



NATIONAL CENTER ON SEXUAL EXPLOITATION

September 10, 2026

The Honorable Kash Patel
Director
Federal Bureau of Investigation
935 Pennsylvania Avenue, NW
Washington, D.C. 20535-0001

Dear Mr. Patel,

The National Center on Sexual Exploitation, headquartered in Washington, D.C., is a nonpartisan policy, research, and advocacy organization dedicated to confronting human trafficking, sexual abuse, and commercial sexual exploitation. We submit this letter to register our firm opposition to internal hiring protocols at the Federal Bureau of Investigation that permit background screeners to exercise discretion when evaluating job applicants with a history of purchasing commercial sex. According to internal Bureau guidance reported by the *Associated Press*, the FBI maintains an automatic disqualification for applicants who engaged in prostitution within the past ten years, three or more times overall, or while holding a position of public trust. However, for individuals who purchased sex more than a decade ago or fewer than three times, the Bureau no longer enforces a mandatory rejection, instructing investigators instead to weigh the context of the conduct.

This discretionary policy introduces profound institutional and operational vulnerabilities into our nation's premier law enforcement agency. People are policy, and the individuals entrusted with federal authority shape the priorities and culture of the Bureau. Federal agents are tasked with investigating complex human trafficking rings, enforcing federal anti-trafficking statutes, and protecting victims of severe abuse. Individuals who have personally purchased commercial sex bring an inherent conflict of perspective to these duties. This dynamic fosters an institutional callousness toward commercial sexual exploitation, reducing severe harm to a benign transaction and eroding the trust of trafficking survivors who must rely on federal officers for safety and justice.

Furthermore, sex buying directly fuels the market demand that drives sex trafficking and systemic violence against prostituted individuals. As early as 1956, the Attorney General of Oregon observed that commercialized prostitution is "made to order" for syndicate operations and can only thrive with "police protection, active or passive." Without sex buyers, the commercial market that incentivizes pimps and trafficking networks to exploit vulnerable individuals would collapse. Purchasing sex inherently exposes prostituted persons to physical assaults, coercion, and profound psychological trauma, while directly lining the pockets of organized crime. Allowing individuals who have fueled this dangerous demand into the FBI connects federal law enforcement directly to the very machinery of exploitation they are sworn to dismantle.

Beyond the impact on victim trust, allowing past sex buyers into sensitive federal roles creates significant counterintelligence and security risks. Commercial sex transactions do not occur in a vacuum; as documented in recent academic research, including *Dignity: A Journal of Analysis of Exploitation and Violence*, illicit commercial demand serves as the economic engine for organized crime syndicates. Furthermore, participating in commercial sex creates digital, financial, and physical records that hostile foreign intelligence agencies routinely target for coercion, extortion, and operational compromise. Permitting discretionary hiring for individuals who have voluntarily exposed themselves to these illicit networks introduces avoidable security vulnerabilities into federal background vetting.

As the rapidly evolving world of technology introduces unprecedented challenges and makes the devastating harms of child sexual abuse material (CSAM) and online exploitation an ever-expanding reality, we cannot afford to compromise our standards. In this complex digital landscape, we must tighten our moral hold rather than release it. Protecting the next generation requires our absolute resolve, unwavering vigilance, and institutional clarity.

While individuals who have purchased sex can reform in private life and contribute positively to society, holding a badge, a gun, and a security clearance at the Federal Bureau of Investigation is not an entitlement. It is an extraordinary honor to serve this country in federal public safety, and that privilege must be reserved exclusively for those who demonstrate the highest moral probity and unassailable judgment. Creating discretionary exceptions for past sex buying compromises federal vetting, undermines institutional integrity, and signals an unacceptable tolerance for illegal exploitation.

We urge FBI leadership to immediately rescind the discretionary context exception and reinstate a clear, non-discretionary standard establishing that any documented history of purchasing commercial sex serves as a permanent bar to employment within the Bureau. We express our enduring gratitude to the dedicated men and women of the Federal Bureau of Investigation for their tireless work to investigate human trafficking, combat commercial sexual exploitation, and protect the vulnerable across our nation.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. van der Watt'.

Marcel van der Watt, Ph.D.
President & CEO
National Center on Sexual Exploitation