

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



April 5, 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 39th Space Symposium and concurrent events, April 7 – 11, 2024

On April 7 – 11, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code will host the 39th Space Symposium in Colorado Springs, Colorado. Complementary Government registration will be covered under the authority of 31 U.S.C. §1353, Gifts of Travel From Non-Federal Sources, using NASA Form 1167. Invitations to additional events may have been provided by the sponsor. The Space Foundation is in control of the arrangements, invitations, and seating for most of the events taking place at the Broadmoor Hotel.¹ The following events will be held in conjunction with the Space Symposium:

1. On April 7, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a Yuri's Night at 5:30 p.m. to 9:00 p.m. in the Space Foundation Discover Center in Colorado Springs, Colorado. Approximately 1300 people are expected to attend. Attendees will have a diversity of views or interests and will include young professionals, students, representatives from other federal agencies, congressional members, representatives from industry, academia, and media. The estimated cost of the event, including all food and beverages, is approximately \$85 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

2. On April 7, 2024, the Collins Aerospace will hold a reception from 6:00 p.m. to 10:00 p.m. in the Golden Bee, at the Broadmoor. Approximately over 150 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$35 per

¹ Certain companies which support the symposium will provide very light snacks and non-alcoholic beverages during morning and afternoon breaks and at some breakout lectures or discussions. This modest fare is not considered a gift under Federal ethics requirements. See 5 C.F.R. § 2635.203(b)(1). Invitations for some meal events in the official program are controlled by corporate hosts and will be addressed in supplemental determinations.

person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.

3. On April 7, 2024, the United Launch Alliance will hold a reception from 6:30 p.m. to 8:30 p.m. in the Penrose Room, at the Broadmoor. Approximately 250 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

4. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a pre-ceremony speaker reception from 4:45 p.m. to 6:00 p.m. at the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$25 per person. Attendance at this event will allow NASA employees who are speaking at an event during the symposium to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

5. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a New Generation Space Leaders Luncheon from 11:30 a.m. to 1:00 p.m. in the Colorado Hall, at the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. This event is open to young professionals 35 or younger.

6. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a New Generation Space Leaders: Networking Reception from 4:30 p.m. to 5:30 p.m. at the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$30.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. This event is open to young professionals 35 or younger and senior mentors.

7. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Government Affairs Social from 4:45 p.m. to 6:00

p.m. at the Broadmoor Hotel. Approximately 150 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$34.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

8. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold the International Astronautical Federation (IAF) Bureau Welcome Toast from 5:00 p.m. to 5:45 p.m. in the Summit Private Dining Room, at the Broadmoor Hotel. This event is hosted by the IAF, a non-profit organization established under French law. Approximately 15 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is between \$15-20 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

9. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Welcome Reception from 5:15 p.m. to 6:00 p.m. in the International Center, at the Broadmoor Hotel. Approximately 500 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$30.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.

10. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Heads of Agency Reception from 7:45 p.m. to 9:15 p.m. at the Broadmoor Hotel. Approximately 125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$40 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

11. On April 8, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an Opening Night Celebration from 8:30 p.m. to 10:30 p.m. at the Lake Terrace Dining Room, Broadmoor Hotel. Approximately 500 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other

federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$170 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.

12. On April 9, 2024, the ANSYS Casino Night hold an event from 8:30 p.m. to 11:00 p.m. at the Broadmoor, 1 Lake Ave., Colorado Springs, CO. Approximately 650 people are invited to attend. **This event is not covered by this determination.** NASA employees who wish to attend it should reimburse ANSYS the estimated value of the event, including food and beverages, which is \$185 per person.

13. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Government Affairs Breakfast from 7:15 a.m. to 8:30 a.m. in the Broadmoor Hotel. Approximately 300 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$95 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

14. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast: International Astronautical Federation from 7:15 a.m. to 8:30 a.m. in the Broadmoor Hotel. Approximately 50-125 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

15. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon hosted by the Australian Space Agency from 12:15 p.m. to 1:45 p.m. in the Broadmoor Hotel. Approximately 50-200 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. **Invited NASA employees may attend this event under the Foreign Gifts and Decorations Act.** Guests of NASA employees are not invited.

16. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an Acquisition Luncheon from 12:15 p.m. to 1:45 p.m. in the Colorado Hall. Approximately 530 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$130 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs.

17. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Senior Executives' Forum Luncheon from 12:15 p.m. to 1:45 p.m. in the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

18. On April 9, 2024, the Lockheed Martin Company will hold a reception from 4:30 p.m. to 6:00 p.m. in the Colorado Hall, at the Broadmoor Hotel. Approximately 50 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$34 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

19. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an International Military Leaders Reception from 5:00 p.m. to 6:15 p.m. at the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$10 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

20. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Corporate Member Appreciation Reception from 5:15 p.m. to 7:15 p.m. at the Broadmoor Hotel. Approximately 125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional

members, and representatives from industry, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$20 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

21. On April 9, 2024, the Greenberg Traurig and International Institute of Space Law will hold a dinner at 6:00 p.m. to 9:00 p.m., at the Garden of Gods Club, Colorado Springs, CO. Approximately 40 people are invited to attend. The estimated cost of the event, including all food and beverages, is approximately \$90 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

22. On April 9, 2024, Leidos will hold a reception from 7:00 p.m. to 9:00 p.m. in the Broadmoor West Tower Ballroom, at the Broadmoor Hotel. Approximately 250 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. Attendance at this event will allow NASA employees and a guest (attending the symposium) to exchange information regarding various NASA programs.

23. On April 9, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Corporate Partnership Dinner from 7:30 p.m. to 9:00 p.m. in the International Center at the Broadmoor Hotel. Approximately 700 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$235 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

24. On April 10, 2024, the Space Foundation will host a Satellite Forum Breakfast at 7:15 a.m. to 8:30 a.m. in the Broadmoor Hotel. Approximately 250 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$90 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA program.

25. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast hosted by the State of Oklahoma from 7:15 a.m. to 8:30 a.m. in the Broadmoor Hotel. Approximately 50-125 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is

approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

26. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a New Generation Space Leaders Breakfast from 7:30 p.m. to 8:30 p.m. at the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies, congressional members, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$70.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. This event is open to young professionals 35 or younger and senior mentors.

27. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an Astronaut Reunion Breakfast from 7:30 a.m. to 8:45 a.m., at the Golden Bee Restaurant, in the Broadmoor Hotel. Approximately 45 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include representatives from industry and members of the public. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding the NASA astronaut program. Due to space limitations for the event, guests are not invited.

28. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an Exhibitor Breakfast from 7:30 a.m. to 9:00 a.m. in the Broadmoor Hotel. Approximately 270 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include representatives from industry and members of the public. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding the NASA astronaut program. Due to space limitations for the event, guests are not invited.

29. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Space Warfighters Luncheon from 12:15 p.m. to 1:45 p.m. in the Colorado Hall at the Broadmoor Hotel. Approximately 570 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$130 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.

30. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an International Space Collaboration Luncheon from

12:15 p.m. to 1:45 p.m. in the Broadmoor Main: Ballroom. Approximately 400 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$130 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.

31. On April 10, 2023, the Aerospace Industries Association (AIA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will hold a Space Policy Networking Lunch from 12:15 p.m. to 1:45 p.m. in the Robert Trent Jones Room at the Broadmoor Hotel. Approximately 125-150 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$40 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

32. On April 10, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Swigert Society Donor Reception from 5:00 p.m. to 6:30 p.m. in the Broadmoor Hotel. Approximately 70 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$20 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

33. On April 10, 2024, the ASRC Federal Holding Company, LLC will hold a Indoor/Outdoor Reception at 5:30 p.m. to 7:30 p.m. in the Bennett Cottage at the Broadmoor Hotel. Approximately 2,000 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$28 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

