

National Aeronautics and Space Administration  
Goddard Space Flight Center  
Greenbelt, MD 20771



August 28, 2013

Reply to Attn of: Office of Chief Counsel

TO: Distribution

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the Mollohan Family Charitable Foundation Golf Tournament on September 3, 2013

On September 3, 2013, the Robert H. Mollohan Family Charitable Foundation (Mollohan Foundation) is sponsoring a golf tournament, lunch, reception, and dinner in Bridgeport, WV. The Mollohan Foundation is a non-profit organization that awards scholarships and debt forgiveness loans to students as well as community grants.

Approximately 200 individuals are expected to attend this event, including Congressmen, state and local officials, and non-profit and industry representatives. The estimated cost per person for the golf tournament, lunch, reception, and dinner is \$210.

Attendance at the reception will allow NASA employees an opportunity to discuss NASA's role in and contributions to West Virginia communities, and disseminate other information about NASA activities. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees, including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge, whose duties do not substantially affect the Mollohan Foundation or the organization issuing the invitation if not the Mollohan Foundation, may accept an invitation for free attendance to the tournament, including the lunch, reception, and dinner. NASA employees may not, however, accept any gift items valued over \$20.

NASA employees whose duties substantially affect the Mollohan Foundation or the organization issuing the invitation, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in blue ink, appearing to read "R. Andrew Falcon", with a long horizontal stroke extending to the right.

R. Andrew Falcon