

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



November 16, 2012

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

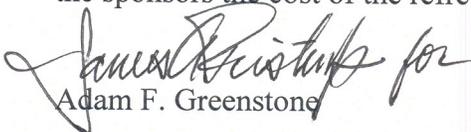
SUBJECT: Determination Regarding Attendance by NASA Attendees at the American Astronautical Society's (AAS) Reception and Screening of a Documentary "Saving Hubble", on November 15, 2012

On November 15, 2012, American Astronautical Society's (AAS) a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host a reception and screening of the documentary "Saving Hubble." This event will take place at the U.S. Navy Memorial Heritage Center, in Washington, DC, from 7 PM to 9 PM.

Co-sponsors of this event include Lockheed Martin, with the support of Ball Aerospace and Technologies Corporation. Approximately 300 people are expected to attend. The estimated cost of the event including all food and beverages is \$25.00 per person. The event will be attended by Congressional members and staff, NASA personnel and other Federal agencies, representatives of the aerospace industry, academia, space advocacy, professional groups, and the media. 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. The non-career employees will need to reimburse the cost of what they consume.

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.

  
Adam F. Greenstone