

National Aeronautics and
Space Administration
John F. Kennedy Space Center
Kennedy Space Center, FL 32899



July 9, 2009

Reply to Attn of: CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Apollo 40th Anniversary Celebration, July 16, 2009

The Boeing Company and United Space Alliance are sponsoring the Apollo 40th Anniversary Celebration at the Kennedy Space Center Visitor Complex, on July 16, 2009. Apollo astronauts Buzz Aldrin, Charlie Duke, Al Worden, Edgar Mitchell and Walt Cunningham will be present at the Visitor Complex to celebrate the 40th Anniversary of Apollo and mark the opening of an all new exhibit at the Apollo/Saturn V Center. This exhibit will showcase rarely seen treasures from the Apollo moon missions. The Apollo artifacts in the new exhibit include a collection of space suits and other gear used by the Apollo moonwalkers to explore the lunar surface.

Approximately 250 invited guests are expected to attend the reception. These guests include Chambers of Commerce, the 45th Space Wing, KSC contractor leaders, small business community leaders, aerospace leaders, representatives of state and local government, local hoteliers, other Federal Agencies, NASA employees, and the media. The cost per person for the reception is approximately \$25.

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 reception will provide employees the opportunity to commemorate this milestone in the Agency's history and a forum for employees to discuss matters of interest to NASA with a diverse group of fellow attendees interested in our activities. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept free attendance at the event.

This determination does not apply to employees whose duties affect the sponsor nor does it cover employees in certain non-career positions. NASA employees whose duties may substantially affect the sponsor, 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 the Chief Counsel's Office. NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of their attendance.

A handwritten signature in cursive script, appearing to read "Jerald D. Stubbs".

Jerald D. Stubbs - JDS
Agency Designee