

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



October 10, 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 American Institute of Aeronautics and Astronautics monthly luncheon on October 23, 2014

On October 23, 2014, the American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon at the Army Navy Country Club in Arlington, Virginia at 11:30 a.m. The guest speaker is Christopher J. Scolese, Director of the NASA Goddard Space Flight Center.

Approximately 80 guests are expected to attend. Invitees include members of Congress, congressional staff, NASA personnel, state and local government officials, representatives from industry and academia, and personnel from other Federal agencies, as well as members of the public. The value of the events, which include all food and refreshments, will be approximately \$28.00 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding NASA's plans and programs. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance to this event, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490.

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

Kathleen T. Spear

for Adam F. Greenstone