

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



July 13, 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 New Horizons Pluto Flyby hosted by the John Hopkins University Applied Physics Laboratory, on July 14, 2015

On July 14, 2015, the John Hopkins University Applied Physics Laboratory (JHUAPL), a subsidiary of John Hopkins University, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Kossiakoff Center on the JHU campus in Laurel, Maryland, at 7:00 p.m. The event is to honor the science and engineering teams that made the New Horizons Pluto Flyby mission possible.

Approximately 400 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$56.00 per person. The event will be attended by members of Congress and staff, representatives from the aerospace industry and academia, state and local officials, personnel from NASA and other Federal agencies, and members of the media. I find that the 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 and operations. Attendance at the reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the JHUAPL – 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 from the JHUAPL for themselves and a guest for free attendance to the banquet.

Moreover, NASA employees whose duties may substantially affect the JHUAPL, such as by way of procurement duties, 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). We understand that JHUAPL will be distributing pins and lanyards, valued at \$1.50 each, to all attendees.



Adam F. Greenstone