



# **Investigative Report of Sexual Misconduct by Chief Ranger at Canaveral National Seashore**

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This is a version of the report prepared for public release.

## SYNOPSIS

We initiated this investigation in February 2016 after the National Park Service's Office of Professional Responsibility notified us of an allegation that a law enforcement supervisor at Canaveral National Seashore (CANA) had engaged in sexual misconduct with his subordinate, a law enforcement employee, at the residence of a park volunteer. During our investigation, we learned that a CANA administrative manager had allegedly made inappropriate comments to the law enforcement employee and to a member of his own administrative staff. We investigated this manager's actions as well.

Our investigation revealed that over the past 5 years, the law enforcement supervisor has shown a pattern of sexual harassment involving the law enforcement employee and two other female employees at CANA. We found that on December 4, 2015, he took the law enforcement employee to the home of a park volunteer and made an unwanted sexual advance toward her in the volunteer's bedroom. We also found that he sexually harassed another employee in 2015 by repeatedly complimenting her on her physical appearance, giving her unwanted and unsolicited tokens of affection, asking her out on dates, and attempting to engage her in conversation about sexually explicit content in movies. In 2011, he harassed the third employee by repeatedly asking her out and calling her on her personal cell phone after duty hours.

Overall, the law enforcement supervisor refused to accept full responsibility for his actions concerning any of the three women. He also provided vague and contradictory answers to our interview questions and demonstrated a lack of candor during multiple interviews about the incident with the law enforcement employee, and denied ever sexually harassing the other two CANA employees.

The administrative manager denied that he made an inappropriate remark to the law enforcement employee, although two witnesses confirmed that he did. He also stated that he could not recall making sexually harassing comments to the administrative assistant, but he told us that he was willing to take full responsibility for anything he said that could have been misinterpreted.

## **DETAILS OF INVESTIGATION**

On February 2, 2016, the National Park Service's (NPS) Office of Professional Responsibility (OPR) notified us about a complaint it had received alleging sexual misconduct by a law enforcement supervisor at Canaveral National Seashore (CANA). According to the complaint, the supervisor allegedly made an unwanted sexual advance toward his subordinate, a law enforcement employee, while the two were at the home of a CANA volunteer in December 2015. The incident was reported anonymously to the CANA superintendent on January 28, 2016. She confirmed the allegation with the employee and forwarded the information to OPR, requesting a formal investigation.

During our investigation of this complaint, we learned that an administrative manager at CANA had allegedly made inappropriate comments to the law enforcement employee and to a member of his own staff. We investigated these allegations as well.

NPS and the U.S. Department of the Interior (DOI) have explicit policies prohibiting sexual harassment and behavior that might create a hostile work environment for its employees. We explain these policies in the "Relevant Policies" section of this report (see pp. 11 and 12).

### **Alleged Sexual Misconduct by the Law Enforcement Supervisor Against a Law Enforcement Employee**

#### *Alleged Incident at the Home of a CANA Volunteer*

We interviewed the law enforcement employee about the events that allegedly took place between her and the law enforcement supervisor. She explained that on December 4, 2015, the supervisor asked her to accompany him to the Apollo Beach District of CANA. On the way, he told her that he needed to stop at the home of a CANA volunteer and fix his Christmas decorations.

The employee described the volunteer as an elderly resident of the CANA gateway community and said that the CANA employees all look out for his wellbeing. Based on her experiences with the volunteer, it did not seem unusual for his Christmas decorations to be in disarray. She said that she had never been to his residence with the supervisor before.

The employee said that when they arrived they straightened the Christmas tree in the living room and a smaller Christmas tree on a table by the front window, and the supervisor then told her: "Let's go upstairs. There's more upstairs." She said that she assumed he meant there were some lights on the upstairs balcony or something similar, but when she got to the top of the stairs, she did not observe any decorations. She said that the supervisor followed her and went into the volunteer's bedroom, where he started to program the television.

The employee said she noticed that the computer desk near the bedroom door was cluttered, so she began to tidy it up. Her back was to the supervisor, she said, when she felt him tug at her shirt and her duty belt. She said that she assumed he was trying to remove a piece of lint from her clothes or perhaps refasten a snap on her belt, but instead he grabbed the left side of her belt,

spun her around, and put his arms around her waist. He then leaned in and tried to kiss her on her lips, she said, but she turned her face away and the kiss landed on her cheek. She stated that his arms were firmly around her and he was pressed against her.

