

National Aeronautics and  
Space Administration

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Cleveland, OH 44135-3191



March 17, 2016

Reply to Attn of: Office of Chief Counsel

TO: Distribution

FROM: Deputy Designated Agency Ethics Official, Acting Chief Counsel

SUBJECT: Widely Attended Gathering Determination regarding attendance at the 13th Annual Conference of SBMT Black Tie Gala Event.

On the evening of Saturday, April 9, 2016, the Society for Brain Mapping and Therapeutics (SBMT) is hosting the 13th Annual Conference of SBMT Black Tie Gala Event at the Miami Hyatt Convention Center in Miami, Florida. This awards event honors those who are at the forefront of brain sciences and biotechnology research.

Among the 300 guests invited to this event are business leaders, Congressional leaders, academia, NASA personnel, and scientists from other Federal agencies. The estimated cost per person for the reception and award event is \$150.00. No gifts will be given at the event. The reception, dinner and awards ceremony will be held from 6:00-10:00pm.

Attendance at the gala event will allow NASA employees an opportunity meet and discuss various technologies, accomplishments and overall progress in biotech space programs. I, therefore, conclude that NASA interest in its employees attending this event outweighs any concern that free attendance may, or may appear to improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g). Accordingly, NASA employees whose duties do not substantially affect the sponsors including employees in non-career positions, for which the Executive Order 13490 requires signing an ethics pledge, may accept the invitation for free attendance for themselves and their guest, to the Black Tie Gala awards event.

NASA employees, whose duties substantially affect the sponsors by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink that reads "Laura Henry".

Laura Henry