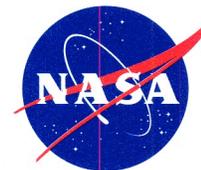


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



October 14, 2011

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the ASTC and Maryland Science Center Reception on October 14, 2011

On October 14, 2011, the ASTC and Maryland Science Center, a non-profit organization under 501(c)(3) of the Internal Revenue Code, is hosting a reception at the Engineers Club in Baltimore, Maryland, at 7 p.m. – 9 p.m. The purpose of this event is to kickoff the ASTC Conference.

Approximately 200 people are expected to attend, including NASA personnel, State and local government officials, industry representatives, academia, and the media. The estimated cost of the luncheon including all food and beverages is \$25.00 per person. I find that this luncheon 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 on various NASA programs with other attendees interested in aerospace. Accordingly, NASA employees whose duties do not substantially affect the sponsors or its members, including employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the reception.

However, NASA employees whose duties may substantially affect the sponsors or a majority of its members, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone