

National Aeronautics and  
Space Administration

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



March 17, 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  
Satellite Industry Association Event on March 23, 2026

On March 23, 2026, the Satellite Industry Association (SIA), a nonprofit trade association under 501(c)(6), will host its 27th Annual Leadership Dinner at the International Spy Museum, 700 L'Enfant Plaza, SW, Washington, D.C. from 6:30 pm to 9:30 pm. The purpose of the Dinner is to celebrate the dynamic role that satellite technologies play in the nation's economic and national security and to also acknowledge leaders in government that have made a significant contribution to advancing satellite business and/or technology.

Approximately 200 senior-level individuals are expected to attend. Guests of NASA personnel are not invited. Attendees will have a diversity of views or interests and will include representatives of the U.S. legislative branch, the satellite industry, and other federal agencies and departments. The estimated cost of the event, including all food and beverages, is \$ 185 per person.

SIA 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 SIA, 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