



December 17, 2010

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at the
American Institute of Aeronautics and Astronautics 2011 Associate
Fellows Dinner

The American Institute of Aeronautics and Astronautics (AIAA), a non-profit organization under 501(c)(3) of the Internal Revenue Code, is hosting a dinner to honor 186 individuals selected to be AIAA Associate Fellows for 2011. Approximately 25 of the individuals selected for the 2011 AIAA Associate Fellows class are NASA employees. The AIAA Associate Fellows Dinner will be held on Tuesday, January 4, 2011, at the Orlando World Center Marriott in Orlando, Florida as part of the 49th AIAA Aerospace Sciences Meeting.

Approximately 250 guests are expected to attend the dinner, including individuals from the aerospace industry, NASA, other Federal agencies, and educational institutions. Tickets are \$85 apiece. Attendance at the dinner will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's aerospace and science missions, and to recognize the achievements of their colleagues.

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. Accordingly, NASA employees whose duties do not substantially affect AIAA or a majority of its members, including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge, may accept an invitation for free attendance to the event for themselves and their spouses or guests.

NASA employees whose duties substantially affect AIAA 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.


Robert M. Stephens