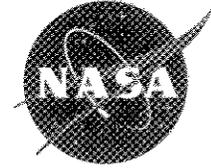


National Aeronautics and Space Administration

**Headquarters**

Washington, DC 20546-0001



April 22, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the STS-134 Pre-launch Reception hosted by Jacobs on April 28, 2011

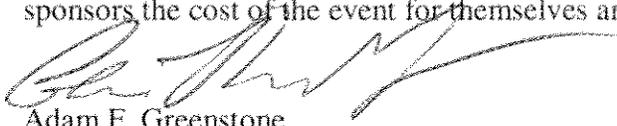
NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by Jacobs at the Hilton Hotel Atlantis Grill Restaurant in Cocoa Beach, Florida, on April 28, 2011, from 8 PM – 11 PM. This event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the reception.

Approximately 300 people are expected to attend this reception. Expected attendees include representatives of government, the aerospace industry, academia, NASA personnel, and the general public. The reception will include refreshments valued at approximately \$15 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.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect Jacobs, 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 local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests.

  
Adam F. Greenstone