

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



November 6, 2015

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Reply to Attn of:

TO: Distribution

FROM: Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance at a Virginia Space Grant Consortium Reception, Hampton, VA, December 7, 2015

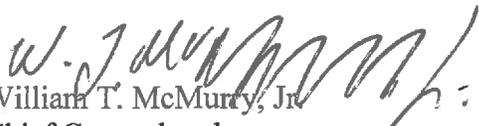
The Virginia Space Grant Consortium (VSGC) is hosting a reception at the Virginia Air and Space Center (VASC) on December 7, 2015 from 4:00 p.m to 6:00 p.m. in honor of Mary Sandy's 25 years of service as its director. The organizers expect approximately 100 people to attend, including a wide range of her current and former colleagues from many diverse organizations including higher education institutions, precollege representatives, business/industry representatives, and NASA. The reception will include hors d'oeuvres, wine, beer and other beverages at a cost around \$30.00 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.

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