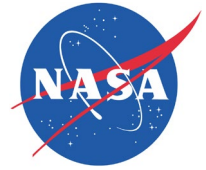


Mary W. Jackson Building NASA Headquarters
Washington, DC 20546-0001



June 25, 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 Rocket Lab
USA Rockets Red Glare Reception on June 25, 2026

On June 25, 2026, Rocket Lab USA, will host a reception on its office rooftop at 700 Pennsylvania Ave SE, Washington, DC, from 5:00 to 7:00 p.m. The purpose of the reception is to celebrate the 250th anniversary of the signing of the Declaration of Independence and the 20th anniversary of Rocket Lab

Approximately 80 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 personnel from the U.S. legislative branch, representatives from industry and trade groups, employees of other federal agencies, and embassy staff. The estimated cost of the event, including all food and beverages, is \$70 per person.

Rocket Lab USA will provide giveaways to include key chains and stickers, valued under \$5 each, and t-shirts, valued \$18 each. NASA employees may accept gifts under the \$20 gift exception set forth at 5 C.F.R. § 2635.204(a), which 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. Note that use of this exception does not allow an employee to accept a key chain or sticker in conjunction with a t-shirt.

Rocket Lab USA 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 Rocket Lab USA, 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