The employee said that she asked the supervisor what he was doing, and he pointed toward the bed and said: "But we're here. Why not? No one will know." She stated that she pushed him away from her and went downstairs, and he followed shortly thereafter. She said that they got back in the car and continued to Apollo Beach, and neither of them mentioned the incident.

The employee described herself to us as "one of the guys" when interacting with her colleagues. She acknowledged that her conversations with them sometimes included vulgarities, but, she said, she never indicated to anyone that she would welcome sexual advances and no one else had ever tried to touch her inappropriately. She also said that before the incident, nothing had ever occurred between her and the supervisor that would have made her feel uncomfortable in that situation.

She said that she did not know whether he had planned the trip to the volunteer's home intending to make an advance toward her, but she stated that he had attempted to create opportunities to be alone with her in the past, such as repeatedly trying to invite himself to her home for lunch. She believed that when she agreed to go with him to the volunteer's home, he probably thought it would be an opportunity for him to try something.

The employee also told us about two more incidents that made her uncomfortable, which occurred the next time she encountered the supervisor. She said that she saw him at the Playalinda Beach ranger station in late January 2016, soon after she returned from a detail at another park. According to the employee, he told her he wanted to discuss with her some safety inspection findings, including potential compliance issues with the ammunition safe and evidence room, which are located in a secluded part of the station.

The employee said that the supervisor kept telling her to come into the evidence room while he pointed out things that needed to be addressed, such as the shelving in the room and the condition of the ammo safe, but she was reluctant to do so because the door would have closed behind her. She stated that when she did eventually go in, he immediately changed the subject from the inspection to his former job in Puerto Rico and how much he missed the music and the people there. She said that she did not feel comfortable in the room with the door fully closed and she quickly retreated and propped it open. The other incident occurred later that day, she said, when the supervisor infringed on her personal space while she was seated at her computer.

After these incidents, the employee said, she confided separately in two coworkers, both CANA law enforcement rangers, and they advised her to contact a counselor and make a formal report. In late January 2016, she described the incident at the CANA volunteer's home to the CANA superintendent after the superintendent learned about it through an anonymous source. The superintendent put the employee in contact with regional Equal Opportunity Office counselors so that she could file a formal sexual harassment complaint against the supervisor, and immediately removed her from his supervision. In addition, on February 25, 2016, the employee filed a formal criminal complaint against the supervisor with the local police department.

When we initially interviewed the law enforcement supervisor about the incident, he remembered going to the CANA volunteer's home with the employee during his lunch break. He did not recall the date, but he said that he had received a call from the volunteer the day before asking him for assistance with his Christmas tree.

When we asked the supervisor specific questions about the incident, his initial statements conflicted with those of his employee. He insisted that the volunteer was at home, in his kitchen, the entire time he and the employee were there, and when we asked him if he brought her to the volunteer's bedroom and tried to kiss her, he said no. He stated that the two never went upstairs and were never alone at any point. He said that it was her word against his and that the volunteer was his witness.

After further questioning, however, the supervisor admitted that the volunteer had not been home. He also acknowledged that the "chances [were] high" that he went to the bedroom because he often had to adjust the settings on the television. At no point in the interview did he mention additional Christmas decorations being upstairs.

After acknowledging that he and his employee were alone in the bedroom, the supervisor told us that he was seated on the bed tending to the television and she was standing at the computer desk. He did not remember what she was doing at the time, but he recalled that she was in uniform and wearing her duty belt. He said that as they were preparing to leave the bedroom, he "probably" attempted to physically direct her toward the door. When we asked him if he tried to kiss her while doing this, he replied: "Chances are . . . it maybe happened . . . I don't remember," but he could not explain why he would attempt to kiss her. He also said that he did not recall grabbing her by her duty belt, but that he probably touched her waist as he was motioning her to leave the room. If he tried to kiss her at that point, he said, it was in a joking or friendly manner.

The supervisor stated that the "chances [were] high" that something happened that could have been misinterpreted, but he said that he did not try to kiss the employee with the intent or expectation of having sex with her. When asked, he also denied making any suggestive comments to her about their being in the bedroom together.

The supervisor said that he had supervised the employee for 2 years. He described her as an experienced ranger and said she was "one of the guys." He said that they had always greeted each other with a friendly hug or a kiss and continued to do so after the incident; he stated that she greeted him with a kiss when she returned from her work detail in late January. He said that he realized that the kiss at the CANA volunteer's house could have been misinterpreted and acknowledged that he should not have been in that position with a subordinate. He also stated that she had never spoken to him about the incident.

