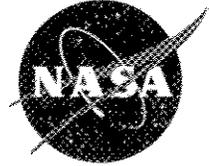


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



May 12, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Sunnyvale, California Reception on May 15, 2008

On May 15, 2008, the City of Sunnyvale, California, is hosting a morning reception at the Senior Center in Sunnyvale, California for Shana Dale and other NASA personnel visiting the area for the San Jose Future Forum. Shana Dale, the NASA Deputy Administrator, will provide remarks on NASA's space program. There will be approximately 40-50 people in attendance from the cities of Sunnyvale and Mountain View, including city officials and local personnel. Five to ten NASA personnel have also been invited in addition to the Deputy Administrator. The per person cost of the food and refreshments is approximately \$20 or less.

I find that this reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA representatives to promote knowledge and understanding of the space program with other attendees.

Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception. NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

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

Adam F. Greenstone