

National Aeronautics and
Space Administration



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

October 15, 2021

CC

TO: Distribution

FROM: OGC/Agency Counsel for Ethics, Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Lucy Mission Post Launch Mission Event, October 16, 2021

Lockheed Martin (LM) will host a post-launch dinner to recognize the Lucy Mission at the Rising Tide Tap and Grille, in Port Canaveral, FL on October 16, 2021. Approximately 100 guests will attend including representatives from industry, state and federal government, and other organizations. The approximate value of the dinner is \$46 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 share information and exchange views about NASA's mission plans and priorities. 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 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 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, and subject to the above, I have determined that NASA invitees may accept their invitations for complimentary attendance at this event under 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 situations.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone
Agency Counsel for Ethics, Alternate Designated Agency Ethics Official