

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



August 29, 2013

Reply to Attn of:

Office of Chief Counsel

TO: Distribution

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at a National Air and Space Museum Reception and Program on September 25, 2013

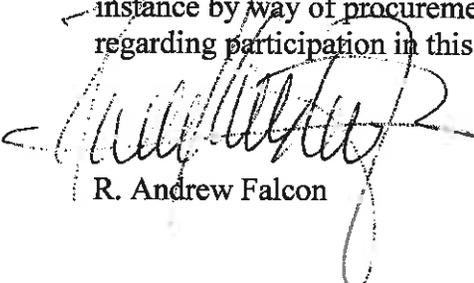
On the evening of September 25, 2013, the Maryland Space Business Roundtable (MSBR) is sponsoring, and NASA and the National Air and Space Museum are hosting, a reception and program at the National Air and Space Museum. The purpose of this event, titled "Close Encounters of the Planetary Minds," will focus on Goddard's exploration of the solar system and cover such missions as the Mars Science Laboratory and the Lunar Reconnaissance Orbiter. Speakers include the Goddard Chief Scientist, Dr. James Garvin.

Among the 1400 guests invited to this event are Congressional members and key staff, state and local officials, academia, industry representatives, NASA personnel, and representatives from other Federal agencies. The estimated cost per person for the reception and program is \$90. No gift items will be distributed.

Attendance at the reception will allow NASA employees an opportunity to discuss issues of interest to the scientific community, including NASA research and discoveries, with other attendees from other Federal agencies, Congress, academia, and industry. 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 whose duties do not substantially affect the MSBR, including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge, may accept an invitation for free attendance to the dinner for themselves and their spouses or guests.

NASA employees whose duties substantially affect the MSBR or any of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.


R. Andrew Falcon