

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



April 19, 2013

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), on April 25, 2013

On April 25, 2013, the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NSC), and the National Defense Industrial Association (NDIA), which are both non-profit organizations under 501(c)(3) of the Internal Revenue Code, will host a joint luncheon at Lockheed Martin Global Vision Center, in Arlington, Virginia from 11:30 AM to 1:30 PM. Although the event will be held in a Lockheed Martin facility, AIAA and NDIA are the hosts and control the invitations and seating. The guest speaker will be Richard McKinney, Deputy Under Secretary of the Air Force for Space.

The luncheon will be widely attended by officials from various Federal agencies, in addition to representatives from industry, the U.S. Congress, academia, and the general public. Approximately 80 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone