

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 11, 2015

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Adam F. Greenstone, Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA staff at the National Press Club Breakfast on September 14, 2015

On September 14, 2015, the National Press Club, a non-lobbying organization, will host a breakfast at the National Press Club at 529 14th St. NW, Ste. 1300, Washington, DC 20045, 9-10 a.m. The purpose of the breakfast is to recognize the halfway point of the One Year Crew Mission.

Approximately 200 to 300 people are expected to attend, including Members of the National Press Club (which includes journalists and communications professionals), representatives of other government agencies, Congressional members, and representatives from the aerospace industry. The estimated cost of the breakfast is \$37.00 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 there is an Agency interest in NASA personnel attending this event because it will further Agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the National Press Club or a majority of its members, may accept an invitation for free attendance to the reception for themselves.

However, NASA employees whose duties may substantially affect the National Press Club or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(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