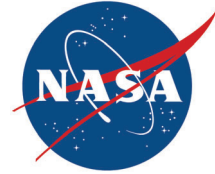


National Aeronautics and Space Administration

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



April 8, 2026

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2026 NSCFL Space Heroes and Legends Award Banquet
Determination Regarding Attendance by NASA Employees at the 2026 NSCFL Space Heroes and Legends Award Banquet

The National Space Club Florida Committee will host the Space Heroes and Legends Award Banquet at the KSC Visitor Complex, Merritt Island, Florida, at 6:30 p.m. on April 18th, 2026. The event is celebrating the Space Heroes and Legends awardee.

The hosts have invited over 200 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. NASA invitees may bring one guest. The estimated cost of the event, including all food and beverages, is \$120 per person. For those attending with a guest, the total estimated cost is \$240. The National Space Club Florida is the primary organizer and Aerodyne, All Points, Amentum, ASRC Federal, Boeing, CTG Federal, United Launch Alliance, BRPH, and Leidos are sponsors for the event. 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 the National Space Club Florida, Aerodyne, All Points, Amentum, ASRC Federal, Boeing, CTG Federal, United Launch Alliance, BRPH, or Leidos, 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: 2026.04.08 13:29:24 -04'00'

Alex Vinson
Agency Designee