

National Aeronautics and  
Space Administration



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

July 15, 2021

CC

TO: Distribution

FROM: Agency Counsel for Ethics,

SUBJECT: Determination Regarding Attendance by NASA Employees at Opening of the Lockheed Martin Spacecraft Test Assembly and Resource (STAR) Center Reception on July 15, 2021

Lockheed Martin (Lockheed) will host a reception on July 15, 2021, to celebrate the grand opening of its new Spacecraft Test Assembly and Resource (STAR) Center facility. Lockheed has invited approximately 200 guests to attend the event. Invitees include representatives from other aerospace contractors, state and local government, academia, trade associations, media, and other segments of the space exploration community. The value of this event is \$17.93 per person.<sup>1</sup>

In accordance with 5 C.F.R. § 2635.204(g), Gifts of Free Attendance at Widely Attended Gatherings, I find this event meets the requirements of a widely attended gathering, and I further determine that there is an Agency interest in having NASA personnel attend this event because their participation will further Agency programs and operations. Specifically, NASA attendees will be able to tour a facility that expands the manufacturing space supporting NASA's Orion spacecraft. This event will also provide a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group of attendees. Because of these benefits to NASA, and having considered the factors enumerated in 5 C.F.R. § 2635.204(g)(4), I also find that the Agency's interest in the attendance of NASA invitees and their guests outweighs the concern that such employees may be, or may appear to be, improperly influenced in the performance of official duties.

However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 may only attend if they reimburse the hosts the value of the event. Additionally, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties or administration of Space Act agreements, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(4) regarding participation in the event from their NASA ethics office. Attendees are reminded to exercise COVID-19 precautions appropriate to their individual situation.

A handwritten signature in black ink, appearing to read "A. F. Greenstone".

Adam F. Greenstone

<sup>1</sup> Some attendees were also invited to a pre-ceremony VIP reception separately valued at \$25.60 per person. Information on attendance to the pre-ceremony reception adequate to ascertain whether it qualified as a widely attended gathering determination was not available at the time of this determination. However, fare provided at the pre-ceremony reception would qualify to be accepted by attendees other than non-career employees required to sign the ethics pledge under Executive Order 13989 under the exception for gifts not exceeding \$20 per occasion if the individual did not then accept more than \$50 from one source in 2021.