National Aeronautics and
Space Administration

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

October 23, 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 University of Alabama President's Tailgate Reception on October 24, 2026

On October 24, 2026, the President of the University of Alabama will host a tailgate reception at the residence lawn of the University President's residence from approximately 12:30 to 1:30 pm. This event will occur prior to Alabama's football game with Texas A & M.

Approximately 1500 people are expected to attend. Guests of NASA personnel are invited. Attendees will have a diversity of views or interests and will include members of Congressional members and congressional staff, representatives from industry and academia, state and local officials, federal officials from other agencies, and university alumni from various sectors. The estimated value of the event, including all food and beverages, is $85 per person.

The University of Alabama's President's office 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 for themselves and a guest. 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 University of Alabama, 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 Greenstone

Digitally signed by Adam Greenstone
Date: 2026.10.23 16:18:16 -04'00'

Adam F. Greenstone