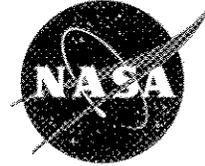


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



November 20, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Lockheed Martin 2008 Holiday Reception on December 3, 2008

On December 3, 2008, Lockheed Martin will hold a holiday reception at the Phoenix Park Hotel on Capitol Hill in Washington, D.C. The reception will be from 6:00 - 8:30 p.m., in which 1600 people have been invited and it is anticipated that approximately 400 people will attend, including members of Congress and their staff, industry representatives, Washington consultants, and personnel from other Federal offices and agencies including NASA, The Coast Guard, HUD, CBO, DoD, Smithsonian/Air & Space, and the Executive office of the President. The approximate cost of the reception is \$135.00 per person.

I find that the Lockheed Martin 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 personnel to meet and discuss the space program with a wide-range of people from industry, Congress, and other Federal agencies.

NASA employees whose duties may substantially affect Lockheed Martin, 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".

Adam F. Greenstone