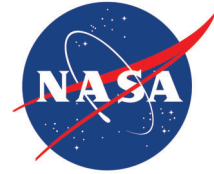


John F. Kennedy Space Center
Kennedy Space Center, FL 32899



April 10, 2025

Reply to Attn of:

CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2025 U.S.
Astronaut Hall of Fame Induction Reception and Gala

On May 31, 2025, the Astronaut Scholarship Foundation will host a reception and gala at 6:00 p.m. at the Kennedy Space Center Visitor Complex in Merritt Island, Florida. The event is celebrating the induction of two astronauts into the Hall of Fame.

The hosts have invited approximately 350 persons. It is anticipated that attendees with a diversity of views or interests will be present. Anticipated attendees include corporate and industry executives and workers, teachers, space enthusiasts, government officials, NASA senior management, aerospace contractors, military leaders, tourism/community leaders, NASA retirees, and up to one guest per each of the invitees. The projected cost for the event, encompassing all food and beverage expenses, is \$500 per attendee. For those attending with a guest, the total estimated cost is \$1,000. The Astronaut Scholarship Foundation is the primary organizer and Valkyrie, Raytheon Technologies Corporation, United Launch Alliance (ULA), Science Applications International Corporation (SAIC), Lockheed Martin, Axient, Kellogg Brown & Root (KBR), Florida Institute of Technology, BRPH Architecture Engineering and Construction, and Copper Moon Coffee are sponsors for the event. By attending this event, NASA attendees will be able to exchange information regarding various NASA programs. As such, 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.

NASA employees who have a significant role in any pending matter affecting the interests of Valkyrie, Raytheon, ULA, SAIC, Lockheed Martin, Axient, KBR, Florida Institute of Technology, BRPH, and Copper Moon Coffee, 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). We understand that a gift bag valued at approximately \$25 will be offered. Employees may accept any item(s) that are under or at the \$20 gift exception rule.

In addition, this is a fundraising event for the Astronaut Scholarship Foundation. NASA employees may not participate in the promotion, production, or presentation of the event including serving as honorary chairperson, sitting at a head table during the event, or standing in a reception line.

Charles Vinson Digitally signed by Charles
Vinson
Date: 2025.04.10 16:19:12 -04'00'

Charles A. Vinson
Agency Designee