



November 21, 2007

Reply to Attn of 140

TO: Distribution

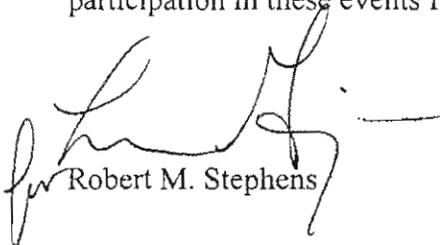
FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance
at the Maryland Space Business Roundtable's Luncheon Events on
November 27, 2007 and December 18, 2007

The Maryland Space Business Roundtable (MSBR) provides a forum for discussion of leading aerospace and science technology issues for industry and government. On November 27, 2007, MSBR is hosting a luncheon and program featuring Dr. Laurie Leshin, the NASA Goddard Deputy Director-Technical. On December 18, 2007, MSBR is hosting another luncheon and program featuring NASA Goddard scientist Dr. James Garvin. Approximately 170 people from NASA, other Federal agencies, universities, and industry are expected to attend each event. The estimated cost per person for each event is approximately \$22. Attendance at the luncheon and program will allow NASA employees a chance to discuss issues affecting the science community with other attendees from other Federal agencies, universities, and industry.

Based on the above, I find that both the November 27 and the December 18, 2007 events meet the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend these events. Accordingly, NASA employees whose duties do not substantially affect MSBR or its members may accept an invitation for free attendance to the luncheons.

NASA employees whose duties substantially **affect MSBR** or its members, for instance by way of procurement duties, should seek an individual determination regarding participation in these events from their local ethics counselor.


for Robert M. Stephens