DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
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AGC(E)03084
August 26, 2003

MEMORANDUM FOR DEPARTMENT OF THE NAVY INVITEES

Subj: 2004 ARMED FORCES COMMUNICATIONS AND ELECTRONICS ASSOCIATION (AFCEA) WINTER DINNER

Ref: (a) Letter from Office of the Assistant Secretary of Defense to AFCEA dated August 4, 2003

The Northern Virginia Chapter of the Armed Forces Communications and Electronics Association (AFCEA) will hold its 2004 Black Tie Winter Dinner on February 7, 2004, at the Sheraton Premiere in Tyson's Corner, Virginia. Approximately 600 people from government and industry, including a number of Department of Navy personnel, will be invited to attend the event. It will include an awards presentation and a speech on transition from military to civilian life. The per-person cost is estimated to be $75.

By reference (a), the Department of Defense (DOD) determined that this event is a social event that DOD employees may not attend in their official capacities but that for the purposes of attendance by DOD employees in their personal capacities as specified in 5 C.F.R. 2635.204(g), Widely Attended Gatherings, the Department may have a community relations interest in attending this event.

The Department of the Navy has determined that attendance by Department of Navy personnel in their personal capacities at this event qualifies as an exception under 5 C.F.R. 2635.204(g)(2). This memorandum constitutes a blanket determination of agency interest in accordance with 5 C.F.R. 2635.204(g)(3)(ii). This memorandum also constitutes a finding under 5 C.F.R. 2635.204(g)(3)(i) that the Department of the Navy's interest in having employees attend this event outweighs concerns that the acceptance of the gift of free attendance may or may appear to improperly influence the employee in the performance of his official duties.

Accordingly, Department of Navy personnel and their spouses or other guest may accept free attendance, food, refreshments, entertainment, and materials furnished to all attendees as an integral part of the event. Department of Navy personnel may not accept travel expenses or lodgings.

If you have any questions concerning this event, please seek advice from your ethics counselor.

David W. LaCroix
Assistant General Counsel (Ethics)