

National Aeronautics and  
Space Administration

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



March 16, 2025

Reply to Attention of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at The  
Planetary Science Caucus Kick-off Event on May 19, 2025

The Planetary Society, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a reception on May 19, 2025, at the Rayburn House Office Bldg., Rayburn Foyer, Washington, DC, from 5:30 p.m. – 7:30 p.m. This kick-off event for the Congressional Planetary Science Caucus in the 119th Congress. The event will include exhibition of space community organizations to educate legislative branch personnel and other guests on aspects of U.S. space science and exploration. The Planetary Society is in control of the planning, organizing, and issuing invitations for this event.

Approximately 100-150 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, representatives of the legislative branch, and representatives from academia and industry. The estimated cost of the event, including all food, beverages and items listed above, is approximately \$34 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 personnel who do not have a significant role in a matter affecting the interests of The Planetary Society may accept an invitation for free attendance for themselves and a guest 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 sponsor, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local NASA ethics counselor as to whether they may accept the invitation.

Adam F. Greenstone