National Aeronautics and Space Administration

Kennedy Space Center
Kennedy Space Center, FL 32899

March 9, 2012

Reply to Attn of: CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: National Space Club Florida Committee Monthly Luncheons for 2012

The Florida Committee of the National Space Club, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host luncheons at the Radisson Resort at the Port in Cape Canaveral, Florida on March 13, May 8, June 12, July 10, August 14, September 11, and November 13, 2012. Approximately 300 guests are expected to attend the luncheons. These guests include corporate executives, representatives of aerospace contractors and other organizations, members of academia and representatives of state and Federal government, elected officials and/or staff, media, and persons interested in space issues. The approximate value of each luncheon is $20 per person.

I find these evens meet 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 attendance at these events. The luncheons will provide employees the opportunity to demonstrate NASA's support of this program which recognizes noteworthy space-related efforts in Florida. In addition, these events are forums for employees to discuss matters of interest to NASA with a diverse group of fellow attendees interested in our activities. It is in the Government's best interest for employees to attend the luncheons as representatives of NASA. Accordingly, NASA employees whose duties do not substantially affect the sponsor, 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 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.

Jerald D. Stubbs
Agency Designee