

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



February 18, 2014

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the California Institute of Technology 50th Anniversary Deep Space Network Dinner on February 20, 2014

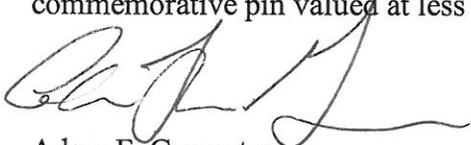
On February 20, 2014, the California Institute of Technology (CalTech), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host a cocktail reception, dinner and program at the Caltech Athenaeum, 551 South Hill Avenue, Pasadena, CA. This event will begin with the reception at 6 p.m., the dinner at 7:00 p.m., and a formal program at 8 p.m. The purpose of this event is to commemorate the 50th anniversary of the NASA Deep Space Network (DSN), as well as the collaboration between NASA and Caltech.

Approximately 225 people have been invited to attend. The estimated cost of the event including all food and beverages for the reception and dinner is \$85.00 per person (\$10 for the reception; \$75 for the dinner). The event will be attended by CalTech and its Trustees, industry, government officials of Spain and Australia, and elected officials from federal, state and local levels. I find that this 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 or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees whose duties do not substantially affect the sponsor, 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 for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, 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.

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 CalTech will be distributing a commemorative pin valued at less than \$5.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a long horizontal flourish extending to the right.

Adam F. Greenstone