

National Aeronautics and Space Administration

Headquarters  
Washington, DC 20546-0001



December 7, 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 a Luncheon and Fire-Side Chat Hosted by Bloomberg Government & Bloomberg L.P. on December 10, 2012

On December 10, 2012, Bloomberg Government & Bloomberg L.P will host Luncheon at the Bloomberg Government Office at 1101 K Street, N.W., 5<sup>th</sup> Floor, in Washington, D.C. from 12 PM – 1:30 PM. The purpose of this event is to have informal discussions with David Rubenstein, co-CEO of the Carlyle Group and Jason Kelly, author of “The New Tycoons: Inside the Trillion Dollar Private Equity Industry that Owns Everything.”

Representatives from academia, industry, and other civilians of Federal agencies, contractors, the media, and members of the public will attend this event. About 50 people are expected to attend. The estimated cost of the luncheon, including all food and beverages, is \$24.00 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)(2). 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 event will allow NASA attendees to learn about commercial trends and activities potentially relevant to Agency programs.

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 [the sponsor], 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 it they reimburse the sponsors the cost of the event [and any gifts they receive] for themselves and accompanying guests.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that Bloomberg will be distributing a pen valued at \$9.99, and a book valued at \$17.48.



Adam F. Greenstone