

National Aeronautics and Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



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Reply to Attn of: 140

TO: Distribution

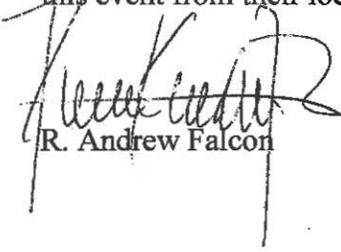
FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at American Geophysical Union Reception

The American Geophysical Union (AGU), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, is hosting a reception on September 14, 2016, at their facility in Washington, D.C. The purpose of the reception is to honor and recognize outgoing AGU president Marcia McNutt and her new role as President of the National Academy of Sciences (NAS).

Approximately 70 guests have been invited to the reception from academia, Federal agencies, AGU, NAS, and colleagues of Dr. McNutt. The estimated cost per person of the reception is \$75. Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's programs and missions.

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). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect AGU or a majority of its members, including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the reception for themselves and a guest. However, NASA employees whose duties substantially affect AGU or a majority of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.


R. Andrew Falcon