

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



March 26, 2015

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

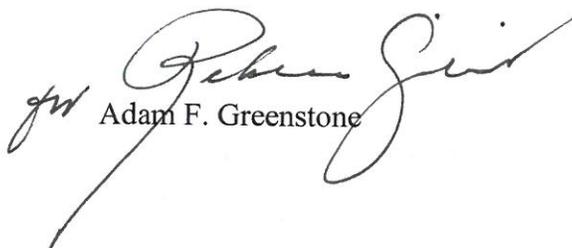
SUBJECT: Determination Regarding Attendance by NASA Employees at National Geographic Television Reception on April 14, 2015

On April 14, 2015, the National Geographic Television, will host a reception at the National Geographic Headquarters in Washington, D.C., at 6:30 p.m. This event is a reception followed by a screening of the Hubble Documentary entitled *Hubble's Cosmic Journey*. The guest speaker will be Dr. John Grunsfeld, Associate Administration, Science Mission Directorate, National Aeronautics and Space Administration. The screening and reception are part of the 25th Anniversary of the Hubble Space Telescope.

Although there are financial sponsors for the reception, the National Geographic Television has sole control of the planning, invitations, and seating for the event. Approximately 400 people are expected to attend including Congressional staff, industry representatives, NASA personnel, members of other federal agencies, and members of the media. The estimated cost of the refreshments, which includes all food and beverages, is \$50.00 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).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. In addition, attendance at the 25th Anniversary event will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the National Geographic or a majority of its members, 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 from the National Geographic for free attendance to the event.

Moreover, NASA employees whose duties substantially affect the host, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".
Adam F. Greenstone