

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 22, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Federation of Galaxy Explorers
Galaxy Ball, June 7, 2008

On June 7, 2008, the Federation of Galaxy Explorers will hold its fourth annual Galaxy Ball at the Westin Hotel in Washington, DC. The Federation is a nonprofit organization which inspires and educates children in space-related science and engineering disciplines. Through the Federation, adult volunteers provide children with a "hands on" understanding of space science, earth science, engineering, and rocketry.

The Galaxy Ball will be a widely attended gathering of approximately 400 including people from the corporate and Federal government sectors, as well as volunteers who have supported the Federation's education activities. In addition, the Federation's Space Leadership Award--which is presented to the individual who, above all others, demonstrates superior leadership before the public to advance the exploration and development of space--will be presented this year to the Honorable Barbara A. Mikulski, United States Senator. Tickets to the reception and dinner, valued at \$ 140 per person, are being offered to some NASA personnel at no cost. Although member corporations provide open seating at their tables to accommodate guests invited by the Federation, the Federation is solely responsible for selecting, inviting, and seating NASA guests.

Attendance at the Ball will allow NASA representatives to establish an Agency presence at an event celebrating work done by the Federation and its volunteers to stimulate children to pursue careers in science and engineering. Attendance will also allow NASA personnel to exchange views relating to NASA's mission with individuals from the corporate and non-profit sectors, the Hill, and other federal agencies.

In addition, each attendee will receive an assortment of mementos valued at approximately \$5 each. 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. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept these mementos. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

There is a fundraising aspect to the event, a silent auction. As a reminder, Federal employees 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 the nonprofit organization.

I find that the Galaxy Ball 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 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.



Adam F. Greenstone