

National Aeronautics and
Space Administration

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



March 17, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the
Ansys Government Initiatives Event on March 19, 2026

On March 19, 2026, Ansys Government Initiatives (AGI, LLC) will host an open-plan standing reception at Union Pub in Washington, DC, from 2:30 pm – 8:30 pm. The purpose of the event is to offer a setting for general networking and industry-wide conversation with an opportunity for informal discussions on the challenges surrounding human spaceflight, climate science, and other key topics in the DC aerospace community.

Approximately 250 people have been invited to attend. Guests of NASA personnel are invited. Attendees will have a diversity of views or interests and will include Congressional staffers, industry representatives, academia, and NASA and other federal agency representatives. The estimated cost of the event, including all food and beverages, is \$ 62 per person.

AGI, LLC 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 AGI, LLC, or its parent company, Synopsys, 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