



HAWAII STATE ETHICS COMMISSION

State of Hawaii • Bishop Square, 1001 Bishop Street, ASB Tower 970 • Honolulu, Hawaii 96813

ETHICS ADVISORY 2013-01

THE UNIVERSITY OF HAWAII ATHLETIC EVENT TICKET POLICIES FOR THE BOARD OF REGENTS, SYSTEM ADMINISTRATORS, AND MANOA CHANCELLOR

May 30, 2013

The Hawaii State Ethics Commission (“Commission”) has reviewed three policies established by the University of Hawaii (“UH” or “University”) pertaining to the distribution of complimentary tickets and passes to UH athletic events (“ticket policies”). They are as follows:

- I. *Athletic Event Ticket and Parking Allocation Policy for the Office of the Board of Regents* (effective 09/13/12) (“**Regents’ Ticket Policy**”);
- II. *Athletic Event Ticket and Parking Allocation Policy for the President, Vice Presidents and Associate Vice Presidents* (effective 09/13/12) (“**System Administrators’ Ticket Policy**”); and
- III. *UH Manoa Office of the Chancellor Athletic Event Ticket and Parking Allocation Guidelines* (undated) (“**Chancellor’s Ticket Policy**”).

The Regents’ Ticket Policy is attached as Exhibit “A;” the System Administrators’ Ticket Policy is attached as Exhibit “B;” and the Chancellor’s Policy is attached as Exhibit “C.”

Each ticket policy was reviewed for consistency with the State Ethics Code, Chapter 84, Hawaii Revised Statutes (“HRS”). The Commission’s guidance applies to the distribution of complimentary tickets and passes to athletic events under the purview of the University of Hawaii at Manoa (“UH Manoa”).

Venues for UH Athletic Events

The Regents’ Ticket Policy, the System Administrators’ Ticket Policy, and the Chancellor’s Ticket Policy pertain to complimentary tickets to UH football games at Aloha Stadium; UH basketball and volleyball games at the Stan Sheriff Center; and UH baseball games at Murakami Stadium. The policies also apply to UH games that are played on the road.

Most of the complimentary tickets are issued for football games at Aloha Stadium. Only a small percentage of complimentary tickets are issued for events at the Stan Sheriff Center and Murakami Stadium. Complimentary tickets to road games, generally, are not available to UH personnel.¹

Tickets, entry passes, and parking passes to UH athletic events are state assets, i.e., state property with a relatively substantial dollar value.² HRS section 84-13, the “fair treatment” provision of the State Ethics Code, prohibits University officials and employees from receiving “unwarranted” privileges, advantages, or treatment or extending such privileges, advantages, or treatment to others.³ Stated differently, the State Ethics Code does not allow the University to provide its own employees or others with complimentary tickets or passes where such distribution would constitute an unwarranted privilege or benefit. In order to comport with the State Ethics Code, the distribution of complimentary tickets or passes to any person, whether a UH official, UH employee, other state employee, or member of the public, must serve a legitimate state purpose.

Legitimate “State Purpose”

The Commission believes that issuing a complimentary ticket or pass to an individual for the following reasons serves a legitimate state purpose:

- The individual is representing the University at an athletic event in accordance with protocol due to the individual’s position at the University.
- The individual is hosting donors or potential donors at an athletic event to express appreciation for their support of the University or to foster relationships with them.
- The individual is hosting a guest whose presence at an athletic event helps to generate goodwill for the University due to the unique stature of that guest.

¹ For each road game, the opponent provides the University with 300 to 400 tickets. However, these tickets are almost always distributed to the student athletes, each of whom receives four complimentary tickets in accordance with NCAA rules, and UH coaches, who receive tickets under the terms of their employment contracts. Any “leftover” tickets are used to fill requests for complimentary tickets, but there rarely are any tickets available for that purpose.

² The Commission acknowledges the University’s position that UH athletic events are the University’s own events. However, the University is a state agency. Therefore, tickets and passes to UH athletic events are considered state property.

³ HRS section 84-13 prohibits state officials and employees from using or attempting to use their official positions “to secure or grant unwarranted privileges, exemptions, advantages, contracts, or treatment” for themselves or others.

- The individual is hosting a guest at an athletic event in order to promote the University to that guest.
- The individual is participating in a recognition ceremony or other University-sponsored program at an athletic event.
- The individual is being honored or recognized at an athletic event.
- The individual is a UH employee who is attending an athletic event in his or her state capacity for legitimate work purposes.
- The individual, due to his or her unique stature, helps to generate goodwill for the University.
- The individual is representing a corporate partner or sponsor of UH athletics at an athletic event.
- The individual is assisting the University's fundraising, marketing, or promotional activities in connection with an athletic event.

There likely are other instances where the distribution and use of complimentary tickets serves a legitimate state purpose. The UH Manoa Chancellor ("Chancellor") oversees the UH Manoa Athletics Department ("Athletics Department"), which is responsible for the varsity sports programs. For that reason, all requests for complimentary tickets under the Regents' Ticket Policy, the System Administrators' Ticket Policy, and the Chancellor's Ticket Policy are funneled through the Chancellor's Office. Therefore, the Commission believes that the Chancellor ultimately has the burden to justify a legitimate state purpose for tickets issued under those ticket policies.

After considering the information provided by the University at the Commission's meetings and other meetings and in numerous telephone discussions--especially the reasons or justifications described by the University for the issuance of complimentary tickets to certain UH employees and their families--the Commission does not agree that all aspects of the ticket policies, in their current form, comport with the State Ethics Code. To be consistent with the State Ethics Code, the Commission recommends that the ticket policies be revised in accordance with the recommendations summarized in the table below.

SUMMARY

	SELF	SIGNIFICANT OTHER (Spouse or Partner)	IMMEDIATE FAMILY MEMBERS	PARKING PASS
REGENT	One ticket per event (or season tickets) (Protocol Function)	One ticket per event (or season tickets) (Protocol Function)	Regent may purchase tickets in areas reserved for Regents or other areas not for sale to public	One per event
BOARD OF REGENTS' STAFF (including Executive Secretary)	One ticket or one entry pass for an event <u>only if required to work</u>	No	No. Staff members cannot purchase tickets in areas reserved for Regents or other areas not for sale to public	One for the event if required to work
PRESIDENT	One ticket per event, (or season tickets) and One entry pass per event (Protocol Function)	One ticket per event (or season tickets) and One entry pass per event (Protocol Function)	President may purchase tickets in areas reserved for President or other areas not for sale to public	One per event
VICE PRESIDENTS	One ticket for an event <u>only if required to work</u>	No	No. Vice Presidents cannot purchase tickets in areas reserved for Vice Presidents working at event or other areas not for sale to public	One for the event if required to work
ASSOCIATE VICE PRESIDENTS	One ticket for an event <u>only if required to work</u>	No	No. Associate VPs cannot purchase tickets in areas reserved for Associate VPs working at event or other areas not for sale to public	One for the event if required to work

	SELF	SIGNIFICANT OTHER (Spouse or Partner)	IMMEDIATE FAMILY MEMBERS	PARKING PASS
CHANCELLOR	One ticket per event and One entry pass per event (Protocol Function)	One ticket per event and One entry pass per event (Protocol Function)	Chancellor may purchase tickets in areas reserved for Chancellor or other areas not for sale to public	One per event
SENIOR CAMPUS ADMINISTRATORS (Vice Chancellors, Deans, Directors)	One ticket for a state purpose	No	No	One for a state purpose
CAMPUS MEMBERS (Faculty, Other Personnel, Students)	One ticket for a state purpose	No	No	One for a state purpose
DONORS; POTENTIAL DONORS	One ticket	Yes, if important to include	Free, if important to include	One
RECIPIENT OF AWARD OR RECOGNITION	One ticket	Yes	Free	One
COMMUNITY AND GOVERNMENT LEADERS	One ticket for a state purpose	N/A	N/A	One for a state purpose
ALUMNI	One ticket for a state purpose	N/A	N/A	One for a state purpose
UH PERSONNEL WHO MUST WORK AT EVERY EVENT	One entry pass	N/A	N/A	One

