

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



May 18, 2012

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

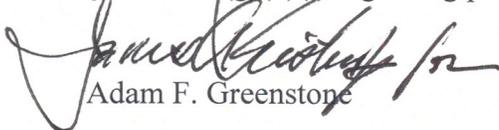
SUBJECT: Determination Regarding Attendance by NASA Employees at Federation of Galaxy Explorers' (FGE) Galaxy Ball on June 2, 2012

On June 2, 2012, the Federation of Galaxy Explorers (FGE), a non-profit organization under Section 501(c)(3) of the Internal Revenue Code, will host a Galaxy Ball, at the Westin Alexandria at 400 Courthouse Road, Alexandria, Virginia, at 6 PM. This event is a cocktail reception followed by a seated dinner, and an award program.

The purpose of this event is to celebrate the Federation of Galaxy Explorers volunteers and leaders in the aerospace community. Sponsors of this event are Boeing, Arianespace, Northrop Grumman, R2AD, TASC, IAI, AGI. Approximately 220 people are expected to attend including Congressional members and staff, academia, industry representatives, NASA personnel, DoD, and personnel from other Federal agencies, and members of the public. The estimated cost of the refreshments, which includes all food and beverages, is \$120.00 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 determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the Galaxy Ball will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the host or its sponsors may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

However, 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 if they reimburse the sponsors the cost of the event for themselves and accompanying guests, in addition to any gift items they accept. The host will distribute a corporate trinket valued at \$10. Moreover, NASA employees whose duties do not substantially affect the host or its sponsors, 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.


Adam F. Greenstone