

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 Significance Holiday Reception on December 9, 2015

On December 9, 2015, the Significance, Inc. will host a reception at the Virtue Feed and Grain in Alexandria, Virginia, at 8:00 p.m. The reception will provide an opportunity for an informal discussion on topics related to financial management.

Approximately 220 people have been invited to attend, including employees of other Federal agencies, representatives of other companies and industrial partners. The estimated cost of the event, including all food and beverages, is \$25 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 Significance, Inc., may accept an invitation for free attendance to the reception for themselves and a guest.

However, NASA employees whose duties may substantially affect the Significance, Inc. 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