

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



December 09, 2013

Reply to: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Armed Forces Communications Electronics Association DC Chapter's Winter Gala on December 10, 2013

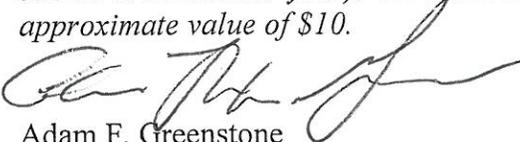
On December 10, 2013, the Armed Forces Communications Electronics Association (AFCEA) DC Chapter, a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host its Winter Gala at the Corcoran Gallery, 17th & New York, Washington, DC, from 7:30 p.m. to 10:30 p.m. In addition to providing an opportunity for socializing and networking, the winter gala is held to raise funds for the AFCEA DC Foundation which offers scholarships to students focused in the hard sciences.

Approximately 1,400 people have been invited, including Congressional representatives and staff, employees from other Federal agencies, industry representatives and academia. The cost of food and beverages will be approximately \$90. 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 this event because it will allow NASA employees an opportunity to discuss NASA's missions and programs with other guests. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation from AFCEA for themselves and an invited guest.

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

Attendees are also reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that AFCEA will be distributing a holiday ornament with an approximate value of \$10.


Adam F. Greenstone