

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

November 7, 2011



Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Attendance at the Mars Science Laboratory Launch Reception hosted by United Launch Alliance

On November 23, 2011, United Launch Alliance will host a reception in anticipation of the Mars Science Laboratory (MSL) launch. The event will be held from 5:30 pm to 7:30 pm at the Radisson at the Port in Cape Canaveral, Florida. Approximately 6,000 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, members of the public, media representatives and NASA personnel. The approximate value of the reception is \$20 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 discuss the MSL 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. They may also accept invitations for accompanying spouses or guests. 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.


Gerald D. Stubbs
Agency Designee

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