

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



April 6, 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 IMAX Corporation Screening and Reception on April 22, 2016

On April 22, 2016, IMAX Corporation will host a screening of *A Beautiful Planet* and a reception at the National Air and Space Museum in Washington, D.C., at 6:30 p.m. The event is to screen the movie *A Beautiful Planet*, which is a portrait of Earth from space, providing a distinct perspective and increased understanding of our planet and galaxy. The movie was made in cooperation with the National Aeronautics and Space Administration (NASA), and features footage captured by the astronauts aboard the International Space Station (ISS). The screening will be followed by a reception.

Approximately 500 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$60.00 per person. The event will be attended by members of Congress and staff, representatives from the aerospace industry and academia, state and local officials, and personnel from other Federal agencies. 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 IMAX Corporation – 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 IMAX for free attendance to the screening and reception.

Moreover, NASA employees whose duties may substantially affect IMAX Corporation, 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