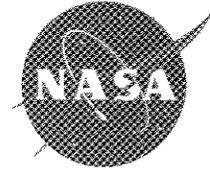


National Aeronautics and Space Administration
Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



August 15, 2011

Reply to Attn of: 30

TO: Distribution

FROM: 30/Langley Research Center, Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance of NASA employees at the Eventi Hotel "What's Your Favorite Space" Reception on August 17, 2011, at the Eventi Hotel, 851 Avenue of the Americas (Sixth Ave) New York City from 6:00 p.m. to 9:00 p.m.

The Eventi Hotel is hosting and sponsoring a reception on August 17, 2011, from 6:00 p.m. to 9:00 p.m. at the Eventi Hotel, 851 Avenue of the Americas (Sixth Ave), New York City, as part of the NASA "What's Your Favorite Space" outreach events and exhibits day in New York City. The purpose of the reception is to allow NASA officials, aerospace industry representatives, New York City business leaders, New York City elected officials, New York State elected officials, and New York congressional representatives to gather and discuss the places NASA has taken the world, the products NASA has made available to industry and the public, and NASA's future vision and missions. I have determined it to be in the best interest of the government for those invited NASA employees to attend this event in their official capacities and as representatives of NASA.

The reception will be widely attended by employees of NASA, industry representatives, New York City business leaders, New York City elected officials, New York State elected officials, and New York congressional representatives. Approximately 450 people have been invited to attend. The estimated cost of the reception, including food and beverages is \$25.00 per person. In accordance with 5 C.F.R. §2635.204(g), and 14 C.F.R. §1207.103, I find that the reception meets the definition of a "widely attended gathering."

I have determined that free attendance at the above mentioned reception is in the interest of the Agency because it will further agency programs and operations. The event will provide NASA employees the opportunity to discuss with local, state, and federal elected officials and representatives of business and industry the many NASA accomplishments, NASA's technology transfer, and NASA's vision and future missions.

Accordingly, invited NASA employees and their invited guests may accept free attendance at the reception; however, NASA employees whose duties may substantially affect the Eventi Hotel 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 employees in non-career positions who have signed the ethics pledge, Eventi Hotel is the sole sponsor of the reception and is neither a lobbying organization nor a registered lobbyist.

In addition to this reception, other events are taking place as part of the "What's Your Favorite Space" outreach day at which gifts, including free food and refreshments, may be offered NASA employees. NASA employees attending such events who are offered gifts are reminded of the \$20.00 gift exception at 5 C.F.R. § 2635.204(a). The exception provides that Federal Government Executive Branch employees may accept gifts valued at \$20.00 or less per source per occasion (and no more than \$50.00 total value from one source in a calendar year). NASA employees should not accept any gift, including food and refreshments, which exceeds \$20.00 in value from one source on each occasion a gift is offered by the source and should not accept any gift that will result in exceeding the \$50.00 calendar year limit for gifts from one source.

Employees are also reminded that it is never inappropriate and is frequently prudent for an employee to decline a gift offered because of his or her official government position or by an entity that does business with NASA. For employees in non-career positions who have signed the ethics pledge, the above gift exception does not apply to permit accepting gifts from lobbying organizations or registered lobbyists.

Questions about this determination may be addressed to Pete Polen at 757-864-3221.



Michael N. Madrid
Deputy Designated Agency Ethics Official