



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

April 10, 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 41st Space Symposium and concurrent events, April 13 – 16, 2026

On April 13– 16, 2026, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code will host the 41st Space Symposium in Colorado Springs, Colorado. Complementary Government registration will be covered under the authority of 31 U.S.C. §1353, Gifts of Travel From Non-Federal Sources, using NASA Form 1167. Invitations to additional events may have been provided by the sponsor. The Space Foundation is in control of the arrangements, invitations, and seating for most of the events taking place at the Broadmoor Hotel.¹ The following events will be held in conjunction with the Space Symposium:

1. On April 12, 2026, the Space Foundation will host the Space Foundation Board Chairman's Reception from 6:30 p.m. to 8:30 p.m. at Cheyenne Mountain Resort, Colorado Springs, Colorado. Approximately 300 people are expected to attend. Attendees will have a diversity of views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$55 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.
2. On April 12, 2026, The Aerospace Corporation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and TechCrunch will co-host an Innovators Reception 2026 from 6:00 p.m. to 8:00 p.m. at the Broadmoor West, West Ballroom. Approximately 100 people are expected to attend. Attendees will have a diversity of views or interests and will include space industry executives, senior military leaders, individuals from startups, investors, and federal employees. The estimated cost of the event, including all food and beverages, is approximately \$67 per person. Attendance at this event will allow NASA employees who are speaking at an event during the symposium to exchange information regarding various NASA programs. Guests are not invited.
3. On April 13, 2026, The Coalition for Deep Space Exploration (CDSE) will hold its annual CDSE luncheon from 12:30 p.m. to 2:00 p.m. at the Dow Finsterwald Room at the Broadmoor Golf Club. Approximately 187 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include industry representatives across the supply chain for various NASA missions. No media will be in attendance. The estimated cost of the event, including all

food and beverages, is approximately \$75.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

4. On April 13, 2026, the Space Foundation will hold a New Generation Space Leaders Luncheon from 4:30 p.m. to 5:30 p.m. at the Cheyenne Mountain Resort, Colorado Springs, Colorado. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies and the legislative branch, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$30 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.
5. On April 13, 2026, the Space Foundation and El Pomar Foundation (a 501 (c)(3) exempt private foundation) will co-host a pre-ceremony speaker reception from 4:45 p.m. to 6:00 p.m. at the Broadmoor Hotel. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$25 per person. Attendance at this event will allow NASA employees who are speaking at an event during the symposium to exchange information regarding various NASA programs. Guests are not invited.
6. On April 13, 2026, the Space Foundation and the Artemis Group will co-host a Government Affairs Social from 4:45 p.m. to 6:00 p.m. at the Broadmoor Hotel. Approximately 150 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies and the legislative branch, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$34.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
7. On April 13, 2026, the Space Foundation and RTX will co-host a Welcome Reception from 5:15 p.m. to 6:00 p.m. at the Broadmoor Hotel. Approximately 500 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies and the legislative branch, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$30.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
8. On April 13, 2026, Vast Space, LLC will hold a reception from 6:00 p.m. to 10:00 p.m. at the Golden Bee Gastropub, in the Broadmoor Hotel. Approximately 400 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign

governments. The estimated cost of the event, including all food and beverages, is approximately \$50.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

9. On April 13, 2026, the Space Foundation and Intuitive Machines will co-host a Heads of Agency Reception from 7:45 p.m. to 9:30 p.m. at the Broadmoor Hotel. Approximately 125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies and the legislative branch, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$34.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
10. On April 13, 2026, the Space Foundation and Boeing will co-host an Opening Night Celebration from 8:30 p.m. to 10:00 p.m. at the Broadmoor. Approximately 500 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include agency directors/managers from other federal agencies and the legislative branch, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$170 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
11. On April 13, 2026, the Space Foundation and International Astronautical Federation (IAF) will co-host a Salon Breakfast: International Astronautical Federation from 7:15 a.m. to 8:30 a.m. at the Broadmoor Hotel. Approximately 100 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$74 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
12. On April 14, 2026, the Space Foundation and Amazon Web Services will co-host an Amazon Web Services Salon Breakfast from 7:15 a.m. to 8:30 a.m. at the Broadmoor Hotel. Approximately 50-125 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
13. On April 14, 2026, the Space Foundation and Oklahoma Department of Commerce will co-host an Oklahoma Department of Commerce Salon Breakfast from 7:15 a.m. to 8:30 a.m. in the Broadmoor Hotel. Approximately 50-125 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign

governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

14. On April 14, 2026, the Space Foundation and Vast will co-host a Vast Salon Breakfast from 7:15 a.m. to 8:30 a.m. in the Broadmoor Hotel. Approximately 50-125 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
15. On April 14, 2026, Blue Origin will hold a Blue Ring Breakfast at 7:15 a.m. to 8:30 a.m. in the Everest Cottage, at The Broadmoor Hotel. Approximately 100 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies, industry representatives and other guests. The estimated cost of the event, including all food and beverages, is approximately \$40.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests of NASA personnel are invited.
16. On April 14, 2026, the World Economic Forum will hold a World Economic Forum Breakfast from 7:15 a.m. to 8:30 a.m. at the Broadmoor. Approximately 50-125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$85 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Guests are not invited.
17. On April 14-16, 2026, from 7:30 a.m. to 3:00 p.m. daily, Voyager Technologies will host a Voyager House Coffee Bar at the Broadmoor. Approximately 2000 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$15 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs.
18. On April 14, 2026, Voyager Technologies will host a Voyager Food Truck at the Broadmoor. Approximately 200-300 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$45 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs.

19. On April 14, 2026, the Space Foundation and Lockheed Martin will co-host a Global Space Collaboration Luncheon from 12:15 p.m. to 1:45 p.m. in the Broadmoor. Approximately 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$130 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs.
20. On April 14, 2026, the Space Foundation and SAIC will hold an SAIC Salon Luncheon from 12:15 p.m. to 1:45 p.m. in the Broadmoor Hotel. Approximately 50-200 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
21. On April 14, 2026, BAE Systems will hold a BAE Salon Luncheon from 12:15 p.m. to 1:45 p.m. in the Broadmoor Hotel. Approximately 50-200 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
22. On April 14, 2026, the Space Foundation and Northrop Grumman will hold a Northrop Grumman Salon Luncheon from 12:15 p.m. to 1:45 p.m. in the Broadmoor Hotel. Approximately 50-200 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
23. On April 14, 2026, the Space Foundation and RTX will co-host an International Military Leaders Reception from 5:00 p.m. to 6:15 p.m. at the Broadmoor Hotel. Approximately 250 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$10 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Guests are not invited.

24. On April 14, 2026, the Space Foundation and El Pomar Foundation will co-host a Corporate Member Appreciation Reception from 5:15 p.m. to 7:15 p.m. at the Broadmoor Hotel. Approximately 125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$25 per person. Attendance at this event will allow NASA employees who are speaking at an event during the symposium to exchange information regarding various NASA programs. Guests are not invited.
25. On April 14, 2026, Lockheed Martin will hold a private reception from 5:30 p.m. to 7:30 p.m. at the Broadmoor Hotel. Approximately 200 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.
26. On April 14, 2026, Integrate and Second Front will co-host Low Earth Luau from 7:00 p.m. to 10:00 p.m. at the Shrunken Head Tiki Bar, Colorado Springs, Colorado. Approximately 100 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and non-profits. The estimated cost of the event, including all food and beverages, is approximately \$58.50 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
27. On April 14, 2026, Astrion will hold a reception starting at 7:00 p.m. at the Broadmoor (Cheyenne Mountain Suite North). Approximately 200 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
28. On April 14, 2026, Ansys – with sub-sponsors Astranis and SimuTech will hold a Space Symposium “Casino Night” from 7:30 p.m. – 10:30 p.m., at the Broadmoor. The planned reception includes non-monetary, casino-themed game activities. There will be no exchange of money, no wagering, and all activities are for thematic entertainment only. All registrants of the 2026 Space Symposium are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is

approximately \$80 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

29. On April 15, 2026, the Space Foundation and Hawkeye 360 will co-host a Salon Breakfast: Hawkeye 360 from 7:15 a.m. to 8:30 a.m. at the Broadmoor. Approximately 50-125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
30. On April 15, 2026, the Space Foundation and Voyager Technologies will co-host a Salon Breakfast: Voyager Technologies from 7:15 a.m. to 8:30 a.m. at the Broadmoor. Approximately 50-125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
31. On April 15, 2026, the Space Foundation and Astra will co-host a Salon Breakfast: Astra from 7:15 a.m. to 8:30 a.m. at the Broadmoor. Approximately 50-125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
32. On April 15, 2026, the Space Foundation and RTX will co-host a Salon Breakfast: RTX from 7:15 a.m. to 8:30 a.m. at the Broadmoor. Approximately 50-125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
33. On April 15, 2026, the Space Foundation will hold an Astronaut Reunion Breakfast from 7:30 a.m. to 8:45 a.m. at the Broadmoor. Approximately 50 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

34. On April 15, 2026, the Space Foundation and the Luxembourg Space Agency will co-host an Exhibitor Breakfast from 7:30 a.m. to 9:00 a.m. at the Broadmoor. Approximately 270 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
35. On April 15, 2026, the Space Foundation will hold a Space Technology Hall of Fame and Awards Luncheon from 12:15 p.m. to 1:45 p.m. at the Broadmoor. Approximately 400 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$130 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.
36. On April 15, 2026, Aerospace Industries Association (AIA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will hold a Space Policy Networking Luncheon from 12:15 p.m. to 1:45 p.m., at the Broadmoor Hotel. Approximately 300 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
37. On April 15, 2026, the California Governor's Office of Business and Economic Development will hold the California Governor's Office of Business and Economic Development Salon Luncheon from 12:15 p.m. to 1:45 p.m., at the Broadmoor Hotel. Approximately 50-200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
38. On April 15, 2026, Bank of America will hold the Bank of America Salon Luncheon from 12:15 p.m. to 1:45 p.m., at the Broadmoor Hotel. Approximately 50-200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this

event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

39. On April 15, 2026, the Ohio Economic Development Corporation will hold the JobsOhio Salon Luncheon from 12:15 p.m. to 1:45 p.m., at the Broadmoor Hotel. Approximately 50-200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
40. On April 15, 2026, Blue Origin will hold a reception from 5:00 p.m. to 7:00 p.m. in the Everest Cottage, at The Broadmoor Hotel. Approximately 400 – 500 people are invited to attend. This event provides for informal discussion with people who have diverse views or interests and will include NASA personnel, DoD personnel, congressional staff, industry representatives, academia, and other guests. The estimated cost of the event, including all food and beverages, is approximately \$105.00 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. An attendee guest is invited.
41. On April 15, 2026, the Astranis Space Technologies Corp. will host an Astranis Reception from 5:30 p.m. to 7:30 p.m. at 21 2nd St, Colorado Springs, Colorado. Over 200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include industry representatives, personnel from other Federal Agencies/DoD, other contractors, international government representative, and other Space Symposium attendees. The estimated cost of the event, including all food and beverages, is approximately \$20 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. An attendee guest will be accepted if accompanied.
42. On April 15, 2026, the Space Foundation will host an executive leadership dinner from 6:30 p.m. to 9:30 p.m. at the Broadmoor Fish House. Approximately 25 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, and associations. The estimated cost of the event, including all food and beverages, is approximately \$270 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Guests are not invited.
43. On April 15, 2026, Voyager Technologies will hold a Starlab reception from 6:00 p.m. to 9:00 p.m., at the Broadmoor Estate House. Approximately 400 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$30 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

