

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



November 14, 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 Women in Aerospace Luncheon on December 5, 2014

On Friday, December 5, 2014, the Women in Aerospace (WIA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon at the Crystal Gateway Marriott, in Crystal City, Virginia, from 11:00 a.m. to 1:00 p.m. The guest speaker for the luncheon is Frank Kendall, Under Secretary of Defense for Acquisition, Technology and Logistics.

Approximately 120 people have been invited to attend, including members of Congress, Congressional Staff, and the Executive Office for the President, representatives from academia and industry, selected members of the media, and employees of other Federal agencies. WIA is in charge of all aspects of the event, including seating arrangements. The estimated cost of the dinner, including all food and beverages, is \$75.00 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 – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the sponsors or a majority of its members, may accept an invitation for free attendance to the event for themselves.

*However, NASA employees whose duties may substantially affect the host, 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.*

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone