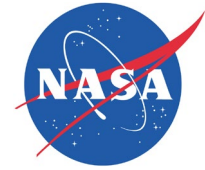


National Aeronautics and
Space Administration



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

May 8, 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 Congressional Reception honoring the Artemis II crew on May 12, 2026

On May 12, 2026, Space Transportation Association (STA) will host a reception honoring the Artemis II crew at the Russell Senate Office Building from 4:30 p.m. to 6:30 p.m. Amentum Holdings, the Boeing Corp., Lockheed Martin, Northrop Grumman, and L3Harris Technologies are sponsors of the event, for which STA controls the invitations and there is no seating.

Approximately 1,000 people have been invited to attend this invitation-only event. Attendees will have a diversity of views or interests and will include members of Congress, congressional staff, and representatives of industry, suppliers, trade associations, federally financed research and development centers (FFRDCs), space-related non-governmental organizations; and local state governments. The estimated cost of the event, including all food and beverages, is \$38 per person.

There will be some mission-related items available for attendees when they depart the event: Artemis branded Moon Pies; Artemis II patches; Freedom 250 mission patches; and Artemis II pins. NASA employees may accept these perishable and presentation items.

STA is primarily 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, along with the opportunity for Congressional stakeholders, industry partners, and other attendees to share perspectives on the success of the mission. 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 STA, 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