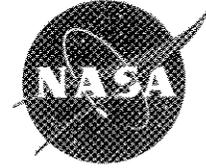


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 11, 2010

Reply to Affn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

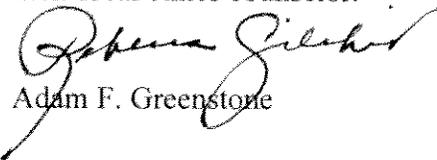
SUBJECT: Determination Regarding Attendance at the Space Policy Institute Dinner in Washington, D.C. on May 26, 2010

On May 26, 2010, 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 Rose Gottemoeller, Assistant Secretary of State for Verification, Compliance, and Implementation.

This event will be a widely attended gathering of over 80 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 event.

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.


jf Adam F. Greenstone