

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



May 21, 2013

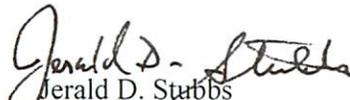
Reply to Attn of: CC-A

TO: All NASA Employees
FROM: CC/Chief Counsel
SUBJECT: Determination Regarding Attendance by NASA Employees at the 40th
Anniversary Celebration of Skylab, July 27, 2013

The Astronaut Scholarship Foundation (ASF), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host the 40th Anniversary Celebration of Skylab at the Kennedy Space Center Visitor Complex's Apollo Saturn V Center on July 27, 2013. The Gala will honor Skylab astronauts scheduled to attend include: Alan Bean, Bo Bobko, Jerry Carr, Bob Crippen, Owen Garriott, Ed Gibson, Joe Kerwin, Jack Lousma, Bill Pogue, William Thornton, and Paul Weitz.. Invitees include corporate and industry executives and workers, members of academia, aerospace contractors, community leaders, Federal Government officials, military leaders and other space enthusiasts. The estimated cost of the dinner is \$750 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 employees attend these events. Through attendance, NASA employees will be able to honor and show support for the astronauts and NASA's historic programs. In addition, these events are 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 do not substantially affect any of the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under the Executive Order 13490, may accept an invitation for free attendance at the event for themselves and a guest. NASA employees whose duties may substantially affect ASF, 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 these events from the Chief Counsel's Office.


Gerald D. Stubbs
Agency Designee