We also asked the law enforcement supervisor about the incidents the employee described at the Playalinda station. He said that he recalled discussing safety inspection results with her, but he denied trying to draw her into the evidence room with him. He also recalled speaking with her about a project while she was seated at her computer, but again he denied trying to be inappropriately close to her.

The supervisor acknowledged participating in conversations with his subordinates in which they used inappropriate language and discussed improper subjects. Some of those discussions, he said, were about sex and alcohol, and he realized that as their supervisor he should have refrained from participating. He said that the employee participated in some of those conversations, but there was never any inappropriate touching in the group. He also admitted that he had suggested to her that he come to her home for lunch, but he said he never intended to act on those suggestions.

When we interviewed him a second time about the incident at the volunteer's home, some of the details of his account changed. He told us that when the volunteer contacted him about the Christmas decorations, he also mentioned needing his television adjusted. He also stated that he told the law enforcement employee that more decorations were upstairs. He said that the volunteer had a storage space on the second level of his home, on the way to the bedroom, where he kept decorations, but when he saw that the space was empty he proceeded to the bedroom to fix the television. He denied that he had planned to lure the employee upstairs.

He said that the employee had been to the volunteer's home before, but he did not know whether she had ever been in the bedroom. He also acknowledged that it was the first time she had been there with him when the volunteer was not present. Later in the interview, he acknowledged that there was no need for her to have been in the bedroom with him.

The supervisor again denied trying to kiss the employee while they were in the bedroom, stating that it was just "her perception" that he was. Shortly after making that statement, however, he admitted that he had tried to kiss her on the cheek. When asked why, he said he did not know. In addition, he again denied motioning toward the bed; he said she was lying about that. He said he was not trying to have sex with her and that he did not know what his intentions were at the time.

He described what transpired in the bedroom as a "misunderstanding," but when asked what the misunderstanding was, he replied that he did not know. He said there had never been any prior "misunderstandings" between him and the employee the entire time she worked for him. As in the first interview, he stated that she had never said anything to him about the incident and she never told him that she felt harassed. He said again that they still hugged each other in greeting.

During this interview, when we asked him if he thought it was inappropriate for him to be in the volunteer's bedroom with a female subordinate, he said no. Later, however, he said that as her supervisor, he never should have been in that position. He said that he planned to change how he interacted with CANA employees so that he was only being polite, nothing more, but he was concerned that others might perceive his new demeanor as retaliatory.

We also spoke with the rangers whom the employee had confided in about the incident at the volunteer's home. Their descriptions of the incident were consistent with each other. One ranger, who stated that he had known the employee for approximately 10 years and considered her a dear friend, told us that she was crying and distressed as she told him about it. She told him that she did not want to deal with the ramifications of reporting the incident, he said, but she seemed relieved to be able to talk to someone about it. The other ranger, who said that she had also

confided in him about her experience in the evidence room at Playalinda, told us that she was conflicted and concerned about her job but he advised her to report the incident immediately.

Both rangers said that the employee's interactions with the supervisor had changed since the incident at the volunteer's house. One said that before the incident, she and the supervisor were always laughing and joking, but when he encountered them at the Apollo Beach Visitor's Center soon afterward he noticed a change in her demeanor. He said that she had attempted to put it behind her and move forward, but she did not want to be alone with the supervisor. She had also expressed to the other ranger that she only felt comfortable being around the supervisor in a group setting, not by herself.

Both rangers said that while the law enforcement staff at CANA often joked with each other and exchanged vulgarities, they had never observed any inappropriate behavior or interactions between the supervisor and the employee. One ranger said that he had seen the supervisor hug her, but stated that he hugged everybody. The other said that he never saw her do anything that could lead the supervisor to believe he could approach her in an inappropriate manner or that she would reciprocate a sexual advance.

#### *Alleged Inappropriate Behavior Between the Supervisor and the Employee*

Shortly after our initial visit to CANA, the superintendent informed us that a CANA administrative manager told her that he had witnessed inappropriate behavior between the law enforcement supervisor and the law enforcement employee during a training session for DOI's time-and-attendance system in mid-January 2016. According to the superintendent, the CANA manager said that he saw the employee place her head on the supervisor's shoulder and whisper in his ear.

