

National Aeronautics and  
Space Administration

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



June 3, 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 Mission 2  
Resilience Lunar Landing Party on June 5, 2025

On June 5, 2025, ispace-U.S., Commercial Space Federation, and SpaceNews will hold a joint “watch” party reception at Hogan Lovells, LLP, in Washington, DC, at 1:30 p.m. to 4:30 p.m. The event is to celebrate and watch the Mission 2 Moon Landing. ispace-U.S., Commercial Space Federation, and SpaceNews are in control of the planning, organizing, and issuing invitations for this event.

Approximately 200 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from congressional staffers, state and local officials, academia, industry representatives, administration personnel, media, and space investors. 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. I find that the event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2).

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.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of ispace-U.S., Commercial Space Federation, and SpaceNews, or Hogan Lovells, 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 ispace-U.S., Commercial Space

Federation, and SpaceNews, will be given out small items such as stickers and pens (none of these items have a retail value greater than \$5) which NASA attendees may accept.

Adam F. Greenstone