

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



June 22, 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 Strategic Forces Association Reception on June 22, 2016

On June 22, 2016, the Strategic Force Association (SFA); a nonprofit organization under 501(c)(6) of the Internal Revenue Code, together with Cyber, Space, and Intelligence Association (CSIA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Lockheed Martin Space Experience Center, located at 2121 Crystal Drive, Suite 100, Crystal City, VA., from 5:30 p.m. to 8:00 p.m. The guest speaker is Mr. Frank A. Rose, Assistant Secretary of State for Arms Control, Verification and Compliance. The event is to discuss emerging security challenges and opportunities.

Approximately 300 people have been invited to attend, including Congressional Members, federal government agencies, and representatives from the industry. Invitations to attend are jointly controlled by SFA and CSIA. The estimated cost of the event, including all food and beverages, is approximately \$35 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 associations or a majority of its members, may accept an invitation for free attendance to the lunch for themselves.

However, NASA employees whose duties may substantially affect the host associations, 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