

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 Holiday Reception hosted by Analytical Graphics, Inc. (AGI) on December 11, 2012

On December 11, 2012, Analytical Graphics Inc. (AGI) will host a Holiday Reception at Sequoia's in Washington, D.C., from 7 p.m. – 10 p.m. The reception will provide attendees the opportunity to network and celebrate the holiday season with space, defense and intelligence personnel.

Approximately 1000 people have been invited to attend, including NASA personal, personnel from other Federal agencies, industry representatives, trade organization representatives, the media, the diplomatic community, academia, and the general public. The estimated cost of the reception, including all food and beverages, is \$47.00 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 exchange information regarding various NASA programs. NASA employees whose duties do not substantially affect the sponsor may accept an invitation for free attendance.

However, NASA employees whose duties may substantially affect the AGI, 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 if they reimburse the sponsor the cost of the event for themselves and accompanying guests.

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

Adam F. Greenstone