Chon and Bradley Miles exchanged vows at Woodend Sanctuary in Chevy Chase, Md., on Nov. 16, 2013. The two first met in 2004 when they were both working on human trafficking issues. (Mark Kuroda)

[53] https://www.washingtonpost.com/lifestyle/weddings/on-love-katherine-chon-and-bradley-myles/2013/11/26/7bc83072-5656-11e3-8304-caf30787c0a9_story.html

Once or twice a week, the two made dinners together, went on long runs or watched movies. They discovered that beneath their vastly different exteriors were very similar core values.

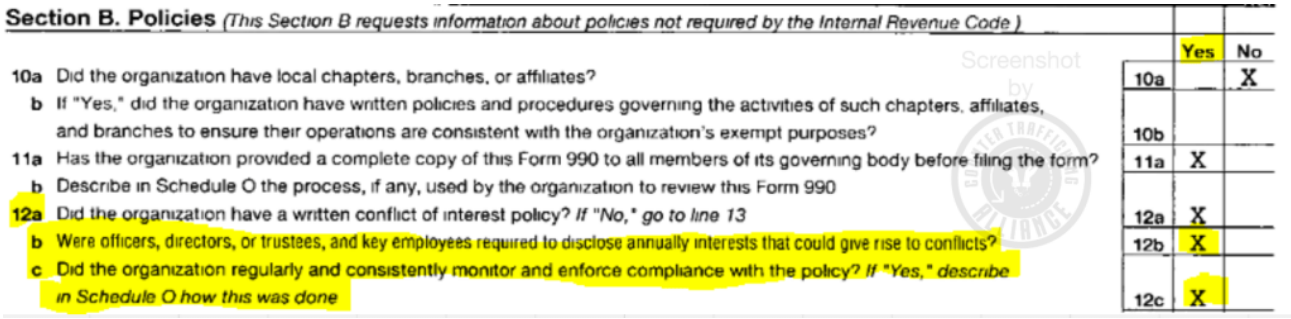
- The Washinton Post

By Spring of 2008, they went public with their affection, and in the article by WP, Chon was "worried that a romance could interfere with their professional dynamic" but continued to date Myles. That year, Myles was also promoted to Deputy Director. The article states that by August 2008, they were dating exclusively. So one would expect, when taxes are filed in 2009, the conflict of interest would be addressed.

By spring, Kat was beginning to realize her feelings for Brad ran deeper than just friendship. She worried that a romance could interfere with their professional dynamic — by then Brad was the deputy director of Polaris — and that it could be disruptive to the organization.

-The Washington Post

As required on the 'Government, Management, and Disclosure' portion of the tax form, Polaris is required to answer questions about their policies in a conflict-of-interest. Below you see an example of tax year 2011, in which Polaris answers 'yes' when asked if "officers, directors, or trustees, and key employees" were required to disclose annually, conflicts of interest. In Schedule-O of the tax forms, they expand on the potential conflict of Derek Ellerman, the Co-Founder of



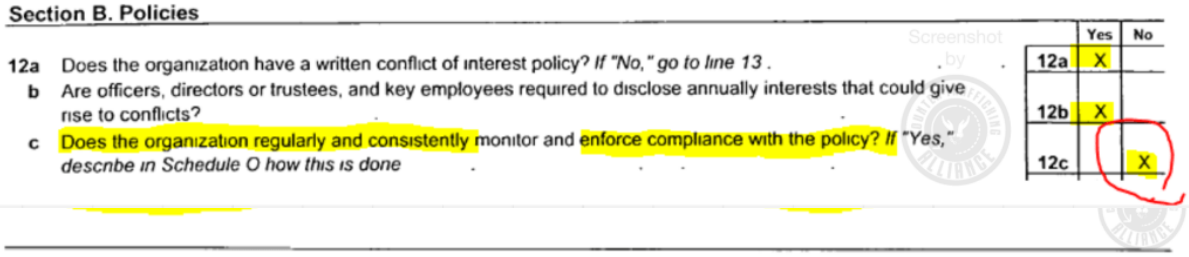
Section B. Policies *(This Section B requests information about policies not required by the Internal Revenue Code.)*

			Yes	No
10a	Did the organization have local chapters, branches, or affiliates?	10a		X
b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?	10b		
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	11a	X	
b	Describe in Schedule O the process, if any, used by the organization to review this Form 990			
12a	Did the organization have a written conflict of interest policy? *If "No," go to line 13*	12a	X	
b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	12b	X	
c	Did the organization regularly and consistently monitor and enforce compliance with the policy? *If "Yes," describe in Schedule O how this was done*	12c	X	

Polaris, and Mei-Mei Ellerman, his mother, serving together on the board.

2011 Polaris 990

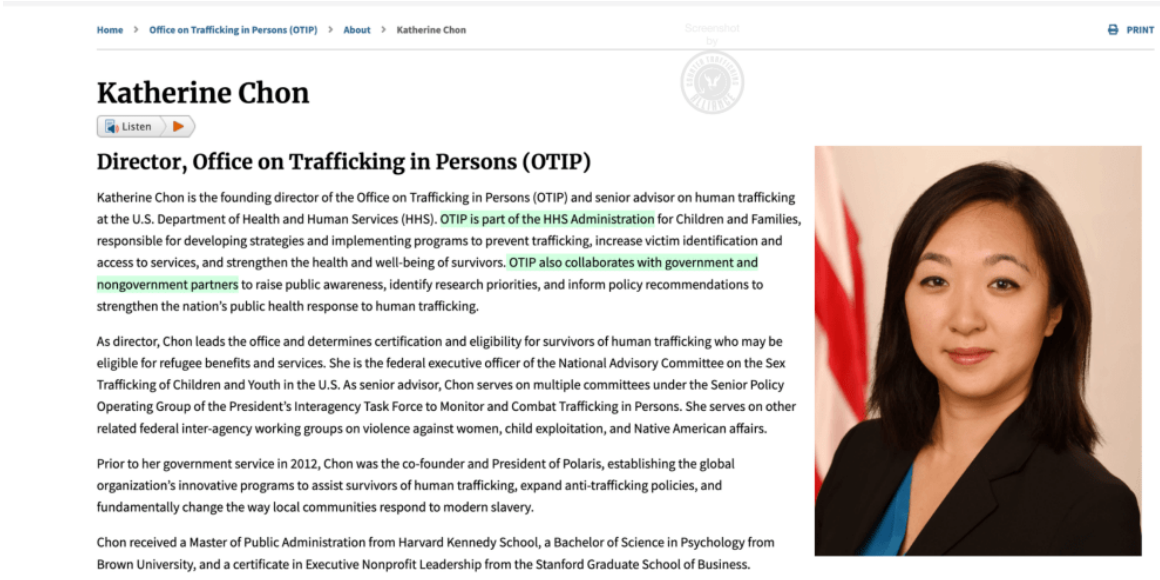
Strangely enough, in the 2008 tax year, that was prepared in 2009, the answer to the conflict-of-interest questions change.



Section B. Policies

			Yes	No
12a	Does the organization have a written conflict of interest policy? *If "No," go to line 13*	12a	X	
b	Are officers, directors or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	12b	X	
c	Does the organization regularly and consistently monitor and enforce compliance with the policy? *If "Yes," describe in Schedule O how this is done*	12c		X

Here you can see Polaris answer that they do not consistently monitor conflicts of interest, and that they do not enforce compliance. When checking to see if the budding romantic relationship was addressed in Schedule-O, similar to the way Ellerman's was, we were disappointed to find nothing about it. From the standpoint of professionalism, this relationship was ethically misguided. As an Executive title holder, Chon was in a position to pressure Myles. From a conflict-of-interest standpoint, Chon votes on promotions and salaries. Was she omitted from the vote on Myles?



