



February 22, 2008

Reply to Attn of: CC-A

TO: Distribution

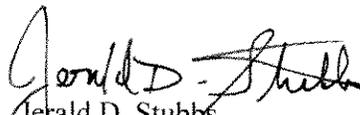
FROM: CC/Chief Counsel

SUBJECT: National Space Club Debus Awards Dinner, April 19, 2008

The Florida Committee of the National Space Club will host the Dr. Kurt H. Debus Awards Dinner at the Debus Center on Saturday, April 19, 2008. This annual award was created by the National Space Club Florida Committee to recognize a person who has made a particularly important contribution to U.S. aerospace efforts while working in Florida. The award is named for KSC's first Director, Dr. Kurt H. Debus. Approximately 300 guests are expected to attend. These guests include corporate executives, aerospace contractor and other organizations, members of academia and representatives of state and Federal government. The cost for the dinner is \$75 a ticket.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). I further determine that there is an Agency interest in attendance at this event. The dinner will provide employees the opportunity to demonstrate NASA's support of this program which recognizes noteworthy space-related efforts in Florida. In addition, this event is a forum for employees to discuss matters of interest to NASA with a diverse group of fellow attendees interested in our activities. It is in the Government's best interest for employees to attend the dinner as representatives of NASA.

Further, for the NASA invitees with duties that substantially affect the sponsor, an individual determination under 5 C.F.R. §2635.204(g)(3)(i) is required. In making this determination, I considered the following: (1) the importance of the event to NASA; (2) the nature and sensitivity of pending matters affecting the sponsor; (3) the significance of your role in any such matters; (4) the purpose of the event; (5) the identity of other expected participants; and (6) the market value of the gift of free attendance. I have considered these factors and determined the Agency's interest in your participation in this event outweighs the concern that acceptance of the gift of free attendance may or may appear to improperly influence you in the performance of your official duties.


Jerald D. Stubbs
Agency Designee

Distribution:
STD-L-A