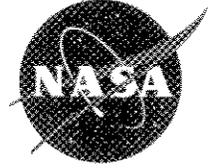


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



April 28, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the ATK, Boeing, Lockheed Martin, USA and UTC Reception on April 30, 2009

On April 30, 2009, the event sponsors will host an evening reception at the Rayburn House Office Bldg., Room B-340, in Washington, DC, from 5:00pm-7:00pm. This reception is to celebrate the successful completion of STS-119.

The event will be widely attended by invitees from other Federal agencies, DoD, congressional offices and staffers, the Executive Office of the President, and International Space Station Partners. Approximately 600 people have been invited and 300 are expected to attend. The estimated cost of the reception, includes all food and beverages, is approximately \$35.00 per person. The reception will allow NASA employees the opportunity to build relationships and improve the lines of communications with other guests and to discuss the accomplishments and progress in space related matters as well as other aspects of common interests.

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. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the reception for themselves. In addition, NASA employees may accept the following items: posters and STS-119 Mission Patches for less than \$10.00 together.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(1) 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 the ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.


Adam F. Greenstone