

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



July 23, 2012

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance at the Economic Development Commission Investors Update Meeting, August 1, 2012

On August 1, 2012, the Economic Development Commission (EDC) will hold its investor update meeting at the Port Canaveral Maritime Center in Cape Canaveral, Florida. Approximately 100 guests are expected to attend. These guests include NASA officials, members of academia, local elected officials, and representatives from the aerospace industry, local businesses, county and local non-profit organizations, and the media. At the conclusion of the meeting, the EDC will host a networking reception with light refreshments. The ticket price to attend this event is \$40 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 invited NASA personnel attend. This event will provide an opportunity for reviewing the EDC's plan for economic development and provide an update on the local economy. 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 the EDC may accept an invitation for complimentary attendance at the event.

In addition, the KSC invitees are institutional leaders. As institutional leaders, they have duties that may substantially affect the EDC. Because of this, the Standards of Ethical Conduct require me to make an individual determination weighing the Agency's interest in their attendance against the concern that this gift may appear to improperly influence them. I have determined NASA's interest in their participation does outweigh the concern that the gift of free attendance may or may appear to influence them in the performance of their official duties. In making this determination, I have considered the following: (1) the importance of the event to NASA; (2) the nature and sensitivity of pending matters affecting the sponsors; (3) the significance of the individual employees' role in any such matters; (4) the purpose of the event; (5) the identity of other expected participants; and (6) the market value of the gift of free attendance. Accordingly, the invitees may attend this event as representatives of NASA.


Gerald D. Stubbs
Agency Designee