

National Aeronautics and Space Administration

Headquarters  
Washington, DC 20546-0001



April 18, 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 Annual Collier Trophy Dinner hosted by the National Aeronautic Association (NAA) and Orbital ATK, on June 9, 2016

On June 9, 2016, the National Aeronautic Association (NAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and Orbital ATK, will host a dinner at the Ritz-Carlton, Pentagon City, VA, at 6:00 p.m. The event is to present the Robert J. Collier Trophy, a prestigious award honoring advancements in the Aviation and Aerospace Industries.

Approximately 250 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$130.00 per person. The event will be attended by members of Congress and their staff, representatives from the aerospace industry and academia, state and local officials, personnel from other Federal agencies, and other members of the general public. As in previous years, the NAA will invite government guests, and is in control of the table seating. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the NAA 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 from the NAA for themselves and a guest for free attendance to the reception.

Moreover, NASA employees whose duties may substantially affect the NAA or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

We understand that the NAA will also be handing out a commemorative coin valued at \$8 to \$10. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year).

*for*   
Adam F. Greenstone