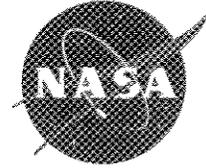


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



June 15, 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 the International Space University's Scholarship Fund Dinner on June 15, 2010

On June 15, 2010, sponsors the International Space University (ISU), and the International Institute of Space Commerce (IISC), non-profit organizations under 501(c)(3) of the Internal Revenue Code are hosting a dinner at the Westin Grand Hotel, in Washington, D. C., from 6:30 p. m.-9:30 p. m. This event is to award an honorary degree to Dr. Greg Olsen.

Approximately 1,400 people have been invited and are expected to attend. The estimated cost of the dinner including all food and beverage, is \$100.00 per person. The dinner will be attended by NASA personnel, representatives of the aerospace industry, state and local officials, the media, the legislative branch, academia, and employees of other Federal agencies. 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 exchange information regarding various NASA programs. Moreover, NASA employees whose duties do not substantially affect 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 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.

It is noted that this event is a fundraiser for the International Space University's scholarship fund. NASA personnel are reminded not to actively participate in any fundraising activities.


Adam F. Greenstone