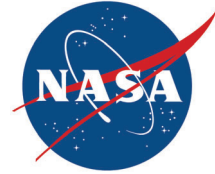


National Aeronautics and Space Administration

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



May 31, 2024

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Grand Opening of The Infinite Exhibition

The Consulate of Canada to Miami/Quebec Office to Miami will host a grand opening of The Infinite exhibition at the Kravis Center, West Palm Beach, Florida, on June 4, 2024, at 5:00 pm. The event is to showcase Canadian innovation in Virtual Reality (VR) technology and is the world's largest immersive exhibit about life in space.

The hosts have invited approximately 200 guests to attend with interests in the world's largest immersive exhibit about life in space. Attendees include Congressional representatives and staffers, state and local officials, academia, industry representatives, NASA personnel, personnel from other Federal Agencies/DOD, members of the public, and media. The estimated cost of the event, including all food and beverages, is \$50 per person. The Consulate of Canada to Miami/Quebec Office is the sponsor for the event. Attendance at this event will allow NASA attendees to exchange information regarding the NASA Deep Space Logistics Program. 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 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. However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 may attend the event only if they reimburse the sponsor the value of the event.

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). Employees may accept any item(s) that are under or at the \$20 gift exception rule. NASA employees in non-career positions who have signed the ethics pledge may only accept a gift item if they reimburse the sponsor.

**Charles Vinson** Digitally signed by Charles  
Vinson  
Date: 2024.05.31 13:19:49 -04'00'

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Charles A. Vinson  
Agency Designee