

Improper Tour Ticket Distribution
Briefing Statement

Visitor and Resource Protection Division
WWII Valor in the Pacific National Monument
September 25, 2013

General Statement of Case Issue

This case involves improper distribution of USS *Arizona* Memorial tour tickets to commercial tour companies, who then distribute or sell the tickets to their customers. Additionally, there is promotion of sales of the Monument's cooperating association's audio tours in exchange for Memorial tour tickets. Making this investigation more difficult is a lack of written and easily substantiated information.

Essential Facts

WWII Valor in the Pacific National Monument consists of sites located in Hawaii, California, and in Alaska's Aleutian Islands and was established to provide an account of the Pacific War. Each location preserves and interprets the unique resources they protect. The Hawaii site (Monument) is located in Honolulu on the island of Oahu, and focuses on the stories of the USS *Arizona*, USS *Utah*, and the USS *Oklahoma*. In addition to these memorials, the Monument includes the Pearl Harbor Visitor Center (Visitor Center), five historic Chief Petty Officer bungalows, a museum, theaters, and audio tour rentals and a bookstore operated by the Monument's cooperating association, Pacific Historic Parks (PHP). The Monument also serves as the portal to other Pearl Harbor Historic sites. The primary interest for many visitors, though, is a tour to the USS *Arizona* Memorial (Memorial) itself.

The Memorial is accessible by boat only, and consists of a three room structure spanning the sunken battleship *Arizona*. Visits to the Memorial begin with a movie presentation, followed by transportation to the Memorial on 150 passenger boats operated by the U.S. Navy. Due to limited space at the Memorial, as well as a desire to maintain a quiet and contemplative atmosphere, tours are limited in size and are controlled by a ticketing system. The Monument's enabling legislation prohibits the Memorial tour tickets from being sold. For many years the only way to acquire a tour ticket was to pick up a ticket in person, which often required a lengthy wait standing in a long line. As visitation to the Monument increased, so did the wait time for an available tour. It also became increasingly challenging to ensure that tour tickets were evenly distributed among commercial tour operators and visitors arriving without a commercial group.

In 2012, the Monument began offering reserved Memorial tour tickets through the website Recreation.gov. This system allows commercial tour companies and visitors to get a ticket ahead of time without having to wait in line, and provides a designated start time for their tour. The tickets are free; the only charge is a \$1.50 convenience fee collected by Recreation.gov to cover the costs of administering their system. For each tour time, a set amount of tickets are available to be reserved by commercial tour companies or groups and a different amount of tickets are available to individual visitors. There are also a limited number of walk-in Memorial tour tickets available at the Visitor Center for visitors. Commercial tour companies are required to reserve tour tickets online, and are not permitted to receive the walk-in tickets. This is to ensure that an adequate number of walk-in tickets are available to visitors who are not a part of a commercial tour group.

Memorial tours are offered beginning at 0800, with the last tour starting at 1500. The ticketing system is designed so that walk-in tickets are available for each tour program, and they can be picked up by visitors throughout the day. Each ticket bears the tour program date as well as the start time on the front. Additionally, reserved tickets bear the name of the person or company who placed the reservation on the bottom of the ticket. Walk-in tickets are blank at the bottom. Memorial tour walk-in tickets may only be picked up on the same date as the program they are for.

Many of the rangers in the Interpretation Division, which is responsible for distributing Memorial tour tickets at the information desk, have reported that there are rarely enough walk-in tickets and that many visitors are not able to visit the Memorial. When visitors do receive walk-in tickets, they often have to wait several hours for an available tour. This is true even for visitors who arrive when the Visitor Center opens and are the first visitors to receive tickets for the day. Since there are supposed to be walk-in tickets available for each tour time, it is unclear why early tours would be unavailable to walk-in visitors. For example, visitors in line when the Visitor Center opens at 0700 often find that there are no tickets available until the afternoon.

The Monument does allow in-house ticket reservations for special groups or friends or family of employees. The tickets reserved this way are pulled from the pool of Memorial tour walk-in tickets, and are supposed to be limited in number. Additionally, walk-in tickets are not offered to commercial tour companies who are required to use Recreation.gov to place their ticket reservations. A spreadsheet is generated each day to track the in-house reservations.

Rangers have noticed that a large number of Memorial tour walk-in tickets are being set aside for commercial tour companies, and an average of 50-100 tickets a day are set aside for PHP's Vice President of Marketing, Carlton Kramer. [REDACTED] EX6 have reported that Mr. Kramer takes a stack of Memorial walk-in tour tickets to the audio tour desk, where they are distributed to visitors that pay \$7 to rent an audio tour from PHP. Walk-in tickets are supposed to be distributed only by the NPS. The walk-in tickets at the audio tour desk are only made available after a visitor pays money for an audio tour headset rental. Around 1400 hours, PHP staff members at the audio tour desk return any remaining walk-in tickets to the NPS information desk to be made available to walk-in visitors for the last several programs. These walk-in tickets are only made available a few minutes to an hour before the program begins.

In addition to distributing Memorial tour tickets at the audio tour desk, Mr. Kramer passes walk-in tickets to drivers working for commercial tour companies. On an almost daily basis [REDACTED] EX6 observe uniformed commercial tour operators enter the private office space of PHP, and then leave carrying a stack of tour tickets. Mr. Kramer's name is listed almost daily on the in-house reservation list as receiving an average of 50-100 walk-in tickets.

