

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 16, 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 Capitol Hill Village Gala on February 27, 2016

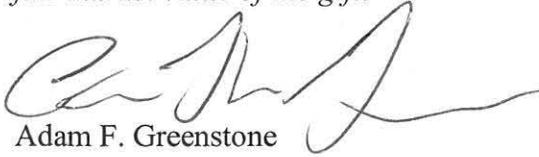
On February 27, 2016, Village Hill Village, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at Dock 5 (above Union Market), in Washington, DC, at 7:00 p.m. to 10:30 p.m. The reception is a celebration for volunteers who provide assistance and programs for allowing senior residents to "age in place" in the community.

Approximately 500 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$125.00 per person. The event will be attended by members of Congress and staff, District of Columbia government officials, personnel from other Federal agencies, business owners, and members of the public. The Capitol Hill Village is in control of the planning and table seating. 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. Attendance at the event will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the Capitol Hill Village – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation from the Capitol Hill Village for themselves and a guest for free attendance to the reception.

However, NASA employees whose duties may substantially affect the Capitol Hill Village, or its members, 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). We understand some of the local businesses may distribute tickets to theatrical performances or gift certificates for local restaurants, etc., the value of which is over \$20. NASA employees may only accept these gifts if they reimburse the business fair market value of the gift.*

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

Adam F. Greenstone