

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



September 15, 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 Igniting the Future Reception on September 17, 2014

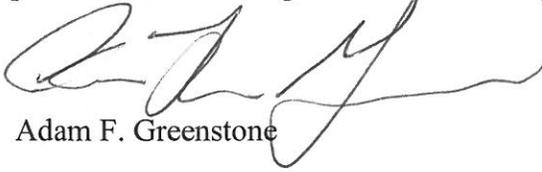
On September 17, 2014, the United Launch Alliance (ULA), will host a reception at the National Geographic Museum, located 1145 17<sup>th</sup> Street NW, Washington, D.C., from 6:00 p.m. to 8:00 p.m. The reception is to celebrate America's launch heritage and the next frontier in space.

Approximately 650 people have been invited to attend, including personnel from other Federal agencies, congressional members and staff, members of the aerospace community, representatives from industry, members of the media, academics and scholars from research organizations. The estimated cost of the event, including all food and beverages, is \$45.00 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 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 NASA's mission and various NASA programs with representatives of the communities participating in the 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 ULA will be distributing a portable mobile charger, the total value of which is \$10.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone