

National Aeronautics and
Space Administration
John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191



June 2, 2009

Reply to Attn of: G

TO: Distribution
FROM: Deputy Agency Ethics Official
SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-127
Pre-Launch Reception

On Thursday, June 11, 2009, DB Consulting Group, Inc. located at the Glenn Research Center, will host a pre-launch reception in anticipation of the STS-127 launch. The event will be held at the Double Tree Hotel in Cocoa Beach, Florida, 2028 N. Atlantic Avenue. The reception will begin at 6:30 p.m. and conclude at 8:30 p.m. with approximately 100 people in attendance including representatives from industry, the Executive and Legislative Branches of the U.S. Government, state officials, NASA, and other Federal employees. DB Consulting Group, Inc. will provide food and beverages at a cost of approximately \$30 per person.

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 having NASA personnel attend the event. The event will allow NASA employees to discuss Space Exploration, the Space Shuttle program, and the STS-127 mission with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the industry co-sponsors may accept an invitation for free attendance at the reception.

NASA employees whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.

In addition to the reception food and beverages, DB Consulting Group, Inc. will give each attendee a key chain valued at less than \$5 each. The \$20 gift exception at 5 C.F.R. § 2635.204(a), provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the key chain. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

A handwritten signature in black ink, appearing to read "J. William Sikora".

J. William Sikora
Chief Counsel