

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



November 14, 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 Secure World Foundation Reception on December 9, 2014

On Tuesday, December 9, 2014, the Secure World Foundation (SWF), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Lincoln Restaurant, in Washington, D.C., from 6:00 to 8:00 p.m. The event is the end of year meeting for the people and organizations who have worked with SWF.

Approximately 200 people have been invited to attend, including members of Congress, Congressional Staff, representatives from other federal agencies and industry. The estimated cost of the reception, including all food and beverages, is \$75.00 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)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

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 – whose duties do not substantially affect the sponsors or a majority of its members, may accept an invitation for free attendance to the event for themselves.

However, NASA employees whose duties may substantially affect the host, 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.

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

Adam F. Greenstone