

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 27, 2009

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 National Air and Space Museum (NASM) Trophy Reception, Awards Presentation and Dinner on April 27, 2011

On April 27, 2009, the National Air and Space Museum (NASM), will host a reception, awards presentation, and dinner at the Smithsonian's National Air and Space Museum in Washington, D.C., starting at 6:30 PM. The reception is funded by the Smithsonian Trust, a 501(c)(3) non-profit organization, with donations from The Hillside Foundation, BAE Systems, The Claude Moore Charitable Foundation, Cubic Corporation, and Pratt & Whitney.

The awards this year will be presented to Michael T. Suffredini and the International Space Station Program Office. The dinner will be widely attended by representatives from other Federal agencies, members of Congress and their staffers, aerospace and defense industries and associations, the media, and NASM board members. Approximately 225-250 individuals have been invited to the dinner. The estimated cost of the dinner, which includes all food and beverages, is \$165.00 per person.

I find that this event 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. This event will allow NASA employees the opportunity to discuss space-related issues and NASA programs with other attendees.

Accordingly, NASA employees whose duties do not substantially affect NASM may accept an invitation from NASM for free attendance to the reception, awards presentation, and dinner for themselves and their guests.

However, NASA employees whose duties may substantially affect NASM or the donor organizations, such as by way of procurement duties, or who receive an invitation from an entity other than NASM, 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".

Adam F. Greenstone