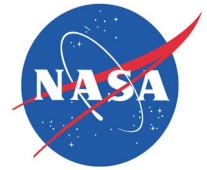


National Aeronautics and
Space Administration

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



March 21, 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 Artemis VIP Reception on March 24, 2025

On March 24, 2025, Amentum, L3 Harris/Aerojet Rocketdyne, The Boeing Company, Lockheed Martin and Northrop Grumman will host an event at the San Diego Air and Space Museum, 2001 Pan American Plaza, San Diego, CA 92101, from 5:00 p.m. to 7:00 p.m.

Approximately 130 people are expected to attend the event. Attendees will have a diversity of views or interests and will include representatives from academia, Congress, industry, state and local government, and other federal personnel. The estimated value of the event, including all food and drink, is approximately \$30 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 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 sponsors, 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