

John C. Stennis Space Center
Stennis Space Center, MS 39529-6000



November 20, 2023

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: CA00/General Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Bayou Classic Pre-Game Brunch on November 25, 2023

On November 25 and 26, 2023, the Bayou Classic college football event and game, sponsored by Proctor and Gamble, will take place in New Orleans, Louisiana. This series of events will include a brunch reception on November 25, 2023 from 11:30 AM until 1:00 PM located in one of the conference rooms inside the Caesar Superdome. The reception will provide attendees the opportunity to network and discuss space-related topics with local public officials and contractors.


Approximately 250 people are expected to attend this event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, academia, media, industry representatives, and state officials. The estimated cost of the event, including all food and beverages, is approximately \$30 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. 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 free attendance at the above-mentioned event is in the interest of the agency because it will further agency programs and operations. Accordingly, NASA employees, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves for free attendance to the brunch reception if they do not have a significant role in any pending sensitive matter that will affect the interests of the sponsor and where acceptance would not create an appearance that the sponsor is receiving preferential treatment. In those circumstances, I find that the Agency's interest in the employees' attendance outweighs any concern that the employees may be, or may appear to be, improperly influenced in the performance of their duties.

However, where NASA employees may have a significant role in any pending sensitive matter

that will affect the interests of the sponsor, such as current procurement duties, or where acceptance may create an appearance that the sponsor is receiving preferential treatment, the employees should seek guidance from their local ethics counselor as to whether they may rely on this determination.

Attendees are also 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).



Distribution:

cc: