



**OFFICE OF  
INSPECTOR GENERAL  
U.S. DEPARTMENT OF THE INTERIOR**

**REPORT OF INVESTIGATION**

<b>Case Title</b> [REDACTED]	<b>Case Number</b> [REDACTED]
<b>Reporting Office</b> <b>Program Integrity</b>	<b>Report Date</b> <b>October 20, 2010</b>
<b>Report Subject</b> <b>Report of Investigation</b>	

**SYNOPSIS**

The Office of Inspector General initiated an investigation following receipt of a complaint letter from Bruce Schundler, former GS-5 Park Ranger, Interpretation Division, Mesa Verde National Park, National Park Service (NPS), on October 27, 2009. Schundler alleged that former Park Superintendent [REDACTED] engaged in “questionable” involvement with CyArk, a digital technology project of the Kacyra Family Foundation. This relationship allegedly included [REDACTED] frequent attendance at seminars with CyArk and [REDACTED] endorsement of the company in these and other settings, improper diversion of monies from appropriated Centennial funds to a “pet” visitor’s center project, and excessive, unnecessary travel to “sister parks.”

[REDACTED] engaged in activities with CyArk, which included joint participation in conferences and meetings. [REDACTED] received two payments from CyArk and/or its parent company, Kacyra Family Foundation, for [REDACTED] participation in at least two of those activities. Wiese’s close ties to the non-profit organization, coupled with [REDACTED] “enthusiastic” endorsement of CyArk, created the appearance of a conflict of interest.

We determined that Schundler’s assertion that [REDACTED] improperly diverted monies from appropriated Centennial funds to a “pet” Visitor’s Center project was inconsistent with records showing that Centennial funds were used for their stated purpose. We also found that [REDACTED] traveled to a sister park in Monte Alban, Mexico, as alleged, but that the travel was consistent with the mission of its sister parks, a priority initiative of both NPS and the President’s Committee on the Arts and the Humanities. The travel was approved through proper NPS channels.

We presented a summary of our investigation to the Colorado Office of the United States Attorney who declined to prosecute.

<b>Reporting Official/Title</b> [REDACTED]/Investigator	<b>Signature</b>
<b>Approving Official/Title</b> Harry Humbert, Director, Program Integrity	<b>Signature</b>

## BACKGROUND

Preservation and documentation of the archeological resources of Mesa Verde National Park were the responsibility of Park Superintendent [REDACTED]. To fulfill that responsibility, [REDACTED] explored and ultimately favored 3D digital preservation and documentation technology provided by a company called CyArk, a subsidiary of the Kacyra Family Foundation (KFF).

[REDACTED] collaborated repeatedly with CyArk to conduct digital preservation of Mesa Verde and other world sites, including Monte Alban Park in Mexico. [REDACTED] admittedly endorsed CyArk's technological capabilities to other national and international park managers, conference attendees and Mesa Verde employees.

## DETAILS OF INVESTIGATION

We received a complaint letter from seasonal Mesa Verde Park Ranger Bruce Schundler on October 27, 2009, alleging that Superintendent [REDACTED] wasted time and money in inappropriate travel and time away from the park, engaged in conflicts of interest and honest services fraud, and abused and misused his authority (**Attachments 1 and 2**). Further, Schundler alleged that [REDACTED] [REDACTED] following Schundler's general inquiries into the park's budget and expenditures, and his scrutiny of [REDACTED] travel and time away from the park.

### **[REDACTED] and CyArk**

We interviewed Schundler on November 5, 2009. Schundler stated that in addition to his complaint letter he also detailed his concerns regarding [REDACTED] on his personal Web site: <http://schundler.net/FOIA.htm> (**Attachment 3**).

Schundler said he worked at Mesa Verde National Park in 2007, where he learned that [REDACTED] had a close connection to a company called CyArk. Schundler said he "Googled" CyArk and found that [REDACTED] was quoted in an archeological magazine about the nonprofit's capabilities. Schundler said he also found information on CyArk's Web site that referred to the relationship between [REDACTED] and CyArk and to the work CyArk was doing at Monte Alban Archeological Park in Oaxaca, Mexico. In addition, he said he found that [REDACTED] participated in two SPAR (Spatial Pattern Analysis and Research) conferences in which CyArk also participated. Schundler said he later heard that [REDACTED] allegedly negotiated future employment with CyArk. Schundler questioned whether [REDACTED] had an employment arrangement with CyArk or if CyArk paid for [REDACTED] participation in conference activities.

