

National Aeronautics and Space Administration

**Headquarters**

Washington, DC 20546-0001



November 9, 2015

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Ball Aerospace & Technology Corporation's Annual Celebration of Innovation Reception on December 1, 2015

On December 1, 2015, the Ball Aerospace & Technology Corporation, will host a reception at the Ronald Reagan Building in Washington, D.C., at 5:00 p.m. This event provides an opportunity to meet and discuss various technologies and related industrial efforts.

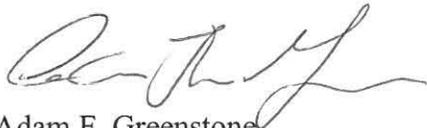
Approximately 750 people have been invited to attend, including members of Congress and their staff, District of Columbia government officials, Executive Branch officials, NASA personnel, other Federal agencies, representatives from industry, and academia. The estimated value of the refreshments, which includes all food and beverages, is \$50 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).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. In addition, attendance at the reception will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees whose duties do not substantially affect Ball Aerospace & Technology Corporation, may accept an invitation for free attendance to the event.

NASA employees who are in non-career positions in which the President's Executive Order 13490 of January 21, 2009, requires signing an ethics pledge, may only attend this event if they reimburse the hosts the estimated value of the refreshments.

Moreover, NASA employees whose duties substantially affect the host, 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.

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).

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone