

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



December 12, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the 66th Annual Wright Memorial Dinner sponsored by the Aero Club of Washington and the National Aeronautic Association on December 13, 2013

On December 13, 2013, the Aero Club of Washington (Aero Club), a non-profit organization under Section 501(c)(6) of the Internal Revenue Service Code, and the National Aeronautic Association (NAA), a non-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will co-sponsor the 66th Annual Wright Memorial Reception and Dinner at the Washington Hilton Hotel, in Washington, D.C., at 6:30 p.m. This event will honor this year's recipient of the Wright Brothers Memorial Trophy, Marion Blakey, former NTSB Chair and FAA Administrator, and current President and CEO, Aerospace Industries Association.

Approximately 900 people are expected to attend, including members of Congress and congressional staff, aviation industry representatives and personnel from other Federal agencies. The estimated cost of the event, which includes all food and beverages, is approximately \$170. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend this event because it will further NASA programs and operations. This event will give NASA employees the opportunity to discuss U.S. space policy, and a variety of other issues related to NASA and its programs, with other attendees. Accordingly, NASA employees whose duties do not substantially affect the Aero Club, NAA or a majority of their members, including employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the Aero Club & NAA reception and dinner for themselves and an invited guest.

However, NASA employees whose duties may substantially affect the event sponsors or a majority of their members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone