

National Aeronautics and Space Administration

Langley Research Center
100 NASA Road
Hampton, Virginia 23681



January 21, 2015

Reply to Attn of: Office of Chief Counsel

TO: Distribution

FROM: Chief Counsel

SUBJECT: Determination Regarding Attendance at Virginia Aerospace Day Legislative Reception, Richmond, Virginia, February 4, 2015

On Wednesday, February 4, 2015, the Virginia Department of Aviation and the Virginia Aviation Business Roundtable, Washington Airport Association, National Institute of Aerospace, Aurora, SGT, SSAI, Jacobs Technology, Liberty University, and other sponsors are hosting a reception at the Library of Virginia in Richmond. The organizers expect approximately 300-400 individuals, including state and local officials, community leaders, representatives of the aerospace industry, and about 40-50 NASA employees. The reception will include food and refreshments at an estimated cost of \$30 per person.

In accordance with 5 C.F.R. §2635.204(g) and 14 C.F.R. § 1207.103, I find that the event meets the definition of a "widely attended gathering." I also find that there is an Agency interest in having NASA personnel attend this event because it will further Agency programs and operations. NASA invitees will have the opportunity to discuss the Administration's activities in Virginia, and exchange information on NASA programs. I further conclude that NASA's interest in its employees attending this event outweighs any concern that attendance and accepting the food and refreshments offered may appear to improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the reception.

NASA employees whose duties may substantially affect the hosts, and NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge, are not covered by this determination and should seek a determination from their ethics counselor pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding their participation in these events.

Questions about this determination may be addressed to either Pete Polen, at 757-864-3225 or Kenneth Goetzke, at 757-864-7390.

A handwritten signature in black ink that reads "Michael N. Madrid".

Michael N. Madrid
Chief Counsel and Designated Agency Ethics Official