

**Written Testimony of Megan Lundstrom**

**Chief Executive Officer, Polaris**

**Before the United States House Committee on Homeland Security Task Force Hearing on  
“A Scourge Against Humanity: Addressing Human Trafficking at Mass Gatherings.”**

**December 17, 2025**

Dear Chairman McCaul, Ranking Member Poe, and Members of the Committee – thank you for the opportunity to testify today. My name is Megan Lundstrom, and I serve as the Chief Executive Officer of Polaris, a national nonprofit dedicated to ending sex and labor trafficking and supporting victims and survivors on their journeys toward freedom. My work, and the testimony I present today, reflect the intersection of lived experience, data, and systems-level reform.

**I. Introduction**

As the United States prepares to host major global events, including the FIFA World Cup, the Olympics, and America 250, it is critical that Congress approaches human trafficking prevention with precision. Large events do not *create* trafficking, but they do amplify existing vulnerabilities, concentrate demand, and stress systems that traffickers already exploit the weaknesses of.

Historically, conversations around human trafficking at major events have focused almost exclusively on sex trafficking.<sup>1</sup> That narrow lens misses a substantial and predictable risk: labor trafficking, particularly in temporary, outsourced, and subcontracted work that supports these events. A comprehensive approach that addresses both labor and sex trafficking protects

---

<sup>1</sup> Gilmer, D. (2025). Trafficking and Large-Scale Events. *Routledge Handbook of Sport Security*, 166.

families, strengthens prosecutions, and ensures federal resources achieve their intended impact on this crime.<sup>2</sup>

## **II. Labor Trafficking at Major Events: A Persistent and Underexamined Harm**

Labor trafficking remains the most under-identified and under-enforced form of human trafficking in the United States, including in the context of major events.<sup>3</sup> The International Labor Organization estimates that there are 24.9 million people globally experiencing forced labor, and that there are five victims of labor trafficking for every 1 victim of sex trafficking.<sup>4</sup> Large-scale events require a rapid and temporary expansion of the workforce in industries that are consistently identified through enforcement actions and research as higher risk for labor trafficking, including venue construction and teardown; hospitality, food service and concessions; janitorial, sanitation and waste services; groundskeeping, landscaping, and security; and transportation and logistics. These positions are frequently filled through multiple layers of subcontractors, labor brokers, and staffing agencies—arrangements that obscure lines of responsibility and enforcement and create conditions in which coercion, wage theft, document confiscation, debt bondage, and threats of retaliation can occur in environments where oversight is fragmented or unclear.

Labor trafficking is a crime of exploitation and fraud.<sup>5</sup> Traffickers deliberately target workers with limited job mobility because it allows them to operate with low risk and high profits. The Department of Homeland Security plays a critical role in disrupting these schemes

---

<sup>2</sup> Alliance to End Slavery & Trafficking. “Presidential Priorities for Ending Forced Labor, Human Trafficking and Modern Slavery, 2025-2029.”

<https://endslaveryandtrafficking.org/wp-content/uploads/2024/11/2025-29-Anti-trafficking-Transition-Recommendations-to-Trump-Administration-FINAL.pdf>

<sup>3</sup> Polaris. “Recognizing Labor Trafficking.” December 16, 2025. <https://polarisproject.org/labor-trafficking/>

<sup>4</sup> International Labor Office. “Global Estimates of Modern Slavery: Forced Labour and Forced Marriage.” 2017.

[https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms\\_575479.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf)

<sup>5</sup> Polaris. “Recognizing Labor Trafficking.” December 16, 2025. <https://polarisproject.org/labor-trafficking/>

by ensuring that enforcement efforts identify and pursue traffickers who abuse labor systems, commit fraud, and profit from coercion. When labor trafficking indicators are recognized and acted upon during enforcement activities, DHS strengthens worker protections, restores the integrity of labor markets, and ensures that bad actors - rather than exploited workers - are held accountable.

