

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



February 25, 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 Commercial Spaceflight Federation's 10th Anniversary Celebration on March 2, 2016

On March 2, 2016, the Commercial Spaceflight Federation (CSF), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, together with Blue Origin and Moon Express, Inc., will host a reception at the Army and Navy Club in Washington, DC, from 6:30 p.m. to 10:00 p.m. The reception is to celebrate spaceflight and the importance of space science and exploration.

Approximately 400 people have been invited to attend, including members of Congress and their staff, industry representatives, and personnel from other Federal agencies. The estimated cost of the event, which includes all food and beverages, is \$90.00 per person. The CSF is in control of the planning and seating arrangements. 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 discussions and 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 hosts, with the exceptions noted below, may accept an invitation to the reception from the CSF for free attendance for themselves and a guest.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the host the cost of the dinner. Additionally, NASA employees whose duties may substantially affect the hosts, or a majority of 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.

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

Adam F. Greenstone