

# WAG Profile

Counselor:

Status: **WAG Determined**

Event: **Navy League Sea-Air-Space Exposition**

Sponsor: **Navy League of the United States  
Cortney Pease, Director of Corporate Events**

Event Date: **05/03/2010**

Location: **Gaylord National Convention Center, National Harbor, Md.**

Purpose: **Annual Exposition**

Approximate total number of attendees: **10000**

Invitees: **Various Invitees**

Identify general sources of attendees at the event. (check all that apply)

**Federal Executive Branch**

**DoD**

**Non-DoD**

**State or local Government**

**Academia**

**Industry**

**Legislative Branch**

Other: **Representatives of foreign embassies**

Is an entity other than the sponsor paying the cost for DOD invitees?

**No**

**Yes**

Identify that entity and the names of the DoD invitees it will pay for

Is an entity other than the sponsor designating the DoD invitees?

**No**

**Yes**

Identify that entity and the names of the DoD invitees it will pay for

Provide estimated cost per person of food and/or refreshments and entertainment at the event.

**Lunch-\$35; Banq-\$90**

If different from the value listed in No. 13 above, identify the ticket or entry fee cost to attend the event.

**No cost**

Identify other gifts being offered in addition to free attendance (i.e., free parking, memento, transportation, etc.)

**Shuttle bus transportation from the Pentagon to the banquet.**

Identify the estimated cost of these other gifts.

**\$9.63**

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This widely attended gathering (WAG) database is intended to assist ethics counselors in staffing questions regarding whether an event qualifies as a WAG pursuant to 5 C.F.R. §2635.204(g), and whether there is an apparent agency interest in having certain employees and/or military members accept an unsolicited offer of free attendance. Before acceptance of free attendance, agency designees and ethics counselors should review the offer in light of other requirements set forth in § 2635.204(g), such as whether the invitation originates with the sponsor of the event, whether agency interest justifies acceptance by a particular employee, and whether the duties of prospective participants conflict with the interests of the offeror.

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Is this a fundraising event?

- No**  
 **Yes**

Is this a recurring event?

- No**  
 **Yes**

### **DETERMINATIONS:**

I. Does event meet widely-attended gathering definition?

- Yes**  
 **No**

[Optional] Yes, but may be additional policy/appearance considerations. See comments below.

II. [Optional] Is there an apparent agency interest to attend?

- Yes**  
 **No**

III. [Optional] If additional gifts are offered (see question #15), may they be accepted?

- Yes**  
 **No**

If Yes, Under which gift exception:

See comments

IV. [Optional] Was additional coordination obtained? (check all that apply)

- |                                                      |                                    |
|------------------------------------------------------|------------------------------------|
| <input checked="" type="checkbox"/> AGC (Ethics)     | <input type="checkbox"/> DoD SOCO  |
| <input checked="" type="checkbox"/> Navy JAG Code 13 | <input type="checkbox"/> Air Force |
| <input type="checkbox"/> USMC (CL)                   | <input type="checkbox"/> Army      |
| <input type="checkbox"/> USMC (JAR)                  | <input type="checkbox"/> OGE       |

### **Comments:**

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The dates for the Sea-Air-Space Exposition are May 3-5, 2010.

There is no charge for civilian employees of the U.S. Government agencies and members of the Armed Forces to attend the exhibits and seminars, or to utilize the bus service. Opportunities and benefits available to a class consisting of all Government employees or all uniformed personnel are not included in the definition of gift (5 C.F.R. 2635.203(b)(4)). Department of the Navy employees may therefore accept free attendance at the seminars and exhibits.

Approximately 1,000 people are expected to attend the reception, banquet and related entertainment, at a fair market value of \$90. Additionally, approximately 800 people are expected to attend the luncheons at a fair market value of \$35 each. Attendees will be Navy League members, various high-ranking government personnel from DOD and other federal agencies, members of Congress and their staffs, representatives of foreign embassies, and designated representatives of businesses and exhibitor companies. Navy League members include businesses and individuals who are connected to or interested in the sea services.

These events qualify as widely attended gatherings under 5 C.F.R. 2635.204(g)(2). In addition, pursuant to 5 C.F.R. 2635.204(g)(3)(ii), there is a reasonable basis for supervisors to find there is an agency interest in having Department of the Navy personnel attend these events. Therefore, supervisors who consider participation by one or more of their employees to be in furtherance of an agency interest may permit personnel whose duties do not substantially affect the Navy League to accept free attendance from the Navy League, including food, refreshments and entertainment, available to all attendees as an integral part of these events. This determination does not apply to other events, e.g. hospitality rooms, that are not an integral part of the Exposition. Department of the Navy personnel may not accept travel expenses or free lodging pursuant to this determination. Notwithstanding this limitation, the shuttle bus transportation from the Pentagon to the banquet, valued at \$9.63 each way, may be accepted under the exception for unsolicited gifts having a value of \$20 or less under 5 C.F.R. 2635.204(a).

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