



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

July 15, 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 Celebrating Viking: The First U.S. Landing on Another Planet Event on July 20, 2026

On July 20, 2026, The Planetary Society, with Johns Hopkins University, National Air & Space Museum, and SpaceNews (collectively, “sponsors”), will host a reception entitled “Celebrating Viking: The First U.S. Landing on Another Planet” at the Cannon House Office Building, 27 Independence Ave SE, Washington, DC, from 5:00 p.m. to 7:00 p.m. with panel discussions from 3:00 p.m. to 5:00 p.m. The purpose of the event is to celebrate the American legacy of leading the world in Mars exploration.

Approximately 750 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 the legislative branch, space industry professionals, and media. The estimated cost of the event, including all food and beverages, is \$15 per person.

Some exhibitors will have swag available during the reception for attendees to take if they choose. The total retail value of each item is less than \$5. 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.

The Planetary Society 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 any of the sponsors (including their subsidiaries), 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