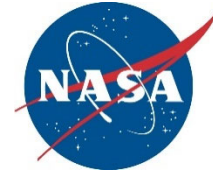


National Aeronautics and Space Administration



**Langley Research Center**  
100 NASA Road  
Hampton, VA 23681-2199

February 2, 2024

Reply to Attn of: 30/Office of General Counsel

TO: Office of Director

FROM: Chief Counsel

SUBJECT: Ethics Determination Regarding NASA Employee Attendance at the 2024 VABA Aviation, Aerospace and Advanced Air Mobility Legislative Reception, Wednesday, February 7, 2024

On February 7, 2024, the Virginia Aviation Business Association (VABA) will host a reception and exhibit hall. This event will be held at Main Street Station, Richmond, Virginia.

VABA expects at least 500 people to attend, including NASA employees, military and civilian employees of other federal agencies, government support contractors, industry partners, educators, state and local community leaders, state elected officials, and members of the public. Historically, approximately 50 NASA employees have attended this annual event.

The event will include remarks by the Virginia Governor and an exhibit hall for attendees to visit. There will be ample opportunities to network among the invited guests. The reception will include food and beverages with a registration cost of \$100 per person.

In addition to VABA hosting this event, the sponsors will include Science Applications International Corporation, the Virginia Spaceport Authority, KBR, Signature Aviation, Science Systems and Applications, Inc., the Virginia Institute for Spaceflight & Autonomy, and others.

In accordance with 5 C.F.R. §2635.204(g) and 14 C.F.R. §1207.103, I find that this event meets the definition of a “widely attended gathering.” I also find that there is an Agency interest in having invited NASA personnel attend this event, as it will further agency programs and interests. NASA invitees will have the opportunity to discuss the Administration’s activities in Virginia, and exchange information on NASA programs. I further conclude that NASA’s interest in its employees attending this event outweighs any concern that attendance may appear to improperly influence NASA personnel in the performance of their official duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the reception.

NASA employees who have a significant role in any pending sensitive matter that will substantially affect the interests of the host and sponsors, and NASA employees who have non-career political appointments, are not covered by this determination, and should seek a determination from their ethics counselor regarding their participation in this event.

Questions about this ethics determination may be addressed to Rob Ayers at 757-864-7522 or [robert.w.ayers@nasa.gov](mailto:robert.w.ayers@nasa.gov).

Andrea Z. Warmbier  
Chief Counsel