

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



January 19, 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 Washington Post Lunch on January 28, 2016

On January 28, 2016, Jeff Bezos, Marty Baron and Fred Ryan of the Washington Post, a media organization, will host a lunch at the Washington Post, Penthouse Suite, in Washington, DC, at 12:00 noon. The Event is to celebrate the opening of the Washington Post's new building.

Approximately 100 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$40.00 per person. The event will be attended by members of Congress and staff, embassy officials, state and local officials, personnel from other Federal agencies, and other members of the media and general public. The Washington Post is in control of the table seating. 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 Washington Post – 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 Washington Post for themselves and a guest for free attendance to the lunch.

However, NASA employees whose duties may substantially affect the Washington Post, or its holding company, Nash Holdings LLC, 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.

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

Adam F. Greenstone