

National Aeronautics and Space Administration

**Headquarters**

Washington, DC 20546-0001



October 12, 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 Joint Luncheon sponsored by the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NSC), and National Defense Industrial Association (NDIA), on October 15, 2012

On October 15, 2012, the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NSC), and the National Defense Industrial Association (NDIA), non-profit organizations under 501(c)(3) of the Internal Revenue Code, will host a joint luncheon at the Boeing Auditorium, at 1200 Wilson Blvd., in Arlington, VA 22209, from 11:30 AM to 1:30 PM. Lieutenant General Charles R. Davis, USAF, will be the guest speaker at this event.

The luncheon will be widely attended by Federal officials from various government agencies, industry, Members of Congress and their staff, academia, and the general public. Approximately 150 people are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$20.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the event.

Accordingly, NASA employees – including non-career appointees required to sign the ethics pledge under Executive Order 13490 – who have been invited to attend may accept free attendance at the event.

NASA employees whose duties may substantially affect the sponsor, 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.

*Kathleen T. Spear*

for Adam F. Greenstone