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Katherine Chon

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Director, Office on Trafficking in Persons (OTIP)

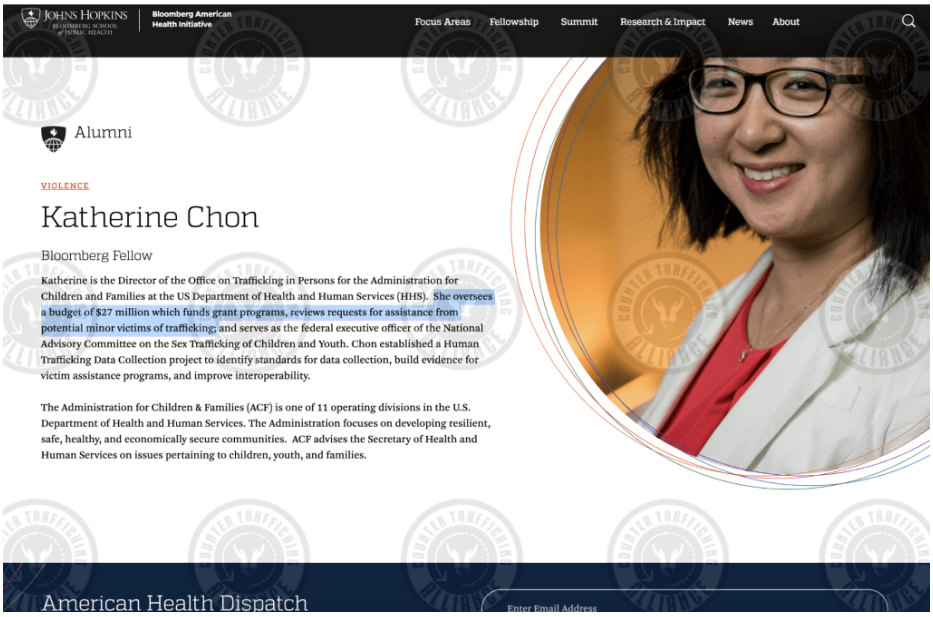
Katherine Chon is the founding director of the Office on Trafficking in Persons (OTIP) and senior advisor on human trafficking at the U.S. Department of Health and Human Services (HHS). OTIP is part of the HHS Administration for Children and Families, responsible for developing strategies and implementing programs to prevent trafficking, increase victim identification and access to services, and strengthen the health and well-being of survivors. OTIP also collaborates with government and nongovernment partners to raise public awareness, identify research priorities, and inform policy recommendations to strengthen the nation's public health response to human trafficking.

As director, Chon leads the office and determines certification and eligibility for survivors of human trafficking who may be eligible for refugee benefits and services. She is the federal executive officer of the National Advisory Committee on the Sex Trafficking of Children and Youth in the U.S. As senior advisor, Chon serves on multiple committees under the Senior Policy Operating Group of the President's Interagency Task Force to Monitor and Combat Trafficking in Persons. She serves on other related federal inter-agency working groups on violence against women, child exploitation, and Native American affairs.

Prior to her government service in 2012, Chon was the co-founder and President of Polaris, establishing the global organization's innovative programs to assist survivors of human trafficking, expand anti-trafficking policies, and fundamentally change the way local communities respond to modern slavery.

Chon received a Master of Public Administration from Harvard Kennedy School, a Bachelor of Science in Psychology from Brown University, and a certificate in Executive Nonprofit Leadership from the Stanford Graduate School of Business.

In 2009, Chon stepped away from a direct oversight role to President of Polaris, so she could focus on her schooling at Harvard Kennedy. While Mark Lagon stepped up to fill the management role, Chon was being groomed for her next position that would pose new conflicts of interest. In February 2010, Myles steps up as CEO, and Lagon leaves to Lexis Nexis. Three years later, Chon completes her Masters of Public Administration and is hired as Senior Advisor on Trafficking in persons. In 2015, Chon becomes the Founding Director of the Office on Trafficking in Persons, and Myles still hold his position as CEO.



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Katherine is the Director of the Office on Trafficking in Persons for the Administration for Children and Families at the US Department of Health and Human Services (HHS). She oversees a budget of $27 million which funds grant programs, reviews requests for assistance from potential minor victims of trafficking, and serves as the federal executive officer of the National Advisory Committee on the Sex Trafficking of Children and Youth. Chon established a Human Trafficking Data Collection project to identify standards for data collection, build evidence for victim assistance programs, and improve interoperability.

The Administration for Children & Families (ACF) is one of 11 operating divisions in the U.S. Department of Health and Human Services. The Administration focuses on developing resilient, safe, healthy, and economically secure communities. ACF advises the Secretary of Health and Human Services on issues pertaining to children, youth, and families.

American Health Dispatch

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According to John Hopkins University website, Chon's function as Director of the OTIP is to oversee the budget which "funds grant programs".

How much is the budget that Chon controls? Over the last five fiscal years listed in the table[54], Chon has managed a total of $103,775,000 in appropriated funds to the OTIP.

ACF's anti-trafficking budget levels

FISCAL YEAR	PROGRAMS FOR FOREIGN NATIONAL VICTIMS	PROGRAMS FOR DOMESTIC VICTIMS	TOTAL
2011	$9,794,000	$0.00	$9,794,000
2012	$9,775,000	$0.00	$9,775,000
2013	$9,341,000	$0.00	$9,341,000
2014	$12,000,000	$1,755,000	$13,755,000
2015	$13,000,000	$2,755,000	$15,755,000
2016	$13,000,000	$5,755,000	$18,755,000
2017	$13,000,000	$5,755,000	$18,755,000
2018	$17,000,000	$6,755,000	$23,755,000
2019	$19,000,000	$7,755, 000	$26,755,000

With these figures and details in mind, there are quite a few conflicts of interest that are seemingly ignored by Polaris Project, and the government entities that fund them.

[54] https://www.acf.hhs.gov/otip/about/budget

7 The data repository

To catch a criminal, an investigator must rely heavily on evidence, leads, and data to build a strong case leading to the perpetrator. The magnitude of the trafficking industry is unfathomable, so it is critical to conduct research on the evolving ways traffickers identify, transport, and sell victims. For Polaris, it undoubtedly relies heavily on a single channel to support essential data to supplement reports and trends made through the trafficking hotline.

It is likely that human trafficking victims will contact Polaris' hotline first and foremost over other resources and expect to receive immediate help. Although Polaris has branded itself as a beacon of hope, it fails to publicly mention that it does not report all leads to law enforcement. Surprisingly, in March 2013 Polaris "learned of 9,000 survivors of trafficking and reported 3,235 cases of human trafficking to law enforcement."[55] That means that of the 9,000 survivors, only 36% were reported to law enforcement.

What is more shocking is that a staggering number of callers who connect with a hotline agent are expected to share sensitive information in order to receive help, despite the low percentage of reports submitted to law enforcement. These callers are not informed on why this level of detail is needed, nor what happens to their data. Examples of the type of details gathered through the hotline include: first and last name, birthday, age, where the caller is located, where the caller is living, who the caller's trafficker is (if it is a direct victim), any associates, etc. But even with these details and descriptions of the crime, Polaris does not pass every incident to law enforcement. How, then, does Polaris determine when it is acceptable to pass reports to law enforcement, if the hotline was intended to be a safe haven for victims? Most importantly, what is Polaris doing with their information?

[55] https://docs.house.gov/meetings/FA/FA00/20130507/100794/HHRG-113-FA00-Wstate-MylesB-20130507.pdf

7.1 Palantir

What the public may not know is that Polaris partnered with Palantir Technologies[56] to manage its data repository. Palantir is a prominent technology firm known for its data mining and surveillance capabilities, which are frequently used in the intelligence and law enforcement communities. The whereabouts surrounding Polaris' data collection and repository are very limited. Even more startling is that Polaris chose to work with a firm that has intimate connections to the intelligence and military communities. Furthermore, Palantir has an appalling track record when handling or safeguarding data. So, what should we know about Polaris' data repository? And what was Palantir really hired to do?

A quick search on the web reveals very little about this partnership, partly due to Palantir strangely scrubbing any relations to this collaboration from its own blog. But the internet is a permanent record, and our research into the company and Polaris' partnership raises concerns over Polaris' legitimacy and its ability to fulfill its mission.

7.2 The History of Palantir Technologies

It is well known that Palantir is shrouded in secrecy. This is a company that has maintained a carefully crafted narrative while still being discrete as it continued to expand and win significantly large government contracts. Moreover, CEO Alex Karp, an unmistakable character, seemed like an odd selection to run Palantir given his lack of technological skills. But Peter Thiel, one of the co-founders of Palantir, felt passionate about Karp. Ironically, this would not be the first unusual fact about Palantir.

In 2003, Palantir was founded by Thiel, the founder of Pay Pal, alongside with Stephen Cohen, Nathan Gettings, Joe Lonsdale, and Alex Karp. It is said that after 9/11, Thiel was compelled to build a tool[57] that would aggregate all data - private details such as financial transactions, cell phone records, and travel records - to prevent terrorist attacks before they occurred. The idea gradually transformed into a data mining tool that would be targeted for use by intelligence and military agencies in the name of defense.

[56] https://www.palantir.com/
[57] https://nymag.com/intelligencer/2020/09/inside-palantir-technologies-peter-thiel-alex-karp.html

Initially, Palantir struggled to be taken seriously by the federal government while competing for the same contracts alongside established defense contractors. But one agency decided to take a chance in its idea, and it could not have been any better for Palantir: the U.S. Central Intelligence Agency (CIA). The CIA was Palantir's first client to beta test and help refine the product, thus further accelerating Palantir's capabilities and competitive edge. Though this rare opportunity was a huge accomplishment for Palantir, its biggest win was the CIA becoming the company's first investor, who invested roughly $2 million.

Palantir continued its focus on data driven solutions and decision-making software, later expanding to include AI solutions to its suite of products and services. With CIA product-approval, Palantir's clientele rapidly grew to include Homeland Security, Airbus, JP Morgan, Morgan Stanley, FBI, and many more. Palantir was soon able to win several key contracts with the federal government, solidifying its footprint in the defense space.

Outside of federal government, Palantir partnered with a handful of non-profit clients, such as Thorn[58], WeProtect Global Alliance[59], and, of course, Polaris Project. One particular client that stood out from its portfolio is the National Center for Missing Exploited Children (NCMEC). What is unique out about this connection is that the same software that is used to find missing children at NCMEC is the same software used for anti-trafficking with Polaris. Is it possible that there could be data sharing between the two organizations?

7.3 DAP Partnership

In 2017, Polaris introduced the **Data Analysis program** through a partnership with **Palantir Technologies**, a data analysis firm whose biggest clients include the **CIA**, the **U.S. military,** and **major banks like JP Morgan Chase**, to build and manage its data solution. The connection was made through Bradley Myles, the former CEO of Polaris, who met with representatives while attending a Google Ideas conference[60]. Since the data center's launch, it has cost Polaris over $800,000 a year to operate and maintain.

[58] https://www.businesswire.com/news/home/20121115005531/en/THORN-Launch-Brings-Technology-Innovation-to-the-Fight-against-Child-Sexual-Exploitation
[59] https://blog.palantir.com/palantir-joins-weprotect-global-alliance-a22641c9670d
[60] https://www.usnews.com/news/articles/2015/01/14/how-big-data-is-being-used-in-the-fight-against-human-trafficking

Ironically, Palantir Technologies' early investments were from the U.S. Central Intelligence Agency's venture capital arm In-Q-Tel. Palantir was also tied to the Cambridge Analytica-Facebook scandal. Furthermore, Palantir Technologies software includes at least 12 groups within the U.S. government. While it is a firm that claims to provide robust software on data analytics and counterintelligence, why would Polaris partner with Palantir to collect data on trafficking victims and minors?

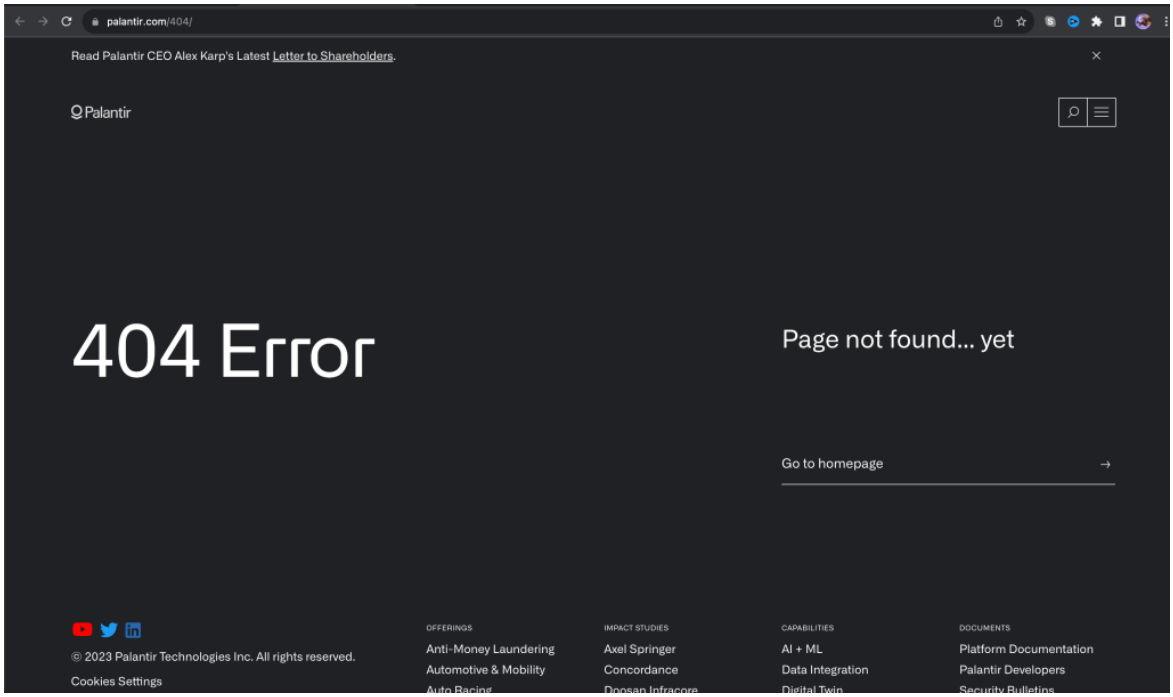


According to Palantir, NCMEC was provided a data integration[61] software that would scan through thousands of tips and reports regarding missing or exploited children, surface actionable intelligence to the NCMEC analyst, and send intel to law enforcement. Some of the tips and reports submitted would be images, and the software would use an algorithm to suggest possible patterns or links based on the data to link potential children to reports. When a "hit" (or in other words a match) was made, the analyst alerted law enforcement.

