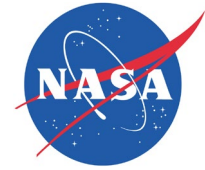


National Aeronautics and  
Space Administration



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

November 21, 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 Women in Aerospace Awards Dinner and Ceremony on December 11, 2025

On December 11, 2025, Women in Aerospace (WIA), a 501(c)(4) non-profit organization, will host an awards dinner and ceremony honoring accomplishments of individuals in the aerospace industry at The Ritz-Carlton, Pentagon City, 1250 South Hayes Street, Arlington, VA, starting at 6:00 p.m. for a cocktail reception and dinner beginning at 7:00 p.m.

Approximately 500 people have been invited to attend this event. Attendees will have a diversity of views or interests and will include representatives from Congress, state and local officials, academia, industry representatives, employees of Federal agencies, and the media. The estimated cost of the event, including all food and beverages, is \$250 for members and \$300 for non-members.

Four scholarships will be presented and award recipients will be recognized with the following awards: Aerospace Awareness Award; Aerospace Educator Award, K-12; Aerospace Educator Award, Higher Ed; Initiative, Inspiration, Impact Award; Leadership Award; Outstanding Achievement Award; and Lifetime Achievement Award.

WIA 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 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 WIA, 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