

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



November 1, 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 Secure World Foundation on November 3, 2011

On November 3, 2011, the Secure World Foundation a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Code, will host a panel discussion, "Russia's Space Plans," in Washington, D.C. from 3 PM – 5 PM. The purpose of this event is to examine Russia's space history, the current status of its space program and International efforts to enhance space security, and possible future paths.

Approximately, 500 people were invited to attend this event. Attendees will include personnel from NASA, other Federal Agencies, academia, industry, DoD, the media, and members of the public. The estimated cost of the event, including all food and beverages, is around \$6 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 on NASA's aerospace programs. Accordingly, NASA employees whose duties do not substantially affect the sponsor, 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 event sponsor, 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