

National Aeronautics and Space Administration
Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



March 26, 2010

Reply to Attn of: 141

TO: Distribution

FROM: Acting Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance by NASA Employees at an ST-131 Pre-Launch Reception hosted by Stinger Ghaffarian Technologies (SGT), on April 3, 2010, in Cocoa Beach, Florida

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by Stinger Ghaffarian Technologies (SGT), on April 3, 2010, from 6 to 9 pm at the Doubletree Inn in Cocoa Beach, Florida. This event is in conjunction with the launch of STS-131, at the Kennedy Space Center.

Approximately 200 people are expected to attend this event. Attendees include NASA personnel, government officials, and technology industry leaders. The reception will include light refreshments valued at approximately \$10.00 per person, and a memento valued at approximately \$5.00 per person. In accordance with 5 C.F.R. §2635.204(g), and 14 C.F.R. §1207.103, I find that the event meets the definition of a "widely attended gathering." I further find that there is an Agency interest in having NASA employees attend the event, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees.

Under 5 C.F.R. §2635.204(a), NASA employees may also accept unsolicited gifts, such as the memento, of an aggregate value of less than \$20 per occasion and \$50 per calendar year from any one source.

NASA employees whose duties may substantially affect the event sponsor, for instance by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in these events from their local ethics counselor. Moreover, NASA employees who are in non-career positions for which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.


Shawn T. Gallagher