

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



December 09, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at Analytical Graphics Inc.'s Holiday Reception on December 10, 2013

On December 10, 2013, Analytical Graphics Inc. (AGI) will hold its Holiday Reception at the National Museum of Women in the Arts, 1250 New York Ave. NW, Washington, DC, 20005, from 7 p.m. to 10 p.m. The reception will provide attendees the opportunity to network and celebrate the holiday season with space, defense and intelligence personnel.

Approximately 350 people are expected to attend this event. Attendees will include personnel from Defense and other federal agencies, White House officials, Congressional representatives and staff, industry representatives, international partners, academia and media. The estimated cost of the event, including all food and beverages, is approximately \$47 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees whose duties do not substantially affect the event 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 and an invited guest 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 also 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 AGI will be distributing mistletoe with a total value of approximately \$1.

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

Adam F. Greenstone