*Agent's Note: Internet inquiries made by OIG investigators found several websites that showed that [REDACTED] and CyArk were co-presenters for several digital documentation industry conference sessions or were partners on digital documentation projects. (**Attachment 4**).*

We interviewed [REDACTED] on December 8, 2009 (**Attachments 5 and 6**). He stated that 3D digital preservation and documentation technology provided by CyArk was one of the options he explored for archeological documentation during his tenure as superintendent at Mesa Verde National Park from 1993 to 2009.

[REDACTED] stated that he met CyArk representatives in 2003 or 2004 at a park meeting concerning archeological site documentation. [REDACTED] said that CyArk [REDACTED] told participants about CyArk's capabilities and, a few months later, came to Mesa Verde with other CyArk representatives to survey Spruce Tree House, one of the park's historical sites.

[REDACTED] stated that CyArk documented the site with "stunning" speed and precision. [REDACTED] said such documentation done by hand would have taken several months and might have been off by four or five inches, but that CyArk equipment took measurements in 20 minutes that were off only by millimeters. [REDACTED] said CyArk's product presented an accurate picture of Spruce Tree House, which included the size of cracks and location of drainage problems. The technology quickly provided archeologists with information that could be used to preserve the site.

[REDACTED] said park staff collaborated repeatedly with CyArk regarding digital preservation of archeological structures both at the park and other world sites, including Monte Alban Archeological Park in Mexico. [REDACTED] said CyArk's technology impressed him. He endorsed their work when speaking with other national and international park managers, conference attendees and Mesa Verde employees.

We asked [REDACTED] if, as a superintendent, [REDACTED] felt uncomfortable endorsing CyArk's product. [REDACTED] replied that [REDACTED] was not endorsing the company but rather the technology and its application to NPS sites. [REDACTED] admitted that [REDACTED] appreciated the value of the technical work CyArk was conducting at Mesa Verde, but that [REDACTED] responsibility required [REDACTED] to determine how the technology could be applied on a larger scale throughout NPS. [REDACTED] said [REDACTED] did not see any problems with that. [REDACTED] said that [REDACTED] admired the CyArk technology [REDACTED].

[REDACTED] said Mesa Verde and [REDACTED] entered into a memorandum of understanding (MOU) formalizing the use of CyArk technology. [REDACTED] said the MOU developed into a 5-year cooperative agreement that enabled the park to reimburse CyArk. The cooperative agreement provided \$5,000 to CyArk the first year and up to \$20,000 for each of the remaining four years. [REDACTED] said [REDACTED] was the project lead, providing approvals for project work and funding.

[REDACTED] also said [REDACTED] worked with CyArk at some conferences showcasing 3D documentation and preservation. [REDACTED] said [REDACTED] attended the 2008 SPAR conference in Dallas, TX, and the 2009 SPAR conference in Denver, CO. [REDACTED] did not recall how [REDACTED] became associated with these conferences, but assumed that the invitation to speak stemmed from [REDACTED] involvement with CyArk's work on Spruce Tree House. [REDACTED] said the SPAR representatives held sessions on preservation, and so invited [REDACTED] to speak on parts of it.

[REDACTED] recalled participating at a conference with CyArk in spring 2009 in Scotland, having been invited by the Glasgow School of Arts to speak on park management. [REDACTED] explained that this organization was a Scottish cultural preservation-oriented entity and that, though CyArk attended the same conference, this had no role in [REDACTED] attendance.

[REDACTED] explained that the invitation to speak came too late for [REDACTED] to submit the requisite paperwork to the NPS Office of International Affairs through [REDACTED] regional International Conservation Program office. [REDACTED] and [REDACTED] decided to travel to Scotland using their own funds. [REDACTED] said [REDACTED] called [REDACTED] to tell [REDACTED] about [REDACTED] plans, and that [REDACTED] had no problem with the planned trip.

[REDACTED] also called the Office of International Affairs about the trip and, again, this office had no problems as long as [REDACTED] did not appear in uniform or present [REDACTED] as an NPS representative.

[REDACTED] said [REDACTED] neither appeared in uniform nor represented [REDACTED] as a park employee. [REDACTED] stated that even though he was introduced to speak by the conference announcer as the [REDACTED] Mesa Verde National Park, [REDACTED] explained to conference attendees that [REDACTED] was not representing NPS at the conference.

