

National Aeronautics and  
Space Administration



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

June 20, 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 Commercial LEO Destinations (CLD) Coalition Reception on June 20, 2023

On June 20, 2023, the following companies formed an informal coalition: Sierra Space, Blue Origin, Arizona State University, Northrop Grumman, Voyager Space, and Axiom Space (“Coalition”), together will host a reception at the Coastline Oyster Co., 319 Pennsylvania Ave., SE, Washington, DC, from 5:30 p.m. – 7:30 p.m. The event is to provide a venue for informal discussion for representatives from industry, the Legislative Branch, and others interested in Commercial Low-Earth Orbit (LEO) Destinations (CLD). Each company of the Coalition is jointly in control of the planning, organizing and issuing of invitations for this event.

Approximately 200 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, representatives from the legislative branch, industry, academia, and scientific organizations. The estimated cost of the event, including all food and beverages, is approximately \$50 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).

NASA employees, who do not have a significant role in a matter affecting the interests of one 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 the ethics pledge under Executive Order 13989, may only attend if they reimburse the sponsor the value of the event.

Additionally, 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 NASA ethics office as to whether they may accept the invitation. Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.

Adam  
Greenstone

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