

National Aeronautics and
Space Administration

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



April 22, 2022

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the events in conjunction with the 2022 Space Launch System/Orion/Exploration Ground Systems Gateway Suppliers Conference on April 28 – 29, 2022

The Aerojet Rocketdyne, Boeing, Lockheed Martin, Jacobs, Northrop Grumman, and Maxar (the “companies”), will hold the 2022 Gateway Suppliers Conference on April 28 and 29, 2022 at the Capitol Hill Washington Hilton in Washington, DC, from 7:00 a.m. to 7:30 p.m. on April 28 and 7:00 a.m. to 3:00 p.m. on April 29. The companies are jointly in control of the planning, organizing, and issuing invitations for this event. The invitation includes two breakfasts, three snacks, one lunch, and an evening reception on the 28th.

Approximately 250 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, and representatives from media, and industry. The estimated cost of the event, including all food and beverages, is approximately \$140 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 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 in non-career positions who are required to sign an ethics pledge under Executive Order 13989 may only attend if they reimburse the sponsors the value of the event.¹

Additionally, 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

¹ NASA Employees may accept free attendance to the events on the day they are speaking or participating in a panel discussion pursuant to 5 C.F.R. 2635.203(b)(8)(i).

from their local ethics counselor as to whether they may accept the invitation. Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.

A handwritten signature in black ink, appearing to read 'A. F. Greenstone', written in a cursive style.

Adam F. Greenstone