

National Aeronautics and Space Administration



Headquarters
Washington, DC 20546-0001

July 10, 2019

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Apollo UK Productions Limited Premiere Reception July 10, 2019

On July 10, 2019, Apollo UK Productions Limited will host a premiere reception at the Lunar Dome on the grounds of the Rose Bowl in Pasadena, California starting at 6:00 p.m. The event is to provide a venue for informal discussion on space matters with members of the aerospace community. Apollo UK Productions Limited is in control of the planning and invitations for the reception.

Approximately 1,000 people are expected to attend the reception. The estimated cost for the reception, including all food and beverages, is approximately \$20 per person. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, representatives from the legislative branch, industry, celebrities, and members of the public. Attendance at this event will allow NASA attendees to exchange information regarding various NASA missions and programs. I find that this event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs and operations. Accordingly, NASA employees – including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13770 -- who do not have a significant role in a matter affecting the interests of Apollo UK Productions Limited may accept an invitation for free attendance for themselves and a guest to this event. In those circumstances, I find that the Agency’s interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of any of the organizers, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation for this event.

Attendees are also reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), at 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 a small gift bag valued at \$20 will be given to all attendees.

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

Adam F. Greenstone