NCMEC's Vice President John Shehan stated:

> *"It used to take days to weeks when dealing with cyber tip online reports and seeing offenders arrested. Now, with Palantir alerts, we're talking hours from the time we receive the information to law enforcement making the arrest."*

Palantir's partnership with NCMEC was announced in 2010 and can still be found on its site. Shortly after NCMEC, Palantir began a partnership with Polaris, a subtle but important detail that will be discussed later in this report. Interestingly, Palantir has scrubbed any reference of Polaris' partnership from its site. Why? Such blog articles like "How Many Years a Slave" written by Palantir discussing the partnership are redirected to a 404 page[62].



[61] https://www.palantir.com/ncmec/
[62] https://www.palantir.com/2014/01/how-many-years-a-slave/

Luckily, we were able to locate the original article as shown below.



THE PALANTIR BLOG

January 24, 2014 Karin Knox

HOW MANY YEARS A SLAVE?

Each year, human traffickers reap an estimated $32 billion in profits from the enslavement of 21 million people worldwide. And yet, for most of us, modern slavery remains invisible. Its victims, many of them living in the shadows of our own communities, pass by unnoticed. Polaris Project, which has been working to end modern slavery for over a decade, recently released a report on trafficking trends in the U.S. that draws on five years of its data. The conclusion? Modern slavery is rampant in our communities.

January is National Slavery and Human Trafficking Prevention Month, and President Obama has called upon "businesses, national and community organizations, faith-based groups, families, and all Americans to recognize

This discovery appears rather unusual since Polaris appears to still be using Palantir's software. Why would Palantir erase any public connection to Polaris? And when? Given the extraordinary capabilities Palantir's products offer, it was important to examine the origins of this partnership to inform the arrangement, motive, and data solution overall.

7.4 The Genesis to the Polaris Data Analysis Program

In 2012, Bradley Myles, the former CEO of Polaris, attended a Google Ideas conference, and through mutual connections, Myles connected with Palantir representatives. It is unclear if Myles was intentionally seeking a data solution while at the conference, or if the connection and idea was spontaneous. But on May 7, 2013, Myles delivered a testimony[63] to the Committee on Foreign Affairs describing the motive to move to a more robust data solution. He stated:

> *"We learn new lessons from our work on the national hotline every day, and they enrich our initial understanding of hotlines from our earlier local hotlines work. Some of the key lessons include:*
>
> *Hotlines concretely increase victim identification rates on a national scale.*
>
> *Hotlines provide opportunities for millions more community members to participate in the anti-trafficking field because they can help with the effort to promote the hotline number, or they can be the "eyes and ears" and look out for opportunities to call.*
>
> *Hotlines cannot be run like an island. Quite the contrary, hotlines need to have a deep and wide network of referral relationships and partnerships that leverage the strengths of local actors in the field."*

He proceeded to describe the necessities of using the data collected through the hotline to detect trafficking trends and patterns:

> *"Each one of these tips contains highly relevant information about understanding the behavior of traffickers and how they exploit their victims. Hotlines therefore are in a unique position to gain strategic insights about effective interventions because hotlines often receive thousands of calls with information about where trafficking is happening and to whom. By adding in a data analysis component, hotlines can identify the newest trends and patterns and then communicate those to the most relevant actors in the field who can use this information to fight the crime."*

Myles later revealed to the committee that in order to disrupt the trafficking market, all global hotlines must share data and centralize the information in order to build a more sophisticated tool to fulfill the mission of eradicating and preventing human trafficking while protecting the innocent. This initiative was called the Global Human Trafficking Hotline Network, which

[63] https://docs.house.gov/meetings/FA/FA00/20130507/100794/HHRG-113-FA00-Wstate-MylesB-20130507.pdf

Google funded and supported. Polaris also joined forces with Palantir, who provided the software and expertise on synthesizing and analyzing data.

Data is an intricate but critical utility in the technology space. With enough metadata and user history, systems can describe user behaviors, tell stories, and even predict future actions before they occur (i.e., Artificial Intelligence). So, how does Palantir's software work with Polaris' data solution?

In the article entitled "Palantir Now Fighting Human Traffickers, Instead of the U.S. Army" written by Foreign Policy[64], Polaris uses,

> *"...Palantir's software to identify patterns in information about traffickers and victims that are gathered by anti-trafficking hotlines around the globe. Basically, Palantir lets Polaris take information other anti-trafficking groups receive and put it into one large database — making it easier to connect cases of trafficking, map trends, and create plans to combat trafficking operations in a specific area. All of this gives non-technical people a 'view of the world as discrete objects, relationships and their describing data…"*

Upon Polaris announcing its collaboration, Palantir shared its involvement in the partnership on its since-deleted blog post. On April 3, 2013, Palantir wrote:

> *"Polaris Project, Liberty Asia[65], and La Strada International[66] are recipients of a $3 million-dollar Global Impact Award[67] given by Google to support nonprofit organizations that use technology to initiate disruptive solutions in their sector.*
>
> *Together, these organizations are launching the Global Human Trafficking Hotline Network, an initiative seeded by Google Ideas to share data and improve coordination between local hotline efforts. Palantir is please to announce our collaboration with Polaris Project, improving the network's ability to manage and analyze the large amounts of disparate data culled from its human trafficking hotline.*
>
> *...The donation of our analytical software platform—with built-in privacy and civil liberties safeguards—as well as our ongoing training and support augments Polaris' existing efforts to disrupt illicit trafficking networks and provide much-needed assistance to victims."*

[64] https://foreignpolicy.com/2013/06/19/palantir-now-fighting-human-traffickers-instead-of-the-u-s-army/
[65] https://archive.is/o/yseVw/www.facebook.com/libertyasiahk
[66] https://archive.is/o/yseVw/lastradainternational.org/
[67] https://archive.is/o/yseVw/www.google.com/giving/impact-awards.html

Furthermore, Palantir described[68] how the product would optimize operations:

> *"Polaris Project uses Palantir Gotham[69] to leverage the data from nearly 100,000 calls. NHTRC may collect up to 170 different quantitative and qualitative variables per case record. These data originate from disparate sources—calls, emails, SMS, online tip reports, and publicly available information about trafficking. By integrating this data into a single platform, along with their national referral database of 3000 contacts that includes anti-trafficking organizations, legal service providers, shelters, coalitions, task forces, law enforcement, and social service agencies, Polaris can locate emergency response resources and identify critical services for victims of trafficking in a matter of seconds."*

In March 2013, Polaris went live[70] with the initiative. In the non-profit world, it is inconceivable to gain significant support and funding from a large tech giant like Google and acquire an innovative software from an emerging tech startup like Palantir to aid in fulfilling a unified goal. This story would seem like a fairytale for any struggling non-profit organization desperately trying to access technologies and funds with the hopes of further accomplishing its mission. But even some fairytales cannot be believed.

[68] https://archive.is/meGjH
[69] https://www.palantir.com/platforms/gotham/
[70] https://polarisproject.org/press-releases/polaris-project-launches-global-human-trafficking-hotline-network/

7.5 The Initiatives, Associations, and Scandals Involving Palantir

Despite its advancements in the technology, nonprofit, and government sectors, Palantir's track record has been littered with scandals involving privacy breaches, mass surveillance, and political meddling. And yet, Palantir always seems to walk away unscathed. Here are a few examples:

Central Intelligence Agency (CIA)

It's one thing to perform contractual work with the CIA. It's another when the contractor is heavily invested by its client. We would be remised to say that it is not suspicious that Palantir's origins has ties to the CIA. In-Q-Tel[71], a venture capitalist firm, is essentially a business extension[72] of the CIA. Not only does In-Q-Tel invest in small startups, it controls many of the investment decisions for these startups.

In-Q-Tel can receive funds from other agencies, such as the National Security Agency (NSA), Federal Bureau of Investigation (FBI), and the Defense Department, to invest in innovative technologies useful for national security. But the CIA remains as In-Q-Tel's main source. Though In-Q-Tel does not disclose successful investments, through its support Palantir was able to build a company with a market capitalization[73] at $32 billion (as of June 2023).

Department of Homeland Security (DHS)

Probably its most controversial work to-date, Palantir helped[74] DHS on numerous projects, including: FALCON, a proprietary version made to replicate Palantir's Gotham software product; and Investigative Case Management (ICM) System, a modernized version of ICE's legacy system TECS that was designed to interface with other systems within and between departments.

[71] https://www.iqt.org/
[72] https://www.wsj.com/articles/the-cias-venture-capital-firm-like-its-sponsor-operates-in-the-shadows-1472587352
[73] https://finance.yahoo.com/quote/PLTR/key-statistics/
[74] https://epic.org/documents/epic-v-ice-palantir-databases/

Palantir's partnership with DHS' Homeland Security Investigations (HSI) division began in 2011. HSI's core mission[75] includes a variety of transnational crimes, one of which is to combat human trafficking and child exploitation. In recent years, Palantir came under fire as reports[76] emerged that ICM and FALCON were interfacing with other agency databases and exchanging sensitive information, some of which have led to national coverage involving deportations. Despite these revelations, Palantir and DHS continued to do business.

In 2022, DHS renewed its contract with Palantir, awarding the company $95.5 million over a five-year period.

JP Morgan Chase

In 2009, JP Morgan Chase partnered[77] with Palantir to leverage its software to institute stringent measures that would servile potentially dishonest traders. The former security chief, Peter Cavicchia III, quietly worked with a number of Palantir engineers to have his security team collect various records on the bank's top executives. These records included emails, browser history, transcripts of phone conversations, and GPS locations. Cavicchia was later caught, prompting an internal investigation, and forcing his resignation in 2013. This incident, however, did not affect Palantir's relationship with the global bank. As of March 31, 2023, JP Morgan Chase invested in Palantir by purchasing roughly 536,00 shares[78] of Palantir stock, also with the intention to leverage AI in banking.

[75] https://www.ice.gov/about-ice/homeland-security-investigations
[76] https://theintercept.com/2017/03/17/palantir-enables-immigration-agents-to-access-information-from-the-cia/
[77] https://www.cnbc.com/2018/04/19/jp-morgan-reportedly-had-to-oust-a-security-chief-backed-by-palantir.html
[78] https://fintel.io/so/us/pltr/jpmorgan-chase-

Cambridge Analytica and Facebook



In 2018, allegations emerged stating Cambridge Analytica accessed and improperly handled over 50 million Facebook users without users' consent. While the media coverage focused on Cambridge Analytica and its influence in the 2016 U.S. Presidential election, it was alleged that Palantir was working with Cambridge Analytica and harvesting Facebook user data. There was no binding contract[79] between Palantir and Facebook.

Center for Disease Control and Prevention (CDC)

At the height of the pandemic, Palantir worked with CDC[80] "to model the potential spread of the virus." CDC staffers were regular users of Palantir's web app, which visualized "the spread of the virus" and anticipated hospital needs. Palantir also worked with the U.K. government on a similar data analysis. In December 2022, Palantir was awarded a five year $443 million[81] contract to streamline other programs involving Palantir -- Health and Human Services (HHS) Protect, Administration for Strategic Preparedness and Response (ASPR) Engage, Tiberius, and DCIPHER.

[79] https://www.cnbc.com/2018/03/27/palantir-worked-with-cambridge-analytica-on-the-facebook-data-whistleblower.html
[80] https://www.prnewswire.com/news-releases/cdc-and-palantir-partner-to-deliver-common-operating-picture-to-advance-public-health-preparedness-301696566.html
[81] https://www.prnewswire.com/news-releases/cdc-and-palantir-partner-to-deliver-common-operating-picture-to-advance-public-health-preparedness-301696566.html

Los Angeles Police Department (LAPD)

In 2020, reports[82] revealed Palantir's partnership with LAPD and how it created one of the most controversial databases, which was none other than a massive police surveillance system containing details from the DMV, license plate information, addresses, names, associates, etc. The report also revealed that similar data-sharing agreements[83] were made between LAPD and other institutions and departments, such as California police departments, universities, school districts and airport police, which transferred data into the Palantir's software.

Ukrainian Government

Shortly after the war in Ukraine began in 2022, Palantir established operations[84] to help the Ukrainian government make real-time battlefield decisions using artificial intelligence. The use of Palantir's software was initially intended to "help resettle Ukrainian refugees to the UK, Lithuania and Poland." The scope expanded to then include military operations as the war continued. Similar operations using Palantir's software were used in Afghanistan "to make decisions and more effectively target and kill enemy combatants." Ukraine is not being charged for use of Palantir's services.



[82] https://www.buzzfeednews.com/article/carolinehaskins1/training-documents-palantir-lapd
[83] https://s3.documentcloud.org/documents/7219695/Request-18-1696-COMBINED-FILES.pdf
[84] https://www.bloomberg.com/news/articles/2023-05-25/palantir-signs-on-for-reconstruction-work-in-war-torn-ukraine#xj4y7vzkg

The Clinton Foundation

Palantir worked with the Clinton's[85] on the Clinton Global Initiative (CGI) on disaster relief and portfolio trends. The supposed connection was initiated[86] by Haim Saban, a media mogul, who emailed John Podesta, who at the time was Hillary Clinton's campaign chief. According to email records, Palantir CEO Karp did not work with any political campaigns with the exception of one he was interested in: Hillary Clinton.

Why are these details essential? Because what appears to be isolated events may actually be a trend going unnoticed. Although this list of initiatives, associations, or scandals surrounding Palantir is not comprehensive, it is an alarming track record nonetheless, and it does not seem that Polaris and Palantir's collaboration was by coincidence. What exactly was Bradley Myles, and other Polaris executives, trying to achieve by using such a controversial tool? Disparate systems interfacing with each other to collect more data can be an added benefit for organizations looking to obtain more holistic data visualizations and patterns. But if the safety of the victims and callers are a concern, why aren't callers informed about how their personal information is handled and how it is used? Additionally, who has access to it?

7.6 Dissecting the Polaris Reports

Each year, Polaris is revered as the organization with the leading statistical data in human trafficking. We are told to believe that Polaris, being the single source of truth, would help eradicate trafficking by detecting trends and sharing these analyses with other organizations, law enforcement, and stakeholders so that respective parties can respond adequately.

