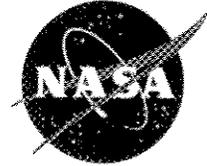


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



December 13, 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 Secure World Foundation Holiday Cocktail Party on December 13, 2010

On December 13, 2010, the Secure World Foundation, a nonprofit organization that does not employ registered lobbyists, will host a reception in Washington, D.C., from 6:00-8:30 p.m. Approximately 60 people are expected to attend, including representatives from academia, international industrial organizations, and other U.S. executive branch Federal agencies. The estimated cost of the refreshments provided, including all food and beverages, is \$50.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

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 NASA attendees to exchange information regarding various NASA programs with representatives of key nonprofit and for-profit sectors. Accordingly, NASA employees – including NASA employees serving in non-career positions for which Executive Order 13490 requires signing an ethics pledge – who have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest. NASA employees whose duties may substantially affect the sponsors, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written in a cursive style.

Adam F. Greenstone