National Aeronautics and Space Administration

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

October 13, 2026

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Gala in Celebration of Artemis

Purpose Entertainment will host the Gala in Celebration of Artemis at the KSC Visitor Complex, Merritt Island, Florida, at 5:30 p.m. on November 6, 2026. The event is celebrating the success of the Artemis II mission as a major event closing out the 250th Anniversary of America and looking to the future as humanity returns to the Moon through the Artemis program.

The hosts have invited approximately 450 people to attend. Attendees will have a diversity of views or interests and will include international space agency heads, Congressional representatives, state and local officials, space industry representatives, members of the media, and contractors. NASA invitees may bring one guest. The estimated cost of the event, including all food and beverages, is $160 per person. For those attending with a guest, the total estimated cost is $320. Purpose Entertainment is the primary organizer and Astra Carta/SMI, Bank of America, Lockheed Martin, Voyager, VAST, Northrop Grumman, OMEGA, Lonestar, Phison, BAE Systems, Astrolab, ILC Dover, and Delaware North 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, Astra Carta/SMI, Bank of America, Lockheed Martin, Voyager,

VAST, Northrop Grumman, OMEGA, Lonestar, Phison, BAE Systems, Astrolab, ILC Dover, or Delaware North, 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 gift bags will be offered valued at approximately $15. Employees may accept any item(s) that are under or at the $20 gift exception rule.

Charles Vinson
Digitally signed by Charles Vinson
Date: 2026.10.13 16:41:21 -04'00'

Alex Vinson
Agency Designee