But there are several issues with Polaris' data set, and we certainly are not the first ones to question the validity of it. The most notable article to single out anti-trafficking organizations and the statistics they share was the 2015 article "Special Report: Money and Lies in Anti-Human Trafficking NGOs"[87] by Anne Elizabeth Moore. Moore investigated roughly 50 prominent organizations who aligned their missions or goals of either eradicating or

[85] https://stories.clintonfoundation.org/analyzing-and-learning-from-the-cgi-commitment-portfolio-24ba982ceeb1
[86] https://gizmodo.com/did-hillary-clintons-campaign-work-with-peter-thiels-pa-1788557665
[87] https://truthout.org/articles/special-report-money-and-lies-in-anti-human-trafficking-ngos/

bringing awareness to human trafficking and found that many did not fulfill their mission, including Polaris. Moore stated:

> *"With names reliant on metaphors of recovery, light and sanctuary, anti-trafficking groups project an image of transparency. Yet these groups have shown a remarkable lack of fiscal accountability and organizational consistency, often even eschewing an open acknowledgement of board members, professional affiliates and funding relationships."*

> *"...One organization addressed below, the Polaris Project, would seem to justify the narrow focus on the sex trade, claiming to have received calls to the hotline of their National Human Trafficking Resource Center[88] reporting 2,740 cases of sex trafficking in 2013, compared to 634 reporting labor trafficking. Yet since Polaris and many other organizations are heavily invested in 'raising awareness' of the potential for human trafficking in what may well be benign or legal situations, there's no telling how accurate their findings are."*

Moore then questions the dubious data collected by these organizations. She found it difficult to pinpoint exactly how these numbers were derived and how accurate they were:

> *"Numbers throughout the murky world of human trafficking are notoriously hard to verify. How many traffickers? Uncountable! How many victims? So many! How old are they? Too young! How much money changes hands? Zillions upon gajillions of dollars, daily! 'Scarily lucrative,' Time declared it in a May 2014 headline. Sound unbelievable? It is, and aid groups will claim it's because the unvarnished truth of human slavery is incomprehensible to most living Americans today."*

> *"...The DC-based Polaris Project, with a $7.3 million budget, is slightly more careful to word unverified statements, but rarely offers any corroboration. 'In street-based sex trafficking, victims are often expected to earn a nightly quota,'* one reads[89]*, 'ranging from $500 to $1,000 or more, which is confiscated by the pimp. Women in brothels disguised as massage businesses typically live on-site where they are coerced into providing commercial sex to 6 to 10 men a day, 7 days a week.' The uses of 'often' and 'typical' are cues that the numbers are shady, but the only resource cited on the page*

[88] https://www.traffickingresourcecenter.org/states
[89] https://www.polarisproject.org/human-trafficking/sex-trafficking-in-the-us

is Polaris' own National Human Trafficking Resource Center, which makes no claims regarding sex work earnings or numbers of clients. The 'nightly quota' may have come from The Urban Institute*, which notes that 18 percent of the pimps they spoke to in major US cities set quotas between $400 and $1,000 per night. But most of the pimps they spoke to didn't set quotas and sex workers often distinguish certain pimps from traffickers in the first place*."

Moore expressed deep concerns surrounding the legitimacy of these organizations and whether they were serving the very people who needed help the most. Ultimately, she presented enough evidence to suggest that the amount of money these anti-trafficking organizations rake in does not translate to the documented figures allocated towards services or support for trafficking victims:

"Of the 50 anti-trafficking organizations examined, a total of 19 disclosed recent annual budgets of $1 million or more, most in 2012 or 2013. (Only the Association for the Recovery of Children's financial data is from earlier – 2007 – and was extremely difficult to track down.) Many organizations pulled in more; in fact, the total combined earnings from those 19 organizations were more than $677.5 million. The remaining organizations that made financial data available, combined, took in more than $8 million. Presuming that each of the nine organizations that make no financial disclosures earn less than $50,000 per year – say, $40,000 (and only two disclosing organizations made under this amount, so this seems low but plausible) – we can add another $360,000 to this total. (This number is certainly an underestimate, as many of the non-reporting organizations have more than one employee, so likely pull in more than $50,000 per year; surely, the three public-private partnerships have larger annual budgets.) This suggests the approximate annual income of $686 million split among the 50 groups. It may not seem like much, for 50 organizations spread across a giant country, working on what may be one of the most pressing human rights issues of our day. Yet $686 million breaks down to about $13.7 million per group, per year – money most organizations of any size would be thrilled to get their hands on. And this amount doesn't include federal funds spent to fight human trafficking, rumored to be between $1.2 and $1.5 billion per year."

"...Given the $686 million anti-trafficking budget shared by 50 of the most prominent organizations (which doesn't count federal costs), this breaks down to an average budget of $343,000 per case – certainly enough to secure each victim a safe place to live for at least a year. Yet a 2013 report found only 682 beds available, nationwide, to victims of trafficking, with another 354 more planned for 2014."

Now, let's examine some of Polaris' available reports. Remember, the source that drives the data is the hotline, and yet testimonies from both internal staff and callers suggest the hotline is chronically inefficient and understaffed. Callers have also noted long wait times (2+ hour waits) to speak with an advocate; some callers never connect with an advocate and simply give up. This strongly suggests that the volume of data collected, or even the sample size, is significantly smaller (and possibly manipulated) if the number of unsuccessful attempts is higher than the number of successful connections. According to Polaris, only calls successfully connected are counted towards their metrics.

One statement that immediately stood out in Polaris' 2020 report[90] is a disclaimer describing the data and the hotline. The report states:

"This data should not be mistaken for the prevalence of human trafficking in North America over a given year. The data only reflects contacts with the Trafficking Hotline, which Polaris operates in cooperative agreement with the U.S. Department of Health and Human Services. The Trafficking Hotline exists first and foremost to serve victims and survivors of sex and labor trafficking. Information is gathered only to the extent that it is necessary to provide that service. Because each situation is unique, so to are the questions answered and answers recorded. It is impossible to know how many other situations of trafficking or exploitation are occurring that are never reported, nor does that Trafficking Hotline know the outcome of these situations or if they ultimately meet the legal definition of trafficking."

Similar language was used in their 2019 report.

(For the purpose of this investigation, our analysis below only included the 2019 report.)

[90] https://polarisproject.org/wp-content/uploads/2022/01/Human-Trafficking-Trends-in-2020-by-Polaris.pdf

The 2019 data represented in the report is documented for one full calendar year. Polaris noted that in 2019, **22,326** victims and survivors were identified. At an initial glance, this appears like a reasonably large number, but after further comparing this data set to other national hotlines, the differences are shocking.



Figure 1: Polaris Project Data Report Year 2019

In *Figure 1, the first page of the 2019 Data Report* above, the *"Contact from Victims and Survivors Themselves*" bar graph shows rapid increases in the number of contacts from victims and survivors. What is unclear is if there are repeat contacts? If so, is this documented in Polaris' system? What measures does Polaris take if these victims/survivors are repeat contacts? How does Polaris track calls that don't go through?

Next, the colorful chevron graph at the bottom of Figure 1, illustrates the total number of situations of human trafficking identified.



Figure 2: Polaris Project Data Report Year 2019

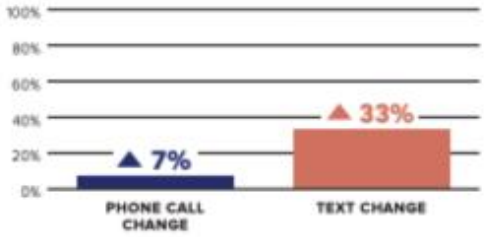
On the second page (*Figure 2. Second Page of the 2019 Data Report)*, Polaris noted receiving over 48,000 contacts. Polaris discreetly uses the term “contacts” but does not indicate these as “calls”.

Finally, a skilled data analyst will also notice that Polaris call metrics have been obscured behind percentages instead of displaying actual numbers. Percentages can be useful at times to show dramatic changes, but they can also be deceitful to embellish the truth to avoid telling the real story. The accurate way to view statistical data is to view the whole numbers in conjunction with percentages.

