

**Lyndon B. Johnson Space Center**

2101 NASA Parkway  
Houston, TX 77058-3696



Reply to Attn of: AL-26-010

TO: Distribution

FROM: AL/Deputy Chief Counsel, Acting

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the Houston Livestock and Rodeo - NASA Night at the Rodeo

On March 7, 2026, The Houston Livestock and Rodeo (HLSR), a 501(c)(3) nonprofit organization, will host a NASA Night at the Rodeo at NRG Center and Stadium. NASA invitees will be offered access to the Tejas Reception, participation in the Grand Entry, and seats to watch the rodeo and concert in the Chairman's Club. At the reception, HLSR will offer attendees an hors d'oeuvres buffet and various alcoholic beverages. Following the reception, NASA invitees who are not participating in the Grand Entry will be escorted to the Chairman's Club at the Stadium to watch the rodeo and concert. The purpose of this event is to honor NASA's collaboration with HLSR on the mutual objective of improving U.S. education in the science, technology, engineering, and mathematics disciplines.

Attendance at the event is by invitation only and approximately 170 people are expected to attend. Approximately 35 NASA employees and their guests are invited to attend. Other expected attendees include HLSR board members and officers, and HLSR ex officios, including local, state, and federal elected officials. The estimated value of the event, including all food and drinks, tickets to the rodeo and concert, and parking, is approximately \$757 per NASA invitee and guest. Entertainment, food and refreshments cost approximately \$366 per person. Parking will also be provided, and a parking pass is valued at \$25.

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 leaders within the Agency and a variety of government and business leaders. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

NASA employees who do not have a significant role in a matter affecting the interests of

HLSR as well as NASA employees who have a significant role in the administration of the Space Act Agreements with HLSR for the Texas Aerospace Scholars and collaboration for community relations and education outreach activities may accept this invitation for free attendance for themselves and a guest to the event. 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.

NASA employees who have a significant role in any other pending matter affecting the interests of HLSR, such as procurement duties, or program management, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.

**AMY XENOFOS** Digitally signed by AMY  
XENOFOS  
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Amy V. Xenofos

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