



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

March 17, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the 2026 Artemis Suppliers Conference on March 19, 2026

On March 23-25, 2026, the 2026 Artemis Suppliers Conference will be hosted at the Ronald Reagan Building and Trade Center (RRBTC) in Washington, DC by nine companies and the Coalition for Deep Space Exploration. The nine prime event sponsors are Boeing, Lockheed Martin, Northrop Grumman, L3Harris, Amentum, Bechtel, Blue Origin, Axiom, and Lanteris.

The Conference will begin at 1:30 pm on March 23 and end on March 25 with various functions occurring at the RRBTC, a Congressional reception in the Hart Senate Office Building, and meetings on Capitol Hill with supplier representatives as follows:

- Monday, March 23 – Networking reception: \$35 per person for hors d’oeuvres and alcoholic or non-alcoholic beverages
- Tuesday, March 24 – Continental breakfast: \$33 per person
- Tuesday, March 24 – Congressional reception: \$35 per person for hors d’oeuvres and alcoholic or non-alcoholic beverages.

Coffee, tea, and water will also be available to conference attendees.

This Conference also includes an Artemis-branded scarf that will serve as a memento that will be available for each Conference attendee as a giveaway at check in. The value is approximately \$10, which may be accepted under the exception allowing gifts not exceeding \$20, if the employee will not have accepted gifts from any of the nine prime event sponsors exceeding \$50 in 2026.

Approximately 700 people have been invited to attend. Guests of NASA personnel are not invited. Attendees will have a diversity of views or interests and will include hundreds of Artemis suppliers nationwide, representatives from NASA, eight Artemis industry prime contractors, trade associations, and consultants, along with a limited number of Congressional members and selected Hill staff to speak during the Conference and a larger number of Congressional staff and members to the Tuesday evening Congressional reception.

The nine prime event sponsors 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).

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 any of the nine prime event sponsors or the Coalition for Deep Space Exploration 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