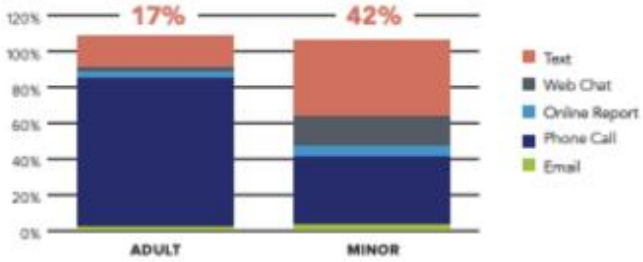
For instance, if only 2 calls made to the hotline were successful out of a total of 3 calls in one day, the success rate for calls connected would be 66.6%. Now, let’s take a larger data set. Let’s say a call center received 1,000 calls in a single day and 656 of those calls were successfully connected. The percentage then would be 65.6%. The percentages from both of the examples are identical, but the actual numbers provided the additional context needed to know the real story and volume.

The Growing Importance of Texting for Help – Cont'd

Also worth noting:
In 2019, the number of identified trafficking situations that originated from text grew by 33% from the previous year (compared to 7% growth in identified trafficking situations originating from calls).



Minor survivors of trafficking utilize text more than adults.
In 2019, 42% of minor victims and survivors of trafficking contacted the hotline via text compared to 17% of adult victims and survivors.



Totals in the table can add up to more than 100% because individuals can use multiple forms of communication with the Trafficking Hotline.

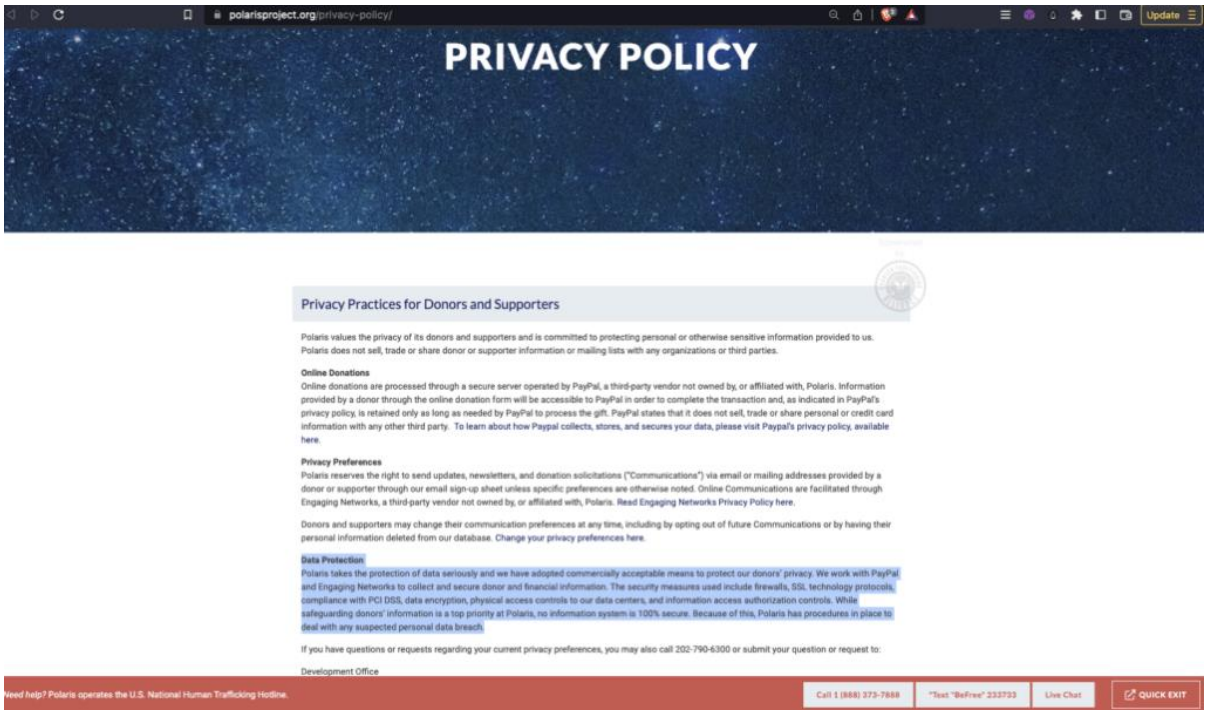
Carolina* called the U.S. National Human Trafficking Hotline to report a scheme where a licensed contractor was using a network to recruit children in Central America and bring them to the United States to work. The children were supposed to be able to send money home to their families but most were not actually being paid, despite working very long hours. On the weekends, the minors were forced to do domestic work in the trafficker's home. Carolina was concerned about the children being physically abused as well. She wanted to report, but she was concerned about her own safety and asked to remain anonymous. The Trafficking Hotline was able to report the tip to local contacts who worked with the appropriate child welfare agency to investigate the situation.

**Carolina's name has been changed and details removed in order to protect her identity.*

Figure 3: Polaris Project Data Report Year 2019

7.7 Polaris Privacy Policy

We'd like to also bring attention to a very short and vague privacy policy, concerning data protection with a focal point to donors. For the interest of victims calling into the hotline, it would be ideal to know how exactly their personal details are processed and stored.



7.8 Comparisons

Let’s take a look at another hotline that is more transparent – the National Domestic Hotline. This hotline has the exact conditions as the trafficking hotline, including:

- A 24 hour national hotline.
- A population requiring immediate needs.

The similarities, however, stop there. Here are the differences between the two.

