

National Aeronautics and
Space Administration

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



July 5, 2023

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at Calgary
Stampede President's Reception on July 7, 2023

On July 7, 2023, Calgary Stampede being designated as a foreign not-for-profit organization under Canadian law, will hold a reception at the Palomino Room, Stampede Park, 1410 Olympic Way Se, Calgary Alberta, Canada, from 6:00 p.m. to 7:15 p.m. The purpose of the event is to welcome key community, government, and corporate leaders from Alberta and elsewhere to the Stampede, by the Stampede President. Calgary Stampede will be in control of the planning, organizing, and issuing invitations for this event.

Approximately 600 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 \$55.00 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 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.

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', is written over a faint, illegible background.

Adam F. Greenstone