We interviewed the administrative manager, who stated that on January 11, 2016, he and two staff members were facilitating the training. Five law enforcement employees, including the supervisor and his subordinate, attended the training.

The manager stated that the supervisor and the employee were seated next to each other to his left at a conference table, and he saw her rest her head on the supervisor's shoulder. He said that the supervisor did not have any particular reaction and appeared expressionless. He said that he told the superintendent it was an odd display and he did not think it was appropriate, so he thought it was worth mentioning.

We interviewed everyone who attended the training, including the supervisor and the employee. No one corroborated what the manager said he observed; both the supervisor and the employee vehemently denied that it happened.

#### **The Law Enforcement Supervisor's Alleged Harassment of an Administrative Assistant**

We interviewed an administrative assistant at CANA who reported a pattern of sexually harassing behavior directed toward her by the law enforcement supervisor over the past year. She told us she first met him when she worked in another CANA division and that their relationship

had been friendly and nothing out of the ordinary. When she started in her current position in approximately 2015, she said, the supervisor was the only person she knew there, and he began asking her out to lunch. She said that she thought nothing of it because it was normal for the employees to have lunch together.

The administrative assistant said that the supervisor began to come into her office and tell her that she was “the most beautiful girl” he had ever seen and that she was his “one true love.” He also brought her a flower from outside and placed it on her desk, and he gave her a rock on another occasion. She believed at first that he was just joking or being playful with her and that the compliments were just part of his culture.

The supervisor frequented the movies, the administrative assistant said, and he would often try to engage her in discussions about movie sex scenes. She said that he would say things about movie actresses such as: “The girl with blond hair . . . she’s really pretty, and she kind of reminds me of you,” and that he would always describe such scenes to her as “making love,” as if to suggest that he and she were in love and would actually make love. He also asked her how old she was and what her feelings were about love with someone older than she was. She said that she tried to make light of the subject and mentioned the difference in her parents’ ages, but the supervisor kept steering conversation back to her and him and to sexual content in movies. She said that these conversations made her extremely uncomfortable.

The administrative assistant stated that on one occasion, when she and the supervisor were in his car returning from lunch, he began to describe a kissing scene from a movie. She said that she abruptly got out of the car, after which he completely refrained from speaking to her for a couple of months. Eventually, however, he resumed telling her that he loved her.

She said that the supervisor had never propositioned her for sex but had often tried to see her outside work. She said that he would tell her that he was frequently in her town and he always had the urge to text her to see if she wanted to see a movie or get something to eat. He never actually texted her, she told us, but he would constantly mention wanting to. She also told us that whenever she left the office without telling him goodbye, he would send her text messages indicating how sad that made him feel.

When we asked the administrative assistant if she felt there was a discernible pattern and history to the supervisor’s behavior, she said yes. She also said yes when asked if she felt that he was trying to date her.

The administrative assistant said she always tried to keep things “light” with the supervisor because, as a supervisor with a certain level of authority, he seemed as though he could make things uncomfortable for her at work. She also felt intimidated because she was the newest person in the office and she was trying to make friends so that her job would go more smoothly. She said that the supervisor’s behavior had stopped to some degree, so she had not felt the need to report it. She believed that if we confronted him with the information she provided, there would probably be some backlash.

The supervisor denied sexually harassing the administrative assistant. He said that he had taken her to lunch alone only once, and the other times they had lunch as part of a group. He said that he had also taken just about every female CANA employee to lunch, including the superintendent.

The supervisor said that when he took the administrative assistant to lunch they talked about work, college, and her boyfriend. He acknowledged that he was passionate about movies and said he probably talked about music and movies as well, but he denied ever engaging her, or attempting to engage her, in conversations about sexual content or sex scenes in movies. He stated that her allegation was a lie.

He also denied giving the administrative assistant unsolicited compliments on her appearance and repeatedly telling her that he loved her. He acknowledged giving her a flower and a stone, but he said that he meant those gestures as a joke. He said that she sometimes gave him stickers with happy faces on them; he did not consider that harassment.

### **The Law Enforcement Supervisor's Alleged Harassment of a CANA Employee**

We interviewed a law enforcement ranger who told us about an incident that allegedly occurred sometime in 2011 and involved the law enforcement supervisor and a CANA employee who now worked at Playalinda Beach.

