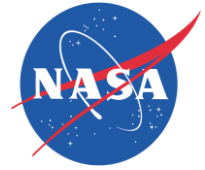


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 4, 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
40th Space Symposium and concurrent events, April 7 – 10, 2025

On April 7 – 10, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code will host the 40th 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 6, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host the Congressional Roundtable: Cooperation Between Legislative, Military & Commercial Space – Developing Pathways for Solutions Chairman's Reception at 4:00 p.m. to 6:00 p.m. at Cheyenne Mountain Resort, Colorado Springs, Colorado. Approximately 100 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 and the legislative branch, representatives from industry, academia, and media. 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.

2. On April 6, 2025, Aerospace Corporation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and TechCrunch will hold a joint reception from 5:00 p.m. to 7:00 p.m. at the Broadmoor Hotel West Tower, Colorado Springs, Colorado. Approximately 100 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,

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.

congressional members, representatives from industry, academia, and media. The estimated cost of the event, including all food and beverages, is approximately \$67 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

3. On April 6, 2025, United Launch Alliance will hold a reception from 6:30 p.m. to 8:30 p.m. in the Main Ballroom, 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 and the legislative branch, 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 to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

4. On April 6, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host the Space Foundation Chairman's Reception at 6:30 p.m. to 8:30 p.m. at Space Foundation Headquarters, 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 and the legislative branch, representatives from industry, academia, and media. 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.

5. On April 7, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a New Generation Space Leaders Luncheon from 12:15 p.m. to 1:45 p.m. in the Colorado Hall, at the Broadmoor Hotel. Approximately 350 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 and the legislative branch, and representatives from industry. 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. This event is open to young professionals 35 or younger.

6. On April 7, 2025, 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 350 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 and the legislative branch, 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.

7. On April 7, 2025, 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 and the legislative branch, 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.

8. On April 7, 2025, 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 and the legislative branch, 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.

9. On April 7, 2025, 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 and the legislative branch, 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. Due to space limitations for the event, guests are not invited.

10. On April 7, 2025, Vast Space, LLC will hold a reception at 6:00 p.m. to 10:00 p.m. at the Golden Bee Gastropub, in the Broadmoor Hotel. Approximately 350 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 and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$50.00 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.

11. On April 7, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host the CEO 40th Anniversary Reception at 7:30 p.m. to 9:00 p.m., in the West Ballroom AB, at the Broadmoor Hotel. Approximately 300 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 and the legislative branch, representatives from industry, academia, and media. The estimated cost of the event, including all food and beverages, is approximately \$30 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.

12. On April 7, 2025, 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 and the legislative branch, 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. Due to space limitations for the event, guests are not invited.

13. On April 8, 2025, 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 and the legislative branch, 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 8, 2025, Blue Origin will hold a Blue Ring Breakfast at 7:15 a.m. to 8:30 a.m. in the Everest Cottage, at The Broadmoor Hotel. Approximately 120 – 150 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, and the legislative branch, representatives from industry, academia, media, and foreign governments. 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. Due to space limitations for the event, guests are not invited.

15. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast: International Astronautical Federation (IAF) from 7:15 a.m. to 8:30 a.m. in the Robert Trent Jones, Sr. Room, at 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 and the legislative branch, 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.

16. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast hosted by Amazon Web Services, 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 and the legislative branch, 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.

17. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast hosted by Oklahoma Space Investment, 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 and the legislative branch, 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.

18. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Global Space Collaboration Luncheon from 12:15 p.m. to 1:45 p.m. in the Colorado Hall at the Broadmoor Hotel. Approximately 180 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 and the legislative branch, 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.

19. On April 8, 2025, 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 75 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 and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$110 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.

20. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon: Amentum, 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 and the legislative branch, representatives from industry, academia, media, 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.

21. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon: SAIC, 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 and the legislative branch, representatives from industry, academia, media, 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.

On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon: Bank of America, 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 and the legislative branch, representatives from industry, academia, media, 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.

22. On April 8, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an International Space Leaders Reception from 5:00 p.m. to 6:15 p.m. at 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 and the legislative branch, 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.

23. On April 8, 2025, 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 and the legislative branch, 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.

24. On April 8, 2025, the Lockheed Martin Company will hold a private reception, hosted by Robert Lightfoot, from 5:30 p.m. to 7:30 p.m. in the Mac Neill Suite (402), 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 and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$42 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

25. On April 8, 2025, the National Security Space Association, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and Redwire will hold a joint reception from 5:30 p.m. to 7:30 p.m. at the Broadmoor Estate House. 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 and the legislative branch, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$35 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.

