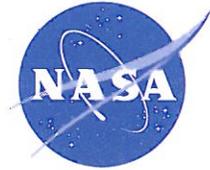


National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001



August 30, 2013

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a luncheon sponsored by the American Institute of Aeronautics (AIAA) National Capital Section (NCS) on September 19, 2013

On September 19, 2013, AIAA NCS, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon at the Army Navy Country Club, 1700 Army Navy Drive, Arlington, Virginia 22202, from 11:30 AM to 1:30 PM. The guest speaker will be Chris Scolese, Director of Goddard Space Flight Center.

The luncheon will be widely attended by Federal officials from various government agencies, industry, Members of Congress and their staff, academia, and the general public. Approximately 80 people are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$20.00 per person. I find that the luncheon meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the event.

Accordingly, NASA employees – including non-career appointees required to sign the ethics pledge under Executive Order 13490 – who have been invited to attend may accept free attendance at the event.

NASA employees whose duties may substantially affect the 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.

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

Adam F. Greenstone