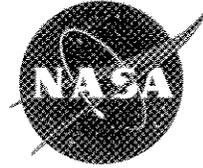


National Aeronautics and Space Administration

**Headquarters**

Washington, DC 20546-0001



October 19, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Space Policy Institute Dinner in Washington, DC on October 21, 2009

On October 21, 2009, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a non-profit organization under Section 501(c)(3) of the Internal Revenue Code, will hold a space policy dinner at the Primi Piatti Restaurant, in Washington, D. C., from 6:30pm-9:00pm.

The dinner will include guest speaker Mr. Norman Augustine of the Review U.S. Human Space Flight Plans Committee, who has served on a wide variety of national reviews and studies related to scientific and technical issues affecting the United States.

This event will be a widely attended gathering of over 100 people, some of whom are involved in NASA projects. Attendees will include Government, civic, business, and academic leaders. The estimated cost of the dinner, which includes all food and beverages, is \$60.00-\$70.00 per person.

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 NASA personnel attending the event. Moreover, NASA employees whose duties do not substantially affect the event sponsors including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the reception.

However, NASA employees whose duties may substantially affect GWU or the GWU Elliott School of Internal Affairs, 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.

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

Adam F. Greenstone