

National Aeronautics and
Space Administration



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

June 11, 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 Greater Houston Partnership Reception on June 12, 2025

On June 12, 2025, the Greater Houston Partnership (GHP) will host a reception at Hotel 1, Place Vendome2, Paris, France, from 7:00 p.m. – 9:00 p.m. The event is to welcome the attendees of Viva-tech, a tech conference held in Paris. The GHP is in control of the planning and invitations for the event.

Approximately 50 people have been invited to attend the reception. Attendees will have a diversity of views or interests and will include representatives of the media, industry, academia, and the government of France. The estimated value of the event, including all food and beverages, is approximately \$350 per person.

Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. There is also an Agency interest in having NASA personnel attend these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA's policies, programs and operations. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the GHP may accept an invitation from the GHP for free attendance for themselves to this 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.¹

However, NASA employees who have a significant role in any pending matter affecting the interests of the GHP, such as procurement duties, program management, or negotiating or administering a Space Act Agreement should seek a separate determination from their local NASA ethics office as to whether they may accept the invitation.

Adam F. Greenstone

¹Given the circumstances attendance will also be authorized under the exception at 5 CFR § 2635.204(i) for meals, refreshments and entertainment in foreign areas.

