

National Aeronautics and Space Administration

Headquarters  
Washington, DC 20546-0001



December 12, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

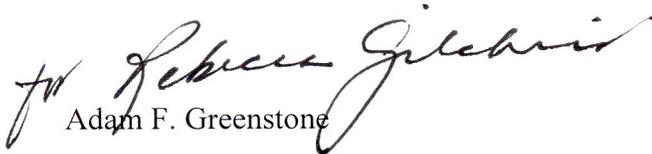
FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Reception hosted by the Women in Aerospace (WIA) on December 14, 2011

On December 14, 2011, Women In Aerospace (WIA), a non-profit organization under Section 501(c)(6) of the IRS Code, will host a reception at the Key Bridge Marriott, Arlington, VA, from 5 PM – 7 PM. The purpose of this event is to celebrate the women in aerospace members and volunteers.

Approximately, 700 people were invited to attend. This event will include attendees from NASA personnel, Members of Congress and Hill staff, the aerospace industry, various government agencies and entities, academia, and the media. The estimated cost of the dinner, which includes all food and beverages, is \$45 per person. I find that this event meets the requirements of a “widely-attended gathering” as defined in 5 C.F.R. §2635.204(g)(2). 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. Accordingly, NASA employees whose duties do not substantially affect the event sponsors, 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 for themselves and their accompanying guest.

However, NASA employees whose duties may substantially affect WIA, 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. Moreover, NASA employees receiving an invitation from an organization other than WIA should also seek an individual determination.

A handwritten signature in black ink, appearing to read "for Rebecca Gilchrist".

Adam F. Greenstone