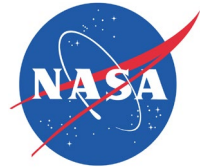


National Aeronautics and  
Space Administration

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



March 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 Terran  
Orbital Corporation Event on March 15, 2023

On March 15, 2023, Terran Orbital Corporation will hold an event at the Smithsonian's National Air and Space Museum, Washington, DC, at 7:00 p.m. to 10 p.m. This event is a celebration of the induction of Terran Orbital's PropCube into the permanent collection of Smithsonian's National Air and Space Museum. Terran Orbital Corporation is in control of the planning, organizing, and issuing 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 congressional staffers, state and local officials, federal executive branch, academia, industry representatives, administration personnel, media, space investors, friends and family. The estimated cost of the event, including all food and beverages, is approximately \$200 - \$300 per person (depending on the level of attendance). 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, including NASA employees in non-career positions required to sign the ethics pledge under Executive Order 13989, who do not have a significant role in a matter affecting the interests of Terra Orbital may accept an invitation for free attendance for themselves and a guest to attend 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.

In addition, 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 ethics counselor as to whether they may accept the invitation.

You are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that you may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that Terran Orbital Corporation will be distributing a CubeSat Squishy which NASA attendees, including NASA employees in non-career positions who have signed the ethics pledge, may accept. An honor basket will be provided to reimburse for other gifts.

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

Adam F. Greenstone