

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 29, 2012

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at a Conference hosted by the World Affairs Council (WAC) on March 30 - 31, 2012

On March 30 - 31, 2012, the World Affairs Council (WAC), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, along with its sponsors, Chevron, Wells Fargo, Marines Memorial Association, and Books, Inc., will host a conference on world affairs, which will include two receptions, and a breakfast, lunch and dinner at St. Regis Hotel, San Francisco at 125 Third Street, San Francisco, CA from 8:30 a.m. to 8 p.m. This event is an annual community event devoted to International issues.

The Guests of Honor will be NASA's Administrator Charles F. Bolden, Jr. and Shanghai Bureau Chief and China Business Editor Vijay Vaitheeswaran. Approximately 400 people have been invited to attend, including NASA personal, personnel from other Federal agencies, representatives of the aerospace industry, non-profit organizations, academia and students, the media and members of the general public. The estimated cost of the meals, including all food and beverages is \$145 per person (i.e. breakfast is \$45, luncheon is \$75 and dinner is \$125). 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 host or its 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.

However, NASA employees whose duties may substantially affect the host or its sponsors, 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 blue ink signature of Adam F. Greenstone.

Adam F. Greenstone