

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 11, 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 a Luncheon sponsored by the American Institute of Aeronautics and Astronautics, National Capital Section, on February 26, 2014

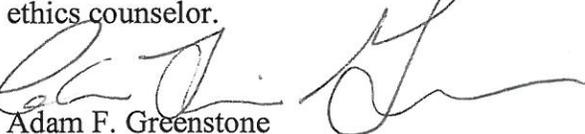
On February 26, 2014, the American Institute of Aeronautics and Astronautics, National Capital Section (AIAA NCS), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon at the Army Navy Country Club, 1700 Army Navy Dr., Arlington, Virginia, at 11:30 a.m. The guest speaker will be William H. Gerstenmaier, the NASA Associate Administrator for the Human Exploration and Operations Directorate.

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, and the general public. Approximately 80 people are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is approximately \$25.00 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.

NASA employees whose duties do not substantially affect the sponsor, 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 free attendance to the event.

However, 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