

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



August 2, 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 Toffler Associates Dinner on August 15, 2016

On August 15, 2016, on the evening before the Space Technology and Investment Forum, the Toffler Associates, will host a reception at the Bluestem Brasserie in San Francisco, CA from 6:00 p.m. through 9:00 p.m. The purpose of the event is to introduce the speakers of the forum to each other and provide an opportunity for discussion.

Approximately 65 people have been invited to attend, including the forum speakers, industry representatives, academia, and other Federal agencies. The estimated cost of the event, including all food and beverages, is \$70 per person. The Toffler Associates is in control of the planning and seating of this event. 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 Toffler Associates or a majority of its members, may accept an invitation for free attendance to the reception for themselves.

However, NASA employees whose duties may substantially affect the Toffler Associates 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