



October 7, 2009

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at
Maryland Space Business Roundtable 15th Annual Gala

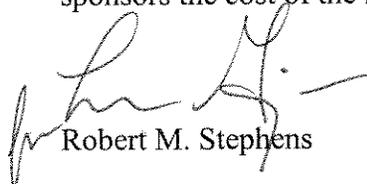
On October 16, 2009, the Maryland Space Business Roundtable (MSBR) is sponsoring their 15th Annual Gala, consisting of a reception, dinner, program, and entertainment by the Capital Steps, at Martin's Crosswinds in Greenbelt, Maryland. U.S. Congressman Steny Hoyer is the guest speaker.

Approximately 450 people have been invited to attend the event, representing NASA, NOAA, Maryland State and local government, universities, science organizations, and industry. The estimated cost per person is \$75.

Attendance at the event will allow NASA employees an opportunity to discuss issues of interest to the scientific and aerospace community, including NASA's missions, with other attendees from government, universities, science organizations, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

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). Accordingly, NASA employees whose duties do not substantially affect MSBR or a majority of its members may attend the event.

NASA employees whose duties substantially affect MSBR or a majority of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the refreshments they consume at the reception.


Robert M. Stephens