

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 2, 2011

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 GRAIL Mission Pre-Launch Reception hosted by Lockheed Martin Space Systems Company (LMSSC) and Jet Propulsion Laboratory (JPL) on September 6, 2011

NASA invitees, accompanied by their spouse or a guest, may attend a reception sponsored by Lockheed Martin and Jet Propulsion Laboratory in the Radisson at the Prot Conference Center in Cape Canaveral, FL, from 6 pm – 8 pm. This event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities.

Approximately 200 people are expected to attend this reception. Expected attendees include Scientists, Congressional members and staff, the aerospace industry, industry representatives, academia, NASA personnel, DOD and personnel from other Federal agencies, the public, the media, and contractors. The reception will include hor d' oeuvres and refreshments valued at approximately \$20 per person. In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the event meets the definition of a "widely attended gathering." I further find that there is an agency interest in having NASA employees attend the event, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect LMSSC and JPL 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 their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend the reception if they reimburse the sponsors the cost of the refreshments consumed for themselves and accompanying guests.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone