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 Reception and Awards Ceremony for the Neil Armstrong Space Prize on October 15, 2026

On October 15, 2026, Purdue University and the College of Engineering (Purdue) will host its reception and awards ceremony for recipients of the Neil Armstrong Space Prize at the Cosmos Club, Washington, DC, from 5:00 p.m. to 6:30 p.m. The purpose of the event is to recognize the recipients of the inaugural Neil Armstrong Space Prize with a reception and an awards ceremony.

Approximately 600 people have been invited to attend. Attendees will have a diversity of views or interests and will include state and federal officials, Purdue Engineering alumni and donors, Purdue administration, Purdue Board of Trustees, 2026 Neil Armstrong Space Prize recipients and their invited guests, Neil Armstrong Space Prize Committee Members, DC Council, and space economy representatives. Guests of attendees are invited. The estimated cost of the event, including all food and beverages, is $100 per person. Awards will be given to the recipients only.

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

Digitally signed by Adam Greenstone
Date: 2026.10.09 14:12:46 -04'00'

Adam F. Greenstone