



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

**REPORT OF INVESTIGATION**

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| <b>Case Title</b><br>FRIENDS OF THE JIMMY CARTER<br>NATIONAL HISTORIC SITE | <b>Case Number</b><br>OI-GA-15-0456-I |
| <b>Reporting Office</b><br>Atlanta Georgia                                 | <b>Report Date</b><br>August 5, 2015  |
| <b>Report Subject</b><br>Report of Investigation                           |                                       |

**SYNOPSIS**

The U.S. Department of the Interior (DOI) Office of Inspector General (OIG) initiated this investigation after receiving a letter from [REDACTED] private citizen, regarding allegations of employee misconduct by [REDACTED] former Superintendent at the Jimmy Carter National Historic Site (JCNHS). [REDACTED] alleged that [REDACTED] misrepresented himself as an agent of the Friends of JCNHS (Friends Group) and verbally offered him the executive director position with the group. [REDACTED] also alleged that [REDACTED] retracted the job offer after he [REDACTED] provided 10 months of services.

These allegations initially led [REDACTED] to discuss his claim for the executive director position with the Friends Group Chairperson, and ultimately led him to request compensation for his services. The board subsequently denied [REDACTED] proposal citing that (1) he was a volunteer with the Friends Group, and (2) [REDACTED] was not authorized to offer him a job. [REDACTED] said the Government received a benefit from his actions, and he believed the Friends Group/National Park Service (NPS) should ratify the unauthorized commitment and pay him \$150,000 for consultation fees.

Our investigation did not uncover any evidence to indicate [REDACTED] offered [REDACTED] the executive director position with the Friends Group. Of the individuals we interviewed only [REDACTED] had knowledge that [REDACTED] offered him the executive director position. [REDACTED] claims for payment by NPS due to [REDACTED] alleged unauthorized commitment were not investigated because we were unable to corroborate [REDACTED] allegations that a job offer was made.

We are providing a copy of this report to the NPS Director for any action deemed appropriate.

**DETAILS OF INVESTIGATION**

|   |                                       |
|---|---------------------------------------|
| <b>Reporting Official/Title</b><br>[REDACTED] Special Agent | <b>Signature</b><br>Digitally signed. |
| <b>Approving Official/Title</b><br>[REDACTED] RAC           | <b>Signature</b><br>Digitally signed. |

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The Friends of the Jimmy Carter National Historic Site (Friends Group) is a nonprofit organization formed to work in conjunction with the Jimmy Carter National Historic Site (JCNHS) to help build support for special projects that normally would not be funded. The Friends Group was incorporated under the laws of the State of Georgia in 2011, and the board of directors (board) was formed in July 2012. The Friends Group's primary funding derived from an ongoing capital campaign/fundraising team who submitted proposals to potential donors.

The U.S. Department of the Interior (DOI) Office of Inspector General (OIG) initiated this investigation in April 2015 after receiving a letter from ██████████ a private citizen (**Attachment 1**). ██████████ alleged that ██████████ former Superintendent at the JCNHS, misrepresented himself as an agent of the Friends Group and verbally offered him ██████████ the executive director position. ██████████ also alleged that ██████████ retracted the job offer after he provided 10 months of services.

██████████ then discussed the job offer/retraction with ██████████ Chairperson of the board of directors (board) for the Friends Group. ██████████ said after thinking through the matter for two weeks, he came to the conclusion that President Carter must have instructed ██████████ to retract the offer.

*Agent's note:* ██████████ did not provide any evidence to support this conclusion.

██████████ stated he decided to forego his claim to the executive director position on the condition that he would be fairly compensated as a consultant (*see Attachment 1*). The board subsequently denied ██████████ proposal citing they didn't owe him anything since he ██████████ volunteered his services. Additionally, the board cited that even if ██████████ had made a job offer on behalf of the Friends Group, he ██████████ was not authorized to do so.

