

National Aeronautics and Space Administration  
Kennedy Space Center  
Kennedy Space Center, FL 32899



August 31, 2011

Reply to Attach:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Attendance at the Celebration of 54 Years of Mission Success from SLC-17

On September 8, 2011, United Launch Alliance will host an event to celebrate 54 Years of mission success from SLC-17. The event will be held from 5:00 pm to 7:00 pm at Milliken's Reef Restaurant in Cape Canaveral, Florida. Approximately 1000 guests have been invited to attend. These guests include representatives from industry leaders, aerospace contractors, and the Federal government, military personnel, members of the public, and NASA personnel. The approximate value of the reception is \$25 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 NASA personnel attending the event. This event will allow NASA employees to show support for the GRAIL mission and discuss the future of the Space program 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 the sponsor may accept an invitation for complimentary attendance at the event. 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. 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 sponsor the cost of the reception.

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

*JDS* - Jerald D. Stubbs  
Agency Designee

Distribution:  
STD-L-A