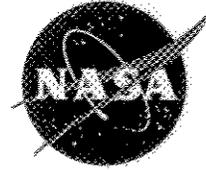


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



May 11, 2011

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 2011 Aerospace Spotlight Awards Gala hosted by the American Institute of Aeronautics and Associates (AIAA) on May 11, 2011

On May 11, 2011, the American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a gala reception and dinner at the Ronald Reagan Building, in Washington, D.C., 6:30 PM.

Approximately 650 people have been invited to attend, including NASA personnel, representatives of the Executive Office of the President, the legislative branch and staffers, state and local government, academia, the media, representatives of the aerospace industry, and employees of other Federal agencies. The estimated cost of the gala reception and dinner, including all food and beverages, is \$250 per person. At the event, various individuals will receive recognition for significant contributions to aeronautics and astronautics, including various government officials and employees.

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.

NASA employees whose duties do not substantially affect the 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 themselves and an invited guest for free attendance to the event. However, 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".

Adam F. Greenstone