34. On April 10, 2024, the L3Harris will hold a reception event at 5:30 p.m. to 7:00 p.m. in the Lake Terrace Dining Room, at The Broadmoor Hotel. Approximately 400 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$24.40 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

35. On April 10, 2023, the Boeing Company will hold an Evening Under the Stars event at 6:00 p.m. to 9:00 p.m. at the Broadmoor Estate House, Colorado Springs. Approximately 600 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

36. On April 10, 2024, the Lockheed Martin Space will hold a reception from 7:00 p.m. to 10:00 p.m. in the Colorado Hall, at the Broadmoor Hotel. Approximately 1300 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

37. On April 11, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Women's Global Gathering Luncheon from 12:15 p.m. to 1:45 p.m. in the Colorado Hall at the Broadmoor Hotel. Approximately 400 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$130 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.

38. On April 11, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Space Technology Hall of Fame Private Induction Ceremony from 4:00 p.m. to 5:30 p.m. at the Broadmoor Hotel. Approximately 100 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$10 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

39. On April 11, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Closing Cocktail Reception from 5:30 p.m. to 6:30 p.m. in the International Center at the Broadmoor Hotel. Approximately 600 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is

approximately \$30 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

40. On April 11, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Space Technology Hall of Fame Dinner from 7:00 p.m. to 9:00 p.m. in the International Center at the Broadmoor Hotel. Approximately 500 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$235 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

41. On April 11, 2024, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Celebration of New Generation Space Leaders from 9:00 p.m. to 12:30 a.m. at Colorado Hall at the Broadmoor Hotel. Approximately 350 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, congressional members, and representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

I find that these events meet 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 these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs, and operations. Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the organization hosting the event as specified herein may accept an invitation for free attendance to that event, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989, except as noted below. 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.³

However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 may only attend the reception events held by Collins Aerospace (April 7), ULA (April 7), Greenberg Traurig (April 9), Leidos (April 9), Lockheed Martin Reception (April 9) ASRC Federal Reception (April 10), The Boeing Company (April 10), L3Harris (April 10), AIA (April 10), and Lockheed Martin Space (April 10), if they reimburse the sponsor the fair market value of the event as these events are

² When the gift of free attendance is from a foreign government, as in the case of the New Zealand, and French Government receptions and (appearing in the official program) Australian Space Agency luncheon, acceptance of the gift is authorized by the Foreign Gifts and Decorations Act.

³ In addition, employees may accept free attendance at events at which they are speaking pursuant to 5 C.F.R. 2635.203(b)(8)(i).

by invitation only and not covered by the registration fee and/or another exception. Additionally, a guest of NASA employees may attend the events to which they have been invited, e.g., the opening and closing ceremonies (April 8 and April 11), Corporate Partnership Dinner (April 9), Astronaut Reunion (April 10), Satellite Forum Breakfast (April 10), Australian Reception (April 9), ASRC Federal Reception (April 10), and the Space Technology Hall of Fame Dinner (April 11). Also, NASA employees who have a significant role in any pending matter affecting the interests of any of the hosts of any event they wish to attend, 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.⁴

This widely attended gathering determination does not cover the receptions in hospitality suites that may occur during the 39th Space Symposium. These suites will be hosted by corporate sponsors. Most NASA employees who are invited may receive refreshments provided in these suites under the exception to the gift rules that allows acceptance of gifts (including refreshments and tangible gift items) with an aggregate value of \$20 or less per event. However, non-career NASA employees subject to the Ethics Pledge required by Executive Order 13989 must provide reimbursement for the fair market value of any refreshments they or their guests consume in the hospitality suites. We understand that honor baskets to do so will be provided.

Attendees are also reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), at which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year).

If employees have any questions on any individual event listed, please contact your local NASA ethics official.

Adam F. Greenstone

⁴ NASA employees who are attending the 39th Space Symposium pursuant to a registration fee NASA has paid for or through sponsored travel approval pursuant to 31 U.S.C. §1353 may attend any of the events hosted by the Space Foundation as provided by those approvals.