National Aeronautics and
Space Administration

**Headquarters**
Washington, DC 20546-0001

December 6, 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 Immersion Consulting's Annual Holiday Party on December 6, 2013

On December 6, 2013, Immersion Consulting (Immersion) will hold its Annual Holiday Party at Longview Gallery, 1234 9th St. NW, Washington, DC, 20001, at 6:30 p.m. The purpose of this party is for networking, holiday celebrations, and the Wounded Warrior PTSD Project Fundraiser.

Approximately 250 people were invited to attend this event. Attendees will include personnel from Defense and other federal agencies, state government, local small business owners, and members of the public. The estimated cost of the event, including all food and beverages, is approximately $30 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 Immersion will be distributing gift bags with a total value of approximately $15.*

Adam F. Greenstone