

National Aeronautics and Space Administration



**Headquarters**  
Washington, DC 20546-0001

November 18, 2015

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Airpress Lunch on November 25, 2015

Airpress, is hosting a lunch on November 25, 2015, in Rome, Italy. The lunch is also sponsored by the Sitael S.p.A. This is a working lunch with members of the Italian Parliamentary Intergroup for Space, representatives of the industry, members from the European Space Agency, Italian Space Agency, Ministry of Defense, Ministry of Education, as well as University and Research and Presidency of the Council Ministers, promoting dialogue regarding space exploration plans. Airpress is in charge of the organization, planning and extended invitations to all personnel attending the lunch. The lunch will take place at the Montecitorio Meeting Center in Rome, Italy at 1:00 p.m. The value of the lunch, to include all food and beverages, is approximately \$35 per person. Approximately 30 people are expected to attend.

I find that this event meets the requirement of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because the content relates to NASA's exploration and technology development objectives, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at this event for themselves. Accordingly, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009 requires signing an ethics pledge may accept a free invitation to attend the lunch for themselves.

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 ethics counselor.

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

Adam F. Greenstone