

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 Analytical Mechanics Associates, Inc. 50th Anniversary Reception at the Virginia Air and Space Center on October 4, 2012

Analytical Mechanics Associates, Inc. (AMA) is hosting a reception in honor of its 50th anniversary, at the Virginia Air and Space Center on October 4, 2012. AMA is inviting current and former employees of AMA, representatives from private industry, academia, and local, state, and federal government 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. Approximately 300 to 400 people are expected to attend. NASA invitees will have the opportunity to further agency programs and operations through meeting with key local public officials, local business leaders, other federal leaders, and members of academia 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. They may also accept invitations for an accompanying spouse or guest.

NASA employees whose duties may substantially affect AMA, 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.

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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