

National Aeronautics and  
Space Administration

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



June 6, 2024

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Vast Space, LLC Event on June 12, 2024

On June 12, 2024, Vast Space, LLC will hold a reception at the office location, 1341 G. St., NW, Ste. 200, Washington, DC, from 6:00 p.m. to 8:00 p.m. This event is a celebration of the “opening” of Vast’s Washington, DC office. Vast is in control of the planning, organizing, and issuing invitations for this event.

Approximately 110 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from congressional staffers, state and local officials, federal executive branch, academia, industry representatives, administration personnel, media, space investors, friends and family. The estimated cost of the event, including all food and beverages, is approximately \$50 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, including NASA employees in non-career positions required to sign the ethics pledge under Executive Order 13989, who do not have a significant role in a matter affecting the interests of Vast Space, LLC 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 in non-career positions who are required to sign an ethics pledge under Executive Order 13989 may only accept the invitation if they reimburse the hosts the fair market value of the events. In addition, 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 Vast Space, LLC will have for the taken small items such as pens and stickers (none of these items have a retail value greater than \$7) which NASA attendees, including NASA employees in non-career positions who have signed the ethics pledge, may accept.

Adam F. Greenstone