One driver, Christopher Rhodes, appears to have a much larger role in the operation than other drivers. Mr. Rhodes is a company supervisor with Royal Hawaiian Limousine, which holds a Commercial Use Authorization permitting the company to conduct business at the Monument. Mr. Rhodes is at the Visitor Center almost daily, where he remains for the majority of the day. He carries an empty shoulder bag into the Visitor Center in the morning, and has been observed [REDACTED] EX6 distributing walk-in Memorial tour tickets from his bag later in the day. Mr. Rhodes is

observed at the audio tour desk on a regular basis. He escorts visitors to the cash register, where they pay for an audio tour rental. Once the transaction is complete, Mr. Rhodes hands Memorial walk-in tour tickets to the visitor.

On August 30, 2013, [REDACTED] EX6 received a report from two visitors that Mr. Rhodes had sold them two Memorial tour tickets for \$39 each. The visitor, [REDACTED] EX6, said that EX6 had searched for "Arizona Memorial tour tickets" using Google. [REDACTED] EX6 said that the first website listed, Ussarizonamemorial.info, made it sound as if it was the only place to acquire tour tickets, and that they cost \$39 each. When [REDACTED] EX6 called the listed telephone number [REDACTED] EX6 was told that the price was for the tickets, but that the ticketing company would provide round trip transportation from Waikiki for free. [REDACTED] EX6 purchased the tickets, and made arrangements to meet Mr. Rhodes at the Visitor Center since EX6 planned to have a rental car. EX6 said that Mr. Rhodes picked up tickets for them at the audio tour desk when they arrived. During the course of the investigation it was discovered that Mr. Rhodes was in the possession of several walk-in Memorial tour tickets on August 30 and that the website used by [REDACTED] EX6 was maintained by Royal Hawaiian Limousine. [REDACTED] EX5(DPP)

[REDACTED] EX5(DPP)

The NPS is aware of what is happening [REDACTED] EX5(DPP). Frank Middleton, who is the Monument's education coordinator, oversees the ticketing and reservation system. [REDACTED] EX6 have observed him engaged in numerous private meetings with Mr. Rhodes in employee areas, and several of these meetings were over one hour in length. Mr. Rhodes also meets, on an almost daily basis, with NPS rangers supervising the information desk operation. I have observed these meetings occurring in NPS offices, and they often last an hour or more. The NPS ranger most often observed meeting with Mr. Rhodes is Del Dandurant, who is a Lead Park Ranger. [REDACTED] EX6 have overheard conversations between Ranger Dandurant and Mr. Rhodes about making reservations, and observed handwritten ledgers on the desk in front of them. When asked why he was in offices closed to visitors, Mr. Rhodes said that he was working with Ranger Dandurant to make special reservations for his tours.

[REDACTED] EX6 observed uniformed commercial tour drivers standing approximately 15 feet in front of the NPS information desk offering walk-in Memorial tour tickets to visitors. When handing the tickets to visitors, the drivers also gave them a brochure advertising their company and solicited business from the visitors. Ranger Dandurant, who was staffing the information desk at the time, was easily within earshot and sight of the exchanges [REDACTED] EX5(DPP)

[REDACTED] EX5(DPP).

Each year the monument holds a commemoration ceremony in remembrance of the attack on Pearl Harbor in 1941. Historically there have been only a few tour programs run on the day of the ceremony due to limited space at the Monument, which led to many visitors and commercial tour operators not receiving tickets. It was announced recently during a ceremony planning meeting that tickets would be offered this year to tour companies and visitors. For each program time 100 Memorial tour tickets will be offered on Recreation.gov for visitors who pay \$7 for an audio tour and 50 Memorial walk-in tickets will be offered at the Visitor Center. There are only 150 available tickets for each program; 100 tour tickets will be offered online for visitors and 50 will be held for visitors at the Visitor Center, leaving it unclear how commercial tour operators are going to acquire tickets if all 150 tickets are reserved for individual visitors.

During conversations [REDACTED] EX6 it has been reported that several people have asked the Monument's superintendent, Paul DePrey, about what was happening with the tickets. Each one said that Superintendent DePrey told them to mind their own business and referred them to Ranger Middleton. [REDACTED] EX5(DPP) [REDACTED] EX5(DPP) No employee has been offered a reason why Memorial tour tickets are being improperly distributed or what may be occurring. None of [REDACTED] EX6 have discussed the situation with either Superintendent DePrey or Ranger Middleton. None of [REDACTED] EX6 has been willing to complete a written statement regarding ticket distribution.

Ranger Middleton appears to be the only member of the NPS staff with access to or control over the ticketing and reservation system. He also is the only person who knows what the matrix is that determines how the tickets are distributed. At a minimum, there is no transparency in the operation. [REDACTED]

Conclusion

This case highlights a lack of transparency in the ticketing and reservation system. It appears, however, that Memorial tour tickets are being sold and/or otherwise improperly distributed with the knowledge and involvement of NPS and PHP employees. While there may be explanations that would alleviate any concerns, [REDACTED] EX5(DPP)

[REDACTED] EX5(DPP) [REDACTED] EX5(DPP) We are requesting consultation and investigatory assistance due to the sensitive nature of the case, limited staffing at the Monument, and [REDACTED]