	SELF	SIGNIFICANT OTHER (Spouse or Partner)	IMMEDIATE FAMILY MEMBERS	PARKING PASS
UH FOUNDATION PERSONNEL	One entry pass per selected personnel	N/A	N/A	One
AHAHUI KOA ANUENUE; NA KOA PERSONNEL	One entry pass per selected personnel	N/A	N/A	One
CORPORATE PARTNERS; SPONSORS	One entry pass per selected representative	N/A	N/A	One

I. REGENTS AND PRESIDENT

A. Regents

Members of the UH Board of Regents receive complimentary seating at Aloha Stadium in the “Brown” Loge Area, in Section H.⁴ A number of seats in this area are set aside for use by the Regents (“Regents’ Area”).⁵ None of the seats in the Regents’ Area are available for purchase by the public on a per game basis. A map of Aloha Stadium is attached as Exhibit “D.”

The Regents are responsible for the entire University System, including UH Manoa. The University considers the Regents as the official representatives or “face” of the University. Given the stature of the Regents, their presence at UH athletic events serves a “protocol” function that constitutes a legitimate state purpose. Therefore, the Commission believes that the State Ethics Code allows each Regent to receive two complimentary tickets per athletic event (or two season tickets)--one for the Regent and one for the Regent’s significant other⁶--and one parking pass.

⁴ There are no seats at the Stan Sheriff Center or at Murakami Stadium reserved specifically for the Regents.

⁵ The number of seats in the Regents’ Area, generally, is based on the previous year’s requests for tickets by the Regents and may change from year to year. A few seats within this area are occupied by paying season ticket holders.

⁶ For the purposes of this discussion, the term “significant other” means a spouse or a partner.

With respect to Emeritus Regents (former Regents), the Commission believes it is an unwarranted privilege, i.e., contrary to the fair treatment provision of the State Ethics Code, for a former Regent to receive free tickets simply as a reward for prior state service. In the Commission's view, this does not further a valid state purpose. Accordingly, any complimentary tickets issued to Emeritus Regents must be for a legitimate state purpose.

B. President

Complimentary seating at Aloha Stadium is available to the President and the President's significant other in the "Brown" Loge Area, Section N, within the 38 seats that are reserved for the Chancellor.⁷

The President is the senior most executive officer in the University System. The President's attendance at UH athletic events serves a "protocol" function. Because of the President's position and associated responsibilities, the Commission does not believe that the State Ethics Code prohibits two complimentary tickets and a parking pass for the President. The Commission also believes that the President may additionally receive, if necessary, two "All-Access" passes (for the President and the President's significant other).⁸ The Commission does not believe that this is an unwarranted privilege given the President's duties.

The *University of Hawaii at Manoa's Sporting Events Guidelines* for the Fiscal Year 2012-2013, attached as Exhibit "E," discuss who may receive All-Access passes.⁹ An All-Access pass is issued to an individual who is deemed "actively engaged," i.e., "required to perform their regular work duties at any sporting event." An All-Access pass provides the holder with entry to Aloha Stadium and other venues but not an assigned seat. The pass also allows the holder to enter certain restricted access areas, such as the playing field. In some situations, an individual who is hosting a guest may need both a ticket and a pass, e.g., the host needs a designated seat in order to sit with the guest during a game but also needs a pass to escort the guest to the playing field for a ceremony.

⁷ There are no seats at the Stan Sheriff Center or at Murakami Stadium reserved specifically for the President or other System Administrators.

⁸ Last year, the President did not request any complimentary tickets for herself. The President instead used an All-Access Pass. The *University of Hawaii at Manoa's Sporting Events Guidelines* state that the President is "actively engaged" at athletic events so a "designated ticket" for the President is "not necessary." However, based on information provided by the University, it appears that both a ticket and an All-Access pass may be necessary in some situations.

⁹ A large number of individuals receive All-Access passes. The *2013 UH Athletics All Access Pass List*, attached as Exhibit "F," identifies individuals who have received those passes.

C. Immediate Family Members

The Commission does not believe that the State Ethics Code prohibits a Regent or the President from purchasing tickets for immediate family members on a per game basis in areas reserved for the Regents or the President, or in other areas that are not for sale to the general public, at fair market value. The fair market value is the price that would be charged to a member of the public if the ticket could be sold to the public. Because of the positions they hold at the University, the Commission does not believe that that this is an unwarranted privilege for the Regents or the President.

Nevertheless, it is a privilege. Therefore, the Commission recommends that the Chancellor and/or the Office of the Board of Regents maintain records of tickets in the particular areas described that are purchased for the Regents' immediate family members and the names of the family members.

II. MEMBERS OF BOARD OF REGENTS' STAFF

The Commission does not believe that the State Ethics Code prohibits a member of the Board of Regents' ("Board's") staff, including the Board's Executive Secretary, from receiving either a complimentary ticket or an All-Access pass¹⁰ and parking to an athletic event for legitimate work purposes. If the staff member is not required to work at the event, a complimentary ticket or entry pass with parking is an unwarranted privilege.

If the staff member is required to attend an athletic event for legitimate work purposes, it is assumed that the staff member will sit near the Regents. The Commission believes that if the staff member is attending because he or she must work at the event, it is an unwarranted privilege for the staff member to be allowed to purchase tickets for immediate family members in areas reserved for the Regents or in other areas not for sale to public.

III. VICE PRESIDENTS AND ASSOCIATE VICE PRESIDENTS

Vice Presidents and Associate Vice Presidents are seated at Aloha Stadium in the "Brown" Loge Area, Section N.

The Commission does not recognize there to be a legitimate state purpose in providing a Vice President with two complimentary tickets (including season tickets) and

¹⁰ The Regents' Ticket Policy allows one complimentary ticket per staff member "supporting Regents at the athletic event." However, the *University of Hawaii at Manoa's Sporting Events Guidelines* indicate that the Board's staff receive All-Access passes instead. The Commission believes that either a complimentary ticket or an All-Access pass is allowed only if the staff member is required to work at an event.

a parking pass for every event.¹¹ The University broadly asserts that a Vice President may be required to work at an event. However, from the information offered by the University, it is unclear to the Commission as to what specific work a Vice President is likely to perform at an athletic event.

Assuming that a Vice President is required to work, one complimentary ticket and a parking pass to the Vice President for that specific event appears reasonable and sufficient. If a Vice President is not expected to work at every game, the Commission believes that a complimentary ticket for every event or season tickets with parking is an unwarranted privilege and therefore prohibited under the State Ethics Code.

Contrary to University's suggestion that a Vice President's spouse should receive a complimentary ticket because it is unfair to leave the spouse at home, the Commission disagrees that the spouse's attendance at the game serves a legitimate state purpose. The Commission believes that complimentary admission for a spouse in that situation is an unwarranted privilege and prohibited under the State Ethics Code. If a complimentary ticket is requested for a Vice President's significant other, the Chancellor has the obligation to scrutinize the reason for the request. If the reason provided is inconsistent with the guidance herein, the request should be rejected.

The Commission believes it is an unwarranted privilege and, therefore, prohibited for a Vice President to be allowed to purchase tickets for immediate family members in areas reserved for Vice Presidents who are attending an event for legitimate work purposes or in other areas that are not for sale to the public.

