National Aeronautics and
Space Administration

Headquarters
Washington, DC 20546-0001

September 27, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at a reception with screening of the movie, *Gravity*, at the National Museum of American History, on October 2, 2013

On the evening of October 2, 2013, Warner Bros. (WB), the Motion Picture Association of America (MPAA) and the Smithsonian will host a reception with screening of the movie, *Gravity*, at the Warner Bros. Theater, National Museum of American History, in Washington, D.C. The reception will begin at 6:16 p.m. and the screening will begin at 7:15 p.m.

Food and beverages will cost approximately $50 per person. The WB and MPAA will be in control of the seating and approximately 400 people have been. I find that the *Gravity* screening 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 allow NASA representatives to exchange views on NASA's programs and policies.

Accordingly, NASA employees whose duties do not substantially affect the sponsor may accept an invitation for themselves for free attendance to the reception and screening. However, 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 sponsor the value of the event and any gift items accepted for themselves and any accompanying guest.

Additionally, 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.

Adam F. Greenstone