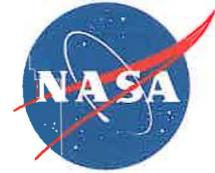


National Aeronautics and Space Administration
Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



October 19, 2015

30

Reply to Attn of:

TO: Distribution

FROM: Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance at Virginia Air and Space Center Reception, Hampton, VA, May 28, 2013

The Virginia Air & Space Center (VASC) is hosting a reception at the VASC on October 21, 2015 from 5:30 to 7:30 p.m. for members of the NASA Visitor Center Consortium (VCC), and the NASA Communication Coordinating Committee. The organizers expect approximately 75 people to attend, including representatives from the above organizations, local elected officials, and community leaders, of which approximately 30 are NASA civil service employees. The reception will include food and beverages of a cost around \$20 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 attend this event because it will further agency programs and operations. NASA invitees will have the opportunity to exchange information on NASA programs, specifically in education and outreach activities. I further conclude that NASA's interest in its employees attending this event outweighs any concern that attendance and accepting the food and refreshments offered may appear to improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA employees and accompanying guests who have been invited to attend may accept free attendance at the reception.

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.

A handwritten signature in blue ink that reads "Charles A. Polen".

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