### **III. What the Data From Past Major Events Shows**

Despite well-documented risks, there is currently no comprehensive national dataset tracking labor trafficking indicators tied to major events. This absence of data does not reflect the absence of harm - it reflects a missed opportunity. Large-scale events bring together regulated industries, complex contracting chains, and temporary workforces, creating a rare window to gather actionable intelligence, identify patterns of exploitation, and strengthen prevention strategies. The progress made in understanding sex trafficking around major events provides a strong foundation; those same analytical, interagency, and survivor-informed approaches can and should be extended to labor trafficking as the next frontier of event-related trafficking prevention.

The data from past major events make clear that this is not uncharted territory. Extensive documentation from Super Bowl host cities demonstrates both what works and what does not. Multi-year case studies from the 2015 and 2016 Super Bowls show that proactive, interagency, and multidisciplinary planning is most effective when it begins early, centers survivor input, and coordinates law enforcement with service providers and community organizations.<sup>6</sup> These approaches were associated with reduced crime

---

<sup>6</sup> Shared Hope International. "Promising Practices in Combating Juvenile Sex Trafficking Surrounding Large Events and Beyond." 2016. [https://sharedhope.org/wp-content/uploads/2016/08/SIH\\_Case\\_Study\\_-\\_Super\\_Bowl\\_Outcome.pdf](https://sharedhope.org/wp-content/uploads/2016/08/SIH_Case_Study_-_Super_Bowl_Outcome.pdf)

displacement, improved victim identification, and increased access to non-punitive services.

At the same time, my 2019 analysis of Super Bowl LIII in Atlanta highlights a critical caution: *increased police activity results in more arrests, but not necessarily improved identification of trafficking or accountability for traffickers.*<sup>7</sup> In Atlanta, adult women were arrested even when clear indicators of victimization were present; survivors were charged alongside their traffickers; and enforcement actions disproportionately focused on individuals selling sex, while buyers and traffickers - all of them males - were far less likely to face serious or lasting consequences. Public narratives in the media framed these outcomes as “rescues,” yet the data reflected continued criminalization of victims.

This distinction is essential. Arrest numbers alone are not a proxy for success, and absent survivor-centered, trauma-informed safeguards, expanded enforcement risks replicating these harms at a much larger scale during events such as the upcoming World Cup.

#### **IV. Accountability, Not Criminalization**

An effective anti-trafficking strategy at major events must be grounded in a clear principle: non-punishment.<sup>8</sup> Traffickers should be held accountable, and individuals experiencing exploitation should not be criminalized.<sup>9</sup> This requires avoiding default arrest-based responses toward individuals in commercial sex and workers in industries where labor trafficking indicators are present; embedding victim advocates directly into

---

<sup>7</sup> Megan Lundstrom. “An Analysis of the 2019 Super Bowl.” February, 2019.

<sup>8</sup> US Department of State. “2025 Trafficking in Persons Report.”

<https://www.state.gov/reports/2025-trafficking-in-persons-report/>

<sup>9</sup> Human Rights Watch. “US: ICE Arrest at FIFA Event Spotlights Dangers for World Cup.” December 16, 2025.

<https://www.hrw.org/news/2025/12/03/us-ice-arrest-at-fifa-event-spotlights-dangers-for-world-cup>

operational planning and on-the-ground responses; ensuring non-punitive access to local, low-barrier services, including drop-in centers; and training patrol officers - not only specialized units - to recognize indicators of human trafficking. Survivor-centered, trauma-informed care is critical and should be prioritized in any law enforcement activities.<sup>10,11,12</sup>

Criminal records remain among the most significant barriers to survivor stability and long-term recovery.<sup>13</sup> While some states permit vacatur or expungement for survivors of sex trafficking, many exclude survivors of labor trafficking despite the presence of identical coercive conditions.<sup>14</sup> At the federal level, there is currently no mechanism for criminal record relief for trafficking survivors convicted of federal offenses, outside of a presidential pardon. This gap undermines survivor cooperation with law enforcement, impedes recovery, and weakens the pursuit of justice. Congress should advance statutory relief that applies to both labor and sex trafficking survivors, covers federal convictions, and recognizes crimes committed as a direct result of trafficking. Absent such reforms, survivors continue to face lifelong penalties for crimes they were forced to commit by their traffickers.

