



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

June 15, 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  
Northrop Grumman Event on June 17, 2026

On June 17, 2026, Northrop Grumman will host a pre-launch reception at Rope Walk Restaurant, Chincoteague, VA, from 5:00 p.m. to 7:00 p.m. The purpose of the reception is to discuss the Pegasus launch of the LINK spacecraft from NASA Wallops Flight Facility.

Approximately 50-60 people are expected to attend. Guests of NASA personnel are not invited. Attendees will have a diversity of views or interests and will include state and local officials, as well as representatives of the U.S. legislative branch, academia, other federal agencies, media, other contractors, and the general public. The estimated cost of the event, including all food and beverages, is approximately \$75 per person.

Northrop Grumman 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 Northrop Grumman, 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