National Aeronautics and Space Administration

Langley Research Center
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April 27, 2015

Reply to Attn of: 30/Office of Chief Counsel

TO: Distribution

FROM: Chief Counsel

SUBJECT: Ethics Determination Regarding VASBA Spring Gala, May 15, 2015

On Friday, May 15, 2015, the Virginia AeroSpace Business Association (VASBA) is hosting their 2nd Annual Spring Gala, at the Hampton Roads Convention Center, Hampton, VA. VASBA, along with Jacobs Engineering Group, Sierra Lobo, and other sponsors are hosting this event, and expect approximately 200-300 individuals to attend, including state and local officials, community leaders, and representatives of the aerospace industry. The reception will include food, beverage, and entertainment of an approximate value of $125 per person.

In accordance with 5 C.F.R. §2635.204(g) and 14 C.F.R. §1207.103, I find that the event meets the definition of a "widely attended gathering." I also find that there is an Agency interest in having NASA personnel and any accompanying invited guests attend this event because it will further agency programs and operations. NASA invitees will have the opportunity to discuss the Administration's activities in Virginia, and exchange information on NASA programs. I further conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may appear to improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the reception for themselves and an invited guest.

NASA employees whose duties may substantially affect the hosts, and NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge, are not covered by this determination and should seek a determination from their ethics counselor pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events.

Questions about this determination may be addressed to Kenneth Goetzke, at 757-864-7390.

W. T. McMurry Jr.

William T. McMurry Jr.
Acting Chief Counsel and
Deputy Designated Agency Ethics Official