

National Aeronautics and
Space Administration
John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191



November 18, 2010

Reply to Attn of: G

TO: Distribution

FROM: Deputy Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance at the Greater Cleveland Partnership's 47th Public Officials Reception

The Greater Cleveland Partnership and COSE will host the 2010 Public Officials reception offering attendees the opportunity to meet Ohio public officials who make key decisions affecting the growth and development of businesses, universities, colleges and other entities in Ohio. The reception will be held on Friday, November 19, 2010 from 5:30 to 9:30 p.m. at the Windows on the River Banquet Facility, located at 2000 Sycamore Street, Cleveland, Ohio. Continental Airlines, Time Warner Cable, PNC, Dominion and Squire Sanders are sponsoring the event. The Greater Cleveland Partnership has invited several NASA employees and their guest to attend the event. I have determined it to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

The reception will be a widely attended gathering of more than 600 individuals who are Ohio House and Senate members, state and county officials, mayors, city council members, judges, and officials who work in the Government, educational, profit and non-profit sectors. NASA invitees will have the opportunity to meet with key public officials who make decisions that affect the development and advancement of the state and region. The estimated cost of the reception, which includes all food and beverages, is \$200.00 per person. I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). In light of NASA's involvement in research programs and support of the state and local community, I conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors including NASA employees in non-career positions who are required to sign the ethics pledge under the Executive Order 13490, may accept an invitation for free attendance at the event for themselves and a guest. NASA employees whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.


for J. William Sikora
Chief Counsel