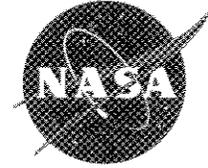


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



April 27, 2009

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the National Air and Space Museum Trophy Dinner on April 29, 2009

On April 29, 2009, the National Air and Space Museum and Safe Flight Instrument Corporation will be co-sponsoring the National Air and Space Museum Trophy Dinner at the Smithsonian's National Air and Space Museum in Washington, D.C., starting at 6:30 p.m.

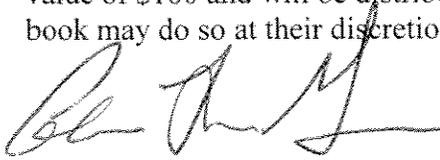
The awards this year will be presented to C. Gordon Fullerton and John R. Casani for Lifetime Achievement. The dinner will be widely attended by representatives from other Federal agencies, members of Congress and their staffers, aerospace and defense industries and associations, and NASM board members. Approximately 599 individuals have been invited to the dinner. The estimated cost of the dinner, which includes all food and beverages, is \$157.50 per person.

I find that this event 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. The dinner will allow NASA employees the opportunity to discuss space-related issues and NASA programs with other attendees. Accordingly, NASA employees whose duties do not substantially affect Safe Flight Instrument Corporation may accept an invitation for free attendance to the reception, awards presentation, and dinner for themselves and their guests.

However, NASA employees whose duties may substantially affect Safe Flight Instrument Corporation, such as by way of procurement duties, 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. Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the dinner for themselves and any accompanying guest.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and

no more than \$50 from one source in a calendar year). NASA invitees should not accept any gifts exceeding the \$20 cap, including but not limited to the book entitled "The Leading Edge of Safety: The Story of Safe Flight Instrument Corporation," which has a value of \$160 and will be distributed at the event. Attendees who wish to purchase the book may do so at their discretion by paying the sponsor the full value of the book.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a prominent initial "A" and "G".

Adam F. Greenstone