

National Aeronautics and
Space Administration

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



April 1, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Innovation Takes Flight Spring Reception on April 2, 2025

On April 2, 2025, the Aerospace Industries Association (AIA) a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a reception, at the Rayburn Foyer, from 5:00 p.m. to 7:00 p.m. The event is to foster networking and discussions between Congressional members, staff, and key stakeholders on current aerospace and defense topics.

Approximately 300 people have been invited to attend. Attendees will have a diversity of views or interests and will include representatives from federal, state, and local government, academia, industry, NASA personnel, media and non-profits. The estimated cost of the event, including all food and beverages, is \$30 per person. The Aerospace Industries Association 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 for themselves and a guest (if invited) 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 the (AIA), 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