

National Aeronautics and  
Space Administration



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

March 18, 2024

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the 2024 U.S. and France Comprehensive Dialogue on Space Reception on March 19, 2024

On March 19, 2024, the Amazon's Project Kuiper, Amazon Web Services and The Aerospace Industries Association, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception, 545 15<sup>th</sup> St. S, Arlington, VA 22203, at 6:00 p.m. The event is to celebrate the U.S. and France dialogue on Space.

Approximately 200 people have been invited to attend. Attendees will have a diversity of views or interests and will include legislators from federal, state, and local government, academia, industry, NASA personnel, media and non-profits. The estimated cost of the event, including all food and beverages, is \$20 per person. The Aerospace Industries Association, Amazon's Project Kuiper and Amazon Web Services are jointly in control of the organizing, planning and invitations for this event. 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 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.

However, NASA employees who have a significant role in any pending matter affecting the interests of the Aerospace Industries Association, Amazon's Project Kuiper, and Amazon Web Services, 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