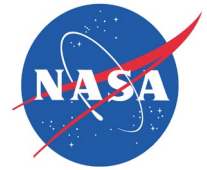


National Aeronautics and  
Space Administration

**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 Space Foundation and Germany Embassy Reception on June 5, 2025

On June 5, 2025, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, along with the German Embassy will host a joint reception, at the residence of the German Ambassador, 1800 Foxhall Rd., NW, Washington, DC 20007, from 6:30 pm to 8:30 pm. The purpose of the reception is to provide a venue for industry, government, international partners, academia, and other stakeholders to discuss topics of interest related to international cooperation in space.

Approximately 600 people have been invited to attend. Attendees will have a diversity of views or interests and will include representatives from the legislative branch, state and local government officials, representatives from industry, employees of Federal agencies, and members from the foreign government space agencies. The estimated cost of the event, including all food and beverages, is \$28 per person. The Space Foundation and German Embassy are 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). To the extent the invitation is a gift from the Federal Republic of Germany, acceptance is authorized by the Foreign Gifts and Decorations Act.

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 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 Space Foundation, 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.

Adam F. Greenstone