

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



September 30, 2013

CC-A

Reply to Attn of:

TO: All NASA Civil Servants

FROM: CC/Chief Counsel

SUBJECT: National Space Club Florida Committee Celebrate Space Dinner,  
October 19, 2013

The Florida Committee of the National Space Club (NSCFC), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a Celebrate Space event at the KSC Visitor Complex Atlantis Facility on Saturday, October 19, 2013. This event replaces the annual Space Ball hosted by NSCFC, which helps further its missions to provide information on space activities, promote space leadership, stimulate advancement of space applications, sponsor educational activities, and provide recognition for contributions to advancements in aerospace science, operations, research, and education. Approximately 300 guests, including corporate executives, representatives of aerospace contractors and other organizations, and representatives of state and Federal government will be attendance. Tickets to the dinner, valued at \$90 for each attendee, are being offered to NASA KSC personnel at no cost.

I find that the Celebrate Space meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). Consequently, 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 personnel in the performance of their official duties.

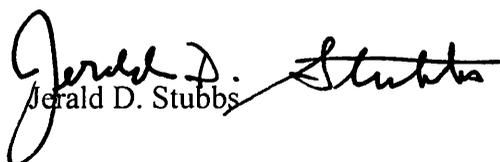
Attendance at the Celebrate Space event will allow NASA representatives to establish an Agency presence at an event celebrating work done by the NSCFC to stimulate young people in the aerospace science and research careers. Attendance will also allow NASA personnel an opportunity to discuss matters of interest with a diverse group of other guests. Through attendance, employees will be able to disseminate information on NASA's ongoing activities and to demonstrate support for the contributions of the American space industry.

Accordingly, NASA employees whose duties do not substantially affect NSCFC, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event. NASA employees whose duties may

substantially affect NSCFC such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

In addition, please note that some NASA contractors may be providing sponsorship for this event and purchasing tables at which NSCFC may seat other attendees. To avoid the appearance of a conflict of interest, NASA employees who attend the event should avoid sitting at a table sponsored by a contractor with whom they are closely and currently involved or expect to be involved within the next few months, (e.g. by way of source selection or contract administration duties).

Finally, NSCFC will provide an event-specific commemorative coin valued at \$4 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.

  
Gerald D. Stubbs