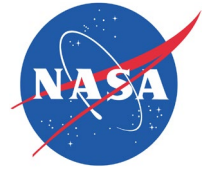


National Aeronautics and
Space Administration

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



September 18, 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 Aviation Hall of Fame Enshrinement Events on September 24, 2026

On September 24, 2026, the National Aviation Hall of Fame (NAHF), a 501(c)(3) organization under the Internal Revenue Code, will host its Enshrinement Ceremony at The Anthem in Washington, DC, beginning with a cocktail reception at 5:30 p.m., followed by dinner and the Enshrinement Ceremony that will end at 10:30 p.m. The purpose of the event is to honor individuals whose achievements and contributions have significantly advanced aviation and aerospace.

Approximately 550 people have been invited to attend. Attendees will have a diversity of views or interests and will include National Aviation Hall of Fame inductees and their families; Members of Congress and congressional staff; state and local officials; representatives from academia and industry; personnel from federal agencies; media; National Aviation Hall of Fame staff; and members of the public. Guests of attendees are invited.

The estimated cost of the event, including all food and beverages, is \$200 per person. NAHF is in control of the organizing and planning for this event, and has numerous corporate, organizational, and individuals that contributed to sponsoring the 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 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.

However, NASA employees who have a significant role in any pending matter affecting the interests of NAHF, 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.

The event has a fundraising component and the event program includes a QR code that provides attendees with an opportunity to make a voluntary contribution to the National Aviation Hall of Fame. A brief fundraising appeal will also be made during the program. Fundraising is not the primary purpose of the event. NASA attendees are reminded that participation in the fundraising activity is strictly personal and voluntary.

Adam F. Greenstone