

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

November 4, 2011



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 Women's Center's 2011 Benefit, "Inspiring Women," hosted by the Women's Center on November 5, 2011

On November 5, 2011, the Women's Center, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Code, will host its 2011 benefit, "Inspiring Women," including a reception and dinner. This event will take place at the Gannett Company Building in McLean, Virginia from 6:30 p.m. – 11 p.m., and will raise funds for the Women's Center. Approximately, 350 people were invited to the event. Attendees will include state and local officials, and representatives from academia, industry, the U.S. Congress, and the media. The estimated cost of the event, including all food and beverages, is around \$105 per person.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having invited NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information on NASA's plans and programs. Accordingly, NASA employees whose duties do not substantially affect the Women's Center, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the Women's Center, 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 local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone