

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



March 24, 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 Lockheed Martin Sustaining Women in STEM Roundtable on March 29, 2016

On March 29, 2016, Lockheed Martin Corporation will host a roundtable discussion at the Lockheed Martin Global Vision Center in Arlington, Virginia, from 8:30 p.m. to 5:00 p.m. The roundtable, for which NASA is also a sponsor, is to discuss strategies and facilitate collaboration for increasing gender diversity in science, technology, engineering and mathematics (STEM).

Approximately 160 people are expected to attend, including representatives from industry, the legislative branch, other Federal agencies, and academia. The estimated value of the food and beverages that will be provided by Lockheed at the event is \$29.00 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).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency discussions and programs. 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 Lockheed Martin, with the exceptions noted below, may accept a free invitation to the roundtable.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse Lockheed Martin the cost of the event. An exception to this exclusion are non-career employees who are scheduled speakers or panel participants. Additionally, NASA employees whose duties may substantially affect Lockheed Martin, or a majority of its members, 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