National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

September 12, 2012

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at a Luncheon hosted by Lockheed Martin and STEMconnector on September 13, 2012

On September 13, 2012, Lockheed Martin and STEMconnector will host a luncheon, with the support of Bloomberg Government, at Bloomberg Government, 1101 K Street, N.W., 5th Floor, in Washington, D.C., from 11:30 a.m. to 1:45 p.m.

The purpose of this event is to facilitate discussions around cyber security, national intelligence and the role of women. Approximately 30 people are expected to attend. The estimated cost of the event including all food and beverages is $20.00 per person. The luncheon will be attended by representatives of the aerospace industry, professional society members, representatives of other non-profit organizations, and executives from the private and public sector. I find that this 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. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the 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. 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 luncheon if they reimburse the sponsors the cost of the refreshments consumed.

Adam F. Greenstone