

National Aeronautics and  
Space Administration

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



April 10, 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 Thunderbird School of Global Management Reception on April 14, 2025

On April 14, 2025, the Thunderbird School of Global Management, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Arizona State University, DC Campus, 1800 I Street NW, Washington, DC, 20006, from 5:00 p.m. to 7:00 p.m. The purpose is to network and have discussions of Space Diplomacy between government and industry.

Approximately 50 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 officials, representatives from industry, employees of Federal agencies, academia, media and members of the public. The estimated cost of the event, including all food and beverages, is \$60 per person. Thunderbird School of Global Management 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 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 Thunderbird School of Global Management and/or Arizona State University, 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