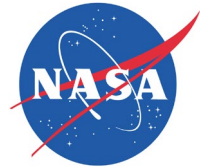


National Aeronautics and
Space Administration

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



July 25, 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 2025
Habitable Worlds Observatory (HWO25) Event on July 29, 2025

On July 29, 2025, the Space Telescope Science Institute (STScI) will hold an event at the John Hopkins DC Bloomberg Center, 555 Pennsylvania Ave., S.E., Washington, DC, from 6:30 p.m. to 9:30 p.m. Space Telescope Science Institute is in control of the planning, organizing, and issuing invitations for this event (sponsors: BAE Systems, L3/Harris, Lockheed Martin, Northrop Grumman, The Planetary Society, and Association of Universities for Research in Astronomy (AURA)).

Approximately 500 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from congressional staffers, executive branch officials, state and local officials, academia, industry representatives, and administration personnel. The estimated cost of the event, including all food and beverages, is approximately \$80 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 STScI may accept an invitation for free attendance for themselves and a guest to attend 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 sponsor, 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.

You are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that you may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that STScI will be handing out stickers, lapel pins, and informative flyers all less than \$1.00 per item in value. Employees may accept said items.

Adam F. Greenstone