

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



April 24, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at a Continental Breakfast, Lunch and Reception Cosponsored by ATK, Boeing, Lockheed Martin, and Pratt & Whitney Rocketdyne on April 24, 2013

On April 24, 2013, ATK, Boeing, Lockheed Martin, and Pratt & Whitney Rocketdyne will host a conference for Space Launch System (SLS) and Orion MPCV related work. The event will include a continental breakfast, light lunch and end of day reception at the Reserve Officers' Association and (for the evening reception) the Longworth House Office Building Cafeteria.

Over 125 complimentary invitations were sent to members of congress and congressional staff, and employees, and industry representatives. Tickets for the events cost \$25 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).

In addition to representatives from across the aerospace industry representing a diversity of interests, members of Congress and congressional staff are expected to attend this event. Attendance at the event will allow NASA personnel to hear discussion from current and prospective industrial partners and congressional members related to NASA's activities and plans, as well as to actively engage in this dialogue. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at any plenary part of the event to which they are invited.

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. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, NASA employees serving in non-career positions who are required to sign an ethics pledge under Executive Order 14390 must reimburse the event sponsors for any refreshments they consume unless they are delivering official remarks for the Agency.

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

Adam F. Greenstone