

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 17, 2016

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 Aviation Week Reception on March 3, 2016

On March 3, 2016, the Aviation Week, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the National Building Museum in Washington, D.C. at 6:00 p.m. The purpose of the reception is to honor the achievements of individuals and companies in the aerospace, aviation and defense arenas by presenting the Philip J. Klass Award for Lifetime Achievement, the Tomorrow's Leaders Award, and the Aviation Week Heroism Award.

Approximately 400 people have been invited to attend, including members of Congress and their staff, personnel from the academia and industry, employees from the Department of Defense, and other Federal agencies. The estimated average value of refreshments served at the event, including all food and refreshments, \$100 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 NASA programs and hear views that relate to NASA's policies and plans from representatives of various sectors. Accordingly, NASA employees, including NASA employees who are in non-career positions which Executive Order 13490 requires signing an ethics pledge, who have been invited to attend may accept free attendance for themselves and a guest to this event.

*However, NASA employees whose duties may substantially affect the event host, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from their local ethics counselor to attend under the widely attended gathering exception.*

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

Adam F. Greenstone