The Commission sees no legitimate state purpose in issuing an Associate Vice President a complimentary ticket and parking to an event unless the Associate Vice President is required to attend an event for legitimate work purposes.¹² However, from the information offered by the University, it is unclear to the Commission as to what specific work an Associate Vice President is likely to perform at an athletic event.

IV. CHANCELLOR

UH Manoa varsity athletic events are under the purview of the Chancellor, UH Manoa's highest ranking official. The Chancellor has the authority to issue

¹¹ Last year, the Acting Athletics Director offered each Vice President and Associate Vice President one complimentary season ticket for football and the opportunity to purchase a second season ticket. None of the Vice Presidents or Associate Vice Presidents accepted that offer.

¹² The System Administrators' Ticket Policy contains no provision regarding the purchase of tickets for an Associate Vice President's immediate family members. The Commission believes that allowing Associate Vice Presidents to purchase tickets for immediate family members in areas reserved for Associate Vice Presidents who are attending an event for legitimate work purposes or in areas not for sale to public would be an unwarranted privilege.

complimentary tickets for a number of seats at Aloha Stadium. The following seats are reserved for the Chancellor's use:

- "Brown" Loge Area, Section N, 38 seats ("Chancellor's 38 Seats").
- A box of 14 seats ("Chancellor's Box") within a larger press box located on the "makai" side of the stadium, on same level as the Brown Loge Area. Members of the Chancellor's staff who work at the football games use an additional 3-4 seats located above the 14 seats. Catered food is available for guests seated in the Chancellor's Box.
- 30 seats in the South End Zone baseball press box ("South End Zone Press Box"). For the past several years, the Stadium Authority¹³ has allowed the Chancellor to use these seats for at least one game of the football season. Historically, the UH Athletics Department has also been allowed to use these seats for at least one game. Catered food is available for guests seated in the South End Zone Press Box.

Thus, for each home football game, the Chancellor has the authority to issue 52 complimentary tickets. Also, for at least one of those games, an additional 30 seats may be available for the Chancellor's use.¹⁴

A. Complimentary Seating for the Chancellor and Significant Other

The Chancellor's Ticket Policy does not specifically describe what the Chancellor receives in terms of complimentary seating for himself. However, the "*University of Hawaii at Manoa's Sporting Events Guidelines*" indicate that the Chancellor receives two All-Access passes, one for the Chancellor and one for the Chancellor's significant other. The Commission believes that two All-Access passes for the Chancellor serves a legitimate state purpose.

The Commission also believes that the State Ethics Code does not prohibit the Chancellor from receiving a complimentary ticket for himself and his significant other,

¹³ The Stadium Authority is a state board that is responsible for maintaining, operating, managing, promoting, and marketing Aloha Stadium.

¹⁴ At the Stan Sheriff Center, the Chancellor sits at a table (that seats about four people) located on the court for basketball and volleyball games. There are no seats at Murakami Stadium reserved specifically for the Chancellor.

in addition to two All-Access passes, if necessary.¹⁵ Given that the Chancellor is responsible for UH Manoa, including the UH Manoa Athletics Department, the Commission does not believe that two All-Access passes and two complimentary tickets with parking is an unwarranted privilege.

B. Immediate Family Members

The Chancellor's Ticket Policy does not specifically address admission to athletic events for the Chancellor's immediate family. The Commission believes that the Chancellor (like the Regents and the President) may purchase tickets on a per game basis for immediate family members in areas reserved for UH officials, if available, at fair market value. Due to the Chancellor's position, the Commission does not believe it is an unwarranted privilege for the Chancellor to be allowed to purchase tickets in areas reserved for the Chancellor or in other areas not for sale to the public.

The Commission recommends that the Chancellor's Office maintain records of tickets in the particular areas described that are purchased for the Chancellor's immediate family members and the names of the family members.

C. Chancellor's Guests

The Chancellor's Ticket Policy states that the UH athletics programs provide opportunities for the UH to connect with a "large community of stakeholders," described as "alumni, donors, friends and leaders in the community and beyond." According to the policy, intended guests may include "stakeholders, internal and external to UH Manoa, with the goal of building relationships and advancing UH Manoa." The Commission understands an "external stakeholder" to mean someone outside of the University, such as a private sector donor. The Chancellor's Office explained that "internal stakeholders" include senior campus administrators (i.e., Vice Chancellors, Deans, or Directors) who host others at athletic events.

Donors and Potential Donors. The Commission believes that complimentary tickets issued to donors and potential donors to maintain or foster relationships with the University serve a legitimate state purpose.

Alumni. The Commission recognizes that there may be instances where issuing a complimentary ticket to alumni may be important in generating goodwill for the University. For example, providing complimentary tickets to select alumni to participate in a

¹⁵ The *University of Hawaii at Manoa's Sporting Events Guidelines* state that the Chancellor is "actively engaged" at athletic events so a "designated ticket" for the Chancellor is "not necessary." However, based on information provided by the University, it appears that both a ticket and an All-Access pass may be necessary in some situations.

homecoming game ceremony appears consistent with a legitimate state purpose. However, the Commission cautions that complimentary tickets should not be distributed routinely to alumni based solely on their status as alumni.

Community and Government Leaders. The Commission also believes that a legitimate state purpose may be served in providing complimentary tickets to community leaders and government officials, e.g., someone attending an event for official business or an individual who helps generate goodwill for the University because of his or her unique stature. However, complimentary tickets should not be distributed routinely to community leaders or government officials (including legislators) by virtue of their official positions.

“Friends.” The use of the term “friends” in the Chancellor’s Ticket Policy is troublesome. The Commission believes that the term “friends” is vague and overly broad and subject to possible misinterpretation. The Commission believes that use of the term is unnecessary if it means donors or potential donors, because the Chancellor’s Ticket Policy already recognizes donors or potential donors.

Senior Campus Administrators. The issuance of a complimentary ticket to a senior campus administrator, i.e., a Vice Chancellor, Dean, or Director, who must host a donor, prospective donor, other benefactor, or the recipient of an award appears consistent with the State Ethics Code. The Chancellor encourages Vice Chancellors to attend athletic events “whenever possible as part of their official responsibilities in providing information and generating support for the University and campus programs.” Although a complimentary ticket to perform specific work related duties, such as hosting a donor, appears consistent with the State Ethics Code, the Commission believes that issuing a free ticket to a Vice Chancellor simply because the Vice Chancellor wants to “show support for the University” is insufficient to constitute a legitimate a state purpose.

Campus Members. The Chancellor’s intended guests also include “campus members,” i.e., faculty, staff, students, development and communication personnel, and administrators. The policy states that these individuals “may be invited on a per game basis to recognize special accomplishments, to host important constituencies and/or to support relationships in conjunction with the senior campus administrators.”

Issuing a complimentary ticket to a campus member who must attend an athletic event to host or assist in hosting others in order to promote the University, advance the University’s interests, or maintain the University’s relationships with donors or other benefactors appears consistent with the State Ethics Code.

Issuing a complimentary ticket to a particular individual in order to recognize a special accomplishment of that individual at the University also appears consistent with the State Ethics Code. However, issuing complimentary tickets to a block of UH employees (e.g., all of the workers in a particular office) for no other reason than to “boost employee morale” raises concerns and most likely does not constitute a legitimate state purpose.

D. Number of Tickets Per Guest; Larger Groups

The Chancellor's Ticket Policy offers two tickets per "guest," with parking. The policy also provides that additional complimentary tickets per guest may be issued "to accommodate larger stakeholder groups/family members," subject to approval by the Chancellor. The Commission does not believe that two tickets are justified in every situation, nor does the Commission believe that additional complimentary tickets may be issued for larger groups in every instance; it depends on who is using the tickets and the associated state purpose.

1. Family Members of UH Officials and Employees

A complimentary ticket issued to a UH official or employee must be for an official work related purpose; i.e., a legitimate state purpose. Likewise, any complimentary ticket issued to a UH official/employee's significant other must be for a legitimate state purpose. In the Commission's view, the Regents, the President, and the Chancellor, due to their positions and for "protocol" reasons, may be allowed to receive a free ticket for their significant other.

With respect to other UH personnel, the Chancellor has the responsibility to ensure that complimentary tickets are being issued for a significant other only where there is a legitimate state purpose in the significant other's attendance. For example, if attendance by a UH employee's spouse is needed to host a potential donor due to the spouse's relationship with the potential donor, a free ticket for the spouse may serve a state purpose.

If a UH employee is being honored at an event, the Commission does not believe that providing complimentary tickets to the employee's significant other and/or immediate family members would raise concerns under the State Ethics Code

It appears that, on occasion, the children of an employee who must work at an event receive free admission and are seated near their parent at the event. This apparently is allowed if the children are young and the employee cannot leave them home alone. The Commission believes that providing free tickets for the employee's children is an unwarranted benefit and is prohibited under the State Ethics Code. Of noteworthy significance here is that the ticket policies applicable to the Regents and the President do not allow their immediate family members (dependent children) to have complimentary tickets.

2. Family Members of Outside Guests

The Commission understands that there may be requests for complimentary tickets for an outside guest (i.e., someone who does not work for the University) as well as the guest's significant other and/or dependent children. For example, it may be

important to include the family members of a donor if this helps to foster the relationship with the donor. In that situation, complimentary tickets for the group may be deemed to serve a legitimate state purpose.

V. UNIVERSITY OF HAWAII FOUNDATION; UNIVERSITY OF HAWAII ALUMNI ASSOCIATION

In 2012, under the direction of the new Chancellor, Tom Apple, the University of Hawaii Foundation (“UH Foundation”) and the University of Hawaii Alumni Association (“UHAA”) recommended individuals to be invited to athletic events. The UH Foundation is the central fundraising organization for the UH System.¹⁶ The UHAA is the official alumni organization of the UH System.¹⁷ After the lists were vetted by the Chancellor, the UH Foundation sent out the invitations and delivered the tickets to the guests. The Chancellor elicited help from the UHAA to assemble a guest list specifically for the homecoming football game. It is expected that the Chancellor will continue to rely on the UH Foundation and the UHAA to provide this assistance.

The Commission believes that final Chancellor approval of the guest lists is essential because, as previously discussed, it is the Chancellor’s responsibility to ensure that UH Manoa’s assets, i.e., the tickets, are being used only for legitimate state purposes. If the Chancellor is relying on recommendations from the UH Foundation and the UHAA, the Chancellor should apprise the UH Foundation and the UHAA of the criteria for determining, for each guest, a legitimate state purpose in issuing a complimentary ticket to that guest.

VI. UH ATHLETICS DEPARTMENT

The Athletics Department at UH Manoa (“Athletics Department”) is under the purview of the Chancellor. The Athletics Department administers the sale of tickets to UH athletic events and manages the allocation of seats that are issued under the terms of the Regents’ Ticket Policy, the System Administrators’ Ticket Policy, and the Chancellors’ Ticket Policy. The Athletics Department has established its own policy regarding the distribution of complimentary tickets, which applies to many different categories of recipients and situations that are specific or unique to the UH Athletics Department and varsity sports.

The Commission has not reviewed all aspects of the UH Athletics Department’s ticket policy and does not intend to address that policy in full at this time. However, the

¹⁶ The UH Foundation is a private 501(c)(3) tax exempt charitable organization that provides fundraising services to all 10 campuses and manages over 5,000 gift accounts to benefit the UH and UH students.

¹⁷ The UHAA is the official alumni organization of the UH System. It is a membership based, 501(c)(3) non-profit organization.

Commission is aware that in many situations, complimentary tickets are issued under the Athletics Department's ticket policy for essentially the same reasons that tickets are issued under the Regents' Ticket Policy, the System Administrators' Ticket Policy, and the Chancellor's Ticket Policy. Therefore, a brief discussion of the role of the Athletics Department with respect to the issuance of complimentary tickets and passes is included here.

The Athletics Department has several reserved seats in Aloha Stadium:¹⁸

- 20 seats in the "Brown" Loge Area, Section N.
- 6 or 7 seats in a box (the "Athletics Director's Box") located near the Chancellor's Box. The Athletics Department has allowed the visiting teams to use the Athletics's Director's Box.
- 4 seats in the South End Zone Press Box.
- 30 seats in the South End Zone Press Box. Historically, the Stadium Authority has allowed the UH Athletics Department to use these seats for at least one game of the football season.

The Athletics Department issues complimentary tickets in the above areas to its own guests, who include donors, corporate partners and sponsors, and others. The department also issues complimentary tickets to individuals in various other areas of the stadium where the seats are not reserved.

The Athletics Department sells season tickets and tickets on a per game basis to the public. The Athletics Department also works closely with Ahahui Koa Anuenu ("AKA"), an organization under the umbrella of the UH Foundation, which is responsible for the coordination and oversight of all fundraising activities that are conducted to benefit and support the UH Manoa athletics programs. As part of its fundraising function, AKA sells higher-end packages, consisting of season tickets and parking, to the public. The Athletics Department also allocates up to 50 tickets per home football game (subject to availability) to AKA that AKA issues free of charge to AKA's guests.¹⁹

¹⁸ At the Stan Sheriff Center, the Athletics Department has 12 reserved seats in the lower level of section FF, for men's basketball; and 12 reserved seats in the lower level of section GG, for men's and women's volleyball. At Murakami Stadium, the Athletics Department has 6 reserved seats in the lower level of section CC, for men's baseball.

¹⁹ The Na Koa football booster club or other booster clubs also submit requests for football tickets to the Athletics Department. The Athletics Department, in turn, informs AKA of the requests. If the requests are cleared, the Athletics Department issues the tickets to the booster club out of the tickets that have been allotted to AKA.

In addition, the Athletics Department issues All-Access passes²⁰ and parking passes²¹ to a large number of individuals, including, but not limited to, the President, Chancellor, Athletics Department administrators and personnel, football personnel, medical personnel, marketing personnel, personnel who manage facilities and events, media relations personnel, UH Foundation officers, selected AKA and Na Koa Football Club personnel, and selected individuals who represent some UH corporate sponsors.²²

As discussed, the Commission views the Chancellor as the “gatekeeper” of all complimentary tickets, seats, and passes that are issued. If the Chancellor delegates some of this authority to the Athletics Department, the Commission considers the UH Athletics Department to be acting on behalf of the Chancellor.

Thus, it is important for the Athletics Department and the Chancellor to be on the “same page” when determining who may receive complimentary tickets and passes and justifying that it serves a legitimate state purpose. It is also important for AKA to be apprised of the criteria for determining a state purpose. It is recommended that the Athletics Department keep records of the individuals who receive complimentary tickets from AKA and the justification for issuing tickets to them.

VII. ADDITIONAL COMPLIMENTARY TICKETS

Any and all additional complimentary tickets and passes, of course, must be issued for legitimate state purposes. The Chancellor is responsible for vetting requests for additional tickets and has the burden to justify the state purpose in honoring such requests. If some of this authority is delegated to the Athletics Department, the Commission will view the Athletics Department as acting on behalf of the Chancellor.

VIII. COMPLIMENTARY TICKETS ARE NON-TRANSFERABLE

Any and all complimentary tickets and passes issued must not be transferable. Restricting their use to the specific individuals who are authorized to use them is consistent with the State Ethics Code.

²⁰ The Athletics Department also issues other types of entry passes to coaches, media personnel, and others.

²¹ The *University of Hawaii at Manoa’s Sporting Events Guidelines* describe parking passes as being “noncomplimentary” (sic), because the parking pass is necessary for work. However, the Chancellor’s Office acknowledged that the recipient does not have to pay for the parking pass.

²² See attached *2013 UH Athletics All Access Pass List*.

IX. WHETHER COMPLIMENTARY TICKETS ARE REPORTABLE GIFTS; RECORD KEEPING

In the Commission's opinion, complimentary tickets and passes received by UH officials and UH employees are not reportable gifts under the HRS section 84-11.5, the gifts reporting law.

At the same time, the Commission considers information as to who receives complimentary tickets to be public information. This information should be readily obtainable from the University through a records request. Therefore, for each athletic event, the Chancellor's Office and the Athletics Department on behalf of the Chancellor's Office should maintain a written record of all individuals who receive complimentary tickets and passes, including the justification for them to receive the tickets and passes. The Commission believes that complete recordkeeping on the part of the Chancellor's Office and the Athletics Department is essential and in the public interest.

Conclusion

In conclusion, tickets and passes to UH Manoa athletic events are state assets, under the jurisdiction and control of the Chancellor. The State Ethics Code prohibits the Chancellor and the Athletics Department acting on behalf of the Chancellor from distributing these assets in a manner that creates unwarranted privileges or advantages or preferential treatment for the Regents, System Administrators, Chancellor, other UH personnel, or anyone else. In order to comport with the State Ethics Code, the distribution of complimentary tickets or passes to any person must serve a legitimate state purpose.

The Commission has offered guidance as to what constitutes a legitimate state purpose. In distributing complimentary tickets and passes, the Chancellor and the Athletics Department on behalf of the Chancellor's Office are responsible for justifying that there is a legitimate state purpose. The Commission does not believe it is necessary, nor does the Commission intend, to review every request for complimentary tickets and passes for consistency with the State Ethics Code. However, if questions arise, the burden is on the Chancellor and the Athletics Department on behalf of the Chancellor to justify a legitimate state purpose.

The Commission does not agree that all aspects of the UH ticket policies applicable to the Regents, the System Administrators, and the Chancellor, in their current form, comport with the State Ethics Code, and has recommended that the ticket policies be revised to be consistent with the State Ethics Code.

This guidance is based on information that was presented to the Commission by the University of Hawaii. Please let the Commission know if any of the information has been stated incorrectly, as that may affect the guidance issued.

The Commission appreciates the University's sensitivity to issues under the State Ethics Code and thanks the University for its cooperation in this matter.

**ATHLETIC EVENT TICKET AND PARKING ALLOCATION POLICY
FOR THE OFFICE OF THE BOARD OF REGENTS**

The primary mission of the University of Hawai'i ("University") is education. An important element in the University's education experience is athletics. University athletic programs build student, alumni and community affinity for their educational institution. Participating in athletics offers students the opportunity to develop leadership skills, learn teamwork, build self-confidence and gain self-discipline. For some, athletic scholarships provide the opportunity to pursue higher education. For all of these reasons, it is in the interest of the University to support athletics and athletic events in order to promote the University to its multiple stakeholders.

In order to facilitate individual Regent promotion of University athletics, this document sets forth a guideline for the allocation of athletic event tickets to the Office of the Board of Regents. Each Regent is also encouraged to purchase additional season athletic tickets and/or parking passes.

Each Regent shall be provided:

- One (1) complimentary ticket per athletic event, and one (1) additional complimentary ticket per athletic event limited to use by a spouse, partner or significant other.
- One (1) complimentary parking pass per athletic event.
- Upon request, and if available, additional complimentary tickets per athletic event for legitimate State purposes.
- Upon request, and if available, tickets per athletic event may be purchased for immediate family members at face value, including premium seat charge.

Board staff shall be provided:

- One (1) complimentary ticket for the Board of Regents Secretary supporting Regents at the athletic event, and one (1) complimentary parking pass per athletic event.
- One (1) complimentary ticket per staff member supporting Regents at the athletic event and one (1) complimentary parking pass per athletic event.
- Upon request, and if available, additional complimentary tickets per athletic event for legitimate State purposes.
- Upon request, and if available, tickets per athletic event may be purchased for immediate family members at face value, including premium seat charge.

Location of seats and limitations:

- Regent and Board staff tickets shall be located in one area designated by the campus' athletic program supporting the athletic event.
- Complimentary tickets for Regents and Board staff are non-transferable and for individual use only.
- This policy is contingent upon the availability of tickets and/or parking passes as determined by the Chancellor or Athletic Director of the campus supporting the athletic event.

This policy does not apply to Emeritus Regents. Requests for tickets and/or parking passes by Emeritus Regents, and all other requests by any person not covered by this policy shall be made directly to the University of Hawai'i Foundation, or the Chancellor or Athletic Director of the campus supporting the athletic event.

**ATHLETIC EVENT TICKET AND PARKING ALLOCATION POLICY
FOR THE PRESIDENT, VICE PRESIDENTS AND ASSOCIATE VICE PRESIDENTS**

The primary mission of the University of Hawai'i ("University") is education. An important element in the University's education experience is athletics. University athletic programs build student, alumni and community affinity for their educational institution. Participating in athletics offers students the opportunity to develop leadership skills, learn teamwork, build self-confidence and gain self-discipline. For some, athletic scholarships provide the opportunity to pursue higher education. For all of these reasons, it is in the interest of the University to support athletics and athletic events in order to promote the University to its multiple stakeholders.

As chief executive officer, the President is responsible for the governance, protection and advancement of the University. The Vice Presidents and Associate Vice Presidents, as well as Chancellors, advance the coordination of these responsibilities throughout the University System. Accordingly, the President, Vice Presidents and Associate Vice Presidents (collectively "System Administrators") are encouraged to support and attend University athletic events as part of their work for the University.

To facilitate promotion of University athletics by System Administrators, this document sets forth a guideline for the allocation of athletic event tickets and parking passes for System Administrators, who are also encouraged to purchase additional season athletic tickets and/or parking passes to support and promote the University.

Upon request, the President shall be provided:

- One (1) complimentary ticket per athletic event, and one (1) additional complimentary ticket per athletic event limited to use by a spouse, partner or significant other.
- One (1) complimentary parking pass per athletic event.
- Upon request, and if available, additional complimentary tickets and parking passes per athletic event for legitimate State purposes.
- Upon request, and if available, tickets per athletic event may be purchased for immediate family members at face value, including premium seat charge.

Upon request, Vice Presidents shall be provided:

- One (1) complimentary ticket per athletic event, and one (1) additional complimentary ticket per athletic event limited to use by a spouse, partner or significant other.
- One (1) complimentary parking pass per athletic event.
- Upon request, and if available, additional complimentary tickets per athletic event for legitimate State purposes.
- Upon request, and if available, tickets per athletic event may be purchased for immediate family members at face value, including premium seat charge.

Upon request, Associate Vice Presidents shall be provided:

- One (1) complimentary ticket per athletic event.
- One (1) complimentary parking pass per athletic event.
- Upon request, and if available, additional complimentary tickets per athletic event for legitimate State purposes.

- Upon request, and if available, tickets per athletic event may be purchased for immediate family members at face value, including premium seat charge.

Location of seats and limitations:

- Complimentary tickets shall be located in areas designated by the campus athletic program supporting the athletic event.
- Complimentary tickets/parking passes are non-transferable and for individual use only.
- If a System Administrator leaves the System Administrator position, the above allocation of tickets/parking passes to that System Administrator ends.
- This policy is contingent upon the availability of tickets and/or parking passes as determined by the Chancellor or Athletic Director of the campus supporting the athletic event.

Requests for tickets and/or parking passes by any person not covered by this policy shall be made directly to the University of Hawai'i Foundation (for fundraising purposes), or the Chancellor or Athletic Director of the campus supporting the athletic event.

