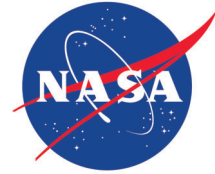


National Aeronautics and Space Administration

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



January 8, 2025

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Firefly Blue Ghost Mission 1 Pre-Launch Reception

Firefly Aerospace will host a reception event of the Blue Ghost Mission 1 launch at the Hilton, Cocoa Beach, Florida, on January 13, 2025, at 7:00 pm. The event is an opportunity for partners and employees to network in the Launch and Lunar Lander Industry and celebrate the Blue Ghost Mission 1.

The hosts have invited approximately 300 guests to attend to attend the reception and celebration event. Attendees include Congressmen, staffers, state and local officials, industry representatives, mission partners, Firefly executives, Firefly Board of Directors, suppliers, investors, and NASA employees. Invitees may bring a guest, such as spouses. The estimated cost of the event, including all food and beverages, is \$20 per person. Firefly Aerospace is the sponsor for the event. Attendance at this event will bring together the employees who have worked on and supported the Blue Ghost 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.

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. 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: 2025.01.08 12:20:11 -05'00'

Charles A. Vinson
Agency Designee