



February 28, 2012

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NCS) luncheon on February 29, 2012

On February 29, 2012, the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NCS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, in will host its February luncheon featuring guest speaker NASA Associate Administrator Dr. John M. Grunsfeld.

The luncheon will take place at Pier 7 Channel Inn, 650 Water Street, S.W., Washington, D.C., from 11:30 am to 1:30 pm. Approximately 60-80 people are expected to attend. The estimated cost of the event including all food and beverages is \$20.00 per person. The event will be attended by State and local officials, representatives of the aerospace industry, non-profit organizations, academia, professional society members, astronauts, NASA personnel, and other Federal agencies. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

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 provide NASA attendees with the opportunity to discuss science and exploration related issues with other guests. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the sponsor, 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