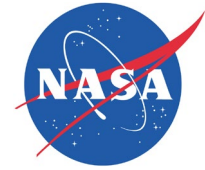


National Aeronautics and
Space Administration



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

June 10, 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
Greater Cleveland Partnership Event on June 10, 2026

On June 10, 2026, the Greater Cleveland Partnership, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a reception honoring the Ohio Congressional Delegation at the Rayburn House Office Building, Washington, DC, from 5:00 p.m. to 6:30 p.m.

Approximately 150 people have been invited to attend. Guests of NASA personnel are not invited. Attendees will have a diversity of views or interests and will include members of Congress, congressional staff, leaders from industry and academia, community leaders from across Northeast Ohio, local elected officials and staff, and personnel from Federal Agencies. The estimated cost of the event, including all food and beverages, is \$80 per person.

The Greater Cleveland Partnership 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 the Greater Cleveland Partnership, 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