

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 28, 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 the Closing Dinner of the Space Generation Congress (SGC) 2012, hosted by Lockheed Martin on September 29, 2012

On September 29, 2012, Lockheed Martin will host a the closing dinner for the Space Generation Congress (SGC), at the Museo Archeologico Virtuale, Ercolano, Italy, at 8:30 PM. The Space Generation Advisory Council (SGAC), a non-profit organization under section 501(c) (3) of the Internal Revenue Code, has organized this event.

The purpose of this event is to celebrate the closing of the 2012 Congress, to facilitate the networking between space young professionals and to give the awards to the scholarship winners of this years Congress. Approximately 200 people are expected to attend. The estimated cost of the event including all food and beverages is \$51 per person. NASA personnel, representatives of the aerospace industry, academia, university students, and young professionals, will attend the dinner. 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 reception if they reimburse the sponsors the cost of the refreshments consumed.

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

Adam F. Greenstone