

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



November 14, 2014

Reply to Attn of: CC-A

TO: To All NASA Civil Servants

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Florida Historical Society Brevard Museum of History & Natural Science, Preview of "Eye of the Universe: The Hubble Space Telescope" Exhibit Reception on November 14, 2014

Florida Historical Society, a 501(c)(3) non-profit organization, will host a preview of the exhibit entitled "Eye on the Universe: The Hubble Space Telescope" at the Brevard Museum of History & Natural Science, 2201 Michigan Avenue, in Cocoa, Florida, on Friday, November 14, 2014, from 6:00 pm to 9:00 pm.

Approximately 1000 guests have been invited to attend, including representatives of state and local Government, industry representatives, local community leaders, NASA personnel, the space tourism community, and members of the public and media. Tickets to the reception, valued at \$75, are being offered to NASA KSC personnel by the Florida Historical Society at no cost.

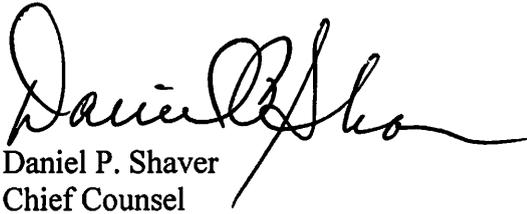
I find that free attendance at the above mentioned event is in the interest of the agency because it will further agency operations and programs by helping to improve NASA's relationship with other members of the Space Coast community and will support NASA's statutory mandate to disseminate information about its activities. I conclude that NASA's interest in its employees and a guest attending this event outweighs any concern that such free attendance may, or may appear to, improperly influence any NASA KSC personnel in the performance of their official duties.

NASA KSC employees may accept an invitation for free attendance to the reception, provided their duties do not substantially affect the sponsors or a majority of its members. This includes NASA KSC employees who are in non-career positions for which they are required to sign an ethics pledge under the Executive Order 13490. However, NASA employees whose duties may substantially affect the event sponsors, such as by way of contracting duties, should seek from the Chief Counsel's Office an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event.

Because the event is a fundraiser for the Florida Historical Society, NASA attendees should avoid participating in any of the fundraising activities, including any promotional, production, or presentation activities. Employees should also avoid making any requests for support for any nonprofit organization.

Gift bags, valued at \$5 each, will be offered to all attendees. NASA 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 and no more than \$50 from one source in a calendar year.

Questions about this determination may be addressed to Adhana Davis at 321-867-9223 or via email at KSC-Ethics-Advisor@mail.nasa.gov.



Daniel P. Shaver
Chief Counsel