

National Aeronautics and
Space Administration

John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191



August 25, 2025

Reply to Attn of: G

TO: Distribution

FROM: G/Chief Counsel, Deputy Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Ohio Aerospace Institute's (OAI) "An Evening with the Stars: Transforming the Impossible into Opportunity"

The OAI, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host "An Evening with the Stars: Transforming the Impossible into Opportunity" at Great Lakes Science Center, 601 Erieside Avenue, Cleveland, Ohio 44114 on September 10, 2025, at 5:00 pm. This event will focus on increasing awareness of Glenn Research Center's (GRC) unique contributions to research and technology within the region and the nation, with presentations by Gabriel Benavides, Rocco Viggiano, and Sarah Dever.

Approximately 330 people are expected to attend the event. Attendees will have a diversity of views or interests and will include representatives from industry and academia, NASA personnel, congressional leaders, and employees of federal agencies. The estimated cost of the event, including food and beverages, is approximately \$150 per person. There will also be valet parking at \$15 per person.

Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. There is also an Agency interest in having NASA personnel attend this event because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA's policies, programs and operations. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

Therefore, 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 sponsor, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from my office as to whether they may accept the invitation.

James W. Jackson