

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 7, 2016

General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the OSIRIS-REx Pre-Launch Welcome Reception on September 7, 2016

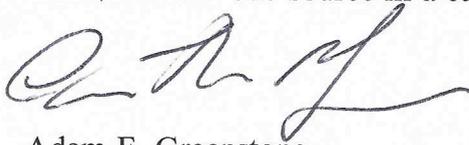
On September 7, 2016, Red Canyon is sponsoring and Lockheed Martin Corporation is organizing the Welcome Reception at Fishlips Waterfront Bar & Grill, 5:00 pm Eastern Time.

Approximately 200 people have been invited to attend, including State and local officials, educational institutions, Lockheed Martin personnel, industry vendors and partners, and nonprofits. The estimated cost of the event, including all food and beverages, is \$15 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. Accordingly, NASA employees whose duties do not substantially affect Red Canyon or Lockheed Martin Corporation may accept an invitation from Red Canyon or Lockheed Martin Corporation for free attendance for themselves and a guest to the reception.

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 Red Canyon or Lockheed Martin Corporation the cost of the event. Additionally, NASA employees whose duties may substantially affect Red Canyon or Lockheed Martin Corporation 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.

Attendees who are not subject to the ethics pledge under Executive Order 13490 are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year).

A handwritten signature in black ink, appearing to read 'A. F. Greenstone', with a long, sweeping horizontal stroke at the end.

Adam F. Greenstone