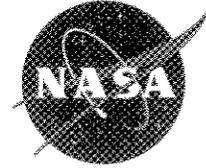


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



December 2, 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 Luncheon for Charles F. Bolden, Jr., NASA Administrator on December 9, 2009

On December 9, 2009, co-sponsors American Institute of Aeronautics and Astronautics (AIAA), and Women In Aerospace (WIA), will host a luncheon for Charles F. Bolden, Jr., NASA Administrator, at the Ritz Carlton, Pentagon City Hotel, in Arlington, VA, from 11:30a.m.-1:30p.m. Industry sponsors includes ATK, Boeing, Lockheed Martin, Northrop Grumman, Orbital Sciences Corporation, SAIC, United Space Alliance, Space X, and Special Aerospace Services.

Approximately 240 people have been invited and is expected to attend. The estimated cost of the luncheon, including all food and all beverages, is \$55.00 per person. The luncheon will be attended by NASA personnel, representatives of the aerospace industry, trade associations, the media, members of Congress and congressional staffers, academia, and employees of other Federal agencies. I find that this luncheon 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 attendees to hear Administrator Bolden's speak with others attendees, and to discuss NASA's programs and activities.

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. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor. Also NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may not accept an invitation for free attendance to the event.

A handwritten signature in cursive script, appearing to read "Adam F. Greenstone".

Adam F. Greenstone