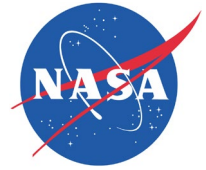


Mary W. Jackson Building NASA Headquarters
Washington, DC 20546-0001



July 9, 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 Opening of the RTX Living in the Space Age Hall at the Smithsonian National Air and Space Museum hosted by Blue Origin on July 14, 2026

On July 14, 2026, Blue Origin will host a reception celebrating the opening of the RTX Living in the Space Age Hall at the Smithsonian National Air and Space Museum, 650 Jefferson Dr SW, Washington, DC, from 7:00 p.m. to 10:00 p.m.

Approximately 400 people have been invited to attend. Guests of NASA attendees are invited to attend. Attendees will have a diversity of views or interests and will include representatives from industry, government, academia, and other guests. The estimated cost of the event, including all food and beverages, is \$83 per person.

Blue Origin will provide company swag for the attendees to take if they choose. The total retail value of each item is under \$20. NASA employees may accept 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.

Blue Origin 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 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 Blue Origin, 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