When interviewed, however, [REDACTED] had no recollection of discussing a trip to Scotland with [REDACTED] (Attachments 7 and 8). Further, we interviewed [REDACTED] with the International Conservation Program office in the NPS Intermountain Region. [REDACTED] explained that one of his primary responsibilities is oversight of international travel by regional employees (Attachments 9 and 10). [REDACTED] said that an employee acting in an official capacity while on travel had to submit a request through his office and that he was unaware of a request from [REDACTED] or approval of [REDACTED] travel to Scotland. [REDACTED] could not explain why neither [REDACTED] nor [REDACTED] recalled discussing the Scotland trip with [REDACTED] (See Attachments 5 and 6).

[REDACTED] said [REDACTED] was not reimbursed for trip expenses though, at one point, CyArk received reimbursement funds from conference organizers, which were offered to [REDACTED] but that [REDACTED] refused to accept the reimbursement. Though requested by investigators, [REDACTED] did not provide documentation to show [REDACTED] used personal funds for the Scotland trip.

Records obtained from CyArk/KFF show that [REDACTED] submitted the following documentation, totaling \$2,475.79, to CyArk related to [REDACTED] trip to Scotland:

- An Orbitz "Travel Document" showing an itinerary for round-trip travel to/from Glasgow, Scotland, for [REDACTED] [REDACTED] with total airfare costing \$1,830.98 (Attachment 11), and
- A Hilton Glasgow receipt, dated April 27, 2009, for \$644.81 (Attachment 12).

Records showed that CyArk reimbursed [REDACTED] for costs incurred in Scotland, issuing check No. 195, dated June 12, 2009, in the amount of \$2,475.79. The note line on the check indicated the payment was for reimbursement (Attachment 13). Ten days later, [REDACTED] wrote check No. 4544, dated June 22, 2009, in the amount of \$3,000 to the Kacyra Family Foundation (Attachment 14). No memo or note accompanying the check explained its purpose. CyArk/ KFF [REDACTED] explained that [REDACTED] returned the CyArk reimbursement via check No. 195, including costs that CyArk had paid on his behalf while in Scotland (Attachment 15). [REDACTED] said this explained why [REDACTED] check was \$524.21 more than the payment from CyArk.

We interviewed [REDACTED] also on December 10, 2009 (Attachments 16 and 17). [REDACTED] confirmed that approximately 5 or 6 years ago, CyArk introduced its technology to NPS officials in Washington, DC. [REDACTED] said [REDACTED] company wanted to do a demonstration project in one of the parks to bring 3D digital preservation technology to life for the NPS officials. Mesa Verde's deteriorating archeological structures and [REDACTED] enthusiasm for technology caused officials to recommend the park's superintendent, [REDACTED] said. [REDACTED] said [REDACTED] contacted [REDACTED] then eventually traveled to Mesa Verde to document Spruce Tree House, one of the park's historical sites.

[REDACTED]

[REDACTED]

We talked to [REDACTED] about the Scotland conference, which [REDACTED] dated to March or April 2009. [REDACTED] said he had been a 2008 keynote speaker and that [REDACTED] had been asked to speak again in 2009. [REDACTED] stated that SPAR, another conference for digital preservation, also contacted [REDACTED] and that organizers for both the SPAR and Scotland conferences requested other suggested speakers, one of whom was [REDACTED]

[REDACTED] said Scotland underwrote the conference costs for each of the speakers CyArk had introduced to them, paying expenses such as transportation and lodging. [REDACTED] said CyArk received one reimbursement check from Scotland to parse out to the individual speakers. According to [REDACTED] CyArk sent a reimbursement check for approximately \$3,000 to [REDACTED] to cover [REDACTED] flights, but [REDACTED] returned the check. [REDACTED] said he was surprised, but accepted the returned check without knowing why [REDACTED] returned it.

When asked if [REDACTED] had been reimbursed for any other activities with CyArk, [REDACTED] said that over a period of 3 or 4 years CyArk held workshops at their headquarters location for which they offered travel reimbursement.

*Agent's note: CyArk/KFF headquarters were located in Orinda, CA at the time of the 2009 workshop.*

[REDACTED] said the conferences lasted 1 or 2 days and that [REDACTED] had attended one or more, though did not know if [REDACTED] had been reimbursed for his attendance.

