



October 19, 2004

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance by NASA Employees at the Annual Octagon Society Dinner on October 20, 2004

On October 20, 2004, the Octagon Society will host its annual Society dinner at the Octagon, in Washington, D.C. Cokie Roberts, author, journalist, television and radio commentator will discuss her recently published book "Founding Mothers." It has been determined to be in the best interest the Government for those NASA employees who are invited to the dinner to attend in their official capacities and as representatives of NASA.

The dinner will be sponsored by the American Architectural Foundation (AAF) and will be widely attended by officials from other Federal agencies, members of Congress and their staffers, as well as members of the AAF and Octagon Society that represent diverse backgrounds and affiliations. An exhibit, "Aerospace Design: The Art of Engineering from NASA's Aeronautical Research," is currently on display in the Octagon Museum Galleries through December 5, 2004. The exhibit was co-organized by the Art Institute of Chicago and the Exploration Systems Mission Directorate (formerly Aerospace Technology Enterprise) and explores the history of aeronautically engineered forms and their relationship to architecture and design. The estimated cost, which includes all food and beverages, is \$100 per person. Approximately 60 people are expected to attend. The event will give NASA employees the opportunity to discuss with other guests the exhibition and how aviation-related forms can be as beautiful as they are functional. As such, I find that the dinner meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I therefore, conclude that NASA's interest in its employees attend this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their duties.

Accordingly, NASA invitees and their spouses or guests may attend the dinner hosted by the AAF on October 20, 2004.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon", with a long, sweeping flourish extending to the right.

R. Andrew Falcon