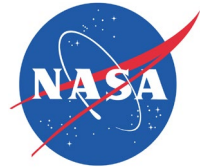


National Aeronautics and  
Space Administration

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



June 13, 2024

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Greater Cleveland Partnership Receptions on June 13 - 14, 2024

On June 13 - 14, 2024, the Greater Cleveland Partnership will hold two receptions at the Rayburn House Office Bldg., 45 Independence Ave., SW, Washington, DC 20515. On June 13, 2024, the Opening Night Reception is from 5:00 p.m. to 7:00 p.m. On June 14, 2024, the Ohio Delegation Breakfast is from 8:30 a.m. to 9:00 a.m. Greater Cleveland Partnership is in control of the planning, organizing, and issuing invitations for this event (Lakeland Community College, Enbridge, NOPEC Energy, Lighthouse Advisers, MAGNET, NorthStar Towers, and Taft LLP are co-sponsors of the event).

Approximately 125 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from congressional staffers, state and local officials, academia, industry representatives, administration personnel, media, and space investors. The estimated cost of the event, including all food and beverages, is approximately \$35 per person. 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).

NASA employees who do not have a significant role in a matter affecting the interests of the Greater Cleveland Partnership may accept an invitation for free attendance for themselves and a guest (if invited) 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 in non-career positions who are required to sign the ethics pledge under Executive Order 13989, may only attend the event if they reimburse the sponsor the value of the event.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of the Greater Cleveland Partnership, 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.

Adam F. Greenstone