

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



December 11, 2015

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Aero Club of Washington Wright Memorial Dinner on December 11, 2015

On December 11, 2015, the Aero Club of Washington, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host an event at Washington Hilton Hotel in Washington, D.C., at 6:30 p.m. The Aero Club is in control of the invitations, planning, and arrangements of the event. The event is to present Burt Rutan with the Wright Brothers Memorial Trophy.

Approximately 600 people have been invited to attend, including Congressional members, Congressional staff, local officials, personnel from other Federal agencies, representatives from industry, and members of the public. The estimated cost of the reception, including all food and beverages, is \$225.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

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 NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect the host, or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance for themselves and a guest to the event.

However, NASA employees whose duties may substantially affect the Aero Club of Washington, 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