



U.S. Department of Justice

Civil Rights Division

Assistant Attorney General
950 Pennsylvania Ave, NW
Washington, DC 20530

November 25, 2025

Via Electronic Mail

Mr. Marc Swanson
Chief Executive Officer
c/o Mr. G. Anthony Taylor, Esq.
General Counsel
United Parks & Resorts Inc.
9205 Southpark Center Loop
Suite 400
Orlando, FL 32819

Re: Americans with Disabilities Act Investigation of United Parks & Resorts Inc.,
DJ # 2026-51716-GNT

Dear Mr. Swanson:

The Department of Justice has opened an investigation of United Parks & Resorts Inc., including SeaWorld, Busch Gardens, Discovery Cove, Sesame Place, Water Country USA, Adventure Island, and Aquatica branded parks and experiences (collectively "UPR"), to determine compliance with Title III of the Americans with Disabilities Act (ADA), 42 U.S.C. §§ 12181–89, and the relevant implementation regulation, 28 C.F.R. Part 36. The Department initiated this investigation after receiving complaints from members of the public with disabilities who allege ADA violations while attempting to access UPR parks.

Title III of the ADA prohibits public accommodations from discriminating against individuals "on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations" the public accommodation provides. 42 U.S.C. § 12182(a).

Title III's implementing regulation specifically addresses "wheelchairs and manually-powered mobility aids." 28 C.F.R. § 36.311(a). As a public accommodation, UPR "*shall permit* individuals with mobility disabilities to use wheelchairs and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use." *Id.* (emphasis added). The ADA also prohibits UPR, as a public accommodation, from discriminating against individuals with disabilities through "the imposition or application of eligibility criteria that screen out or tend to screen out an individual with a disability or any class of individual with disabilities from fully and equally enjoying" any goods or services UPR provides, "unless such criteria can be shown to be necessary" for UPR to provide them. 42 U.S.C. § 12182(b)(2)(i); *see also* 28 C.F.R. § 36.301.

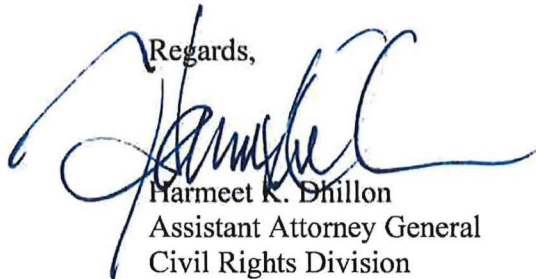
Complaints filed with the Department allege that UPR has prohibited a certain type of manually-powered mobility aid—rollator walkers with seats—in some of its parks, including SeaWorld Orlando, Busch Gardens Tampa Bay, and Aquatica Orlando.¹ Further, complaints allege that UPR parks offer guests with disabilities who use rollator walkers for mobility the option to rent alternative mobility aids for a surcharge, in potential violation of 28 C.F.R. § 36.301(c).

Accordingly, the Department has authorized an investigation to determine whether UPR is engaged in discrimination as set forth above. We have not reached any conclusions about UPR's compliance with the ADA and the subject matter of this investigation. We will consider all relevant information, and we welcome your assistance in sharing and identifying relevant information.

In order to facilitate our investigation, we urgently request a meeting with the appropriate representative(s) to gather information on this policy. Within one week, please provide the name, physical address, email address, and telephone number of the person with whom this office should arrange a meeting. Please provide this information to David Gardner, a Trial Attorney in the Disability Rights Section, who can be reached at (202) 598-1628 or david.gardner@usdoj.gov, and Alex Karahalios, an Assistant U.S. Attorney in the U.S. Attorney's Office for the Middle District of Florida, who can be reached at (813) 274-6362 or alexandra.karahalios@usdoj.gov.

Thank you for your cooperation.

Regards,



Harmeet K. Dhillon
Assistant Attorney General
Civil Rights Division



for Gregory W. Kehoe
U.S. Attorney
U.S. Attorney's Office
Middle District of Florida

¹ See *Accessibility*, SeaWorld Orlando, <https://seaworld.com/orlando/help/guests-with-disabilities/> (last accessed Nov. 23, 2025); see also *Accessibility*, Busch Gardens Tampa Bay, <https://buschgardens.com/tampa/park-info/accessibility-guide/> (last accessed Nov. 23, 2025); see also *Accessibility*, Aquatica Orlando, <https://aquatica.com/orlando/help/guests-with-disabilities/> (last accessed Nov. 24, 2025).