



December 2, 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 Second Annual Joint Space Association Holiday Party on December 9, 2025

On December 9, 2025, Aerospace Industries Association, Coalition for Deep Space Exploration, Satellite Industry Association, and Commercial Space Federation, as the primary co-host will host its annual holiday gathering at the National Housing Center in Washington, DC, from 5:30 p.m. to 8:00 p.m.

American Institute of Aeronautics and Astronautics, American Astronautical Society, Computer & Communications Industry Association, Secure World Foundation, Space for Humanity, Space Enterprise Council, U.S. Chamber of Commerce, and NewSpace Nexus are also sponsors of the event, along with the hosts. All of the sponsors and hosts are either non-profit organizations, industry groups, or non-profit trade associations.

Approximately 250 – 350 people have been invited to attend this invitation-only event. Attendees will have a diversity of views or interests and will include representatives from industry, associations, other federal agencies, and the U.S. legislative branch. The estimated cost of the event, including all food and beverages, is \$40 per person.

Commercial Space Federation 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 sponsors 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 Commercial Space Federation or any of the other co-hosts and sponsors, 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