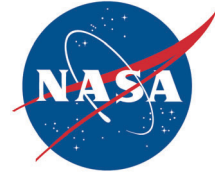


Lyndon B. Johnson Space Center

2101 NASA Parkway
Houston, TX 77058-3696



April 8, 2025

Reply to Attn of: AL-25-024

TO: Distribution

FROM: AL/Deputy Chief Counsel, Acting

SUBJECT: Determination Regarding Attendance by NASA Employees at the RNASA Awards Banquet and Stellar Awards Luncheon on April 25, 2025

On April 25, 2025, the Rotary National Award for Space Achievement (RNASA) Foundation will host its 37th annual awards banquet at the Hyatt Regency Houston in Houston, Texas. The banquet includes the presentation of RNASA's National Space Trophy and the Stellar Awards given to various individuals for accomplishments in spaceflight, engineering, science, management, and education. The awards banquet will begin with a reception at 6 p.m. followed by dinner and the awards ceremony at 7 p.m.

The RNASA Foundation, a nonprofit organization under 501(c)(4) of the Internal Revenue Code, was founded by the Space Center Rotary Club of Houston, Texas, in 1985 to recognize achievements in space and create greater public awareness of the benefits of space exploration and to recognize the people whose work in the field of space exploration has lasting impact and benefits. RNASA carries out its goal through organizing an annual awards banquet. RNASA does not employ registered lobbyists, and is a distinct organization from, and not controlled by, the Rotary Foundation of Rotary International. Its operations are conducted by a committee of individuals and the trophy winner is selected by a board of advisors composed of eminent individuals from government, industry, and media, including former winners.

The estimated value of the banquet, including all food and drinks, is approximately \$110 per person. Approximately 720 attendees are expected to attend this event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, Congressional members and staff, members of the media, academia, industry, and representatives from international partner organizations. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs with attendees from other organizations. RNASA is in control of the invitations and arrangements, including seating, for the event.

Additionally, on April 25th, Stellar Award nominees are invited to a luncheon hosted by RNASA at the Hilton Hotel in Nassau Bay, Texas. The estimated value of the lunch,

including all food and drinks, is approximately \$27 per person. Approximately 135 attendees are expected to attend the luncheon. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, the media, academia, and industry. The Stellar Award nominees will receive a pen, book, and certificate with an expected value of \$20.

This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities. This event will further agency programs or operations including promoting community relations and providing the opportunity for the exchange of views and information between leaders within the Agency and a variety of academic, business, and leaders within the community. I find that this event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g).

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 for themselves and a guest, if applicable, to the events. 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.

NASA employees whose duties have a significant role in any matter affecting the interests of RNASA, such as procurement duties, program management, or negotiating a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.

Cody Corley Digitally signed by Cody Corley
Date: 2025.04.09 15:14:24
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Cody L. Corley

AA/S. A. Koerner
AA/D. M. Shafer
AA/D. A. Terrier
AA/S. M. Castillo
AD/D. R. Mathis
AD/A. Sanchez
AH/D. P. Costello
AH4/Z. J. Holliday
AJ/R. M. Neal-Mujahid
AL/R. T. Suratt
BA/B. J. Niese
BA/E. J. Schell
CA/N. D. Knight
CA/K. N. Lindgren

CA/M. T. Vande Hei
CA8/E. J. Nelson
CB/J. M. Acaba
CB/S. Furukawa
CB/A. E. Mogensen
CB/L. S. Parmitano
CB/S. Walker
CB6/M. R. Barratt
CB6/M. M. Behnken
CB6/R. J. Bresnik
CB6/M. S. Dominick
CB6/T. C. Dyson
CB6/J. J. Epps
CB6/R. T. Hines
CB6/W. W. Hoburg
CB6/S. G. Love
CB6/N. A. Mann
CB6/J. U. Meir
CB6/J. Moghbeli
CB6/D. R. Pettit
CB6/K. H. Rubins
CB6/S. D. Tingle
CB6/S. L. Williams
CB6/B. E. Wilmore
CB6/S. D. Wilson
DA/L. E. Kearney
EA/G. J. Lebeau
EA/J. K. White
FA/M. R. Abbott
FA/H. E. Ridings
FA/J. S. Stich
GA/H. C. Hu
GA/D. W. Korth
IA/T. P. LeBlanc
IA/J. F. Skelton
JA/M. B. Schwartz
LA/G. S. Obert
LA/S. H. Schmidt
MA/C. Garcia-Galan
MA/J. B. Olansen
NA/W. J. Lyles
OA/D. E. Contella
OA/D. J. Weigel
OB/O. B. Abotteen
OD/D. H. Korth

OR/T. H. Braithwaite
OS/T. Nishikawa
OT/E. J. Van Der Wal
OU/V. G. Priotto
ER/S. E. Fredrickson
SA/M. A. Frieling
SA/T. A. Taddeo
SA/R. L. Tures
SA2/D. K. Baumann
SA2/K. D. Pickering
SD/V. C. Herod
UA/A. T. Hart
XA/D. C. Gaines
XA/B. A. Laws
XI/E. K. Stansbery
VA/R. S. Jones
ARC/E. L. Tu
AFRC/B. Flick
GRC/J. A. Kenyon
GSFC/M. Lysrup
HQ/BG/C. Hansen
HQ/J. E. Petro
HQ/V. E. Wyche
HQ/C. Swails
HQ/T. Carlson
HQ/S. Shinn
HQ/J. M. Seaton
HQ/J. W. Pellicciotti
HQ/J. D. Polk
HQ/K. Elliott
HQ/K. Calvin
HQ/C. A. Weeden
HQ/I. Lan
HQ/E. Ho
HQ/K. Feldstein
HQ/M. Hone
HQ/D. Deneal
HQ/R. Pearce
HQ/L. Glaze
HQ/N. Fox
HQ/K. Bowersox
HQ/J. Montalbano
HQ/C. P. Turner
HQ/D. F. Mitchell
JPL/L. Leshin

KSC/R. DeLoach
KSC/K. M. Manning
LaRC/T. Dyal
MSFC/J. Pelfrey
SSC/J. W. Bailey
WSTF/RA/M. A. Burke
WSTF/RA/J. E. Noble