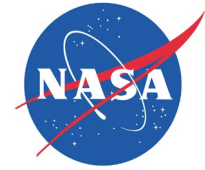


National Aeronautics and  
Space Administration

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



March 23, 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  
Space Exploration Technologies Event on March 24, 2026

On March 24, 2026, the Space Exploration Technologies (SpaceX), will host a networking reception at the National Portrait Gallery, Washington, D.C. from 8:00 pm to 11:00 pm.

Approximately 150 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 in addition to SpaceX employees, representatives of other companies and other federal agencies. The estimated cost of the event, including all food and beverages, is \$ 75 per person.<sup>1</sup>

SpaceX 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.

However, NASA employees who have a significant role in any pending matter affecting the interests of SpaceX, 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

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<sup>1</sup> This event also includes a variety of gifts for attendees to take as they leave the event. The gifts range in value from \$3 to \$20 each. Attendees are expected to use their discretion to determine how many gifts they can accept, as SpaceX will be offering up to 3 gifts per person. NASA employees may accept these gifts under the exception allowing gifts not exceeding \$20 in the aggregate, if the employee will not have accepted gifts from SpaceX exceeding \$50 in 2026.