National Aeronautics and
Space Administration

John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191

March 24, 2011

Reply to Attn of: G

TO: Distribution

FROM: Deputy Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-134 Pre-Launch Reception hosted by Call Henry, Incorporated.

On Monday April 18, 2011 Call Henry, Incorporated will host a pre-launch reception in anticipation of the STS-134 launch. The event will be held at the Double Tree Hotel in Cocoa Beach, Florida, 2028 N. Atlantic Avenue. The reception will begin at 6:00 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. Call Henry, 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 the attendance of the event by NASA personnel. The event will allow NASA employees to discuss space exploration, the Space Shuttle program, and the STS-134 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 do not substantially affect any of the sponsors including NASA employees in non-career positions who are required to sign the ethics pledge under the Executive Order 13490, may accept an invitation for free attendance at the event for themselves and a guest. 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, Call Henry, Inc., will give each attendee a custom imprinted Skeda II card case valued at less than $5 for each attendee. 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. NASA invitees are reminded not to exceed the $50 cap on gifts from one source in a calendar year.

J. William Sikora