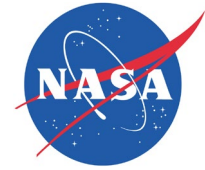


National Aeronautics and  
Space Administration



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

November 19, 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 Umbra  
Holiday Gathering on December 3, 2025

On December 3, 2025, Umbra Lab, Inc., an American space technology company, will host a holiday gathering/social at Jack Rose Dining Saloon in Washington, DC, from 6:00 p.m. to 9:00 p.m.

Approximately 150 people have been invited to attend. Attendees will have a diversity of views or interests and will include representatives from other federal agencies, congressional offices, trade groups, press, research organizations and other non-profits, academia, the investment community, and industry. The estimated cost of the event, including all food and beverages, is \$80 per person. Attendees may bring a guest, space permitting. This event also includes a gift of playing cards valued at \$14 which may be accepted under the exception allowing gifts not exceeding \$20, if the employee will not have accepted gifts from Umbra Lab, Inc. exceeding \$50 in 2025.

Umbra Lab, Inc. 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 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. NASA employees may also accept an invitation for an accompanying guest.

However, NASA employees who have a significant role in any pending matter affecting the interests of Umbra Lab, Inc., 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