National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

December 7, 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 Maryland Space Business Roundtable (MSBR) Luncheon on December 13, 2011

On December 13, 2011, the Maryland Space Business Roundtable (MSBR), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon at Martin's Crosswinds, in Greenbelt, Maryland, at 11:30 AM. The luncheon is to provide attendees information regarding possible business opportunities within Maryland, and an opportunity for the aerospace community to share views with colleagues.

The guest speaker of the event is Dr. James Garvin, Chief Scientist, NASA, Goddard (GSFC). Approximately 500 people have been invited to attend, including NASA personal, NOAA personnel, personnel from other Federal agencies, DoD, Members of Congress and congressional staff, state and local officials, the media, representatives of the aerospace industry, academia, contractors, as well as the general public. The estimated cost of the luncheon, including all food and beverages, is $23.00 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 NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect the MSBR, 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 the MSBR, 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.

Adam F. Greenstone