

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



October 5, 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 Von Braun Memorial Dinner on October 27, 2016

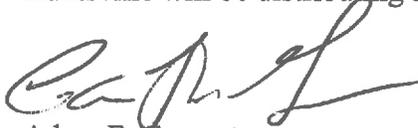
On October 27, 2016, The National Space Club Huntsville, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and Boeing will host a dinner at the U.S. Space and Rocket Center at 5:30 p.m. The purpose of the event is to provide an opportunity for discussion on space exploration and to recognize the award winners and nominees for their contributions in advancing space exploration. Charles F. Bolden, Jr., Administrator, National Aeronautics and Space Administration (NASA), will be presented the Dr. Wernher von Braun Space Flight Trophy.

Approximately 900 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$100.00 per person. The National Space Club Huntsville will organize and plan the event and will be in control of the seating and invitations. The event will be attended by personnel from NASA and other Federal agencies, National Space Club Huntsville Board Members, industry representatives, and elected government officials. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the event will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the National Space Club Huntsville or a majority of its members – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation from the National Space Club Huntsville for free attendance for themselves and a guest to the event.

Moreover, NASA employees whose duties may substantially affect the National Space Club Huntsville or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(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). We understand that the National Space Club Huntsville will be distributing a novelty space item, the total value is \$10.00.



Adam F. Greenstone