

National Aeronautics and  
Space Administration



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

October 29, 2021

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Space  
Policy Institute/George Washington University Dinner on November 2, 2021

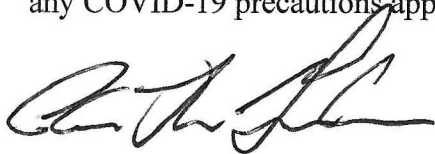
On November 2, 2021, the Space Policy Institute (SPI) of George Washington University's (GWU) together with Limitless Space Institute (LSI), both organizations are a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a dinner at the DACOR Bacon House in Washington, DC, from 6:30 p.m. to 9:30 p.m. SPI and LSI jointly are in control of the planning, organizing, and issuing invitations for this event. The guest speaker at the event will be Harold "Sonny" White, Director of Advanced Research and Development, Limitless Space Institute.

Approximately 40 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 \$96 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 — including NASA employees in non-career positions who are required to sign an ethics pledge under Executive Order 13989 — who do not have a significant role in a matter affecting the interests of SPI or GWU 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 sponsor, such as procurement duties, program management, or

negotiating or administering a Space Act Agreement – LSI does have a Space Act Agreement with NASA - should seek a separate determination from their local ethics counselor as to whether they may accept the invitation. Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone