National Aeronautics and
Space Administration

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

November 13, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at Rocket Lab's 100th Electron Launch Celebration on November 18, 2026

On November 18, 2026, Rocket Lab will host a reception to celebrate its 100th Electron Launch at Love, Makoto, 200 Massachusetts Ave NW, Washington, DC, from 5:30 p.m., to 7:30 p.m.

Approximately 650 people have been invited to attend. Attendees will have a diversity of views or interests and will include Congressional representatives and staffers, academia, industry and science policy employees, personnel from other Federal Agencies, members of the public, and media. Guests of attendees are invited.

The estimated cost of the event, including all food and beverages, is $30 per person. The following gifts will be available for attendees to choose: stickers ($1), pens ($3.25), lapel pins ($2.50), keychains ($1.50), hats ($8), socks ($3), bracelets ($1), and t-shirts ($18). NASA employees may accept gifts in combination 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.

Rocket Lab is in control of the organizing and planning for this event, and has numerous organizations that contributed to sponsoring the 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 for themselves and a guest 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, 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 Greenstone

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Adam F. Greenstone