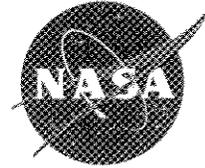


National Aeronautics and Space Administration

**Headquarters**

Washington, DC 20546-0001



August 24, 2010

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

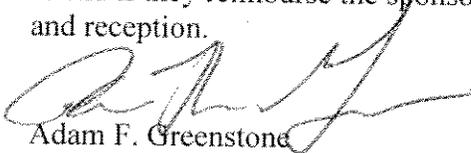
SUBJECT: Determination Regarding Attendance by NASA Employees at the Samuel J. Heyman-Service to America Medals Reception & Dinner on September 15, 2010

On September 15, 2010, sponsors, Booz Allen Hamilton, CH2M Hill, DuPont, United Technologies Corporation, Chevron, Eads North America, Ernst & Young, LLP, Monster Government Solutions, Citigroup, Deloitte, McKinsey & Company, and Foresee Results, will host a reception at 5:30 p. m. and dinner following at 6:30 p. m., at the Andrew W. Mellon Auditorium, in Washington, D. C.

Approximately 2,000 individuals have been invited and 600 are expected to attend the reception and dinner. Attendees will include NASA and other government personnel, and also aerospace leaders from the military, industry, academia, and other non-profit organizations. The estimated cost of the reception and dinner, which includes all food and beverages is \$56.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). There is an Agency interest in having NASA personnel attend the event because attendance will provide NASA employees with the opportunity to provide information on NASA's programs and policies to a variety of commercial, non-profit, and governmental organizations. Accordingly, NASA invitees may attend the event without charge. The reception and dinner will also give NASA employees the opportunity to celebrate with the winners of this year's Service to America Medals for excellence in the federal workforce.

However, NASA employees whose duties may substantially affect the event sponsors or a majority of its members such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the refreshments they consume at the dinner and reception.

  
Adam F. Greenstone