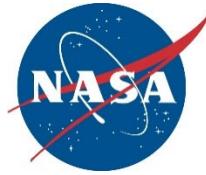


National Aeronautics and Space Administration

Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



January 30, 2026

Reply to Attn of: 30/Office of General Counsel

TO: Distribution

FROM: Office of General Counsel - Langley

SUBJECT: Ethics Determination Regarding NASA Employee Attendance at the 2026 VABA Aviation, Aerospace and Advanced Air Mobility Legislative Reception, February 4, 2026

On February 4, 2026, the Virginia Aviation Business Association (VABA) will host a reception and exhibit hall. This event will be held at Main Street Station, located at 1500 E. Main Street, Richmond, Virginia.

At this event, the organizers had over 600 people attend last year and expect as many to attend this year, including invited NASA employees, military and civilian employees of other agencies, aerospace companies, government support contractors, educators, state and local community leaders, and state elected officials.

The event will include remarks by the Virginia Governor and an exhibit hall for attendees to visit. There will be ample opportunities to network among the invited guests. The reception will include food and beverages with a registration cost of \$100 per attendee.

In addition to the host of these events, other sponsors or presenters will likely include Virginia Dept. of Aviation, Signature Aviation, Virginia Spaceport Authority, Virginia Institute of Space and Autonomy, Virginia Innovation Partnership Corporation, Virginia Space Grant Consortium, Rocket Lab, Analytical Mechanics Associates, Virginia Economic Development Partnership, VASBA and others.

Invited NASA employee may accept free attendance. In accordance with 5 C.F.R. §2635.204(g) and 14 C.F.R. §1207.103, I find that these events meet the definition of a “widely attended gathering.” I also find that there is an Agency interest in having invited NASA personnel attend these events, as it will further agency programs and interests. NASA invitees will have the opportunity to discuss the Administration’s activities, and exchange information on NASA programs. I further conclude that NASA’s interest in its employees attending these events outweighs any concern that attendance may appear to improperly influence NASA personnel in the performance of their official duties.

NASA employees who have a significant role in any pending sensitive matter that will substantially affect the interests of the host and sponsors, and NASA employees who have non-career political appointments, are not covered by this determination, and should seek a determination from their ethics counselor regarding their participation in this event.

Questions about this determination may be addressed to Sara Rathgeber at 757-864-4301.

Andrea Z. Warmbier
Chief Counsel and
Agency Ethics Official