██████████ told us he met ██████████ in November 2010 through ██████████ Vice Chair of the Plains Better Hometown Program (PBHP) and a long-time friend (**Attachment 2**). ██████████ said ██████████ told him about his plans to create the Friends Group, and ██████████ requested his talents to raise funds for the new group. ██████████ said no promises were made, but ██████████ told him the project could lead to a mutually beneficial relationship, specifically a position with the Friends Group. ██████████ stated he was involved in several preliminary meetings/phone calls/email discussions with ██████████ prior to the job offer, but his most significant achievement was assisting with drafting the bylaws.

██████████ stated that ██████████ offered him the executive director position with the Friends Group on April 18, 2012. According to ██████████ his primary duty was to facilitate a \$10 million fundraising campaign. ██████████ said ██████████ told him the board would determine the salary, but they both agreed that \$75,000 per annum was reasonable. ██████████ also said ██████████ told him that he could not get paid until the Friends Group received funding from the campaign. ██████████ told us the offer was not in writing, but it was sealed by a handshake and witnessed by ██████████

██████████ stated that ██████████ told him he was not the executive director in February 2013. ██████████ said he contacted ██████████ at the end of February 2013, and ██████████ told him she was not aware of the job offer. Subsequently the board told ██████████ they never requested his services and ██████████ did not have the authority to offer him the job. ██████████ stated that recruiting ██████████ as the Lead Fundraiser was the essential function of the executive director, and the Government received a benefit because of his ██████████ services. ██████████ believed he should be paid \$150,000 for consultation fees from April 2012 to September 2013 when the board finally answered him.

**Knowledge of the job offer**

When we spoke to [REDACTED] she said [REDACTED] did not offer [REDACTED] the executive director position in her presence, and she was not aware that [REDACTED] offered him [REDACTED] the position (**Attachment 3**). [REDACTED] confirmed that [REDACTED] was a long-time friend of hers who helped her raise thousands of dollars for the Plains Better Hometown Program (PBHP). [REDACTED] told us [REDACTED] had volunteered his services during the PBHP fundraisers, and he wanted to help with the creation of the Friends Group. [REDACTED] stated she assumed [REDACTED] was volunteering his services with hopes that he would get the executive director job. [REDACTED] added that [REDACTED] was assisting her, and [REDACTED] never sought any assistance from [REDACTED].

[REDACTED] told us he discussed the vision of the JCNHS and the purpose of the Friends Group when he initially met [REDACTED] (**Attachment 4**). [REDACTED] said [REDACTED] expressed a serious interest in wanting to help. [REDACTED] stated that he knew [REDACTED] was not working and he [REDACTED] had discussed an interest in a paid role with the Friends Group on a couple of occasions. However, [REDACTED] told us he did not offer [REDACTED] a position. [REDACTED] said he told [REDACTED] that the board would determine who they wanted to hire and President Carter would have a significant say in whoever was hired. [REDACTED] stated that the Friends Group did not have any money and they did not show an interest in filling any paid positions at the time. [REDACTED] did not recall having any discussion with [REDACTED] in reference to salary.

[REDACTED] stated that if the board wanted to hire [REDACTED] in a leadership role he [REDACTED] would have supported it because of the hard work [REDACTED] achieved. However, [REDACTED] said from the onset it was understood that [REDACTED] time was volunteered. [REDACTED] also said to the best of his knowledge everyone who came onboard was helping out the Friends Group, and he thought [REDACTED] was someone who had an interest in seeing the Friends Group do well.

[REDACTED] said she was not part of the board when it was formed, but she was told that [REDACTED] services were voluntary (**Attachment 5**). [REDACTED] also saw an email from [REDACTED] to [REDACTED] in which [REDACTED] referred to [REDACTED] as the acting executive director/fundraiser volunteer (**Attachment 6**). [REDACTED] added that all of the officers of the board volunteered their services, but she will be a salaried employee in her new role as Director of the Friends Group on July 13, 2015 (*see Attachment 5*).

[REDACTED] stated that [REDACTED] told her [REDACTED] offered him a job with the Friends Group at the end of 2012 or early 2013. [REDACTED] told her the job offer was a "handshake offer," and he [REDACTED] did not have a written contract. [REDACTED] said both [REDACTED] and [REDACTED] told the board that [REDACTED] was not offered a position.

*Agent's note: One of the functions of the board was to implement the bylaws. Although the board was not formed at the time [REDACTED] said he was offered the position, a draft copy of the bylaws existed. In fact, [REDACTED] stated that he assisted with drafting the bylaws (*see Attachment 2*).*

[REDACTED] told us the bylaws state that no National Park Service (NPS) employee shall be elected or appointed to a position on the board (**Attachment 7**). Additionally, the bylaws state that the Superintendent cannot vote on any issue that should be considered by the board. [REDACTED] believed the bylaws would have prohibited [REDACTED] from offering a position to [REDACTED] (*see Attachment 5*).

[REDACTED] told us he was not aware of [REDACTED] ever offering the executive director position to [REDACTED] (**Attachment 8**). [REDACTED] stated that [REDACTED] never told him that [REDACTED] offered him the executive director position. However, [REDACTED] told him that he [REDACTED] was working as a volunteer.

[REDACTED] supervised [REDACTED] while acting as the NPS Deputy Regional Director from

November 2009 to October 2012 (**Attachment 9**). [REDACTED] could not remember if the Friends Group was formed during her supervision of [REDACTED] and she did not recall having specific discussions about the group. However, she was not aware of [REDACTED] ever offering the executive director position to [REDACTED]

[REDACTED] NPS Deputy Regional Director, has been [REDACTED] supervisor both at the JCNHS site and currently at Cumberland Island National Seashore (CINS) (**Attachment 10**). [REDACTED] said she first heard of the alleged job offer through a letter that [REDACTED] attorney submitted to the Friends Group. A copy of the letter was forwarded to NPS' solicitor's office to determine if there were any implications against NPS. [REDACTED] stated there were no allegations or financial obligations against NPS, but [REDACTED] wanted compensation from the Friends Group for what he felt he was promised. [REDACTED] said [REDACTED] told her he did not offer [REDACTED] a position, and he did not know why [REDACTED] was under the impression that an offer was made to him.

**Unauthorized commitments**

Federal regulations state that contracting officers may ratify unauthorized contractual commitments if the head of contracting activity (HCA) approved the ratification action (**Attachment 11**). Federal regulations also state that generally the Government is not bound by commitments made by persons who do not have contracting authority. Such unauthorized acts may violate laws or regulations. Therefore, such unauthorized commitments should be considered as serious employee misconduct and consideration given to initiating disciplinary action.

*Agent's note: Our investigation did not reveal any evidence to support [REDACTED] claim that [REDACTED] offered him the executive director's position with the Friends Group on April 18, 2012. In fact, [REDACTED] refuted [REDACTED] account. As a result, we did not investigate [REDACTED] claims for ratification of an unauthorized commitment because we were unable to corroborate his allegations that a job offer was made.*

**SUBJECT(S)**

[REDACTED] [REDACTED] Superintendent, NPS Cumberland Island National Seashore

**DISPOSITION**

This case is being referred to the NPS Director for any action deemed appropriate.

**ATTACHMENTS**

1. Copy of the complaint letter from [REDACTED] dated April 14, 2015.
2. IAR - Interview of [REDACTED] on May 6, 2015.
3. IAR - Interview of [REDACTED] on May 28, 2015.
4. IAR - Interview of [REDACTED] on June 30, 2015.
5. IAR - Interview of [REDACTED] on July 2, 2015.
6. Copy of an email from [REDACTED] to [REDACTED] referring to [REDACTED] as the acting executive director/volunteer.
7. Copy of the Friends Group bylaws.
8. IAR - Interview of [REDACTED] on July 9, 2015.
9. IAR - Interview of [REDACTED] on July 16, 2015.

10. IAR - Interview of [REDACTED] [REDACTED] on July 16, 2015.
11. Copy of 48 CFR § 501.602-3 Ratification of unauthorized Commitments.