

National Aeronautics and Space Administration
Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



September 11, 2012

Reply to Attn of: 30

TO: Distribution

FROM: Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance at the City of Hampton
Department of Economic Development VIP Reception in recognition of the 95th
Anniversary of NASA Langley Research Center, at the Virginia Air and Space
Center on September 20, 2012

The City of Hampton Department of Economic Development is hosting a reception in honor of the 95th Anniversary of NASA Langley Research Center, at the Virginia Air and Space Center on September 20, 2012. The City is inviting representatives from private industry, academia, and local, officials. NASA leaders and employees have also been invited to attend the event. I have determined it to be in the best interest of the government for those invited NASA employees to attend this event in their official capacities and as representatives of NASA.

The reception will be a widely attended gathering attended by a large number of persons with a diversity of views and interests. The event is sponsored by the City of Hampton, the National Institute of Aerospace, Jacobs Technology, Inc., SGT, Inc., Sierra Lobo, Inc., the Virginia Peninsula Chamber of Commerce, and Geo-Sans, Inc. Approximately 120 people are expected to attend. NASA invitees will have the opportunity to further agency programs and operations through meeting with key local public officials, business leaders, and others who have an interest in the agency mission. The reception will include food, beverages, and presentations. In accordance with 5 C.F.R. §2635.204(g), and 14 C.F.R. §1207.103, I find that the event meets the definition of a widely attended gathering and in light of NASA's involvement in space and aeronautics research and the Hampton Roads community, I conclude that NASA's interest in its employees attending this event outweighs any concern that attendance and accepting the food and beverage offered may, or may appear to, improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event.

NASA employees whose duties may substantially affect the event sponsors, and NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge, are not covered by this determination and should seek a determination from their ethics counselor pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events.

NASA employees attending such events who are offered separate gifts are reminded of the \$20.00 gift exception at 5 C.F.R. § 2635.204(a). The exception provides that Federal Government Executive Branch employees may accept gifts valued at \$20.00 or less per source per occasion (and no more than \$50.00 total value from one source in a calendar year). NASA employees should not accept any gift, including food and refreshments, which exceeds \$20.00 in value from one source on each occasion a gift is offered by the source and should not accept any gift that will result in exceeding the \$50.00 calendar year limit for gifts from one source.

Questions about this determination may be addressed to Kenneth Goetzke at 757-864-7390.



Michael N. Madrid
Chief Counsel and
Deputy Designated
Agency Ethics Official