

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 10, 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 Space Foundation Pre-Opening Ceremony VIP Reception on April 13, 2015

On April 13, 2015, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a Pre-Opening Ceremony VIP Reception for Speakers and Special Guests at the Summit Restaurant in Colorado Springs, CO, from 5:00 p.m. to 6:30 p.m. The event is to honor the speakers and special guests for their contribution to the Space Symposium Conference.

Approximately 125 people have been invited to attend, including Congressional members and staff, academia, industry representatives, and employees of other Federal agencies. The estimated cost of the reception, including all food and beverages, is \$15 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 Space Foundation, may accept an invitation for free attendance to the reception for themselves.

However, NASA employees whose duties may substantially affect the Space Foundation, 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