

National Aeronautics and
Space Administration



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

January 13, 2023

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Artemis I Reception: From Liftoff to Splashdown.

On January 17, 2023, Lockheed Martin Corporation (“Lockheed Martin”), The Boeing Company (“Boeing”), Northrop Grumman Corporation (“Northrop Grumman”), Aerojet Rocketdyne (“Aerojet”), and Jacobs Engineering Group Inc. (“Jacobs”) will host a reception at Royal Sands Social Club, 26 N. St. SE, Washington, DC 20003, from 5:00 p.m. to 7:00 p.m. The event will provide a forum for a diverse group of Artemis I Launch attendees to connect, network, and disseminate information on ongoing activities and discuss matters of interest.

Over 300 people have been invited to attend. Attendees will have a diversity of views or interests and will include Nasa personnel, National Space Council, the Office of Science and Technology Policy, OMB, House and Senate Members and staff, Artemis I Industry partners, professional society representatives, trade associations, educational NGOs, advocacy groups and consultants. The estimated cost of the event, including all food and beverages, is \$38.00 per person. I have determined 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 information, ideas and views pertaining to NASA’s policies, programs, and operations. I find that the event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2).

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 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 in non-career positions who are required to sign the ethics pledge under Executive Order 13989, may only attend the event 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 Lockheed Martin, Boeing, Northrop Grumman, Aerojet, and Jacobs, 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.

Adam F. Greenstone

¹ NASA employees who are scheduled to speak at the reception may accept free attendance for themselves and one invited guest pursuant to 5 CFR 2635.203(b)(8)(i) and (iii).