

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



December 5, 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 Space Systems/Loral Reception on December 16, 2014

On December 16, 2014, Space Systems/Loral will host a reception at the Marriott Marquis in San Francisco, California, from 5:00 p.m. to 7:30 p.m. The reception is being held in conjunction with the AGU Fall Meeting but is a wholly separate event.

Approximately 150 people have been invited to attend, including representatives from other Federal agencies, members from academia, industry researchers, and various sectors of the space science community. The estimated cost of the dinner, including all food and beverages, is approximately \$40.00 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 with other guests regarding various NASA programs. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance to this event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from their local ethics counselor to attend under the widely attended gathering exception. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsor the value of the food and refreshments they consume and any gift items accepted for themselves.

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). We understand that Space Systems/Loral will be distributing a slide ruler (value \$2.00), a ball point pen (value \$1.00) and a USB memory device (value \$5.00).

Kathleen T. Spear

for Adam F. Greenstone