

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



June 21, 2013

Reply to Attn of: CC-A

TO: All NASA Civil Servants

FROM: CC/Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance at the Atlantis Grand Opening at Kennedy Space Center Visitor Complex, June 28, 2013

The Delaware North Companies Parks & Resorts (DNC) will host the Atlantis Grand Opening at the Kennedy Space Center Visitor Complex on June 28, 2013, from 6:00 – 10:00 p.m. More than 2000 guests are expected to attend the opening. Guests will include Federal, state, and local officials, members of academia, industry and media representatives, contractor and NASA personnel, space coast tourism and community leaders, and members of the public. The market value of the opening is approximately \$55 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 the space shuttle program and NASA’s legacy and to show support for NASA’s continued mission. 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 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. NASA employees whose duties may substantially affect 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.

In addition, DNC will provide an event-specific gift bag valued at \$12 to each of the attendees. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion. NASA invitees are also reminded not to exceed the \$50 cap on gifts from any one source in a calendar year.

  
Jerald D. Stubbs  
Agency Designee