

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



July 18, 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 Invincea, Inc. Breakfast on July 26, 2016

On July 26, 2016, the Invincea, Inc. will host a breakfast at The Old Ebbitt Grill in Washington, D.C. at 8:00 a.m. The guest speakers are Ann Barron-DiCamillo, Former Director of US-CERT, Department of Homeland Security; Lieutenant General (U.S. Army Retired) Rhett Hernandez; and Mr. Stanley Lowe, Former CISO, Department of Veterans Affairs.

Approximately 40 people have been invited to attend, including personnel from other Federal agencies, Congressional members and staff. The estimated cost of the dinner, including all food and beverages, is \$20.00 per person. 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 or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs. NASA employees whose duties do not substantially affect the MSBR, or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect Invincea, Inc., such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone