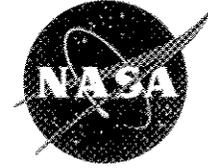


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



December 4, 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 Secure World Foundation Reception on December 9, 2009

On December 9, 2009, the Secure World Foundation (SWF), a non-profit organization under § 501(c)(3), is hosting a cocktail reception at the Bar Dupont in the Dupont Hotel, in Washington, D. C., from 6:00p.m.-8:00p.m.

Approximately 150 people have been invited and are expected to attend. The estimated cost of the reception which includes all food and beverages, is \$50.00 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 reception 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 discuss NASA's programs and activities with other attendees. Moreover, NASA employees whose duties do not substantially affect the event sponsor, 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 event for themselves and their invited guests.

However, NASA employees whose duties may substantially affect the SWF, 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.

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

Adam F. Greenstone