UH Mānoa Office of the Chancellor
Athletic Event Ticket and Parking Allocation Guidelines

The University of Hawai'i at Mānoa is home to a diverse NCAA Division I athletics program with a multitude of men's, women's, and coed varsity teams in affiliation with the Western Athletic Conference (WAC), the Mountain Pacific Sports Federation, and the Pacific Coast Intercollegiate Yacht Racing Association. The goals for our teams are to be highly competitive, fully compliant in meeting NCAA standards, and, most importantly, succeed academically and graduate. Our student-athletes learn many valuable life lessons through their participation in sports and also serve as important ambassadors of the University. Through our athletics programs, we enjoy many valuable opportunities to connect with a large community of stakeholders in Hawai'i and beyond. This community includes alumni, donors, friends and leaders in the community and beyond. Such connections generate broader public awareness about contributions of UH Mānoa and the UH System as a whole. For those reasons, we encourage and welcome participation in these events by members of UH Mānoa, UH System, the Board of Regents, established and potential donors/alumni/friends/community leaders and members of the UH Mānoa campus community.

To facilitate promotion of UH Mānoa athletics programs, the Chancellor of UH Mānoa and the Director of Athletics have established guidelines for athletic event ticket and parking allocations for UH Mānoa athletics events.

Guidelines

The Office of the Chancellor allocates complimentary athletic event tickets and parking passes on a per-game basis and this allocation may vary from time to time. A major focus is hosting donors/friends/community leaders to cultivate relationships, demonstrate appreciation for support, and promote recognition and visibility of UH Mānoa's academic programs.

Intended guests may include stakeholders, internal and external to UH Mānoa, with the goal of building relationships and advancing UH Mānoa; senior campus administrators (Vice Chancellors, Deans and Directors) to build and maintain relationships with stakeholders that will support and advance UH Mānoa and its programs; and campus members (faculty, staff, students, development and communication personnel and administrators) who may be invited on a per game basis to recognize special accomplishments, to host important constituencies and/or to support relationships in conjunction with the senior campus administrators.

Vice Chancellors at UH Mānoa are encouraged to attend whenever possible as part of their official responsibilities in providing information and generating support for the University and campus programs.

Each guest is offered two (2) tickets with parking. Subject to approval by the Chancellor, additional complimentary tickets for each guest may be provided to accommodate larger stakeholder groups/family members.

Procedure

The procedure for requesting tickets includes:

1. The Chancellor, working in conjunction with UH Foundation and senior campus administrators (Vice Chancellors, Deans and Directors), identifies prospective guests. Senior campus administrators may also request tickets through the Office of the Chancellor to specific games. Information to be provided includes guest name(s), title, company, affiliation, and other pertinent information.
2. Complimentary tickets will be in areas designated for the use of the UH Mānoa Chancellor.
3. Upon approval, ticket(s) and parking pass will be issued. Complimentary tickets are for personal use of the recipient and are not to be sold, exchanged or transferred. In addition, the ticket(s) and parking pass will be issued on per-game basis.
4. Complimentary tickets/parking passes received by University employees may be subject to annual gift disclosure to the Hawai'i State Ethics Commission. See appropriate guidelines.

These guidelines are contingent upon the availability of tickets and parking passes, and is subject to change with approval of the UH Mānoa Chancellor. Exceptions to the guidelines require approval by the UH Mānoa Chancellor.

Aloha Stadium Football Configuration

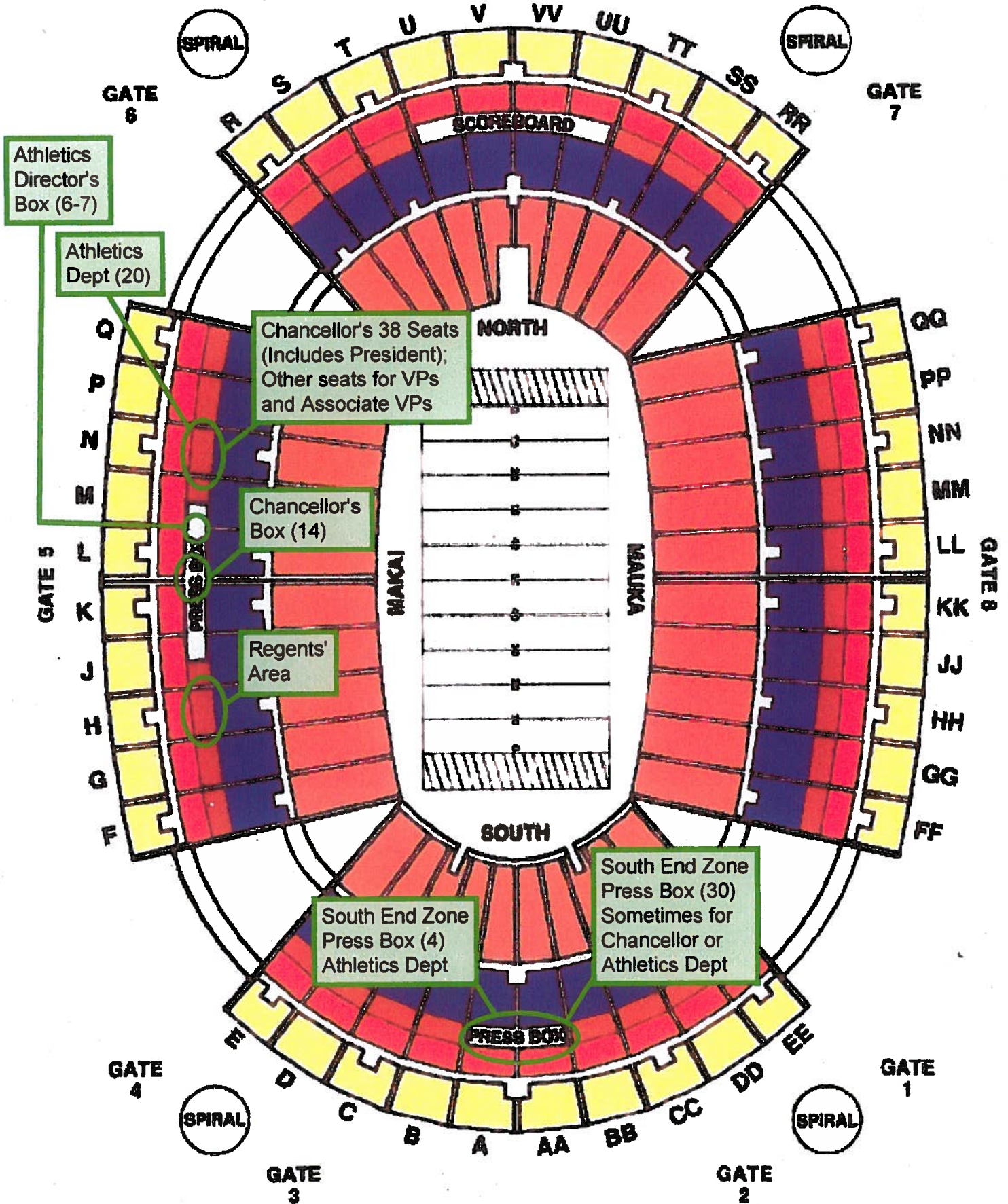


EXHIBIT "D"



UNIVERSITY OF HAWAII AT MĀNOA'S
SPORTING EVENTS GUIDELINES

This memorandum provides guidelines for support services to Athletics events in the 2012-13 fiscal year.

The Athletic department shall deliver all athletic event tickets and associated parking passes designated for the Board of Regents, UH-designated administrators and the UHM chancellor to the UH Mānoa Chancellor's Office (Chancellor's Office). The chancellor's office shall disburse the tickets and associated parking to the appropriate entities.

Football Tickets and Aloha Stadium Parking Allocations

The chancellor's office shall keep a recordation of the complimentary football tickets and associated Aloha Stadium parking passes and prepare a "confirmation" letter that the recipient of the tickets and parking passes must sign. The letter must also include the "actual retail" value of the tickets and parking passes and a statement that the recipient is responsible to report it's value to the State Ethic Commission.

The complementary football tickets and associated parking passes for the UH System president and UH Mānoa chancellor shall be included in the pool of tickets and parking passes designated as the UH Mānoa Development allocation.

This allocation shall be managed and distributed by the University of Hawai'i Foundation on behalf of the chancellor's office. These tickets are designated as follows:

1. Brown Loge, Section N, Row 2, Seats 1 to 18;
2. Brown Loge, Section N, Row 3, Seats 1 to 20;
3. Chancellor's Press Box No. 7, Seats 1 to 14; and
4. When available, South End Baseball Press Box, Rows 2, Seats 1 to 17 and Row 1, Seats 5 to 17.

The President and the Chancellor are provided UH Mānoa Athletic All-Access passes, and are deemed as "Actively Engaged" while in attendance. Therefore, their designated tickets are not necessary. ("Actively Engaged" refers to UH personnel required to perform their regular work duties at any sporting event.

Chancellor's Support Service at a Warrior Football Game

Non-Complementary Aloha Stadium Parking Passes

2500 Campus Road, Hawai'i Hall 202
Honolulu, Hawai'i 96822
Telephone: (808) 956-7651
Fax: (808) 956-4153

An Equal Opportunity / Affirmative Action Institution

The Chancellor's office requests five (7) non-complementary Aloha Stadium parking passes for the following individuals:

	Name	Title	Office
1.	MRC Greenwood	UH System President	UH System President's Office
2.	Tom Apple	Chancellor	UH Mānoa Chancellor's Office
3.	Keith Amemiya	Executive Secretary	UH Board of Regents' Office
4.	Leila Wai Shimokawa	Executive Assistant	UH Board of Regents' Office
5.	Mānoa Advancement		UH Mānoa Chancellor's Office
6.	Mānoa Advancement		UH Mānoa Chancellor's Office
7.	UH Foundation	Ass. VP of Development, UH Manoa	UH Foundation

These parking passes are designated for "actively engaged" UH personnel. All requests for additional parking passes are subject to approval by the chancellor's office.

Staff of the Chancellor's Press Box and Loge

The chancellor's press box and loge area shall be staffed by no more than two (2) members of UH Mānoa's advancement team. The advancement team members will arrive to the Aloha Stadium no later 90 prior to the start of the game, while the UH Foundation member will arrive no later than 45 minutes to start of the game.

Centerplate

The Chancellor's Office is in the process of working with Centerplate regarding access to the Press Box Buffet for the Chancellor's Press Box and Loge Guests.

Press Box Area Wristbands

The chancellor's loge guests shall receive one press box area wristband per person. These wristbands must be worn at all-time and are non-transferable. The wristband provides each guest with limited access to the buffet and rest room facilities. Guests are prohibited from loitering in the press box area and children under the age under of eight (8) must be accompanied by an adult at all time while the press box area. The advancement team members shall assistance the Aloha Stadium personnel with enforcement.

Chancellor's Guests Visit to the Playing Field

The Chancellor's Office will take your department's lead regarding the chancellor's press box and loge guests visit to the playing field. Traditionally, the chancellor's guests were allotted 10 minutes (running time) on the sidelines. Guests proceed to the field level at the start of the third quarter. UHM advancement team members provide a briefing of the policies, restrictions and potential dangers for guests wishing to visit the fields. Guests must be accompanied and abide by the instruction of the advancement team members. Guests younger than 10 years old are not allowed on the field.

Other Sporting Events Tickets and Parking Allocations

The chancellor's office shall keep a recordation of the complimentary tickets for other sporting tickets and associated parking passes and prepares a "confirmation" letter that the recipient of the tickets and parking passes must sign. The letter must also include the "actual retail" value of the tickets and parking pass and a statement that the recipient is responsible to report it's value to the State Ethic Commission.

All-Access Passes

The Chancellor's office requests all-access passes for the following individuals:

	Name	Title	Office
1.	MRC Greenwood	UH System President	UH System President's Office
2.	Patricia Johnson		UH System President's Office
3	David Lonborg	Executive Assistant	UH System President's Office
4.	Keala Monaco	Executive Assistant	UH System President's Office
5.	Keith Amemiya	Executive Secretary	UH Board of Regents' Office
6.	Lei Wai Shimokawa	Executive Assistant	UH Board of Regents' Office
7.	Tom Apple	Chancellor	UH Mānoa Chancellor's Office
8.	Anne Apple		UH Mānoa Chancellor's Office
9.	**Tracy Orillo-Donovan	Mānoa Advancement	UH Mānoa Chancellor's Office
10.	***Elmer K. Kaai	Mānoa Advancement	UH Mānoa Chancellor's Office
11.	**Arlene Abiang	Mānoa Advancement	UH Mānoa Chancellor's Office

12.	**Dyan Kleckner	Mānoa Advancement	UH Mānoa's Chancellor's Office
13.	Donna Vuchinich	President & CEO	UH Foundation
14.	Greg Willems	VP of Development	UH Foundation
15.	Alvin Katahara	Ass. VP of Alumni Relations	UH Foundation
16.	*Lori Admiral	Ass. VP of Development, UH Manoa	UH Foundation

*** Designated Lead for staffing of Chancellor's Athletics Events

** Designated staff for Chancellor's Athletic Events

* Designated staff for UH Mānoa Development (Guests)

The chancellor's office shall provide the Athletic Department with all photos, if requested.

These all-access passes are designated for "actively engaged" UH personnel. All requests for additional all-access are subject to approval by the chancellor's office.

Chancellor's Athletic Events Coordinator

Elmer Kaai shall serve as the lead coordinator for my athletics events calendar, please feel free to have your staff contact him directly at (808) 956-3816 or elmerk@hawaii.edu.

