

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



January 13, 2026

Reply to Attn of:

CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Artemis II
Supplier Engagement Reception

On January 14th, 2026, Amentum will host a reception at 6 p.m. at Gators Portside, Port Canaveral, Florida. The event is celebrating the Artemis II rollout at Kennedy Space Center.

The hosts have invited approximately 250 persons to attend. Attendees will have a diversity of views or interests and will include NASA employees, members of academia, contractors, local government officials, and guests of invitees. NASA invitees may bring one guest if authorized. The projected cost for the event, encompassing all food and beverage expenses, is \$40 per attendee. For those attending with a guest, the total estimated cost is \$80. Amentum is the organizer and sponsors for the event include L3 Harris, Aerojet Rocketdyne, Boeing, Lockheed Martin, and Northrup Grumman. 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 Amentum or other sponsors, 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 gifts valued at approximately \$10 will be offered. Employees may accept any item(s) that are under or at the \$20 gift exception rule.

 Digitally signed by Charles
Vinson
Date: 2026.01.13 09:53:50 -05'00'

Alex Vinson
Agency Designee