

National Aeronautics and Space Administration

**Headquarters**  
Washington, DC 20546-0001



October 6, 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 2016 GCN dig IT Awards Dinner on October 13, 2016

On October 13, 2016, GCN will host a dinner at the Ritz-Carlton in Tysons Corner, Virginia at 5:00 p.m. The purpose of the event is to provide an opportunity for informal discussion on new technologies and strategies in the industry. The event will include the presentation of six different awards to top programs for achievement on various projects throughout the industry.

Approximately 350 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$85.00 per person. The GCN will organize and plan the event and will be in control of the seating. The event will be attended by personnel from other Federal agencies, Congressional representatives, state and local officials, academia, media, and industry representatives. 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 event will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect GCN – 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 GCN for free attendance for themselves and a guest to the event.

Moreover, NASA employees whose duties may substantially affect GCN, 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.

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

Adam F. Greenstone