

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



February 15, 2012

CC-A

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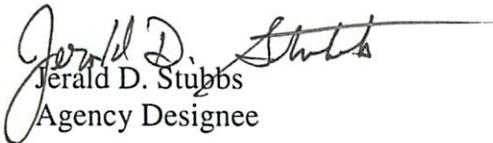
FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance at the Celebration of 50 Years of Americans in Orbit, February 18, 2012

On February 18, 2012, Delaware North Companies (DNC) will host the Celebration of 50 Years of Americans in Orbit Ceremony and Reception at the Kennedy Space Center Visitor Complex (KSCVC) starting at 6:00 pm. Approximately 750 guests are expected to attend the event with 250 guests expected to attend the reception. Invitees include personal guests of John Glenn and Scott Carpenter, federal, state and local elected officials, aerospace industry representatives, high-level Mercury-era workers, influential community leaders, members of the media, and NASA personnel. The approximate value of the event is \$34 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 Agency officials to show support for and celebrate the orbital flights of the Mercury Program. In addition, attendees will be in a diverse forum conducive to disseminating information on NASA's ongoing and future activities and discussing matters of interest to NASA.

Accordingly, NASA employees whose duties do not substantially affect DNC, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event. NASA employees whose duties may substantially affect DNC, 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.


Gerald D. Stubbs
Agency Designee