

NATIONAL AERONAUTICS AND SPACE  
ADMINISTRATION

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



May 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  
H2M Summit 2025 and surrounding events on May 28-29, 2025

On May 28-29, 2025, the Explore Mars, Inc., a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host the Human to Mars Summit 2025 at the Jack Morton Auditorium, The George Washington University, Washington, DC, from 8 a.m. to 6 p.m. Explore Mars is in control of the plans and invitations for the Summit program events unless otherwise indicated. The purpose of the event is to bring experts from around the world together to provide a forum for discussions on the technical, scientific, and policy challenges of sending humans to the Moon and Mars in the upcoming decades. Attendees will include representatives from the legislative branch, industry, government agencies, media, entertainment community, non-profit organizations, STEM educators, and academia. An award will be given to the student winner of the Mars Innovation Challenge.

Approximately 200 – 300 people are expected to attend the event. The program will include two continental breakfasts, two coffee breaks, and two receptions.

May 28<sup>th</sup>: Continental breakfast (included with conference registration) estimated value of the breakfast \$15.00 per person. Coffee break (included with conference registration) estimated value of the coffee break is \$15.00 per person. The program will include an offsite reception (paid separately, not included with registration) – estimated value is \$85 per person.

May 29<sup>th</sup>: Continental breakfast (included with conference registration) estimated value of the breakfast \$15.00 per person. Coffee break (included with conference registration) estimated cost of the coffee break \$15.00 per person. The program will include an onsite reception (paid separately, not included with registration) estimated value is \$30.

Attendance at these events will allow NASA attendees to exchange information regarding various NASA programs.

I find that these events meet the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g). 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 Explore Mars may accept an invitation for free attendance to the events where complimentary invitations have been issued. 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 Explore Mars, 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 of free attendance to the event.

Adam F. Greenstone