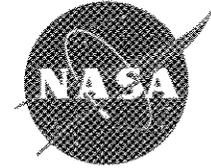


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



June 11, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the AIAA National Capital Section Awards Banquet Dinner on June 11, 2010

On June 11, 2010, the American Institute of Aeronautics and Astronautics National Capital Section (AIAA NCS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code and co-sponsors, Aerojet, Northrop Grumman, Ball Aerospace, Honeywell International, and Lockheed Martin, will host a dinner at the Army Navy Country Club, in Arlington, VA., at 6:00 p.m. The guest speaker for the event is Dr. Laurie Leshin, Deputy Associate Administrator for NASA's Exploration Systems Mission Directorate.

Approximately 100 people have been invited and are expected to attend. The estimated cost of the dinner including all food and beverages is \$73.00 per person. The dinner will be attended by NASA personnel, students, parents, teachers, and AIAA members. I find that this dinner 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 the opportunity to celebrate and honor the winners of the AIAA-NCS 2009-2010 student science fair awards.

However, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the event for themselves and any accompanying guests. Moreover, 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.

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

Adam F. Greenstone