

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



August 20, 2015

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Swiss Embassy Reception on September 16, 2015

On September 16, 2015, the Swiss Embassy, will host a reception at the Swiss Embassy, in Washington, D.C., at 6:00 p.m. The event is to celebrate Swiss innovation and cooperation in their aerospace industry. The keynote speaker is Ambassador Martin Dahinden, Swiss Ambassador to the United States.

Acceptance of the general gift of attendance from the Swiss government is authorized by the Foreign Gifts and Decorations Act. However, we understand there will be separate locations on the Embassy grounds integrated with the event that are sponsored by various corporations to include, a Raclette Station sponsored by Emmi Roth, an Absinthe Tasting sponsored by Kubler, a Fumoir and Santis Malt Lounge sponsored by Davidoff Cigars and Locher Brauerei, and a Gourmet Coffee Lounge sponsored by Nespresso.

Approximately 1,200 people have been invited to attend, including members of Congress and Congressional staff, state and local government officials, representatives from other Federal agencies and academia, Embassy officials and members of the diplomatic corps, and members of the media and general public. The estimated cost of the reception, including all food and beverages, is \$85 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. In addition, attendance at the reception will allow NASA representatives to discuss NASA's programs and plans with the other attendees.

Accordingly, NASA employees whose duties do not substantially affect the Swiss Embassy or the various lounge sponsors, including NASA employees in non-career positions who are

required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest from the Swiss Embassy for free attendance to the event.

Moreover, NASA employees whose duties substantially affect the host, such as by way of procurement duties, 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 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 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone