

National Aeronautics and Space Administration



Headquarters
Washington, DC 20546-0001

September 30, 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 Conservation International Reception on October 20, 2016

On October 20, 2016, Conservation International (CI), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Decatur House at Lafayette Square, Washington, DC at 6:30 p.m. The purpose of the event is to provide an opportunity for discussion on Conservation International's mission and programs.

Approximately 200 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$75.00 per person. The CI will organize and plan the event and will be in control of the seating. The event will be attended by members of CI and their Board of Directors, Congressional members and their staff, Diplomatic officials and staff from foreign embassies, personnel from other Federal agencies, and the public. 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 and operations. Attendance at the reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the CI or a majority of its members – 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 CI for free attendance to the reception.

Moreover, NASA employees whose duties may substantially affect the CI or a majority of its members, 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.

Kathleen T. Spear

for Adam F. Greenstone