

National Aeronautics and  
Space Administration  
**Lyndon B. Johnson Space Center**  
2101 NASA Parkway  
Houston, Texas 77058-3696



March 19, 2012

Reply to Attn of: AL-12-025

TO: Distribution

FROM: AL/Deputy Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the 26<sup>th</sup> Annual Rotary National Award for Space Achievement (RNASA) Foundation Awards Banquet

On April 27, 2012, the RNASA Foundation will host their 26<sup>th</sup> Annual Awards Banquet at the Hyatt Regency Houston hotel in Houston, Texas. The awards banquet includes the presentation of RNASA's National Space Trophy and Stellar Awards. The RNASA Foundation has selected Johnson Space Center Director Michael L. Coats as the recipient of this year's National Space Trophy. The awards banquet will begin with a reception at 6 p.m., followed by dinner and the awards ceremony beginning at 7 p.m. The RNASA Foundation is a nonprofit charitable organization which exists to recognize people whose work in the field of space exploration has lasting impacts and benefits. The Annual RNASA Awards Banquet is the Foundation's principal event.

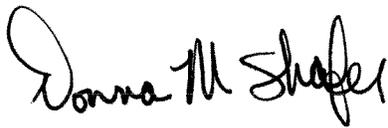
Attendance at the RNASA Awards Banquet is by invitation or corporate sponsorship only. Individuals, corporations, or foundations donate between \$2,000 and \$5,000 to sponsor tables at the event. Table sponsors routinely donate seats at their tables back to the RNASA Foundation. The Foundation then extends invitations to NASA and other Government employees and their spouses or guests to attend the awards banquet. Table sponsors are not permitted to request that specific Government employees be seated at their tables and the RNASA Foundation will endeavor to ensure that Government attendees are not seated at tables sponsored by Government contractors whom those employees can affect. The RNASA Foundation makes all invitation and seating decisions for the event.

Approximately 800 guests are expected to attend this event from throughout the aerospace industry. Invited guests include past National Space Trophy honorees, members of the RNASA Board of Advisors, members of Rotary International and the Rotary Club of Space Center, aerospace corporate representatives, Department of Defense and NASA representatives, Federal, state, and local political leaders, media representatives, individuals from academia, and their spouses or guests. There are no individual tickets sold for this event. The estimated cost per person for food and refreshments at the event is approximately \$100.

I find that this event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. §2635.204(g). This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities. This event will further Agency programs or operations including promoting community relations and providing the opportunity for the exchange of views and information between leaders within the Agency and leaders within the space-related industry and the community.

It is my determination that it is in the Agency’s interest for NASA invitees and their invited spouses or guests to attend the reception and dinner. Their attendance outweighs any concern that the acceptance of any benefits may, or may appear to, improperly influence any NASA employee in the performance of official duties. Accordingly, NASA invitees whose duties do not substantially affect the RNASA Foundation are authorized to attend and to accept any food and refreshments offered in conjunction with this event for themselves and their invited spouses or guests.

NASA employees whose duties may substantially affect the RNASA Foundation, or who are in noncareer positions for which Executive Order 13490 of January 21, 2009, requires signing an ethics pledge, are not covered by this determination, and should seek an individualized ethics determination from their local ethics counselor regarding participation in this event.



Donna M. Shafer

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