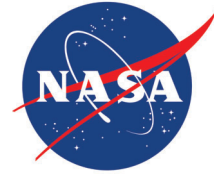


**John F. Kennedy Space Center**  
Kennedy Space Center, FL 32899



May 8, 2025

Reply to Attn of:

CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Axiom Space AX-4 Launch Viewing Event

No earlier than June 8, 2025, Axiom Space will host a launch viewing event at the Kennedy Space Center Operations Support Building II. The event is celebrating the AX-4 Private Astronaut Mission.

The hosts have invited approximately 250 persons to attend. Attendees will have a diversity of views or interests and will include NASA officials, state, and local officials (Governors of Florida and Texas) industry representatives, foreign dignitaries (primarily diplomatic personnel), other Federal Agency officials, National Space Council representatives, members of the public, and members of the media. The projected cost for the event, encompassing all food and beverage expenses, is \$50 per attendee. Axiom Space is the organizer and sponsor 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 sponsor may accept an invitation for free attendance 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 Axiom Space, 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 \$80 will be offered if attendees register for launch and transportation. If NASA personnel drive on their own (do not register for the launch/bus) then they will not be offered the bags. Employees may accept any item(s) that are under or at the \$20 gift exception rule.

**Charles Vinson**

Digitally signed by Charles  
Vinson  
Date: 2025.05.08 15:17:43 -04'00'

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Charles A. Vinson  
Agency Designee