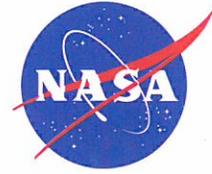


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 16, 2016

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 Gala Dinner and Conferment on June 6, 2016

On June 6, 2016, the Bar-Ilan University will host a dinner, sponsored by the Danielle Foundation, at the Dan Accadia Hotel in Herzliya-on-the-Sea, Israel at 6:45 p.m. The Bar-Ilan University is in control of the planning and invitations for this event. I understand that Bar Ilan University selected the NASA Administrator, Charles F. Bolden Jr. to receive an Honorary Doctorate at a ceremony the following day, June 7, 2016, and would like to make introductions to colleagues the Administrator would not otherwise meet. The purpose of the event is to present Presidential Awards of Distinction and the Alumni Achievement Awards.

Approximately 250 people have been invited to attend, including the Attorney General of Israel and the founder of the Law Center, members from academia, personnel from other countries and the public. The estimated average value of refreshments served at the event, including all food and refreshments, approximately \$106 per person (\$400 Israeli New Shekel). 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 employees attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding NASA programs and international space partners. Accordingly, NASA employees, including NASA employees who are in non-career positions which Executive Order 13490 requires signing an ethics pledge, who have been invited to attend may accept free attendance for themselves and a guest to this event.

However, NASA employees whose duties may substantially affect the sponsor, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from their local ethics counselor to attend under the widely attended gathering exception.

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

Adam F. Greenstone