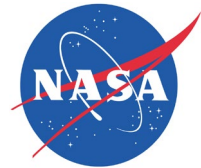


National Aeronautics and
Space Administration

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



January 23, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the California
Manufacturers & Technology Association Reception on January 24, 2026

On January 24, 2026, the California Manufacturers & Technology Association (CMTA), a 501(c)(6) nonprofit organization, will host a standing reception at Fleming's Steakhouse in Pasadena, CA from 6:30 p.m. to 8:00 p.m.

Approximately 30 people have been invited to attend. Attendees will include academic and industry representatives with a diversity of perspectives and interests. The estimated cost of the event, including all food and beverages, is \$88 per person. Attendees may bring a guest.

CMTA 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 CMTA 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.¹

However, NASA employees who have a significant role in any pending matter affecting the interests of CMTA 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

¹ NASA officials and employees who will present information on behalf of the Agency at the event, as well as NASA personnel deemed essential by NASA to accompany them, may also accept free attendance pursuant to the "speaker's exception" at 5 CFR 2635.203(b)(8).