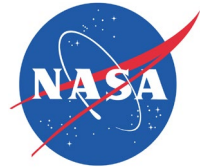


National Aeronautics and  
Space Administration

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



November 7, 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 Rocket Lab  
Event on November 19, 2024

On November 19, 2024, Rocket Lab will hold an event at the NASA Wallops Flight Facility, Chincoteague Rd., Wallops Island, VA 23337, at 7:00 p.m. This event is to view the Rocket Lab Launch from NASA Wallops in supporting the DOD's MACH-TB program. Rocket Lab is in control of the planning, organizing, and issuing invitations for this event.

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 \$25 per person (includes nominal giveaways such as t-shirts, hats and stickers). 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 Rocket Lab 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.

However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 may only attend the reception if they reimburse the sponsor the fair market value of the event.

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 Rocket Lab will have available mission patches (\$9 value), tote bags (\$4.50 value), t-shirts (\$7.50 value), stickers (\$1 value), coffee mugs (\$5.50 value), pins ((\$3.25), and lapel pins (\$2.50 value). Employees may accept said items in combinations not exceeding \$20, except that NASA employees in non-career positions subject to the ethics pledge who may only accept a gift item if they reimburse the sponsor.

Adam F. Greenstone