

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 12, 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 Robert A. and Virginia Heinlein Prize Trust awarding of The Heinlein Prize for Accomplishments in Commercial Space Activities.

On Wednesday, September 14, 2016, the Robert A. and Virginia Heinlein Prize Trust, a nonprofit organization established under 501(c)(3) of the Internal Revenue Code, will host a reception and dinner at the National Air and Space Museum, in Washington, D.C., at 7:00 p.m. The event is to honor the recipient of the Heinlein Award, Jeff Bezos, for his commercial space accomplishments.

Approximately 300 people have been invited to attend, including members of Congress, Congressional Staff, representatives from academia and industry, selected members of the media, and employees of other Federal agencies. The estimated cost of the reception and dinner, including all food and beverages, is \$150 per person. Heinlein Prize Society has control of the planning of the event. 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 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 the Heinlein Prize Society – 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 Heinlein Prize Society for free attendance to the event for themselves and a guest.

However, NASA employees whose duties may substantially affect the Heinlein Prize Society 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.

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

Adam F. Greenstone