



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

March 13, 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 Amazon, Smithsonian, and Space for Humanity Event on March 16, 2026

On March 16, 2026, Amazon.com, Inc., in partnership with the Smithsonian National Air and Space Museum and Space for Humanity, a 501(c)(3) non-profit organization, will host a reception, integrated speaking program, and movie screening at the Smithsonian National Air and Space Museum in Washington, DC, starting at 7:00 pm at which the NASA Administrator will speak. The movie screening will begin at 8:11 pm. The purpose of the event is to connect with space policy leaders to discuss and disseminate information about NASA's programs and activities, including by comparing current program information with artistic depictions in film.

Approximately 300 people are expected to attend. Guests of NASA personnel are not invited. Attendees will have a diversity of views or interests and will include representatives of state and local government, academia, media, and industry, as well as members of Congress, personnel from other federal agencies, and members of the public. The estimated value of the reception, including all food and beverages, is \$14 per person. The movie screening is valued at \$14.99, which may be accepted without reimbursement under the exception allowing gifts not exceeding \$20 (the "\$20 rule"), so long as the employee will not thereby have accepted gifts from Amazon exceeding \$50 in 2026.

Amazon, the Smithsonian, and Space for Humanity 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 Amazon or Space for Humanity, 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