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

September 2, 2015

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at a National Air and Space Museum Reception and Program on September 30, 2015

On the evening of September 30, 2015, the Maryland Space Business Roundtable (MSBR), NASA, and the National Air and Space Museum are hosting an evening reception and program at the National Air and Space Museum. The purpose of the event, titled "Our Violent Universe: Monsters of the Cosmos," will focus on NASA's astrophysics missions and discoveries, including knowledge learned about gamma-ray bursts, quasars, and black holes.

Among the 1200 guests invited to this event are Congressional members and key staff, state and local officials, academia, industry representatives, NASA personnel, and representatives from other Federal agencies. The estimated cost per person for the reception is $85. No gift items will be distributed.

Attendance at the reception will allow NASA employees an opportunity to discuss issues of interest to the scientific community, including NASA astrophysics research and discoveries, with other attendees from other Federal agencies, Congress, academia, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

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). Accordingly, NASA employees whose duties do not substantially affect the MSBR, including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge, may accept an invitation for free attendance to the dinner for themselves and their spouses or guests.

NASA employees whose duties substantially affect the MSBR or any 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