

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



November 15, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Celebrating International Cooperation in Space panel and luncheon on November 19, 2013

On November 19, 2013, the American Astronautical Society (AAS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host the Celebrating International Cooperation in Space panel and luncheon at 2325 Rayburn on Capitol Hill in Washington, DC, from 11:30 a.m. to 1:30 p.m. The purpose of the event is to provide an educational briefing on international space ventures.

Approximately 75 people have been invited. The estimated cost of the luncheon, including all food and beverages, is \$25.00 per person. This event will be attended by Congressional members and staffers, and the aerospace industry. 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, or who receive an invitation from an organization other than AAS, 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