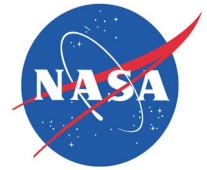


National Aeronautics and  
Space Administration

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



February 27, 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 BAE Systems SPHEREx Launch on February 27, 2025

On February 27, 2025, BAE Systems and California Institute of Technology will host an event at the Santa Ynez Valley Marriott, 555 McMurray Road, Buellton, CA 93427, from 4:30 p.m. to 6:30 p.m.

Approximately 300 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members from academia, industry representatives, personnel from media outlets, and contractor personnel. The estimated value of the event, including all food and drink, is approximately \$35 per person. 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 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 a small SPHEREx cup with a BAE Systems logo is available for each attendee as a giveaway, at check-in, the cost being \$2.72.

Adam F. Greenstone