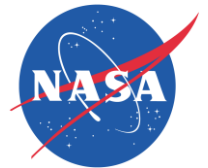


National Aeronautics and  
Space Administration

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



July 11, 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 Space  
Innovation Summit reception on July 11, 2023

On July 11, 2023, Comtech and Airbus U.S. Space & Defense will jointly hold a VIP Reception and Award Presentation at the ASU Barbara Barrett & Sandra Day O'Connor Center, 1800 I. St., NW, Washington, DC 20006, at 6:30 p.m. to 8:00 p.m. The purpose of the event is advancing innovation in the exploration, commercialization, and defense of Space. The Gen. John E. Hyten Award will be presented to Gen. John Raymond. Comtech & Airbus Space & Defense are in control of the planning, organizing, and issuing invitations for this event.

Approximately 85 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from congressional staffers, state and local officials, academia, industry representatives, administration personnel, media, and space investors. The estimated cost of the event, including all food and beverages, is approximately \$75 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).

NASA employees who do not have a significant role in a matter affecting the interests of the sponsor may accept an invitation for free attendance for themselves and a guest (if invited) 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 sponsor the value of the event.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of Comtech and Airbus U.S. Space & Defense, 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.

Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.

Adam F. Greenstone