26. On April 8, 2025, 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 9:15 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 and the legislative branch, 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.

27. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold an Acquisition Breakfast from 7:15 a.m. to 8:30 a.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 and the legislative branch, 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.

28. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast: RTX, 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 and the legislative branch, 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.

29. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast: HawkEye 360, 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 and the legislative branch, 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.

30. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Breakfast: Amazon Kuiper Government Solutions, 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 and the legislative branch, 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.

31. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a New Generation Space Leaders Breakfast from 7:15 a.m. to 8:30 a.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 and the legislative branch, 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.

32. On April 9, 2025, 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 various NASA programs. Due to space limitations for the event, guests are not invited.

33. On April 9, 2025, 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 various NASA programs. Due to space limitations for the event, guests are not invited.

34. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon: Pioneering Space in the Lone Star State, from 12:00 p.m. to 2:15 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 and the legislative branch, representatives from industry, academia, media, 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.

35. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon hosted by Astranis from 12:15 p.m. to 1:45 p.m. in the Donald Ross Room (located on the 2nd floor of the Golf Club Room), at 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 and the legislative branch, 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. Due to space limitations for the event, guests are not invited.

36. On April 9, 2025, Aerospace Industries Association (AIA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will hold a Space Symposium Network Luncheon from 12:15 p.m. to 1:45 p.m., at 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 and the legislative branch, 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.

37. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon: Aerospace Industries Association, 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 and the legislative branch, representatives from industry, academia, media, 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.

38. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Salon Luncheon: Raft, 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 and the legislative branch, representatives from industry, academia, media, 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.

39. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Space Technology Hall of Fame and Awards Luncheon from 12:15 p.m. to 2:00 p.m., in the Colorado Hall, at the Broadmoor Hotel. 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 and the legislative branch, 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 and a guest to exchange information regarding various NASA programs.

40. On April 9, 2025, Blue Origin will hold a reception at 5:00 p.m. to 7:00 p.m. in the Everest Cottage, at The Broadmoor Hotel. Approximately 200 – 250 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 and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$40.00 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.

41. On April 9, 2025, 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 and the legislative branch, 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.

42. On April 9, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and the Air & Space Force Association will hold a joint Executive Leadership Dinner: Ensuring U.S. Leadership in Space from 6:30 p.m. to 9:00 p.m. at the Broadmoor Fish House. Approximately 21 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 and the legislative branch, representatives from industry, and associations. The estimated cost of the event, including all food and beverages, is approximately \$255 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.

43. On April 9, 2025, SpaceX will hold a SpaceX Symposium Reception at 8:00 p.m. to 11:00 p.m., PLAY at the Broadmoor Hotel. Approximately 100 people are invited to attend. The estimated cost of the event, including all food and beverages, is approximately \$50 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.

44. On April 10, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Space Workforce for Tomorrow Luncheon from 5:00 p.m. to 6:30 p.m. in the Broadmoor West: Rocky Mountain Ballroom. 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 and the legislative branch, 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 and a guest to exchange information regarding various NASA programs.

45. On April 10, 2025, 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 Colorado Hall, 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 and the legislative branch, 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 to exchange information regarding various NASA programs. Due to space limitations for the event, guests are not invited.

46. On April 10, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will hold a Closing Dinner: Securing our Future from 7:00 p.m. to 9:00 p.m. at the International Center, 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 and the legislative branch, 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.

47. On April 10, 2025, 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 and the legislative branch, 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.

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, 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

Additionally, one guest of NASA employees may attend the events to which they have been invited, e.g., the opening and closing ceremonies (April 7 and April 10), Congressional Roundtable, Aerospace Corporation and Chairman’s Reception (April 6), Corporate Partnership Dinner (April 8), National Security Space Association (April 8), Space Technology Hall of Fame and Awards Luncheon (April 9), and Space Workforce for Tomorrow (April 10). 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 40th Space Symposium. These suites will be hosted by corporate sponsors. Most NASA employees who are invited may receive refreshments

² When the gift of free attendance is from a foreign government, as in the case of the Japan, New Zealand, Canadian, Australian, and Italian Government receptions, 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).

⁴ NASA employees who are attending the 40th 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 provided by those approvals.

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. Attendees are reminded that this \$20 gift exception at 5 C.F.R. § 2635.204(a), allows acceptance of 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