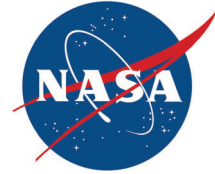


National Aeronautics and Space Administration

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



April 22, 2024

Reply to Attn of: CC

TO: Distribution

FROM: CC/Acting Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2024 Monthly National Space Club Florida Committee (NSCFL) Luncheon

The NSCFL will host a luncheon once per month at the Radisson Resort at the Port, Cape Canaveral, Florida. The event is to enable networking and presentation/exchange of ideas common to the commercial and government Aerospace industry.

The hosts have invited over 250 persons to attend. Attendees will have a diversity of views or interests and will include local Aerospace companies, elected officials, industry leaders, USAF, and NASA. The estimated cost of the event, including all food and beverages, is \$40 per person. All Points, ARES, ASRC Federal, Boeing, Chenega Infinity, Delaware North, Herndon Solutions Group, Jacobs, Lockheed Martin, SAIC, Sierra Lobo, and ULA are sponsors for the 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 sponsors 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 his or her duties. However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 may attend the event only if they reimburse the sponsor the value of the event.

NASA employees who have a significant role in any pending matter affecting the interests of All Points, ARES, ASRC Federal, Boeing, Chenega Infinity, Delaware North, Herndon

Solutions Group, Jacobs, Lockheed Martin, SAIC, Sierra Lobo, and ULA, 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.

Thomas Browder Digitally signed by Thomas
Browder
Date: 2024.04.22 16:32:13 -04'00'

Thomas M. Browder III
Agency Designee