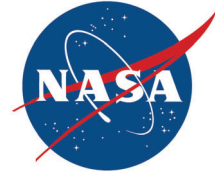


National Aeronautics and Space Administration

Lyndon B. Johnson Space Center

2101 NASA Parkway
Houston, TX 77058-3696



April 21, 2026

Reply to Attn of: AL-26-021

TO: Distribution

FROM: AL/Associate Chief Counsel for Operations

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the RNASA Awards Dinner and Stellar Awards Luncheon on April 24, 2026

On April 24, 2026, the Rotary National Award for Space Achievement (RNASA) Foundation, will host a reception and an awards dinner at the Hyatt Regency hotel in Houston, Texas, at 6:00 pm. The RNASA Foundation is a 501(c)(4) nonprofit organization and was founded by the Space Center Rotary Club of Houston, Texas in 1985 to recognize achievements in space and create greater public awareness of the benefits of space exploration. The RNASA Foundation does not employ registered lobbyists and is a distinct organization from the Rotary Foundation of Rotary International. The RNASA Foundation's annual awards dinner helps to fulfill its mission of recognizing the people whose work in the field of space exploration has had lasting impact and benefits. This is the 38th annual awards dinner for the presentation of the National Space Trophy, which is awarded to an outstanding American who has made major contributions to the United States space program. This year's National Space Trophy recipient is Peggy Whitson.

The event will include a reception with food and refreshments followed by dinner and the awards ceremony. The estimated value of the event, including all food and drinks, is approximately \$125 per person. Approximately 116 NASA employees are invited to attend and may each invite a guest. In total, approximately 800 attendees are expected to attend this event. Attendees will have a diversity of views or interests and will include representatives from Federal, and State government, members of academia, and various leaders of the aerospace industry. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs with attendees from other organizations.

Additionally, the Stellar Award nominees are invited to the Great Wolf Lodge in Webster, Texas for a luncheon hosted by the RNASA Foundation on the same day. The RNASA Foundation solicits Stellar Award nominations for space industry workers and teams deserving of special recognition. This year, there were 138 nominations including personnel

of various federal agencies, and various members of the aerospace industry. The estimated value of the lunch, including all food and drinks, is approximately \$58 per person. Approximately 20 NASA employees are invited to attend and may each invite a guest, approximately 130 attendees, along with their guests, are expected to attend the luncheon. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, and various members of the aerospace industry. The Stellar Award nominees are expected to receive a pen, book, and certificate for a total value of approximately \$20. The winner of the Stellar Award will receive a trophy valued at \$180.

These events are of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities. These events 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 academic, business, and leaders within the community. I find that this event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g).

It is my determination that it is in the Agency's interest for NASA invitees to attend the RNASA awards dinner and the Stellar Awards luncheon. Their attendance outweighs any concern that the acceptance of any benefits may, or may appear to improperly influence them in performance of their official duties. Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the RNASA Foundation are authorized to attend and to accept any food and refreshments offered in conjunction with this event for themselves and their invited guests. However, NASA employees whose duties may substantially affect the RNASA Foundation are not covered by this determination and should seek an individualized ethics determination from the Office of Chief Counsel regarding participation in this event pursuant to 5 C.F.R. §2635.204(g)(3).

AMY XENOFOS Digitally signed by AMY
XENOFOS
Date: 2026.04.21 12:01:04 -05'00'

Amy V. Xenofos
Associate Chief Counsel for Operations
on behalf of Chief Counsel

cc:
HQ/Ethics Team