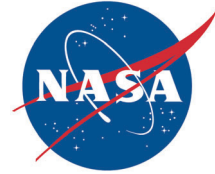


**John F. Kennedy Space Center**  
Kennedy Space Center, FL 32899



October 4, 2023

Reply to Attn of: CC

TO: All NASA Civil Servants

FROM: CC/Chief Counsel

SUBJECT: National Space Club Florida Committee Celebrate Space Awards Banquet,  
October 13, 2023

National Space Club Florida Committee (NSCFL), a nonprofit organization under section 501(c)(3) of the Internal Revenue Code, will host a Celebrate Space Awards Banquet event at the Radisson Resort at the Port - Convention Center on Friday, October 13, 2023. This event is hosted by NSCFL, which helps further its mission to provide information on space activities, promote space leadership, stimulate advancement of space applications, sponsor educational activities, and provide recognition for contributions to advancements in aerospace science, operations, research, and education. Approximately 250 guests, including all aerospace companies, elected officials, industry leaders, Air Force, and NASA employees. Tickets to the banquet, valued at \$70 for each attendee, are being offered to NASA KSC personnel at no cost. NASA invitees have been invited to bring a guest.

I find that the Celebrate Space Banquet meets the requirements of a *widely attended gathering*, as defined in 5 C.F.R. § 2635.204(g). Consequently, I conclude that NASA's interest in its employees and a guest attending this event outweighs any concern that such free attendance may, or may appear to, improperly influence any NASA personnel in the performance of their official duties.

Attendance at the Celebrate Space Banquet event will allow NASA representatives to establish an Agency presence at an event recognizing achievements by people in aerospace science and research careers. Attendance will also allow NASA personnel an opportunity to discuss matters of interest with a diverse group of other guests. Through attendance, employees will be able to disseminate information on NASA's ongoing activities and to demonstrate support for the contributions of the American space industry.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13770, may accept an invitation for complimentary attendance at this

event. NASA employees whose duties may substantially affect any of the sponsors, such as by way of procurement duties or administration of Space Act agreements, should seek an individual determination regarding participation in this event from the Office of the General Counsel.

In addition, some NASA contractors may be providing sponsorship for this event and purchasing tables at which NSCFL may seat other attendees. To avoid the appearance of a conflict of interest, NASA employees who attend the event should avoid sitting at a table sponsored by a contractor with whom they are closely and currently involved or can reasonably expect to be involved within the next few months, (e.g., by way of source selection, contract administration, or partnership agreement duties).

**DANIEL SHAVER** Digitally signed by DANIEL  
SHAVER  
Date: 2023.10.04 12:22:23 -04'00'

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Daniel P. Shaver  
Agency Designee