

National Aeronautics and
Space Administration
Goddard Space Flight Center
Greenbelt, Maryland 20771



August 12, 2026

140/Office of the General Counsel

TO: Distribution

FROM: GSFC Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA employees at Roman Space
Telescope Recognition Event on August 28, 2026

On August 28, 2026, Aerodyne, BAE, KBR, L3-Harris, and Peraton, will host a pre-launch reception at the Hilton Garden Inn in Cocoa Beach, FL from 5:00 p.m. to 8:00 p.m. The purpose of the reception is to commemorate the Roman Space Telescope launch and recognize significant contributions to the mission.

Approximately 400 people are expected to attend. Guests of NASA personnel are not invited. Attendees will have a diversity of views or interests and will include Federal, state and local officials, representatives of academia, officials from other federal agencies, media, and space industry professionals. The estimated cost of the event, including all food and beverages, is approximately \$100 per person.

Attendance at this event will allow NASA attendees to exchange information regarding RST and various NASA activities. 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 sponsors 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 any of the sponsors identified above, 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 'D. Barrett', with a stylized, cursive script.

David Barrett
Chief Counsel
Goddard Space Flight Center