

National Aeronautics and  
Space Administration



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

August 26, 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 Blue Origin  
Space Resources Center of Excellence, Grand Opening Reception on August 27,  
2024

On August 27, 2024, the Blue Origin Company, will hold a reception at the Space Resources Center of Excellence, 5350 Biloxi Ave., Los Angeles, CA 91601, from 3:00 p.m. to 6:00 p.m. (Pacific Time). Blue Origin 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 other federal agencies, representatives from academia, industry, and other partners beyond Blue Origin and non-profits organizations. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. Attendance at these events 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 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. NASA employees who do not have a significant role in a matter affecting the interests of Blue Origin may accept an invitation for free attendance to these events. 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 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. Additionally, NASA employees in non-career positions who are required to sign an ethics pledge under Executive Order 13989 may only accept the invitations if they reimburse the hosts the fair market value of the events.<sup>1</sup>

Adam F. Greenstone

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<sup>1</sup> This determination applies only to NASA employees not on official travel, or who are on official travel for other activities.