

National Aeronautics and Space Administration



**Headquarters**  
Washington, DC 20546-0001

December 1, 2015

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Washington Nationals First Ladies Breakfast on December 2, 2015

The Washington Nationals First Ladies is hosting a breakfast on December 2, 2015, at The Washington Nationals Ball Park in Washington, D.C. The breakfast is also sponsored by Grant Thornton, International Business Machines (IBM), and Inova Health System. The guest speaker at the breakfast is U.S. Representative Debbie Vasserman Schultz, member of the House Committee on Appropriations. The First Ladies is control of the invitations, planning, and seating for this event.

Approximately 100 people have been invited to attend, including members of Congress, Chief of Police, and Secretary of the Air Force. The breakfast will take place at the Washington Nationals Baseball Park – Home Team Clubhouse, Washington, D.C. at 8:00 a.m. The value of the breakfast, to include all food and beverages, is approximately \$44 per person.

I find that this event meets the requirement of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because the content relates to NASA's diversity development objectives, including executive advancement of women, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at this event for themselves.

However, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009 requires signing an ethics pledge may only attend if they reimburse the host the value of the event. Additionally, NASA employees, whose duties may substantially affect the sponsors, 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 ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone