

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



July 25, 2014

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 Mars Up Close Reception sponsored by the National Geographic Society, on August 4, 2014

On August 4, 2014, the National Geographic Society, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a public event at the National Geographic Grovesnor Auditorium, followed by a reception at the National Geographic Dining Hall in Washington, DC, at 7:30 p.m. The event will include a panel discussion regarding the latest discoveries from the Red Planet and share what has been learned from Curiosity and other Mars rovers.

The reception will be widely attended by Federal officials from various government agencies, state and local officials, industry representatives, members of Congress and their staff, academia, members of the media, and the general public. Approximately 400 people are expected to attend. The estimated value of the reception, which includes all food and beverages, is approximately \$24.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the event will provide NASA employees the opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the event.

I find that NASA employees – 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 for complimentary attendance for themselves and their spouse, if invited, to this event.

However, NASA employees whose duties may substantially affect the sponsor, or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding acceptance of complimentary attendance for this event from their local ethics counselor.

*Pursuant to 5 C.F.R. § 2635.204(a), the \$20 gift exception, NASA employees may also purchase tickets offered by National Geographic at the reduced group rate of \$20 per ticket, a savings of \$4 each, so long as the total savings does not exceed \$20, and the employee will not have accepted gifts exceeding \$50 from National Geographic during this calendar year.*



Adam F. Greenstone