---

<sup>10</sup> Institute on Assets and Social Policy. “Trauma-Informed Care for Survivors of Human Trafficking: A State of the Field in 2019.”

<https://heller.brandeis.edu/iere/pdfs/racial-wealth-equity/immigrant-integration/trauma-informed-care-for-survivors-of-human-trafficking-a-state-of-the-field-in-2019.pdf>

<sup>11</sup> US Department of Justice. “Trauma-Informed Care for Survivors of Human Trafficking: A State of the Field in 2019.” <https://www.ojp.gov/library/publications/trauma-informed-care-survivors-human-trafficking-state-field-2019>

<sup>12</sup>Center for Health Care Strategies. “State and Federal Support of Trauma-Informed Care: Sustaining the Momentum.” September 27, 2017. <https://www.chcs.org/state-federal-support-trauma-informed-care-sustaining-momentum/>

<sup>13</sup> Polaris. “Criminal Record Relief for Trafficking Survivors.” 2023.

<https://polarisproject.org/wp-content/uploads/2023/04/Criminal-Record-Relief-for-Trafficking-Survivors-by-Polaris.pdf>

<sup>14</sup> *Id.* at 32.

## V. Recommendations for Congress and Federal Agencies

As the United States prepares to host the World Cup and other major international events, we urge Congress to take the following actions:

### 1. **Broaden the federal focus beyond sex trafficking**

Ensure the Department of Homeland Security, the Department of Justice, and partner agencies explicitly plan for *labor trafficking* risks across event-related industries.

### 2. **Integrate labor rights outreach into event planning**

DHS can partner with local and national workers' rights organizations to educate workers about their rights, how to report abuse, and ensure that seeking assistance will not result in arrest or deportation.

### 3. **Strengthen oversight of event-related imports**

Fully utilize existing authorities, including Withhold Release Orders and the Uyghur Forced Labor Prevention Act, to prevent goods produced with forced labor, from souvenirs to uniforms, from entering U.S. markets.<sup>15,16</sup>

### 4. **Require victim-centered enforcement metrics**

Measure success by traffickers prosecuted and victims out of harm's way, rather than by raw arrest totals alone.

### 5. **Reauthorize and strengthen the Trafficking Victims Protection Act (TVPA)**

For twenty-five years, the TVPA has been the backbone of U.S. anti-trafficking efforts, funding survivor services, law enforcement training, and prevention programs at the federal, state, and local levels. Reauthorization ensures sustained support for victims while reinforcing bipartisan leadership to combat human trafficking.

## VI. Conclusion

Large events test our systems. They reveal whether we respond with coordination or chaos, with data or myth, with justice or optics. If we plan early, center survivors, and focus on accountability rather than criminalization, the World Cup can demonstrate not just global athletic leadership but global moral leadership.

<sup>15</sup> US Department of Labor. "Information and Resources on Withhold Release Orders (WROs)."

<https://www.dol.gov/index.php/agencies/ilab/comply-chain/steps-to-a-social-compliance-system/step-6-remediate-violations/key-topic-information-and-resources-on-withhold-release-orders-wros>

<sup>16</sup> US Department of State. "Uyghur Forced Labor Prevention Act (UFLPA) Fact Sheet." January 20, 2025.

<https://www.state.gov/office-to-monitor-and-combat-trafficking-in-persons/releases/2025/01/uyghur-forced-labor-prevention-act-uflpa-fact-sheet>

Polaris stands ready to support Congress, federal agencies, and other partners in identifying and implementing best practices in the anti-trafficking field. This includes promoting approaches that are survivor-centered, informed by data from past events, attentive to both labor and sex trafficking, and designed to prevent harm caused by outdated or punitive interventions.

By learning from prior events, centering survivor expertise, and prioritizing prevention and accountability, we can ensure that major events are managed in ways that protect human rights, expand access to justice, and advance the effectiveness of U.S. anti-trafficking efforts.

Thank you for your attention. I look forward to your questions.