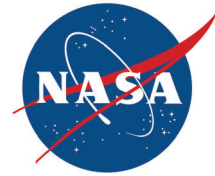


John F. Kennedy Space Center
Kennedy Space Center, FL 32899



October 3, 2024

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Jet Propulsion Laboratory (JPL) Europa Clipper Reception

The Jet Propulsion Laboratory (JPL) will host a reception event coinciding with the Europa Clipper launch at the Courtyard by Marriott, Cocoa Beach, Florida, on October 8, 2024, at 6:00 pm. The event is an opportunity for NASA and JPL partners and employees to welcome the personnel who have supported the Europa Clipper mission and to celebrate the launch and initiation of the mission.

The host, JPL, has invited approximately 300 guests to attend the reception and celebration event. Attendees include project leadership; Assembly, Test, and Launch Operations (ATLO) personnel; JPL team members; and NASA employees. The estimated cost of the event, including all food and beverages, is \$20 per person. JPL is the sponsor for the event. Invitees are allowed to bring one guest each to the reception. Attendance at this event will bring together the employees who have worked on and supported the Europa Clipper program. In consideration of the foregoing, 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 themselves and a guest for free attendance 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 any of the sponsors, 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.

Charles Vinson Digitally signed by Charles
Vinson
Date: 2024.10.03 16:21:21 -04'00'

Charles A. Vinson
Agency Designee