

National Aeronautics and Space Administration  
Langley Research Center  
100 NASA Road  
Hampton, VA 23681-2199



January 13, 2020

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Reply to Attn of:

TO: Distribution

FROM: Chief Counsel

SUBJECT: Ethics Determination Regarding NASA Employee Attendance at Virginia Aviation, UAS & Aerospace Legislative Reception, Richmond, Virginia, January 29, 2020

On Wednesday, January 29, 2020, the Virginia Aviation Business Association, the Virginia Department of Aviation, Signature Flight, The Virginia Center for Unmanned Systems at CIT, Science Applications International Corporation, Virginia Space and other sponsors will host a reception at Main Street Station in Richmond, Virginia. The organizers expect approximately 450 individuals to attend, including state and local officials, community leaders, representatives of the aerospace industry, and about 50 NASA employees. The reception will include food and beverages at an estimated cost of about \$40 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 attend this event, as it will further agency programs and interests. 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 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.

NASA employees who have a significant role in any pending sensitive matter that will substantially affect the interests of the hosts, and NASA employees who have non-career political appointments, are not covered by this determination and should seek a determination from their ethics counselor regarding their participation in this event.

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

A handwritten signature in cursive script that reads "Charles A. Polen".

Charles A. Polen  
Chief Counsel and  
Deputy Designated Agency Ethics Official