National Aeronautics and
Space Administration

Headquarters
Washington, DC 20546-0001

November 4, 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 and Astronautics, National Capital Section, on November 21, 2013

On November 21, 2013, the American Institute of Aeronautics and Astronautics, National Capital Section (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 at 1700 Army Navy Drive, Arlington, Virginia, 22202, from 11:30 a.m. to 1:30 p.m. The guest speaker will be Matt Mountain, Space Telescope Science Institute.

The luncheon will be widely attended by Federal officials from various government agencies, state and local officials, industry representatives, members of Congress and their staff, academia, media, 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 reception 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 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