2013 UH ATHLETICS ALL ACCESS PASS LIST

FNAME	LNAME	Department	Company	Photo1	Barcode
Ben	JAY	DIRECTOR of	ATHLETICS	C:\Doc	
Rockne	FREITAS	ACTING	ATHLETIC DIRECTOR	C:\Doc	
Leinaala	FREITAS	UH ATHLETICS		C:\Doc	
Carl	CLAPP	ASSOCIATE AD	ADMIN. SERVICES	C:\Doc	
Joyce	CLAPP	UH ATHLETICS		C:\Doc	
Marilyn Moniz	KAHOOHANOHAN	ASSOCIATE AD	SWA	C:\Doc	
Dwight	KAHOOHANOHAN	UH ATHLETICS		C:\Doc	
John	McNAMARA	ASSOCIATE AD	EXTERNAL AFFAIRS	C:\Doc	
Sherry	McNAMARA	UH ATHLETICS		C:\Doc	
Amanda	PATERSON	DIR. of COMPLIANCE	UH ATHLETICS	C:\Doc	
Jeannie	LEE	EXECUTIVE ASST.	to the ATHLETIC DIR.	C:\Doc	
Michele	INOUCHI	UH ATHLETICS	BUSINESS OFFICS	C:\Doc	
Chandra	KINILAU	UH ATHLETICS	STAFF	C:\Doc	
Peter	NICHOLSON	UH FACULTY	ATHLETIC REP.	C:\Doc	
Aimee	SCHILAND	FACULTY REP	GUEST	C:\Doc	
Carolyn	BERRY	UH ATHLETICS		C:\Doc	
Eric	OKASAKI	HEAD ATHLETIC	TRAINER	C:\Doc	
Jayson	GOO	ASSISTANT ATHLETIC	TRAINER	C:\Doc	
Daniel	MAR CHONG	ASSISTANT ATHLETIC	TRAINER	C:\Doc	
Lynn	NAKAGAWA	ASSISTANT ATHLETIC	TRAINER	C:\Doc	
Renae	SHIGEMURA	ASSISTANT ATHLETIC	TRAINER	C:\Doc	
Brian	WONG	ASSISTANT ATHLETIC	TRAINER	C:\Doc	
Dr. Nicholas	CRAWFORD	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Nicole	GESIK	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. KIMO	HARPSTRITE	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Duane	HENNION	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Elizabeth	IGNACIO	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Robert	KAGAWA	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Jay	MARUMOTO	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Burt	MORITV IV	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Andrew	NICHOLS	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Gale	PRENTISS	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Conner	QUINN	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Mark	SANTI	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Sabrina	TAN	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Troy	TANJI	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Torin	TORIGOE	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Stacy KAN,	TRIVEDI	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. David	VASCONCELLOS	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Dr. Chelsea	WALKER	TEAM PHYSICIAN	UH ATHLETICS	C:\Doc	
Susan	KONDO	MEDICAL STAFF	UH ATHLETICS	C:\Doc	
Vince	BALDEMOR	DIRECTOR	KOA ANUENUE	C:\Doc	
David	ESTERMAN	KOA ANUENUE		C:\Doc	
Carol	GOUVEIA	KOA ANUENUE		C:\Doc	
Kelvin	SHOJI	KOA ANUENUE		C:\Doc	
Wayne	VIEIRA	KOA ANUENUE		C:\Doc	
Richard	SHERIFF	STAN SHERIFF CENTER	MANAGER	C:\Doc	
Russ	GIMA	STAN SHERIFF CENTER	ASS'T MANAGER	C:\Doc	
Kekoa	SEWARD	STAN SHERIFF CENTER	ASS'T MANAGER	C:\Doc	
Tommy	HEFFERNAN	STRENGTH	COORDINATOR	C:\Doc	
Joycelyn	LAU	NA'KOA	FOOTBALL CLUB	C:\Doc	

EXHIBIT "F"

2013 UH ATHLETICS ALL ACCESS PASS LIST

Kim	FUJIUCHI	NA'KOA	FOOTBALL CLUB	C:\Doc
Brad	JONES	DIR. FOOTBALL	ADMINISTRATION	C:\Doc
Lacey	LAVARIAS	EXECUTIVE ASST.	UH FOOTBALL	C:\Doc
Dory	KONG	VIDEO COORDINATOR	UH FOOTBALL	C:\Doc
Brent	INOUE	UH ATHLETICS	MARKETING	C:\Doc
Aaron	MANDICH	UH ATHLETICS	MARKETING	C:\Doc
Kyle	BRYAN	UH ATHLETIC	MARKETING	C:\Doc
Cory	ENRIQUES	UH ATHLETIC	MARKETING	C:\Doc
Billy	V	UH ATHLETIC	MARKETING	C:\Doc
Darren	ITO	UH ATHLETICS	MARKETING	C:\Doc
Al	GINOZA	UH EQUIPMENT	MANAGER	C:\Doc
Ken	FUJIMURA	UH EQUIPMENT	STAFF	C:\Doc
Ronn	MIYASHIRO	UH EQUIPMENT	STAFF	C:\Doc
Scott	TOMIYOSHI	UH EQUIPMENT	STAFF	C:\Doc
Kyle (Tats)	TATEISHI	UH EQUIPMENT	STAFF	C:\Doc
Teri	CHANG	ASS'T ATHLETICS DIR	FACILITY & EVENTS	C:\Doc
Edward	CASHMAN	UH EVENTS	MANAGEMENT	C:\Doc
Piliialoha	CASHMAN	UH EVENTS	MANAGEMENT	C:\Doc
Uluwehi	CASHMAN	UH EVENTS	MANAGEMENT	C:\Doc
Mahealani Sis	FINAU	UH EVENTS	MANAGEMENT	C:\Doc
Tony	FINAU	UH EVENTS	MANAGEMENT	C:\Doc
Gary	KANESHIRO	UH EVENTS	MANAGEMENT	C:\Doc
James	KON	UH EVENTS	MANAGEMENT	C:\Doc
Bobbie	OMOTO	UH EVENTS	MANAGEMENT	C:\Doc
Wendy	TATSUNO	UH EVENTS	MANAGEMENT	C:\Doc
Aileen	YAMASHITA	UH EVENTS	MANAGEMENT	C:\Doc
Derek	INOUCHI	DIRECTOR	UH MEDIA RELATION	C:\Doc
John	BARRY	UH MEDIA RELATIONS		C:\Doc
Neal	IWAMOTO	UH MEDIA RELATIONS		C:\Doc
Jay	METZGER	UH MEDIA RELATIONS		C:\Doc
Kara	NISHIMURA	UH MEDIA RELATIONS		C:\Doc
Chris	KUMAGAI	UH MEDIA RELATIONS	UH COMPUTER SPEC	C:\Doc
Archer	KUMAGAI	UH MEDIA RELATIONS		C:\Doc
Troy	YAMAMOTO	UH MEDIA RELATIONS	INTERNET SPECIALIS	C:\Doc
Walter	WATANABE	TICKET MANAGER	UH ATHLETICS	C:\Doc
Donna	TENGAN	UH TICKET	OFFICE	C:\Doc
Keri Ann	IWAKI	UH TICKET	OFFICE	C:\Doc
Kelsy	YOSHIMURA	UH TICKET	OFFICE	C:\Doc
Tom	APPLE	UH MANOA	CHANCELLOR	C:\Doc
Anne	APPLE	UH CHANCELLORS	OFFICE	C:\Doc
Arlene	ABIANG	UH CHANCELLORS	OFFICE	C:\Doc
Tracy Orillo	DONOVAN	UH CHANCELLORS	OFFICE	C:\Doc
Elmer	KA'AI	UH CHANCELLORS	OFFICE	C:\Doc
Dyan	KLECKNER	UH CHANCELLORS	OFFICE	C:\Doc
Jim	NISHIMOTO	UH CHANCELLORS	OFFICE	C:\Doc
Dr.M.R.C	GREENWOOD	UH PRESIDENT		C:\Doc
Pat	JOHNSON	UH PRESIDENT'S	GUEST	C:\Doc
David	LONBORG	UH PRESIDENT'S	OFFICE	C:\Doc
Keala	MONACO	UH PRESIDENT'S	OFFICE	C:\Doc

2013 UH ATHLETICS ALL ACCESS PASS LIST

Donna	VUCHINICH	PRESIDENT CEO	UH FOUNDATION	C:\Doc
Greg	WILLEMS	VP DEVELOPMENT	UH FOUNDATION	C:\Doc
Lori	ADMIRAL	Asst VP DEVELOPMENT	UH FOUNDATION	C:\Doc
Alvin	KATAHARA	Asst. VP - ALUMNI	UH FOUNDATION	C:\Doc
Leila Wai-	SHIMOKAWA	BOARD of REGENTS	STAFF	C:\Doc
Keith	AMEMIYA	BOARD of REGENTS	STAFF	C:\Doc
UH Football Access Only				
Patrick	BULLARD	SPONSOR	PAPA JOHNS	C:\Doc
Quan	NGUYEN	SPONSOR	PAPA JOHNS	C:\Doc
Walter	HOWARD	SPONSOR	PAPA JOHNS	C:\Doc
Greg	CABANTING	SPONSOR	KAI MEDIA MARKETII	C:\Doc
Tim	BROWN	SPONSOR	NAPA	C:\Doc