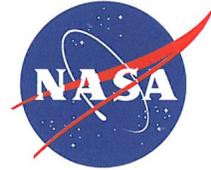


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



December 4, 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 Holiday Reception co-sponsored by Explore Mars, Inc., the American Astronautical Society, and the Space Policy Institute on December 4, 2013

On December 4, 2013, Explore, Mars, Inc., the American Astronautical Society (AAS), and the Space Policy Institute (SPI), all non-profit organizations under section 501(c)(3) of the Internal Revenue Code, will co-sponsor a holiday reception at the City View Room, 7<sup>th</sup> floor, 1957 E St., NW, George Washington University, Washington, DC, from 5:30 p.m. until 7:30pm.

Approximately 100 people are expected to attend. The estimated cost of the reception, including all food and beverages, is \$50.00 per person. This event will be attended by Congressional members and staffers, academia, and industry representatives. 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 the co-sponsors 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 co-sponsors such as by way of procurement duties, or who receive an invitation from an organization other than the co-sponsors, 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