[REDACTED] stated that [REDACTED] never received any payments or gifts from CyArk, except for an occasional lunch or dinner costing between \$10 and \$15 (See Attachments 5 and 6) that he and [REDACTED] would alternately pay. CyArk records revealed that check No.1831, dated May 9, 2008, for \$1,110.50 was issued from the Kacyra Family Foundation to [REDACTED] for air, auto, and lodging related to a CyArk workshop held on April 21, 2008 (Attachment 18).

### Potential future employment

We interviewed [REDACTED] on November 11, 2009 (Attachments 19 and 20). [REDACTED] said that [REDACTED] often talked about working for CyArk when [REDACTED] retired. [REDACTED] said [REDACTED] also talked about working for a group called OPEN, which provided environmental education to children. [REDACTED] said that [REDACTED] told [REDACTED] talked with both CyArk and OPEN about potentially working with them as a consultant.

[REDACTED]

[REDACTED] agreed that [REDACTED] numerous appearances at events where CyArk was also in attendance, [REDACTED] introduction of CyArk to other park leaders, and [REDACTED] obvious enthusiasm for the CyArk technology could lend to the appearance of impropriety (See Attachments 5 and 6). Despite appearances, [REDACTED] said that [REDACTED] was not employed by CyArk nor did he have any type of agent agreement.

[REDACTED] did not recall talking to [REDACTED] about potential employment with CyArk. [REDACTED] said [REDACTED] never had any conversations with CyArk about future employment aside from their general inquiries about what [REDACTED] planned to do after [REDACTED] retired. [REDACTED] said neither [REDACTED] nor anyone else at CyArk offered [REDACTED] a job, but that if [REDACTED] started [REDACTED] own consulting business in park management, which [REDACTED] planned to do eventually, [REDACTED] would attempt to use anybody [REDACTED] had contact with during his NPS career.

When asked if [REDACTED] had ever sent a resume to CyArk in pursuit of future employment, [REDACTED] stated emphatically that [REDACTED] “absolutely” had not. [REDACTED] elaborated that he only fantasized about getting a job with CyArk, observing, “What they’re doing is pretty amazing. I mean, that’s incredible.” When asked, [REDACTED] said that since [REDACTED] retirement, [REDACTED] had not solicited CyArk, Kacyra Family Foundation, or [REDACTED] for employment.

When questioned, [REDACTED] stated that [REDACTED] had not consulted with [REDACTED] regarding post-employment ethics guidelines (See Attachments 7 and 8).

[REDACTED] also said he had not discussed potential future employment opportunities with [REDACTED] (See Attachments 16 and 17). [REDACTED] further stated [REDACTED] did not want to employ [REDACTED] but to “leverage” [REDACTED]: [REDACTED] just like the Minister of Culture in Scotland; now [REDACTED] an ambassador of CyArk or an evangelist of CyArk . . . Those are the people; I don’t want to lose them. I want to leverage them. [...] We don’t need people here as much as we need partners. And I think it was clear to [REDACTED] [...] I would love to have someone like [REDACTED] on the Board. We don’t pay our Board anything.”

[REDACTED] added, “The best thing that [REDACTED] can do for us and has done is be a passionate person for the technology and be where [REDACTED] is so [REDACTED] can attest to what we did for [REDACTED] [...] And we don’t have \$100,000 [...]. If you look at our budgets, that’s just ludicrous. [...] We’re a very small organization. I’m still really in it. We can’t afford...that kind of a position, and I don’t think at this stage of the game, do we need a manager with [REDACTED] skills. I look at [REDACTED] as a manager and an administrator. He’s not a techy, and he’s not a fundraiser, etc. So those kind of skills are not skills that we need.”

### Visitor Information Center Project

Schundler alleged that the newly constructed Mesa Verde Visitor Information Center was [REDACTED] “pet project” and that [REDACTED] inappropriately spent funds from other parts of the budget to support the Visitor Information Center project (See Attachments 1 and 2). As an example, Schundler said that in 2008 many parks received “Centennial” funds to hire seasonal rangers, but that Mesa Verde actually had not hired seasonals. Schundler questioned what happened to the funds.

