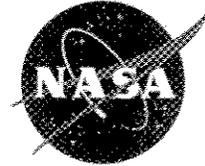


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 12, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the
Maryland Space Business Roundtable Luncheon on March 16, 2009

On March 16, 2009, the Maryland Space Business Roundtable, a non-profit organization under 501(c)(3), of the Internal Revenue Code, is hosting a luncheon at Martin's Crosswinds, in Greenbelt, MD., at 11:30 a. m. The guest speaker will be the Honorable Barbara Mikulski of the United States Senate.

Approximately 350 people have been invited and 200 expected to attend. The estimated cost of the luncheon which includes all food and beverages, is \$27.00 per person. The luncheon will be attended by NASA personnel, representatives of the aerospace industry, trade associations, the media, Congressman and Congressional staffers, academia, and other employees of Federal agencies. 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 event will allow attendees to provide up to date information on activities and programs on earth and space science, to the government, and industry educational groups that attend. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsors, 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. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone