

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 the  
National Geographic Screening and Reception on April 8, 2015

On April 8, 2015, the National Geographic, will host a screening and reception at the National Air and Space Museum in Washington, D.C., from 6:45 p.m. to 10:30 p.m. This event is a screening of the *Living in the Age of Airplanes* premiere, describing the importance of aeronautics to the world.

Although there are financial sponsors for the reception, the National Geographic has sole control of the planning, invitations, and seating for the event. Approximately 200 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 \$60.00 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 screening and reception 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.

There may be small gift items handed out, i.e., lapel pin, bag, keychain, etc., valued at less than \$5 per piece. 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).

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", is written over the printed name. The signature is fluid and cursive, with a large initial "A" and "G".

Adam F. Greenstone