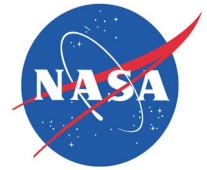


National Aeronautics and
Space Administration

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



May 15, 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 American Rocketry Challenge Reception on May 17, 2025

On May 17, 2025, the Aerospace Industries Association (AIA) a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a reception, at Great Meadow, The Plains, Virginia, from 6:30 a.m. to 7:00 p.m. The purpose is to celebrate the nation's top student rocketry teams and promote rocketry and STEM education through competitive launches, hands-on demonstrations, and engagement with government and industry leaders. Awards will be given to student teams participating in the competition.

Approximately 500 people have been invited to attend. Attendees will have a diversity of views or interests and will include legislators from federal, state, and local government, academia, industry, NASA personnel, media and non-profits. The estimated cost of the event, including all food and beverages, is \$50 per person. The Aerospace Industries Association is in control of the organizing, planning and invitations for this event. 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 for themselves and a guest (if invited) 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.

However, NASA employees who have a significant role in any pending matter affecting the interests of the (AIA), 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 AIA will be given out small items such as patches,

stickers, and mementos (none of these items have a retail value greater than \$3) which NASA attendees may accept.

Adam F. Greenstone