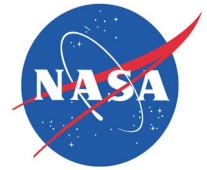


National Aeronautics and
Space Administration

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



March 18, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at an Evening of Honors Awards Dinner presented by Government Executive on April 3, 2025

On April 3, 2025, Government Executive (GovExec) will host a reception and awards dinner at The Anthem in Washington, DC, from 5:00 p.m. to 10:00 p.m. The event honors current and former government and industry personnel who have made significant advancements across government. An engraved glass award will be given to Fed 100 winners at the event. The fair market value is \$40.¹

Approximately 700 people have been invited to attend. Attendees will have a diversity of views or interests and will include representatives from the legislative branch, state and local government, industry, other federal agencies, academia, and media. The estimated value of the event, including all food and beverages, is \$175 per person. GovExec is in control of the organizing, planning and invitations for this event. 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 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.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of the GovExec, 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

¹ A NASA employee who has been selected among the Fed 100 winners may accept the engraved glass award so long as Government Executive does not have interests that may be substantially affected by the performance or nonperformance of the employee’s official duties. Award selectees should contact a local NASA ethics official with further questions in conjunction with the award that may arise.