

National Aeronautics and Space Administration  
Langley Research Center  
100 NASA Road  
Hampton, VA 23681-2199



May 12, 2016

30/Office of Chief Counsel

Reply to Attn of:

TO: Distribution

FROM: Chief Counsel

SUBJECT: Ethics Determination Regarding Langley Air Force Base 100<sup>th</sup> Anniversary Gala, September 17, 2016

On Saturday, September 17, 2016, the City of Hampton and the Virginia Peninsula Chamber of Commerce are hosting the Langley Air Force Base 100th Anniversary Gala at the Hampton Roads Convention Center, Hampton, Virginia. The hosts expect several hundred individuals to attend, including state and local officials, community leaders, and representatives of the defense and aerospace industry. The reception will include food, beverage, and entertainment of an approximate value of \$65 per person.

In accordance with 5 C.F.R. §2635.204(g) and 14 C.F.R. §1207.103, I find that the event meets the definition of a "widely attended gathering." I also find that there is an Agency interest in having NASA personnel and any accompanying invited guests attend this event because it will further agency programs and operations. NASA invitees will have the opportunity to discuss the Agency's activities in Virginia, and exchange information on NASA programs with other attendees. I further conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may appear to improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event for themselves and an invited guest.

NASA employees whose duties may substantially affect the hosts, and NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge, are not covered by this determination and should seek a determination from their ethics counselor pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events.

Questions about this determination may be addressed to Kenneth Goetzke, at 757-864-7390.

  
William T. McMurry, Jr.  
Chief Counsel and  
Deputy Designated Agency Ethics Official