

National Aeronautics and Space Administration

Lyndon B. Johnson Space Center

2101 NASA Parkway
Houston, TX 77058-3696



March 2, 2026

Reply to Attn of: AL-26-009

TO: Distribution

FROM: AL/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the Wells International Foundation International Women's Day Building a Legacy of Leadership Luncheon

On March 4, 2026, the Wells International Foundation (WIF) is hosting its International Women's Day Building a Legacy of Leadership luncheon at the Corinthian Houston from 11:30 am to 1:30 pm. This event honors the extraordinary women, men, and organizations whose leadership, service, and advocacy embody WIF's mission to empower women and girls worldwide. Invitation to the luncheon includes complimentary valet parking, admission, a seated lunch, and entertainment. No gifts, giveaways, or exclusive hospitality are expected. Sponsors of the event include United Airlines, FedEx, M&D Consulting, and Prairie View A&M University.

WIF is a U. S. non-profit organization whose mission is to empower women, children and youth, and persons of African descent to realize their highest potential through arts, literacy, study abroad, and other educational and cultural programs. During the luncheon, WIF will be presenting several awards that celebrate individuals and organizations whose leadership, service, and advocacy uplift women and girls. JSC Director Vanessa Wyche will be receiving the Extraordinary Public Service Award and the NASA invited attendees will be sitting at her table.

WIF's International Women's Day Building a Legacy of Leadership luncheon is an invitation-only event, with an expected attendance of approximately 150 individuals. Invitees include community leaders, educators, and media. The press has been invited through a media release. The value of the offered attendance (\$200) is reasonable and reflects the standard admission value for all attendees. Although QR codes for donations will be available at the event, the attendees are not required to donate and no fundraising solicitation is directed towards the NASA attendees.

Attendance at this event is in the agency's interest because it provides an opportunity to

engage with community leaders, educators, and local organizations relevant to NASA's public engagement, community partnership, and outreach activities. Participation facilitates awareness of community initiatives and offers an opportunity for NASA to maintain strong, positive relationships with Houston-area stakeholders. The event's focus on leadership and community engagement aligns with broader federal interests in public service, STEM engagement, and civic partnerships. The nature, size, and diversity of attendees qualify the luncheon as a “widely attended gathering” under 5 C.F.R. § 2635.204(g)(2).

NASA employees who do not have a significant role in a matter affecting the interests of the sponsors may accept an invitation for free attendance for themselves and a guest 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. Additionally, NASA employees who have a significant role in any pending matter affecting the interests of Wells International Foundation or its sponsors listed above, 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.”

**RANDALL
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cc:
HQ/Ethics Team