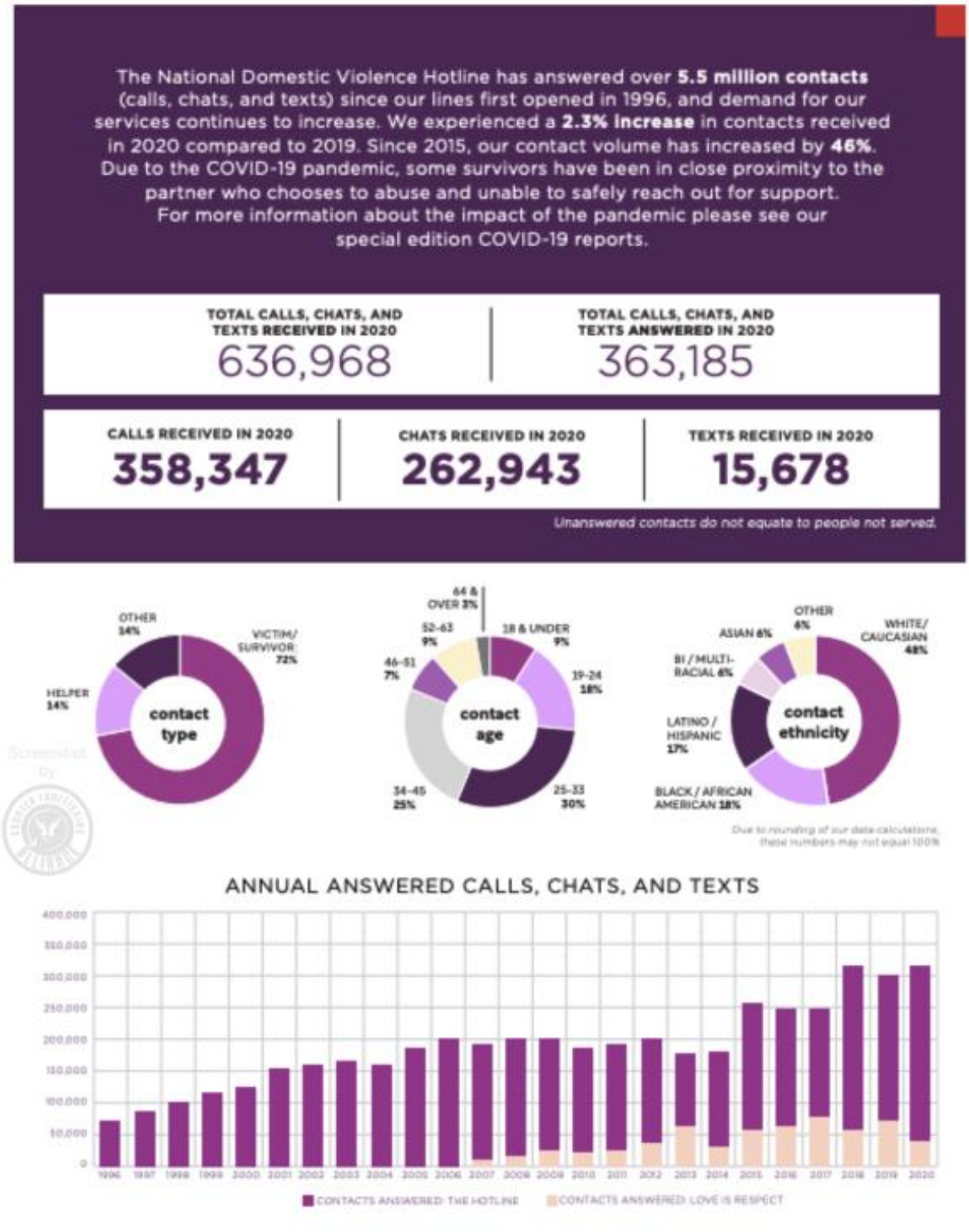


Figure 4: Second page of the National Domestic Violence Hotline 2020 Impact Report[91]

[91] https://www.thehotline.org/wp-content/uploads/media/2021/06/Hotline-EOY-Impact-Report-2020_FINAL.pdf

On the first page (*Figure 4. First page of the National Domestic Hotline*), the National Domestic Hotline report explicitly defines a “contact”. It also notes how many contacts were received based on the contact method. Finally, it explicitly shows how many calls/chats/texts were received and how many were answered. Out of the total received in 2020, the hotline was able to answer 57% of those contacts.

Moreover, it is clear to the reader how the hotline is performing year-over-year and within a given year. These are the types of basic questions that should be answered and not solely concealed behind percentages.

Finally, the National Domestic Violence report is able to distinguish who is calling the hotline, the age, additional demographic details, and other pertinent details to help dissect and understand trends in abuse and the various types. These details are invaluable to consumers of this report because there are clear patterns noted through the calls, prompting clear, actionable decisions.

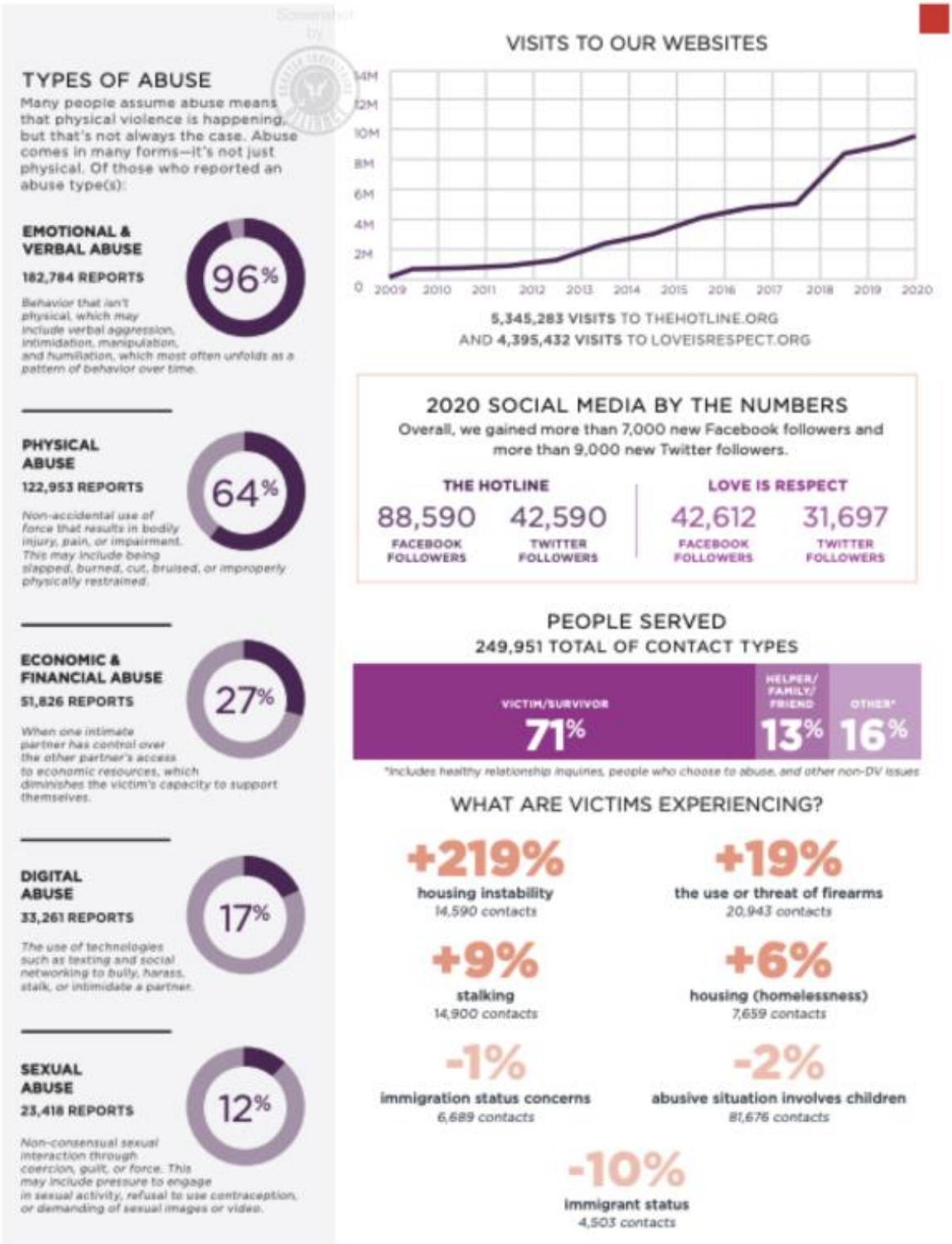


Figure 5: Second page of the National Domestic Violence Hotline

It is shocking, to say the least, that a large organization such as Polaris who runs the national hotline and oversees the global hotline can receive substantial amounts of donations and funding, collaborate closely with technology leaders in the industry, establish a sophisticated data repository costing on average over $800,000 a year and still fail to produce action-driven outcomes towards its mission of anti-trafficking.

What Polaris leadership (knowingly) fails to understand is that this data would help law enforcement expedite cases, link possible victims to a trafficker or multiple traffickers and take rings down, if that is in fact what Polaris wants. This data would offer smaller, non-profit organizations fighting the same goals the ability to refine their strategies, services, and support for local victims based on noticeable trends. This data, if it was fully disclosed, would bring awareness to the public so that it would promote more activism towards anti-trafficking and ensure the safety of all victims, especially children. But Polaris continues to seemingly starve stakeholders and recipients with weak statistics and little perceivable action.

So, if the depth of the data is limited to a select few, then who? Who is accessing the data? What are these actors trying to monitor? Are data sets being manipulated to conceal something more nefarious? Is Polaris interfacing with other systems outside of its ecosystem that the public isn't aware of? Or rather, is Polaris acting as a front to something else?

The ones who are hurt the most by this are the trafficking victims. They are already in a vulnerable state where survival is paramount. Calling a hotline should not have to be a stressful experience, and it certainly should not be a data collection tool with the intention of surveilling or conducting other backdoor motives. The victims have every right to know how their data is collected and used, otherwise Polaris has failed in providing the one thing every victims seek to regain: **Trust**.