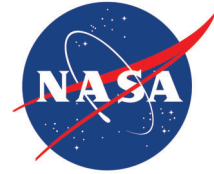


John F. Kennedy Space Center
Kennedy Space Center, FL 32899



February 5, 2025

Reply to Attn of:

CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2025 National Space Club Florida Committee (NSCFL) Monthly Luncheon

The NSCFL will host a luncheon approximately once per month at Radisson Resort at the Port, Cape Canaveral, Florida. The proposed dates are February 11th, March 18th, May 13th, June 10th, August 12th, September 9th, and November 11th. The event is to enable networking and presentation/exchange of ideas common to the commercial and government aerospace industry.

The hosts have invited over 300 persons to attend. Attendees will have a diversity of views or interests and will include aerospace corporations, NSCFL Members, Congressmen, state and local officials, industry representatives, NASA personnel, personnel from other Federal Agencies, and media members. The estimated cost of the event, including all food and beverages, is \$35 per person. Amentum, All Points ASRC, Astrion, Boeing, BRPH, Burns & McDonnell, Delaware North, HSG, ILS, JLRD Inc., Lockheed Martin, Northrop Grumman, Orlando Aviation Consultants, Onyx Aero, RSNext, RS&H, Space FL, 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 Amentum, All Points ASRC, Astrion, Boeing, BRPH, Burns & McDonnell, Delaware North, HSG, ILS, JLRD Inc., Lockheed Martin, Northrop Grumman, Orlando Aviation Consultants, Onyx Aero, RSNext, RS&H, Space FL, 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.

You are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 for each occasion (and no more than \$50 from one source in a calendar year). Employees may accept any item(s) that are under or at the \$20 gift exception rule. NASA employees in non-career positions who have signed the ethics pledge may only accept a gift item if they reimburse the sponsor.

Charles Vinson Digitally signed by Charles
Vinson
Date: 2025.02.05 14:54:42 -05'00'

Charles A. Vinson
Agency Designee