

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



October 12, 2016

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Ball Aerospace & Technology Corporation Innovation Reception on November 29, 2016

On November 29, 2016, Ball Aerospace & Technology Corporation (Ball Aerospace) will host a reception at the Reagan Building and International Trade Center, Washington, DC at 5:00 p.m. The purpose of the event is to provide an opportunity for discussion on various technologies and industry accomplishments.

Approximately 200 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$50.00 per person. Ball Aerospace will organize and plan the event and will be in control of the seating. The event will be attended by members of the executive and legislative branches, academia, personnel from other Federal agencies and the aerospace industry. I find that the 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 and operations. Attendance at the reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the Ball Aerospace or a majority of its members may accept an invitation from the Ball Aerospace for free attendance for themselves and a guest to the reception.

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 only attend this event if they reimburse the hosts the estimated value of the event. Moreover, NASA employees whose duties may substantially affect the Ball Aerospace or a majority of its members, 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.

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for Adam F. Greenstone