[REDACTED] Budget Analyst, Mesa Verde National Park, stated that Centennial funds were never used to pay for the Visitor Information Center (Attachments 21 and 22). [REDACTED] remarked that the guidelines for receipt and use of the funds were explicit and strict, and that Mesa Verde complied with them. [REDACTED] said two types of Centennial fund categories existed: Centennial Challenge funds, which are grant funds that had to be matched by the park and were intended as one-time monies to accomplish different park projects; and Centennial Commitment funds, which are added to base funding annually for 10 years and used to hire additional employees. [REDACTED] said that Commitment funds were used for their intended purpose.

[REDACTED] provided a memorandum dated October 23, 2007, with the subject “Centennial Commitment Seasonal Staffing” (Attachment 23). The memo guidance stated “all parks with Centennial

Commitment seasonal must have special accounts established, programmed, and spent out in accordance with the attached WASO budget and finance guidelines for IMR's 583 seasonal positions." The chart attached to the memo indicated that Mesa Verde was obligated to increase the number of seasonal employees in its Interpretation division by nine, with a maximum of \$116,000 to be spent toward the wages of these seasonal employees. Budget documents also provided by [REDACTED] showed that the park hired 12 seasonal employees during fiscal year 2008, in compliance with its Centennial Commitment fund responsibilities (**Attachment 24**).

### **Travel to Sister Parks**

In his complaint letter to the OIG, Schundler alleged that [REDACTED] "traveled too much, his travel expenses were excessively high, and a lot of his travel was just not necessary." Schundler's complaint letter further detailed that the proposed 2009 budget indicated that \$421,000, or 6.5 percent of the park's budget was allocated for travel (See Attachments 1 and 2). Schundler added that \$21,000 was set aside for foreign travel.

We asked [REDACTED] about the park's travel budget (See Attachment 21). [REDACTED] explained that MEVE's travel budget included funding for all Permanent Change of Station (PCS) moves, in addition to standard travel. [REDACTED] elaborated that such moves could include the costs of "buying out," or rather, purchasing the home vacated by a relocating employee. [REDACTED] estimated that at least half of the budgeted travel funded PCS moves.

[REDACTED] recalled that over the past three years, [REDACTED] had requested and subsequently had been authorized to go on international travel three times. Two of the trips were to Mexico to the MEVE sister park at Monte Alban. [REDACTED] did not state the destination of the third trip. [REDACTED] recalled that [REDACTED] had taken a trip to Scotland in 2009 that [REDACTED] paid for [REDACTED]. [REDACTED] stated [REDACTED] did not think there was anything unusual about the amount of travel [REDACTED] had taken over the past several years or that it was excessive.

Deputy Park Superintendent [REDACTED] said [REDACTED] never felt that [REDACTED] ravel was unusual or unnecessary (Attachments 25 and 26). [REDACTED] stated that the park superintendent's job is to work on the macro level, while the deputy park superintendent focuses on the day-to-day responsibilities of park operations. [REDACTED] said, "If the Superintendent's in the Park too much, then he's probably not doing his job."

[REDACTED] said Mesa Verde's "sister park" relationship with Monte Alban began around 1999 (See Attachments 5 and 6). He said the NPS international program encouraged parks to interact scientifically and personally with counterparts in other countries and had developed policy to commit NPS to cover the costs for "the relationship and its exchanges."

According to the NPS Web site, more than 30 NPS sites currently maintain active relationships with parks in other countries (**Attachment 27**). Many are located along the United States' borders with Mexico and Canada, where international cooperation is particularly important. On May 9, 2007, Mesa Verde National Park, the NPS Office of International Affairs, and the President's Committee on the Arts and the Humanities "brought together more than 50 leaders from culture, parks, tourism, philanthropy, preservation and businesses, as well as representatives from Mexico to develop a new international approach to collaboration, Sister Cultural Parks" (**Attachment 28**).

[REDACTED] explained that in the fall of 2008, Mesa Verde representatives and CyArk traveled to Mexico to “cooperatively [...] support and to introduce CyArk to Monte Alban,” MEVE’s sister park in Oaxaca, Mexico (See Attachment 5). According to [REDACTED] the cost of the CyArk work was underwritten by a cooperative agreement with CyArk to provide scientific support for site documentation at Monte Alban. [REDACTED] said that approximately \$5,000 of the cooperative agreement funding came from the NPS Intermountain Region International Committee Office because CyArk’s work at Monte Alban was consistent with the cooperative agreement’s purpose.

