National Aeronautics and Space Administration

**Headquarters**
Washington, DC 20546-0001

February 26, 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 Maryland Space Business Roundtable Luncheon on March 18, 2014

On Tuesday, March 18, 2014, the Maryland Space Business Roundtable (MSBR), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon at Martin's Crosswinds, 7400 Greenway Center Drive, Greenbelt, Maryland, at 11:30 a.m. The luncheon is to provide information to attendees regarding possible business opportunities within Maryland and to provide an opportunity for the aerospace community to share views with colleagues.

Approximately 350 people have been invited to attend, including personnel from other Federal agencies, Congressional members and staff, state and local officials, the media, representatives of the aerospace industry and academia, as well as the general public. The estimated cost of the luncheon, including all food and beverages, is $30.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect the MSBR, 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 MSBR, 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