44. On April 15, 2026, Boryung (ROK) will host a Humans in Space Networking Reception 6:00 p.m. to 9:00 p.m. in Colorado Springs, Colorado. Approximately 100-200 people are expected to attend. Attendees will have a diversity of views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, media, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Attendance at this event will allow NASA employees and a guest to exchange information regarding various NASA programs.
45. On April 15, 2026, the Consulate-General of Japan in Denver, Japan-America Society of Southern Colorado, Japan-America Society of Colorado, and the Japan Aerospace Exploration Agency will co-host a Japan-U.S. Space Industry Reception from 7:00 p.m. to 9:00 p.m. at View House, Colorado Springs, Colorado. Approximately 100-200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
46. On April 15, 2026, Astranis will hold a private reception from 7:00 p.m. to 9:00 p.m., at the Broadmoor Estate House, 60 1st Street. Approximately 400 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$30 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
47. On April 15, 2026, AE Industrial Partners, Redwire, Firefly Aerospace, and Applied Composites will hold a Space Symposium Sci-Fi Networking Luncheon from 7:00 p.m. to 9:00 p.m., at the Broadmoor Estate House. Approximately 400 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, state and local officials, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$30 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.
48. On April 15, 2026, SpaceX will hold a Satellite Reception 2026 from 8:00 p.m. to 11:00 p.m., at the Broadmoor Hotel. Approximately 175 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies, representatives from industry, academia, and commercial space partners. The estimated cost of the event, including all food and beverages, is approximately \$50 per person.

Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Guests are not invited.

49. On April 16, 2026, the Space Foundation will hold a Leonardo DRS Breakfast from 7:15 a.m. to 8:30 a.m. in the Broadmoor West, West Ballroom. Approximately 50-125 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$70 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Guests are not invited.
50. On April 16, 2026, Exploration Laboratories LLC will hold an ExLabs Planetary Defense Salon Luncheon from 12:15 p.m. to 1:45 p.m. at the Broadmoor. Approximately 50-200 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$95 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Guests are not invited.
51. On April 16, 2026, the Space Foundation will hold a Space Warfighters Dinner from 7:00 p.m. to 9:00 p.m. in the Broadmoor West, International Center. Approximately 300 people are expected to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and foreign governments. The estimated cost of the event, including all food and beverages, is approximately \$100 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Guests are not invited.

I find that these events meet the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs, and operations. Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the organization hosting the event as specified herein may accept an invitation for free attendance to that event, except as noted below. 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.ⁱⁱ For those events that are providing or offering gifts to attendees, NASA employees may accept these gifts under the \$20 gift exception set forth at 5 C.F.R. § 2635.204(a), that allows the employee to accept gifts not exceeding \$20 in the aggregate if the employee will not have accepted gifts from the one source exceeding \$50 in 2026.

Additionally, one guest of NASA employees may attend the events to which the employee and a guest have been invited. Also, NASA employees who have a significant role in any pending matter affecting the interests of any of the hosts of any event they wish to attend, 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.ⁱⁱⁱ

This widely attended gathering determination does not cover the receptions in hospitality suites that may occur during the 41st Space Symposium. These suites will be hosted by corporate sponsors. NASA employees who are invited may receive refreshments provided in these suites under the exception to the gift rules that allows acceptance of gifts (including refreshments and tangible gift items) with an aggregate value of \$20 or less per event. Attendees are reminded that this \$20 gift exception at 5 C.F.R. § 2635.204(a), allows acceptance of no more than \$50 from one source in a calendar year.

In addition, NASA employees may accept invitations to attend the following events under the Foreign Gifts and Decorations Act^{iv}:

Monday, April 13: Australia Welcome Reception, 4:00 p.m. to 6:00 p.m., the Broadmoor

Tuesday, April 14: South Australia Reception: 4:00 p.m. to 6:00 p.m., the Broadmoor

Wednesday, April 15: Canada Reception: 5:30 p.m. to 7:00 p.m., Penrose Heritage Museum. Colorado Springs, Colorado

If employees have any questions on any individual event listed, please contact your local NASA ethics official.

Adam F. Greenstone

ⁱ Certain companies which support the symposium will provide very light snacks and non-alcoholic beverages during morning and afternoon breaks and at some breakout lectures or discussions. This modest fare is not considered a gift under Federal ethics requirements. See 5 C.F.R. § 2635.203(b)(1).

ⁱⁱ In addition, employees may accept free attendance at events at which they are speaking pursuant to 5 C.F.R. 2635.203(b)(8)(i).

ⁱⁱⁱ NASA employees who are attending the 40st Space Symposium pursuant to a registration fee NASA has paid for or through sponsored travel approval pursuant to 31 U.S.C. §1353 may attend any of the events hosted by the Space Foundation provided by those approvals.

^{iv} When the gift of free attendance is from a foreign government, as in the case of the receptions listed above or any foreign government, acceptance of the gift is authorized by the Foreign Gifts and Decorations Act.