

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



May 27, 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 United Launch Alliance's Dinner in Lake Buena Vista, Florida on May 27, 2009

On May 27, 2009, the United Launch Alliance (ULA) will host a dinner at Fulton's Crab House in Lake Buena Vista, Florida. Co-sponsors are Starflight, Inc and the Spacecoast Tourism Board. Although this event is being held in Florida in conjunction with the National Space Society's International Space Development Conference, this is a stand-alone event in the evening and not part of the conference itself.

The dinner will be attended by approximately 60 people, including Congressmen, elected officials from Florida, NASA employees, and representatives of over 30 different companies. Many of the attendees are speakers at the National Space Society's conference. The estimated cost of the dinner, which includes all food and beverages, is \$100.00 per person. I find that this dinner 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 NASA employees to discuss NASA's space program with other people who are interested in aerospace issues and space development. Accordingly, NASA employees whose duties do not substantially affect the sponsors, or a majority or all of their members, may accept an invitation for free attendance to the dinner.

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 the 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.

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

Adam F. Greenstone