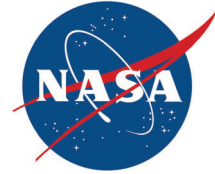


National Aeronautics and Space Administration

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



June 20, 2024

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the GOES-U VIP Launch Viewing Event

SpaceX will host the GOES-U VIP Launch Viewing Event at the OSB II, John F. Kennedy Space Center, Florida, on June 25, 2024, at 3:00 p.m. The event is an opportunity for partners and employees to learn about the mission, watch the launch, socialize, and network.

The hosts have invited approximately 400 guests to attend and watch the satellite launch aboard SpaceX's Falcon Heavy rocket. Attendees include NASA personnel, NOAA personnel, congress members and staffers, state and local officials, and industry representatives. The estimated cost of the event, including all food and beverages, is \$20 per person. SpaceX is the sponsor for the event. Attendance at this event will allow NASA attendees to learn about the final mission in the GOES-R series, interact with NASA and NOAA program managers and scientists, and ultimately watch the satellite launch aboard SpaceX's Falcon Heavy rocket. 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 to the event for themselves and a guest. 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 for themselves and their guest. An honor basket will be provided.

NASA employees who have a significant role in any pending matter affecting the interests of SpaceX, 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). 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: 2024.06.20 12:13:39 -04'00'

Charles A. Vinson
Agency Designee