The ranger said that one day, soon after the employee accepted her position in Playalinda, there were reports of inclement weather approaching and the supervisor was repeatedly on the radio checking on the Playalinda employee's whereabouts. The ranger said that she heard the radio traffic and went to check on the employee herself, and she asked her why the supervisor appeared to be so concerned about her. The Playalinda employee told her that one of the reasons she was happy to be working in Playalinda was that she could get away from the supervisor because he was constantly trying to get her to go out with him and calling her in the evenings after work. The ranger said this employee told her that the supervisor gave her "the creeps."

According to the ranger, the Playalinda employee did not report the supervisor's behavior to her own supervisor because she did not want to cause problems, and she asked the ranger to keep their conversation confidential. Nevertheless, the ranger reported the information to a supervisory ranger, who directed her to prepare a written statement of what the employee had told her. The ranger said that another supervisory ranger later met privately with the Playalinda employee and the law enforcement supervisor, after which no further action was taken.

We interviewed the Playalinda employee, who told us that she and the supervisor had been coworkers at Apollo Beach sometime in 2010, while she was working there temporarily. She said that he began asking her out to the movies every week and it was annoying. She said that he had asked her enough times to make her question his motives, and she did not welcome his behavior, mainly because he was married. (The ranger had told us that the supervisor's family was still living in Puerto Rico at that time.)

The employee said that the supervisor stopped asking her out after she transferred to Playalinda. She confirmed that she confided in the ranger that she was happy to be at Playalinda because she would no longer have to deal with the supervisor. She also told us that the ranger documented and reported their conversation without consulting her.

The Playalinda employee recalled feeling intimidated during the meeting with the supervisor and the supervisory ranger. She said they told her that she had misinterpreted the supervisor's intentions and that the misunderstanding was caused by cultural differences.

She stated that the supervisor had never displayed any inappropriate physical behavior with her and had never tried to be alone with her. She said that she got along well with him now and she did not want to escalate something that had occurred in the past.

The supervisor told us that he had not tried to date the Playalinda employee in 2011, and he had not harassed her by calling her after work and repeatedly asking her out. He did not go so far as to call her a liar, but he insisted that he was not lying. He said that it was a "misunderstanding" between the two of them and the supervisory ranger had them sit down and address it. He said he also received a reprimand or counseling, but the matter was handled internally.

We reviewed the supervisor's official personnel file and discovered one letter of reprimand and one letter of warning, both of which resulted from two unrelated Office of Inspector General investigations. Neither case involved sexual harassment allegations. We also interviewed the superintendent of the San Juan National Historic Site in Puerto Rico, who told us that he worked with the supervisor from 2002 until the supervisor transferred to CANA. He did not recall any incidents or reports of harassment of any kind involving the supervisor.

### **Harassment Allegations Against CANA Administrative Manager**

When we interviewed the law enforcement employee, she stated that inappropriate comments were made at CANA headquarters frequently but no one ever complained. She went on to say the administrative manager once told her he had dreams about her. She said that he made the comment during a group conversation in the presence of herself and three other CANA employees, including a ranger and the CANA administrative assistant. She said that the remark offended her, but she dismissed it and told him that she did not need to hear that. She said that she was not the type of person to report such a comment, and she did not feel harassed by it.

We interviewed the three employees about the alleged comment. One did not remember any such remark, but the ranger and the administrative assistant did.

The ranger recalled that the employee quickly dismissed the manager's remark during the conversation. He said that while she did not appear overly shocked or upset by it, she was definitely not flattered and she did not give him an opportunity to elaborate. He said that the comment was taken as a joke and he did not believe it rose to the level of harassment. He said that it seemed out of character for the manager and he may have just been trying to join their conversation.

The administrative assistant said that she was a little shocked and uncomfortable when she heard the remark, and the employee it was directed to seemed shocked as well. The administrative assistant said that the employee made light of the comment but she did not know how the employee felt; she only knew that the comment was abnormal.

The administrative assistant also told us that the administrative manager had made comments to her that could be considered questionable. She described them as casual and said that she did not think they were meant to harass her, but they made her feel “creepy and weird.” For example, she said, a few months before we spoke to her, she was wearing a peach-colored dress at work. The manager told her that the dress reminded him of a Creamsicle and said that he could “lick it up.” She recalled another incident when she came to work with a bruise on her neck that she had sustained while working out, and when the manager noticed it he asked her if she had a hickey.

She said that the manager’s comments made her feel uncomfortable because he had granddaughters her age, and she told us that she had considered reporting him but she did not want to jeopardize her job. She said that he seemed uneasy at times; she described their working relationship as stressful. She told us that there was more, but she suddenly became uncomfortable and did not want to continue the interview.

When we first interviewed the manager about the remark he allegedly made to the law enforcement employee, he said that the employee was “delusional” and “not wrapped too tight.” He said it bothered him that someone in a law enforcement position would make false statements and that doing so showed her state of mind, intentions, and disposition.

When we interviewed him a second time and told him that the ranger and the administrative assistant had both said they witnessed him making the comment, he said that while he still did not recall it, he might have made it if they said he had. He said that he did not remember ever being that unprofessional, but if he did make the remark he was clearly at fault and would take full responsibility. He said that he was not trying to make any type of advance toward the employee or suggest anything inappropriate.

When asked about the comments he allegedly made to the administrative assistant, the manager acknowledged that he complimented her on the color of her dress and said that it resembled a Creamsicle, but he denied telling her that he wanted to lick it. He also vaguely remembered asking her about a bruise on her neck, but recalled that she told him it was from weightlifting. He did not recall attempting to talk to her about hickies.

The manager said that his comments were not sexual harassment, but if they raised concerns about sexual harassment, he would have to behave differently in the future. He said that he was familiar with NPS’ sexual harassment policy and the fact that harassment was largely based on individual perception. He noted that some CANA employees tended to joke around more than others, but he was “hyperaware” that anything could be perceived as sexual harassment, whether it was intended to be or not. He stated that he was cautious because of this and thought about what he was going to say before he said it. He also said that he was acutely aware of his role as a supervisor as it pertained to preventing an environment where sexual harassment can exist.

The manager said he was upset that a positive comment he made to someone had turned into something negative and that he took full responsibility for his actions. He also said that a refresher course on sexual harassment or sensitivity training would be beneficial.

### **RELEVANT POLICIES**

Sexual harassment, according to DOI Equal Opportunity Directive No. 2002-16, dated April 16, 2002, is defined as—

unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, or sexually offensive work environment.

NPS Director's Order No. 16E (DO16E), "Sexual Harassment Policy," dated December 28, 2011, stipulates that sexual harassment in the work environment will not be tolerated from employees or applicants for employment. DO16E also demands that all NPS employees and contractors avoid offensive or inappropriate sexual or sexually harassing behavior. Violations of the policy will result in disciplinary action, ranging from reprimand to termination. Managers and supervisors are required to take all actions necessary to prevent or eliminate employee exposure to a hostile, intimidating, or offensive work environment. They must also receive continuing education on prohibiting sexual harassment through training and communications.

The DOI Equal Opportunity Program defines a hostile work environment as a form of harassment demonstrated by severe and pervasive conduct that permeates the work environment and interferes with an employee's ability to perform his or her job. The U.S. Department of Labor (DOL) defines a hostile work environment as "unwelcome conduct of supervisors, coworkers, customers, contractors, or anyone else with whom the victim interacts on the job, and the unwelcome conduct renders the workplace atmosphere intimidating, hostile, or offensive." DOL provides the following examples of behavior that may contribute to a hostile work environment:

- discussing sexual activities;
- telling off-color jokes involving race, sex, disability, or other protected areas;
- touching the victim unnecessarily;
- commenting on the victim's physical attributes;
- displaying sexually suggestive or racially insensitive pictures;
- using demeaning or inappropriate terms or epithets;
- using indecent gestures;
- using crude language;
- sabotaging the victim's work; or
- engaging in "hostile physical conduct."

In addition, NPS Law Enforcement Ranger Reference Manual 9, Chapter 4, “Ethics and Conduct,” provides a code of conduct for all NPS law enforcement personnel and administrators. The manual states that these personnel must not commit any act, either when conducting official business or in their personal lives, that would subject DOI or NPS to public censure or adverse criticism, nor can they knowingly violate any local, State, or Federal laws or regulations. Recognizing the unique position of traditional high public trust held by law enforcement personnel and administrators, this code places special demands on them to preserve the confidence of the public, their own peers, their supervisors, and society in general.

### **SUBJECTS**

1. CANA Law Enforcement Supervisor.
2. CANA Administrative Manager.

### **DISPOSITION**

We provided this report to the Director of NPS for action. The criminal investigation of the law enforcement supervisor by the local police department is still pending.