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: Astronaut Hall of Fame Induction Ceremony, May 4-5, 2012

The Astronaut Scholarship Foundation (ASF), a non-profit organization under 501(c)(3) of the Internal Revenue Code, and Delaware North Companies Parks & Resorts (DNC) will host the upcoming U.S. Astronaut Hall of Fame Induction Ceremony on May 4-5, 2011. The Induction Gala will be hosted by ASF and held at the Apollo Saturn V Center on Friday evening, May 4, 2012. More than 600 guests are expected to attend the gala, which consists of a reception, dinner and program featuring prior and current inductees. On Saturday afternoon, May 5, 2012, ASF and DNC will jointly host the Induction Ceremony at the KSC Visitor Complex. Approximately 1,000 people are expected to attend the ceremony. A post-induction reception for 200 guests will follow. Guests at each function will include corporate and industry executives and workers, teachers, aerospace contractors, military leaders, space coast tourism and community leaders, space enthusiasts and representatives of Federal, state and local government. The market value of the gala and reception is approximately $275 a 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 NASA employees to honor and show support for the inductees. In addition, this event is a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group of fellow attendees.

Accordingly, NASA employees whose duties may substantially affect ASF or 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. NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation of free attendance to the events for themselves and any accompanying spouse or guest.

Jerald D. Stubbs
Agency Designee