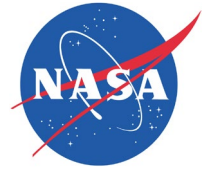


National Aeronautics and
Space Administration

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



May 29, 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 National Aeronautic Association Presentation of the Robert J. Collier Trophy Event on June 11, 2026

On June 11, 2026, the National Aeronautic Association (NAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will formally present the Robert J. Collier Trophy. AE Industrial Partners, the reception sponsor, will host a reception beginning at 6:00 p.m. followed by a dinner and reception hosted by Firefly Aerospace, the presenting sponsor, that will begin at 7:00 p.m. Both events will be held at the Hilton National Mall Wharf in Washington, DC.

Approximately 200 people have been invited to attend. Guests of NASA personnel are invited. Attendees will have a diversity of views or interests and will include members of Congress, state officials, NASA personnel, industry representatives (including National Aeronautic Association Board Members), and academia. The estimated cost of the event, including all food and beverages, is \$325 per person.

Firefly Aerospace and AE Industrial Partners are in control of organizing and planning this event, and NAA is in control of the invitations and seating chart. 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 NAA, Firefly Aerospace, or AE Industrial Partners 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 NAA, Firefly Aerospace, or AE Industrial Partners (including subsidiaries), 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