

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



April 23, 2015

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 Dedication of Enterprise Ceremony hosted by the Intrepid Sea, Air and Space Museum, on April 26-27, 2015

On April 26-27, 2015, the Intrepid Sea, Air and Space Museum, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception on April 26 and a lunch on April 27, 2015 at the Intrepid Sea, Air and Space Museum Complex in New York, NY. The reception on the evening of April 26, will be from 6:30 p.m. to 9:30 p.m. at the Space Shuttle Pavilion. The lunch on the afternoon of April 27, will be from 12:00 noon to 1:00 p.m. at the Michael Tyler Fisher Education Center. The events surround the dedication of the Enterprise Space Shuttle, honoring all those who lost their lives in Apollo 1, Challenger and Columbia.

Approximately 85 people are expected to attend the reception on the evening of April 26. The estimated cost of the reception, which includes all food and beverages, is \$100.00 per person. Approximately 400 people are expected to attend the lunch on April 27. The estimated cost of the lunch, which includes all food and beverages, is \$110.00 per person. The events will be attended by family members of the astronauts who lost their lives in Apollo 1, Challenger and Columbia, personnel who worked with or on those missions, staff and board members from the Astronauts Memorial Foundation, Challenger Center staff, Intrepid staff and trustees, and personnel from NASA. In addition, approximately 200 students will attend the lunch on April 27; and following the lunch, the students will give demonstrations of their experiments to the guests. I find that the events meet 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 events because it will further Agency programs and operations. Attendance will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the Intrepid Sea, Air and Space Museum – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation for themselves and a guest for free attendance to the events.

Moreover, NASA employees whose duties may substantially affect the Intrepid Sea, Air and Space Museum, such as by way of procurement duties, or who receives an invitation from an entity other than Intrepid Sea, Air and Space Museum, 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.

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).



Adam F. Greenstone