

National Aeronautics and
Space Administration



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

February 12, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the ServiceNow Executive Circle at Federal Forum 2025 on February 12, 2025

On February 12, 2025, ServiceNow will host an event at the Gaylord National Resort & Convention Center, 201 Waterfront St., National Harbor, MD 20745, from 7:00 a.m. to 4:00 p.m. The event is intended to inform today's federal digital leaders about focused outcomes with AI, and provides a unique opportunity to network, learn, and share with innovative thinkers in government and society.

Approximately 125 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members from the legislative branch, personnel from federal agencies, and industry representatives. The estimated value of the event, including all food and drink, is approximately \$198 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 ServiceNow 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. NASA employees who have a significant role in any pending matter affecting the interests of the ServiceNow, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone