

National Aeronautics and Space Administration



Headquarters
Washington, DC 20546-0001

December 11, 2019

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Aero Club of Washington and the National Aeronautic Association Wright Memorial Dinner on December 13, 2019

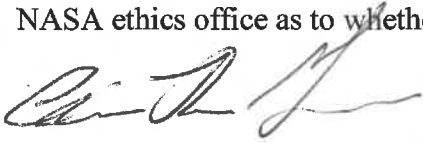
On September 24, 2019, both the Aero Club of Washington and the National Aeronautic Association (NAA), both nonprofit organizations under 501(c)(3) of the Internal Revenue Code, will host a dinner at the Marriott Wardman Park Hotel in Washington, DC from 6:30 p.m. – 9:30 p.m. The event will provide an opportunity for discussion on space travel and the premier award, the Wright Memorial Trophy, will be presented during the dinner.

Approximately 500 people have been invited to attend the reception. Attendees will have a diversity of views or interests and will include representatives from the legislative branch, state and local government officials, personnel from academia, industry representatives, employees from Federal agencies, members of the public, media, as well as a Tuskegee Airman. The estimated value of the event, including all food and beverages, is \$111 per person. Both organizations are in control of the planning and invitations for the event.

Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. There is also an Agency interest in having NASA personnel attend these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA's policies, programs and operations. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the Aero Club of Washington and/or the NAA—including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13770—may accept an invitation for free attendance for themselves and a guest to this event. In those circumstances, I find that the Agency's interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of the organizers, such as procurement duties, program management, or negotiating or administering a Space Act Agreement should seek a separate determination from their local NASA ethics office as to whether they may accept the invitation.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone