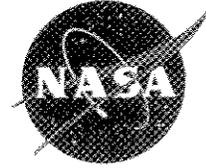


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



January 7, 2010

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at 6th Annual Armed Forces Foundation Congressional Gala Reception on March 3, 2010

On March 3, 2010, the Armed Forces Foundation, under non-profit 501(c)(3) of the Internal Revenue Code, will host a reception at the Ronald Regan Building, in Washington, D. C., at 6:30p.m. This event is to honor wounded service members and those serve them.

The reception will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, Congress, academia, and other Federal agencies. Approximately 800 people have been invited and is expected to attend. The estimated cost of the reception, which includes all food and beverages, is \$95.00 per person. I find that this event 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 reception will allow NASA employees to honor wounded service members and those serve them. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

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 event. However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(j) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over a white background.

Adam F. Greenstone