

National Aeronautics and
Space Administration

Mary W. Jackson Building NASA Headquarters
Washington, DC 20546-0001



May 3, 2024

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at “Be Human” –
World Meeting on Human Fraternity Dinners on May 10th – 11th, 2024

On May 10, 2024, The Foundation Fratelli tutti being designated as a foreign not-for-profit organization under Italian law, will hold a dinner, at the Vatican Museums (Sistine Chapel and Gallery of Braccio Nuovo of the Vatican Museums), Vatican City, Italy, at 7:15 p.m. On May 11, 2024, a dinner will be held at St. Peter’s Basilica, Rome, Italy, from 7:30 p.m. to 9:30 p.m. The purpose of the event is to foster alliances between civil society and opinion leaders and give hope and answers to the global challenges facing humanity. The Foundation Fratelli tutti will be in control of the planning, organizing, and issuing invitations for this event.

Approximately over 1000 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, members of the legislative branch, state and local government officials, representatives from academia, industry, and foreign entities. The estimated cost of the event, including all food and beverages, is approximately \$180.00 per person (€150). Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. 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 provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs, and operations.

NASA employees, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989, who do not have a significant role in a matter affecting the interests of the sponsor may accept an invitation for free attendance to the event. In those circumstances, I find that the Agency’s interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of the sponsors, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.

For Adam F. Greenstone