

National Aeronautics and  
Space Administration

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



October 7, 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 United Airlines Reception held in conjunction with the Governor's Aerospace Advisory Council's first Virginia Aviation & Aerospace Summit

On October 12, 2021, United Airlines (UAL) will hold a reception at the United Airlines Aircraft Hanger in Dulles, Virginia, from 5:00 p.m. to 7:00 p.m. This event is the opening reception held in conjunction with the Governor's Aerospace Advisory Council's (GAAC) first Virginia Aviation & Aerospace Summit taking place in Hampton, Virginia. UAL is in control of the planning, organizing, and issuing invitations for this event.

Approximately 80 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, and representatives from industry, and state and local government officials. The estimated cost of the event, including all food and beverages, is approximately \$40 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 UAL may accept an invitation for free attendance to the event under the ethics rules. 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 reception if they reimburse the sponsor the fair market value of the event. An honor basket will be provided.

In addition, 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, 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 'A. F. Greenstone', written in a cursive style.

Adam F. Greenstone