National Aeronautics and
Space Administration

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

October 9, 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 Dinner for guests of the Neil Armstrong Space Prize on October 15, 2026

On October 15, 2026, the Purdue University President's Office (Purdue) will host its Dinner for VIP guests of the Neil Armstrong Space Prize at The Pembroke, Washington, DC, from 7:00 p.m. to 8:30 p.m. The purpose of the event is to host the 2026 recipients of the Neil Armstrong Space Prize for dinner, along with other guests, following the awards ceremony.

Approximately 40 people have been invited to attend. Attendees include the selection advisory committee, astronauts who attended Purdue, the prize recipients, and the Armstrong family, representing a diversity of views or interests from industry, the public sector, academia, and other areas. The estimated cost of the event, including all food and beverages, is $80 per person.

Purdue is in control of the organizing and planning 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 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 Purdue, 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

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