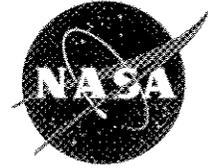


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 23, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Space Policy Institute Dinner in Washington, DC on March 13, 2009

On March 13, 2009, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will hold a space policy dinner at the Primi Piatti restaurant, in Washington, D. C., from 6:30pm-9:00pm.

The dinner will include guest speaker Gen. Lester L. Lyles (USAF ret.), discussing the National Academies project on "Rationale and Goals of the U. S. Civil Space Program." Gen. Lyles will discuss some of his thoughts and insights from the effort but final conclusions will be released only after the study is formally concluded. The topic is certain to be of importance to the new Administration and Congress.

This event will be a widely attended gathering of over 100 people, some of whom are involved in NASA projects, and with whom NASA personnel will be involved in the future. Attendees will include Government, civic, business, and academic leaders. The estimated cost of the dinner, which includes all food and beverages, is \$80.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in NASA personnel attending the event. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the reception.

However, NASA employees whose duties may substantially affect GWU or the GWU Elliott School of Internal Affairs, such as by way of procurement duties, or who are in non-career positions for which the President's Executive Order of January 21, 2009 requires signing an ethics pledge, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


for Adam F. Greenstone