



February 13, 2008

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at Reception
Sponsored by PM EXPO Conference Sponsors.

The sponsors of the Project Management 2008 EXPO Conference are hosting a reception the evening of February 27, 2008 and have invited NASA employees who are attending a separate conference nearby. Approximately 500 guests are expected to attend the reception, including individuals from the aerospace industry, other Federal agencies, and educational institutions. The estimated cost per person of the reception is approximately \$15, and will include light appetizers and a cash bar. The sponsors of the event are Valador, CSC, SGT, USA, DB Consulting, Booz Allen Hamilton, ASRC, and Boeing.

Based on the above, I find that the event meets 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 this event because attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning the management of major aerospace programs and projects. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect the event sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens", with a long, sweeping horizontal line extending to the right.

Robert M. Stephens