

National Aeronautics and Space Administration

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



March 4, 2026

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2026 National Space Club Florida Committee Monthly Luncheon

The National Space Club Florida Committee will host a luncheon approximately once per month at Radisson Resort at the Port, Cape Canaveral, Florida. The proposed dates are March 17th, April 18th, May 12th, June 9th, July 15th, August 11th, September 8th, November 3<sup>rd</sup>, and December 16th. 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 people 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. A.I. Solutions, All Points, Amentum, ASRC, Boeing, BRPH, Burns & McDonnell, Craig Technologies, Deck Four, Delaware North, Lockheed Martin, Onyx Aerospace, Rexel & Rockwell, RS&H, Space Florida, ULA, and Chenega 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.

NASA employees who have a significant role in any pending matter affecting the interests of A.I. Solutions, All Points, Amentum, ASRC, Boeing, BRPH, Burns & McDonnell, Craig

Technologies, Deck Four, Delaware North, Lockheed Martin, Onyx Aerospace, Rexel & Rockwell, RS&H, Space Florida, ULA, and Chenega, 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.

**Charles Vinson** Digitally signed by Charles  
Vinson  
Date: 2026.03.04 12:47:32 -05'00'

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Alex Vinson  
Agency Designee