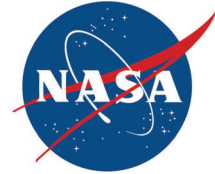


National Aeronautics and Space Administration

**Lyndon B. Johnson Space Center**

2101 NASA Parkway  
Houston, TX 77058-3696



August 13, 2025

Reply to Attn of: AL-25-039

TO: AA/D. M. Shafer

FROM: AL/C. L. Corley

SUBJECT: Widely Attended Gathering Determination for Dinner Regarding the International Astronautical Congress in 2029

On Monday, August 18, 2025, the Houston First Corporation, the Greater Houston Partnership, and the Bay Area Houston Economic Partnership will host a dinner at Vic & Anthony's Steakhouse at 6:30 PM to discuss Houston's vision for the International Astronautical Congress in 2029. Ms. Shafer has been invited to attend this dinner by the Houston First Corporation.

The dinner will consist of food and beverages with no gifts provided to attendees. The cost of the dinner is approximately \$150 per person. Additionally, this dinner is invitation only and the guests of attendees are not invited. The dinner will be attended by people of diverse backgrounds. There are approximately 20 invited guests including various aerospace industry leaders, employees of the Texas Space Commission, employees of the Houston Spaceport, and the CEO of the American Institute of Aeronautics and Astronautics (AIAA).

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 leadership within the Agency and leaders within the community and the aerospace industry. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

It is my determination that it is in the Agency's interest for Ms. Shafer to attend this dinner. I have considered the importance of this event to the Agency, the purpose of this event; the identity of other expected participants, and the market value of the gift of free attendance at the event to Ms. Shafer. After considering these factors, I have determined that the Agency's interest in attendance by Ms. Shafer at this event outweighs any concern that the acceptance of items being provided at the dinner may, or may appear to, improperly influence Ms. Shafer

in the performance of her official duties. Accordingly, Ms. Shafer is authorized to attend the dinner and accept any food and refreshments offered in conjunction with this event.

**Cody Corley** Digitally signed by Cody Corley  
Date: 2025.08.14 12:32:25  
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Cody L. Corley  
Deputy Chief Counsel, Acting