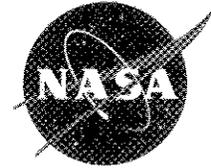


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



June 10, 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 a "Tea at the Ritz" Event hosted by ATK on June 14, 2009

NASA invitees, and their spouses or guests, may attend a cocktail reception sponsored by ATK at the Hotel Ritz, in Paris, France, from 4:00 p.m.-6:00 p.m. The event is a traditional social kick-off to the Paris Air Show and has been held since 1981. The guest speaker will be Dr. Jaiwon Shin, NASA Associate Administrator, Aeronautics Research Mission Directorate (ARMD).

This event will be a widely-attended gathering, of approximately 300 representatives from government, the aerospace industry, and the community. Food and light refreshments will be served at a cost of approximately \$120.00 per person, and is an open bar setting but will not include a meal or buffet. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2). This event will allow NASA employees and the U. S. Government officials an opportunity to discuss Paris Air Show exhibitions, and to dialogue with industry and foreign government representatives who are also participating in the air show. I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. However, NASA employees whose duties may substantially affect ATK, 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 reception.

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 gift items distributed at the reception which exceed the \$20 cap.

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

Adam F. Greenstone