

National Aeronautics and
Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



June 10, 2009

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at an
Lunar Reconnaissance Orbiter Pre-Launch Reception

ATK Space Systems, Lockheed Martin Space Systems, SGT, Inc., and Stellar Solutions are sponsoring a pre-launch reception currently scheduled for June 16, 2009, in anticipation of the launch of the Lunar Reconnaissance Orbiter (LRO). The event will be held at the Doubletree Hotel in Cocoa Beach, FL from 6:30 PM to 8:30 PM.

Approximately 250 individuals are expected to attend, including representatives from industry, state government, not-for-profit organizations, academia, the U.S. Congress, and Federal agencies. The cost per person is estimated to be approximately \$68. Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event because attendance at the reception will allow NASA employees an opportunity to discuss NASA's space exploration program and the LRO mission with Congressional members and staffers, state officials, industry representatives, and other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect the event sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

In addition to the reception food and beverages, ATK is planning on giving attendees the following gift items: binoculars valued at \$5 each and light cubes at \$1 each. Attendees are reminded of the \$20 gift exception at 5 CFR § 2635.204(a), which allows employees to accept gifts valued at no more than \$20 from a source per occasion. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.


Robert M. Stephens