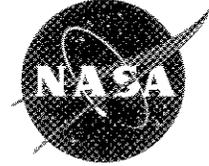


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 29, 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 a Woodrow Wilson Luncheon on June 1, 2009

On June 1, 2009, the Woodrow Wilson House, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon in Washington, DC., at 12:30 p.m. This event is to discuss a travelling museum exhibition focusing on President Woodrow Wilson and his role in fostering scientific and technological innovation in the U. S.

The luncheon will be widely attended by Federal officials from some Government agencies, local government officials, representatives of industry and private individuals, academia, National Trust for Historic Preservation staff members and representatives of the Smithsonian Institution, the National Science Resource Center, and the American Chemical Society. Approximately 50 people have been invited and 15 are expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$18.00 per person. The luncheon will allow NASA employees the opportunity to discuss the topic of the presidential innovation through science and exploration with other guests.

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 having NASA personnel attend the event so that NASA invitees may attend the event without charge. However, NASA employees whose duties do not substantially affect the event sponsor, such by the 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone