National Aeronautics and Space Administration

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

October 27, 2026

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Artemis Gala Sponsor Reception

Purpose Entertainment will host a Sponsor Reception for the Artemis Gala at the KSC Visitor Complex, Merritt Island, Florida, at 6:00 p.m. on November 5, 2026. The event is a pre-gala celebration event including industry partners and officials.

The hosts have invited approximately 150 people to attend. Attendees will have a diversity of views or interests and will include industry representatives and sponsors of the Artemis Gala. NASA invitees may bring one guest. The estimated cost of the event, including all food and beverages, is $100 per person. For those attending with a guest, the total estimated cost is $200. Purpose Entertainment is the primary organizer and Astrolab and Phison 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 Purpose Entertainment, Astrolab, or Phison, 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: 2026.10.27 12:45:25 -04'00'

Alex Vinson
Agency Designee