

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 21, 2014

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

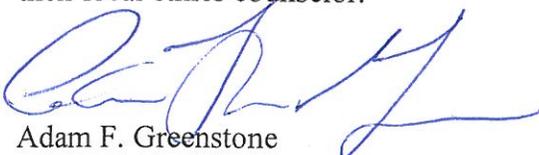
SUBJECT: Determination Regarding Attendance by NASA employees at the 16th Annual Gala Celebration hosted by the Armed Forces Communications and Electronics Association Bethesda Chapter on March 22, 2014

On March 22, 2014, the Armed Forces Communications and Electronics Association International (AFCEA) Bethesda Chapter, a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host its 16th Annual Gala Celebration at the Marriott Wardman Park Hotel in Washington, D.C., at 5:30 p.m. This year's gala will benefit two charities — The Children's Inn at NIH and the House of Ruth.

Approximately 800 people have been invited, including Congressional members and staffers, state and local officials, academia, IT industry representatives, personnel from other Federal Agencies, members of the public, media, and contractors. The approximate cost of food and beverages to be served is approximately \$120. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations by facilitating the exchange of professional information between NASA employees and representatives of other organizations, including information on NASA's policies and plans.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest from AFCEA.

However, NASA employees whose duties may substantially affect the event sponsor, or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone