

National Aeronautics and
Space Administration



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

May 6, 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
Pennsylvania (PA) State Day Reception on May 6, 2025

On May 6, 2025, the Commonwealth of Pennsylvania will hold a reception at the Pennsylvania State Capitol Bldg., from 6:00 p.m. to 8:00 p.m. The purpose of the event is to share information on NASA with industry, associations, universities, state, local and federal government staff, and local elected officials and other community leaders.

Approximately 130 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from academia, local business leaders, and universities, as well as elected officials. The estimated cost of the event, including all food and beverages, is approximately \$75 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 the Commonwealth of Pennsylvania 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 sponsor should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.

Adam F. Greenstone