

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



February 27, 2015

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 17th Annual *A Night for the Children* Gala Celebration hosted by the Armed Forces Communications and Electronics Association Bethesda Chapter on March 21, 2015

On March 21, 2015, 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 17th Annual Gala Celebration at the Marriott Wardman Park Hotel in Washington, D.C., at 6:00 p.m. This year's gala will benefit three charities — Hope for Henry Foundation, DC House of Ruth, and Children of Fallen Soldiers Relief Fund.

Approximately 700 people have been invited, including industry representatives, personnel from other Federal Agencies, and members of the media. AFCEA, Bethesda Chapter, is in control of the event, to include planning, invitations, and seating. 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 host, 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 a guest.

However, NASA employees whose duties may substantially affect the event host, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone