

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



October 23, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the "Earth From Space" Reception hosted by the American Astronautical Society on November 13, 2013

On November 13, 2013, the American Astronautical Society (AAS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host a viewing of the film "Earth From Space" followed by a panel discussion and reception at the U.S. Navy Memorial Heritage Center at 701 Pennsylvania Ave. NW, Washington, DC, from 6:00 p.m. to 8:30 p.m.

Approximately 200 people have been invited. The event will be attended by representatives of the aerospace industry, members of Congress and congressional staffers, professional societies, academia, other non-profit organizations, other Federal agencies, the media and the general public. The approximate cost of the event, including all food and beverages, is \$20.00 per person. 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. Accordingly, NASA employees – including employees in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect AAS may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect AAS 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.


Adam F. Greenstone