

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



June 4, 2010

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Journey to the Stars Reception on June 7, 2010

On June 7, 2010, sponsors, the American Museum of Natural History (AMNH), National Air and Space Museum (NASM), National Oceanic and Atmospheric Administration (NOAA), and the National Aeronautics and Space Administration (NASA), with co-sponsors, Lockheed Martin Corporation, American Meteorological Society, John Hopkins University Applied Physics Laboratory, Science and Technology Corporation, and Northrop Grumman Corporation, will host a reception at the National Air and Space Museum, in Washington, D.C., from 6:30 p.m.-9:00 p.m. The reception is to celebrate space science and education highlighting new formal education materials created by NASA that support the Journey to the Stars planetarium show.

This event will be a widely-attended gathering of approximately 600 representatives of NASA, the aerospace industry, the legislative branch, state and local governments, trade associations, academia, and the media. The cost of the reception, which includes food and beverages is approximately \$115.00 per person.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C. F. R. § 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the event for themselves and any accompanying guest. However, NASA employees whose duties may substantially affect the event sponsors such as by the 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 their local ethics counselor.

NASA employees attending the event are reminded of the \$20 gift exception at 5 CFR § 2635.204(a), which provides that employees are permitted to accept gifts valued at no more than \$20 per occasion. NASA employees should not accept any gifts distributed at the reception that exceed the \$20 cap. NASA invitees who are required to sign the ethics pledge may only receive such gifts if they reimburse the sponsor the fair market value.


for Adam F. Greenstone