

National Aeronautics and Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



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Reply to Attn of: 140

TO: Distribution

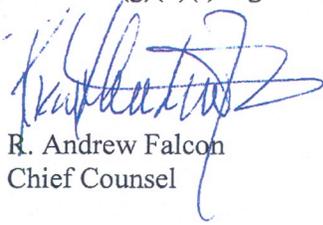
FROM: Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA employees at the Maryland Space Business Roundtable 18th Annual Gala and 22nd Anniversary Celebration

On October 12, 2012, the Maryland Space Business Roundtable (MSBR), a non-profit organization under 501(c)(3) of the Internal Revenue Code, is hosting its 18th Annual Gala and 22nd Anniversary Celebration at Martin's Crosswinds in Greenbelt, MD. The evening will include remarks by NASA officials and Members of Congress, a dinner, and entertainment by the Capitol Steps. The cost of a ticket to the event, which includes dinner and entertainment, is \$100.

The dinner will be attended by NASA personnel, Members of Congress, representatives of the aerospace industry, state and local officials, the media, academia, and employees of other Federal agencies. I find that this dinner meets the requirements of a "widely attended gathering" as defined in 5 CFR § 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 allow attendees to exchange information regarding various NASA programs. Persons attending the event will generally be accompanied by a spouse or other guest. Therefore, I authorize employees to accept an invitation of free attendance to a spouse or accompanying guest. Moreover, NASA employees whose duties do not substantially affect MSBR, including NASA employees in noncareer positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and an accompanying guest.

However, NASA employees whose duties may substantially affect the MSBR, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


R. Andrew Falcon
Chief Counsel