

National Aeronautics and  
Space Administration

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



November 26, 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 Space  
Association Holiday Party on December 9, 2024

On December 9, 2024, the Aerospace Industries Association (AIA), Commercial Space Federation (CSF), Satellite Industry Association (SIA), and Coalition for Deep Space Exploration (CDSE), CSF being designated as a not-for-profit organization under Section 501(c)(6) of the Internal Revenue Service Code, will jointly hold a holiday party at Johns Hopkins University – SAIS, 555 Pennsylvania Ave., NW, Washington, DC, 20001, from 5:00 p.m. to 8:00 p.m. Commercial Space Federation will be in control of the seating arrangement for this event.

Approximately 250-350 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, members of the legislative branch, state and local government officials, representatives from academia, industry, and foreign entities. The estimated cost of the event, including all food and beverages, is approximately \$40 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 the five sponsors may accept an invitation for free attendance for themselves and a guest 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 the sponsors, 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.

Additionally, 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 event.

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 Commercial Space Foundation and Sponsors will be distributing a map that shows all the satellite offices of their members, NASA attendees, including NASA employees in non-career positions who have signed the ethics pledge, may accept.

Adam F. Greenstone