



February 18, 2014

Reply to Attn of: **General Law Practice Group**

**TO:** Distribution

**FROM:** Alternate Designated Agency Ethics Official

**SUBJECT:** Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the Goddard Memorial Dinner and reception, hosted by the National Space Club (NSC) on March 07, 2014

On March 7, 2014, the National Space Club (NSC), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host and sponsor the Goddard Memorial Dinner and a pre-dinner reception at the Washington Hilton, 1919 Connecticut Avenue, N.W., Washington, D.C., from 6:30 p.m. to 10 p.m. The purpose of the event is to present awards to a number of outstanding individuals for accomplishments in spaceflight, engineering, science, management and education. The premier award, the Goddard Trophy, is presented to the individual, group or program deemed to have made the most significant contribution to space activity in the previous year.

Approximately 2,200 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$300.00 per person. The event will be attended by senior leaders of the aerospace industry, members of Congress and staff, representatives from academia and the media, state and local officials, personnel from other Federal agencies, students who are being recognized, and other members of the general public. As in prior years, the NSC will invite government guests, and is also in control of table seating. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the dinner and reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the NSC or a majority of its corporate members – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation for themselves and a guest for free attendance to the dinner and reception.

Moreover, NASA employees whose duties may substantially affect the NSC or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

This widely attended gathering determination does not cover the receptions in hospitality suites that will occur after the Goddard Memorial Dinner concludes. These suites will be hosted by nine corporate sponsors. Most NASA employees who are invited may receive refreshments provided in these suites under the exception to the gift rules that allows acceptance of gifts (including refreshments and tangible gift items) with an aggregate value of \$20 or less per event. If \$20 or more is consumed, the employee should personally provide that amount in honor baskets that the NSC will provide. However, non-career NASA employees subject to the Ethics Pledge required by Executive Order 13490 must provide reimbursement for the fair market value of any refreshments they or their guests consume in the hospitality suites.



Adam F. Greenstone