[REDACTED] with the NPS International Conservation Program, said that [REDACTED] office administers Intermountain Region Conservation Program project funds and outreach in an effort to maintain or open the lines of communication with Intermountain Region international partners (See Attachment 9). [REDACTED] explained that these projects’ funds represent only a small pool of money that the region annually receives to promote international projects, one of which was a CyArk digital preservation project for which his office had administered funding.

**SUBJECT(S)**

[REDACTED] former Superintendent, Mesa Verde National Park, Intermountain Region, NPS

**DISPOSITION**

A summary of this matter was provided to the Colorado Office of the United States Attorney for review and prosecutorial consideration. On August 3, 2010, the case was declined. Prior to our submitting the report for prosecution consideration, [REDACTED]

Ex.5

This report will be closed in the files of this office and a copy forwarded to Director, National Park Service for information.

**ATTACHMENTS**

1. IAR – Interview of Bruce Shundler on November 5, 2009.
2. Transcript – Interview of Bruce Shundler, Seasonal Park Ranger, Mesa Verde National Park, NPS, on November 5, 2009.
3. Complaint letter, submitted by Bruce Shundler, dated October 1, 2009.
4. IAR – Investigative Activity - Internet inquiries made by OIG investigators which validated Shundler’s assertions regarding ties between [REDACTED] and CyArk.
5. IAR – Interview of [REDACTED] on December 8, 2009.
6. Transcript – Interview of [REDACTED] former Superintendent, Mesa Verde National Park, Intermountain Region, NPS, on December 8, 2009.
7. IAR – Interview of [REDACTED] on November 12, 2009.
8. Transcript – Interview of [REDACTED] Intermountain Region, National Park Service, on November 12, 2009.
9. IAR – Interview of [REDACTED] on November 12, 2009.



10. Transcript - Interview of [REDACTED] International Conservation Program, Intermountain Region, National Park Service, on November 12, 2009.
11. Orbitz "Travel Document" showing itinerary for round-trip travel to/from Glasgow, Scotland for [REDACTED] total airfare cost: \$1,830.98.
12. Hilton Glasgow receipt, dated April 27, 2009, for \$644.81.
13. Check No. 195, dated June 12, 2009, in the amount of \$2,475.79, issued to [REDACTED] from CyArk for reimbursement of expenses associated with the Scotland conference.
14. Check No. 4544, dated June 22, 2009, in the amount of \$3,000 issued to KFF from [REDACTED] No memo or note was written on the check to explain its purpose.
15. IAR - Interview of [REDACTED] on August 27, 2010.
16. IAR - Interview of [REDACTED] on December 10, 2009.
17. Transcript - Interview of [REDACTED] Kacyra Family Foundation/CyArk, on December 10, 2009.
18. Check No. 1831, dated May 9, 2008, in the amount of \$1,110.50, from KFF to [REDACTED] for air, auto, and lodging related to the CyArk 500 workshop.
19. IAR - Interview of [REDACTED] on November 11, 2009.
20. Transcript - Interview of [REDACTED], Mesa Verde National Park, National Park Service, on November 11, 2009.
21. IAR - Interview of [REDACTED] on November 10, 2009.
22. Transcript - Interview of [REDACTED] Budget Analyst, Mesa Verde National Park, National Park Service, on November 10, 2009.
23. Memorandum for Superintendents, Intermountain Region, from Director, Intermountain Region, regarding Centennial Commitment Seasonal Staffing, October 23, 2007.
24. Personal Services Report - Account Detail by Dollars, Pay Period: 2007-22 thru 2008-21A, November 4, 2009.
25. IAR - Interview of [REDACTED] on November 10, 2009.
26. Transcript - Interview of [REDACTED], Mesa Verde National Park, National Park Service, on November 10, 2009.
27. National Park Service. (n.d.). "Making Friends Across Borders: Exploring National Park Sisterpark Relationships." Office of International Affairs. Retrieved from [http://www.nps.gov/oia/topics/sisterparks/maps/sister\\_map.html](http://www.nps.gov/oia/topics/sisterparks/maps/sister_map.html).
28. President's Committee on the Arts and the Humanities. (n.d.). *PCAH's Sister Cultural Parks Conference Breaks New Ground in International Cooperation: Sister Parks Declaration*. Retrieved from <http://www.pcah.gov/international/sistercult.htm>.
29. Declination letter from Assistant U.S. Attorney [REDACTED], dated August 3, 2010.