

National Aeronautics and
Space Administration



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

November 26, 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 AGI Holiday Reception on December 3, 2024

On December 3, 2024, Ansys Government Initiatives (AGI) will host an event at the Cosmos Club, 2121 Massachusetts Ave., NW, Washington, D.C., 20008, from 7:00 p.m. to 10:00 p.m. The reception is held to celebrate the advancement in aerospace and defense during the holiday season with industry friends and colleagues. An opportunity for informal discussions on the challenges surrounding human spaceflight, climate science, and other topics in the DC aerospace community. AGI is in control of all the arrangements and invitations for the event.

Approximately 400 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members from the congressional staffers, industry representatives, NASA, DoD, OSD, military personnel and academia. The estimated value of the event, including all food and drink, is approximately \$95 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). 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 who do not have a significant role in a matter affecting the interests of the sponsor 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 AGI, 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