

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



January 20, 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 Committee of 100/Jones, Walker Lunch on January 20, 2016

On January 20, 2016, the Committee of 100 (C100) for Economic Development in Louisiana, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host an event at the Russell Senate Office Building, Room SR325, in Washington, D.C., at 11:30 p.m. The event is sponsored by Jones, Walker, LLP. The lunch provides an opportunity for informal discussions on economic development in Louisiana with Congressional members, business leaders and business consultants.

Approximately 100 people have been invited to attend, including Congressional members, Congressional staff, personnel from other Federal agencies, representatives from business, and leaders from the academic community. The estimated cost of the reception, including all food and beverages, is \$19.75 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).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding national and regional aviation and business issues.

NASA employees, other than non-career employees subject to the ethics pledge in Executive Order 13490, whose duties do not substantially affect the C100 or Jones Walker may accept an invitation for free attendance for the event. However, NASA employees whose duties may substantially affect the C100 or Jones, Walker 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 in non-career positions who are required to sign the ethics pledge under Executive Order 13490 must reimburse the organizers the value of the event to attend.

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

Adam F. Greenstone