National Aeronautics and Space Administration

Goddard Space Flight Center
Greenbelt, MD 20771

November 7, 2014

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at a National Society of Black Engineers Dinner on November 22, 2014

The National Society of Black Engineers (NSBE) is hosting a dinner on the evening of November 22, 2014 at Martin's Crosswinds in Greenbelt, Maryland. Vantage and ADNET are among the sponsors of the event. The purpose of this event is to recognize and honor the NSBE Goddard Chapter's 10th anniversary.

The event is open to the public and approximately 75 individuals have purchased tickets to date, including individuals from industry, universities, and other agencies. Four Goddard officials have been offered free tickets. The estimated cost per person for the reception is $60. No gift items will be distributed.

Attendance at the reception will allow NASA employees an opportunity to discuss issues of interest to the engineering community, including NASA missions, with the other attendees. 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 NSBE or the sponsors of the event may accept an invitation for free attendance to the dinner for themselves and their spouses or guests.

NASA employees whose duties substantially affect the NSBE or the sponsors of the event, 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