

National Aeronautics and  
Space Administration

**John F. Kennedy Space Center**  
Kennedy Space Center, FL 32899



May 12, 2010

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

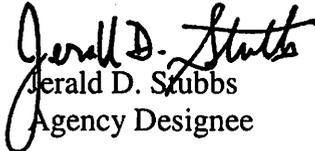
SUBJECT: Attendance at the STS-132 L-1 Pre-Launch Reception

On May 13, 2010, Abacus Technology Corp., Barrios Technology, Teledyne Brown Engineering, Inc., Pratt & Whitney Rocketdyne, ATK Aerospace Systems, Lockheed Martin Space Systems Company Michoud Operations, Tessada & Associates, Inc., and Science and Technology Corp. will co-host a pre-launch reception in anticipation of the STS-132 launch. The event will be held from 6:00 pm to 8:00 pm at the Double Tree Hotel in Cocoa Beach. More than 600 guests have been invited to attend. These guests include corporate and industry executives and workers, members of academia, military leaders, aerospace contractors, community leaders, representatives of Federal, state, and local government, and NASA employees. The approximate value of the reception is \$29 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 in having NASA personnel attend the event. This event will allow NASA employees to discuss the Space Shuttle program, the International Space Station, and the STS-132 mission, Atlantis' final planned mission, with the other attendees. In addition, this event is a forum for attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors may accept an invitation for complimentary attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect any of the 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 the Chief Counsel's Office. Moreover, 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 reimburse the sponsors the cost of the reception.

In addition, a gift bag will be provided to all attendees and their guests. The bag will include a variety of small items, each valued at \$5.00 or less. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion per source. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the gift bag for themselves and their guests. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

  
Gerald D. Stubbs  
Agency Designee

Distribution:  
STD-L-A