National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

March 29, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the National Aeronautics Association Dinner and Reception on May 13, 2010

On May 13, 2010, the National Aeronautic Association, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a reception and dinner at the Crystal Gateway Marriott, in Arlington, VA, at 7:00 p. m.

The reception and dinner will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, Congress, academia, and other Federal agencies. Approximately 450 people have been invited and is expected to attend. The estimated cost of the reception and dinner, which includes all food and beverages, is $150.00 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception and dinner will allow NASA employees to view the ceremony and accompanying awards when NASA's International Space Station program is awarded the 2009 Robert Collier Trophy. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

Moreover, NASA employees whose duties do not substantially affect the NAA, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event. However, NASA employees whose duties may substantially affect NAA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

for Adam F. Greenstone