

National Aeronautics and Space Administration



Headquarters
Washington, DC 20546-0001

December 9, 2015

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance at the South Carolina Business Council Reception on December 9, 2015

On December 9, 2015, the South Carolina Business Council, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a reception at the U.S. Capitol, Room H-137 in Washington, D.C. at 6:00 p.m. The South Carolina Business Council controls the planning. The reception will provide an opportunity to participate in discussions of interest to NASA with a spectrum of South Carolina organizations and with the South Carolina Congressional Delegation.

Approximately 100 people have been invited to attend, including members of Congress and Congressional staff, employees of other Federal agencies, representatives of other companies and trade associations, academia, and law and consulting firms. The estimated cost of the event, including all food and beverages, is \$28.75 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 – 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 host, may accept an invitation for free attendance to the reception for themselves and a guest.

However, NASA employees whose duties may substantially affect the South Carolina Business Council 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