

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



November 5, 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 COTS Reception hosted by the Antares Cygnus Team on November 6, 2013

On November 6, 2013, Orbital Sciences Corporation, ATK, Aerojet, and Honeywell (the Antares Cygnus Team) will host a reception at Sonoma, 223 Pennsylvania, Avenue, SE, Washington, DC, 20814, from 5:30 PM to 7:30 PM. This event will be a celebration of the successful completion of the Commercial Orbital Transportation Systems (COTS) program, and to report out on results of the first Cygnus mission and Antares launches.

Approximately 400 guests have been invited to attend. Invitees include members of Congress and Congressional staff, state and local government officials, industry representatives, academia, and personnel from other Federal agencies. The cost of the event, which includes all food and refreshments, will be approximately \$35.00 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 (subject to the exceptions noted below) who have been invited to attend may accept free attendance at the event.

NASA employees whose duties may substantially affect the event sponsors, such as by way of contracting 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the value of the event and any gift items accepted for themselves.

Attendees who are not subject to the ethics pledge 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 a Mission patch & poster, lanyards and space candies will be distributed with a total value under \$20.*

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

Adam F. Greenstone