

National Aeronautics and  
Space Administration



**Mary W. Jackson Building NASA Headquarters**  
Washington, DC 20546-0001

October 7, 2021

Reply to Attn of: General Law Practice Group

**TO:** Distribution

**FROM:** Agency Counsel for Ethics

**SUBJECT:** Determination Regarding Attendance by NASA Employees at the Lucy Launch Mission Events, October 12 & 13, 2021

Southwest Research Institution (SwRI) and Lockheed Martin (LM), will host the Peer Awards Dinner at the Cocoa Beach DoubleTree Hotel in Cocoa Beach, Florida on October 12, 2021; and SwRI and United Launch Alliance (ULA) will host the Pre-Launch Dinner at the Kennedy Space Center (KSC) Visitor Complex Saturn V Facility on October 13, 2021. These events will recognize the contributions of Lucy Mission personnel and celebrate their mission work. Approximately 200 guests will attend the Peer Awards dinner and approximately 800 people will attend the pre-launch dinner. Attendees will include representatives from industry, academia, as well as from state government. The approximate value of the Peer Awards dinner is \$145 a person; and the pre-launch dinner is \$130 a person.

In accordance with 5 C.F.R. § 2635.204(g), Gifts of Free Attendance at Widely Attended Gatherings, I find this event meets the requirements of a widely attended gathering, and I further determine that there is an agency interest in having NASA personnel attend this event because their participation will further agency programs and operations. Specifically, this event allows NASA employees to honor and show support for a program recognizing important contributions to U.S. aerospace efforts. This event also provides a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group of fellow attendees. Because of these benefits to NASA, and having considered the factors enumerated in 5 CFR § 2635.204(g)(4), I also find that the Agency's interest in the invited NASA employees' attendance outweighs the concern that such employees may be, or may appear to be, improperly influenced in the performance of official duties.

However, NASA employees whose duties may substantially affect any of the event sponsors, 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 this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which Executive Order 13989 requires signing an ethics pledge may only accept the meals if they reimburse the sponsor the value of the event and any gift items accepted for themselves and their guest.

Accordingly, I have determined that NASA invitees may accept their invitations for complimentary attendance at these events in accordance with the ethics rules. NASA attendees

are reminded to exercise any COVID-19 precautions and obtain any administrative approvals related to COVID safety appropriate to their individual situation.

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 SwRI will be distributing a lanyard (\$2.34). NASA attendees including employees in non-career positions who have signed the ethics pledge may accept the gift of lanyard.

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

Adam F. Greenstone