

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



July 11, 2013

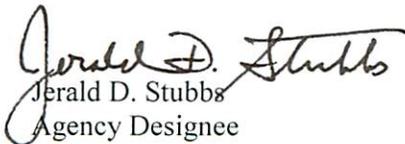
Reply to Attn of: CC-A

TO: All NASA Employees
FROM: CC/Chief Counsel
SUBJECT: Determination Regarding Attendance by NASA Employees at the Apollo 44th Anniversary of the First Manned Lunar Landing, July 20, 2013

The Grumman Lunar Module Reunion Team, a non-profit organization under 501(c)(3) of the Internal Revenue Code, and Northrop Grumman Corp. will sponsor a Celebration of the Apollo 44th Anniversary of the First Manned Lunar Landing at the Kennedy Space Center Visitor Complex's Apollo Saturn V Center on July 20, 2013. The celebration will consist of a dinner honoring the Apollo Crew and Grumman Lockheed Martin Team Members. Invitees include corporate and industry executives and workers, members of academia, aerospace contractors, community leaders, Federal Government officials and other space enthusiasts. The value of the dinner is \$90 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 this event. Through attendance, NASA employees will be able to honor and show support for the crew and team members that supported the Apollo program. 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 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 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 these events from the Chief Counsel's Office.


Jerald D. Stubbs
Agency Designee