

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



March 7, 2013

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Reply to Attn of:

TO: Distribution

FROM: Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance at the Analytical Mechanics Associates, Inc. Reception, Virginia Air and Space Center, March 13, 2013

Analytical Mechanics Associates, Inc. (AMA) is hosting a reception at the Virginia Air and Space Center on March 13, 2013. AMA is inviting approximately 75 representatives of international space agencies and organizations, including about 15 NASA employees. The reception is in conjunction with the 28th Meeting of the Committee on Earth Observation Satellites (CEOS) Strategic Implementation Team (SIT-28), but is not an integral part of that meeting. The reception will include food and beverages of a cost around \$50 per person.

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." I also find that there is an Agency interest in having NASA personnel attend this event because it will further agency programs and operations. NASA invitees will have the opportunity to discuss the role of NASA in the international earth science community with other attendees. I further conclude that NASA's interest in its employees attending this event outweighs any concern that attendance and accepting the food and refreshments offered 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 reception.

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.

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