

National Aeronautics and  
Space Administration

**Lyndon B. Johnson Space Center**  
2101 NASA Parkway  
Houston, Texas 77058-3696



March 24, 2014

Reply to Attn of : AL-14-026

TO: Distribution

FROM: AL/Deputy Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the 28th Annual Rotary National Award for Space Achievement (RNASA) Awards Banquet

On April 11, 2014, the RNASA Foundation will host their 28th Annual Awards Banquet at the Hyatt Regency Houston Hotel in Houston, Texas. The Awards Banquet includes the presentation of RNASA's National Space Trophy and Stellar Awards. The RNASA Foundation has selected NASA Administrator, Charles Bolden, as the recipient of this year's National Space Trophy. The Awards Banquet will begin with a reception at 6 p.m., followed by dinner and the awards ceremony beginning at 7 p.m. The RNASA Foundation is a nonprofit charitable organization that exists to recognize people whose work in the field of space exploration has lasting impacts and benefits. The annual RNASA Awards Banquet is the Foundation's principal event.

Attendance at the RNASA Awards Banquet is by invitation or corporate sponsorship only. Individual, corporations, or foundations donate between \$2,000 and \$5,000 to sponsor tables at the event. Individual tickets cost between \$300 and \$800 per seat. Table sponsors routinely donate seats at their tables back to the RNASA Foundation. The Foundation then utilizes the donated seats to extend invitations to NASA and other Government employees and their guests to attend the Awards Banquet. The RNASA Foundation will endeavor to ensure that Government attendees are not seated at tables sponsored by Government contractors whom those employees can affect. To assist in ensuring that seating arrangements are appropriate, the RNASA Foundation has included a field in its online RSVP system that requests that the invitee disclose if they are involved with evaluation activities associated with any company. For the Stellar Award nominees, the RNASA foundation will request, via e-mail, that each Government employee disclose if they are involved with evaluation activities with any company. The RNASA Foundation makes all seating decisions for the event based on the collected information.

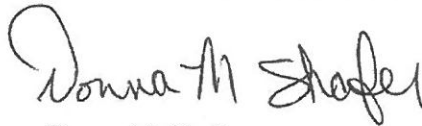
Approximately 800 guests are expected to attend this event from throughout the aerospace industry. Invited guests include past National Space Trophy honorees, members of the RNASA Board of Advisors, Members of Rotary International and the Rotary Club of Space Center, aerospace corporate representatives, Department of Defense and NASA representatives, Federal, state, and local political leaders, media representatives, individuals from academia, and

their guests. The estimated cost per person for food and refreshments at the event is approximately \$100.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities. This event will further agency programs or operations including promoting community relations and providing the opportunity for the exchange of views and information between leaders within the agency and leaders within the space-related industry and the community.

It is my determination that it is in the Agency's interest for NASA invitees and their guests to attend the reception and dinner. Their attendance outweighs any concern that the acceptance of any benefits may, or may appear to improperly influence any NASA employee in the performance of official duties. Accordingly, NASA invitees whose duties do not substantially affect the RNASA Foundation are authorized to attend and to accept any food and refreshments offered in conjunction with this event for themselves and their guest.

NASA employees whose duties may substantially affect the RNASA Foundation, or who are in non-career positions for which Executive Order 13490 of January 21, 2009, requires signing an ethics pledge, are not covered by this determination and should seek an individualized ethics determination from their local ethics counselor regarding participation in this event.



Donna M. Shafer

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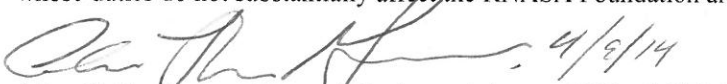
AA/E. Ochoa  
 AB/K. A. Shireman  
 AC/M. W. Saunders  
 AD/M. A. Kincaid  
 AH/N. V. Saiz  
 AJ/D. Urbanski  
 AL/B. J. Roan  
 AM/G. C. Lutz  
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 BA/D. L. Johnson  
 CA/J. L. Kavandi  
 DA/P. S. Hill  
 EA/L. N. Hansen  
 FA/J. M. Hanley  
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 LA/D. E. Swanson  
 NA/W. S. McArthur  
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 QA/A. J. Lindenmoyer  
 RA/J. P. McManamen  
 SA/J. R. Davis  
 VA/K. L. Lueders  
 YA/V. E. Wyche (Acting)

cc:

W-JS/L. M. Atkinson  
 WR/D. C. Hess

Addendum: The RNASA Foundation is a non-profit organization organized under Section 501(c)(4) of the Internal Revenue Code which does not employ registered lobbyists, and which is a distinct organization from and not controlled by the Rotary Foundation of Rotary International. Accordingly, I have determined that NASA employees in non-career positions for which Executive Order 13490 of January 21, 2009 requires signing an ethics pledge whose duties do not substantially affect the RNASA Foundation are covered by this determination.



Adam F. Greenstone, Alternate Designated Agency Ethics Official