

National Aeronautics and Space Administration

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



October 1, 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 Events
Related to the 77th International Astronautical Congress (IAC) in Antalya,
Turkey, October 5 – October 9, 2026

Representatives from NASA have been invited to attend a series of events in conjunction with the International Astronautical Congress (IAC) in Antalya, Turkey. The IAC is intended to enable representatives from the space industry, space users, space policy makers, students, young professionals, researchers, and academicians to meet and exchange experiences and knowledge on space-related topics, and to develop world-wide cooperation programs. The IAC is the largest annual event organized by the International Astronautical Federation (IAF), a non-governmental, non-profit membership organization, based in Paris, France. The Congress is hosted by one of the IAF's member countries, which forms a local organizing committee. Events organized by other organizations adjacent to the IAC include:

1. AWS Aerospace & Satellite Solutions Lunch Reception and Dinner, October 6, 2026, 12:00 pm – 3:30 pm. AWS Aerospace & Satellite Solutions will host LAUNCHPAD: Building the Commercial and Technological Infrastructure for the Next Era of Space at the Susesi Convention Center, Belek, Antalya, Turkey. Approximately 60 people have been invited to attend the lunch reception and dinner. Expected attendees include representatives from U.S. and foreign senior government, foreign space agencies, and industry. The lunch reception and dinner will include food and beverages valued at approximately \$284 (€245) per person for the lunch reception and \$114 (€100) per person for the dinner. The event is by invitation only for the recipient.
2. Space Exploration Technologies (SpaceX), October 6, 2026. SpaceX will host SpaceX Moonrise. Approximately 150 people are expected to attend the reception. Expected attendees include representatives of federal government agencies and industry. The dinner will include food and beverages valued at approximately \$75 per person. The event is by invitation only. This event includes an edible item as a gift worth \$10 which may be accepted under the exception allowing gifts not exceeding \$20 if the employee will not have accepted gifts from SpaceX exceeding \$50 in 2026.
3. Voyager Technologies, Max Space, and Firefly Aerospace Networking Reception, October 6, 2026, from 6:30 pm to 9:30 pm. The three companies will host a reception at Gloria Gold Club, 12A Turzim Caddesi, Belek, Antalya, Turkey. Approximately 600

people have been invited to attend the reception. Expected attendees include representatives of industry, international space agency delegates, other federal agencies, members of academia, media, international government, and other invitees. The dinner will include food and beverages valued at approximately \$394 (€347) per person. The event is by invitation only, which includes a guest. This event includes a gift bag valued at \$17.95. NASA attendees may accept the gift bag under the exception allowing gifts not to exceed \$20 if the employee will not have accepted gifts from either of the three hosts exceeding \$50 in 2026.

4. Voyager Technologies Networking Reception, October 7, 2026, from 7:00 pm to 10:00 pm. Voyager Technologies will host an evening reception at OGGI Restaurant, Belek, Antalya, Turkey. Approximately 100 people have been invited to attend the reception. Expected attendees include representatives of industry, international space agency delegates, other federal agencies, members of academia, media, international government, and other invitees. The dinner will include food and beverages valued at approximately \$20 per person. The event is by invitation only, which includes a guest. This event includes a gift bag valued at \$5.00. NASA attendees may accept the gift bag under the exception allowing gifts not to exceed \$20 if the employee will not have accepted gifts from Voyager Technologies exceeding \$50 in 2026.

In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the events listed above meet the definition of a “widely attended gathering.” I further find that there is an agency interest in having NASA employees attend the events, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance for themselves, and if invited a single guest, for these events.¹

NASA employees who have a significant role in any pending matter affecting the host of an event in this determination, 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 an invitation of free attendance. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). NASA invitees should not accept gift items exceeding the \$20 cap.

In addition, NASA employees may accept invitations to attend the following events under the Foreign Gifts and Decorations Act²:

¹ In addition, invited employees may accept free attendance at the following IAF program events which are covered by the IAC registration fees or based on the exception for gifts and refreshments, and entertainment in foreign areas in 5 CFR §2635.204(i): the IAF Opening Ceremony, Welcome Reception, and breakfasts, luncheons, VIP events (including those co-sponsored by foreign governments for which acceptance is authorized by the Foreign Gifts and Decorations Act), young professionals events, and IAC 2026 Launch Reception. Attendance at the IAC closing gala dinner, for which tickets are 299 euros, is not covered in the IAC registration fee, and the IAF has not offered any free gala invitations to NASA employees. While a gift of a single ticket to the closing dinner gala may be accepted under the gifts in foreign areas exception noted above, NASA employees receiving an invitation to attend the gala should exercise caution to ensure it is not accepted under circumstances where their integrity or impartiality may be questioned.

² The Foreign Gifts and Decorations Act authorizes acceptance of gifts from a foreign government not exceeding \$525.

Ministers and Members of Parliament Dinner

Sunday, October 4 at 7:00 pm – 10:00 pm; Gloria Golf Club; co-hosted by the Turkish government, the Turkish Space Agency (TUA) and the International Astronautical Federation (IAF)

UAE Space Agency Reception

Tuesday, October 6 at 7:00 pm – 10:00 pm; Asil Lebanese Restaurant, The Lands of Legends; hosted by the UAE Space Agency

European Space Agency (ESA) Gala Dinner

Tuesday, October 6 at 6:30 pm; Susesi Luxury Resort; hosted by ESA

German Night

Tuesday, October 6 at 7:00pm; Gloria Golf Resort; hosted by DLR

IAC 2027 Kickoff Reception

Wednesday, October 7 at 7:30pm; Cornelia Golf Club; hosted by the Polish Space Agency (POLSA) and the IAF

IAC 2028 Samarkand – Dinner Reception

Wednesday, October 7 at 7:30pm; Selectum Family Resort Belek; hosted by Uzcosmos in Samarkand, Uzbekistan

Adam

Greenstone

Digitally signed by Adam
Greenstone
Date: 2026.10.01
19:27:53 -04'00'

Adam F. Greenstone