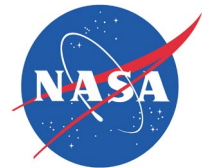


National Aeronautics and
Space Administration

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



February 19, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the events in
conjunction with the 2025 Artemis Suppliers Conference on March 3-5, 2025

The 2025 Artemis Suppliers Conference will be held on March 3 – 5, 2025 at the Ronald Reagan Bldg. and Trade Center, 1300 Pennsylvania Ave., NW, Washington, DC, on March 3; from 5:30 p.m. to 7:30 p.m., on March 4; from 7:00 a.m. to 7:45 a.m., and 5:00 p.m. to 7:00 p.m., and on March 5; from 7:00 a.m. to 9:00 a.m. Aerojet Rocketdyne, Boeing, Lockheed Martin, Jacobs, Bechtel, Northrop Grumman, and Maxar are jointly in control of the planning, organizing, and issuing invitations for this event as hosts. The invitation includes all day coffee, waters, beverages.

Day 1 (March 3rd):

Welcome Congressional reception: \$35 per person for hors d'oeuvres and alcoholic or non-alcoholic beverages.

Day 2 (March 4th):

Congressional Reception (in the Russell Senate Office Bldg.): \$28 per person for hors d'oeuvres and alcoholic or non-alcoholic beverages.

- Continental breakfast: \$33 per person.
- Buffet lunch: \$36 per person.
- Networking reception: \$35 per person for hors d'oeuvres and alcoholic or non-alcoholic beverages.

Day 3 (March 5th):

- Wednesday, March 5th, continental breakfast: \$33 per person.

Approximately 750 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members of Congress, personnel from other federal agencies and organizations, members of the legislative branch, and representatives from media, and industry. 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 sponsors may accept an invitation for free attendance 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.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of the hosts, 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 an Artemis branded memento is available for each conference attendee as a giveaway, at check-in, the cost is \$10.00 which NASA attendees who have not accepted more than \$50 in gifts from any of the hosts in 2025 may accept.

Adam F. Greenstone