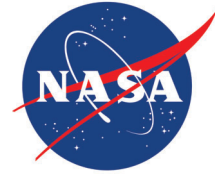


**John F. Kennedy Space Center**  
Kennedy Space Center, FL 32899



January 9, 2025

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Blue Origin  
New Glenn 1 Mission Launch Viewing Event

Blue Origin will host a launch viewing event of the New Glenn 1 Mission at the Blue Origin Rocket Park, Merritt Island, FL, on January 9, 2025, at 11:00 pm. The event is an opportunity for partners and employees to network in the space flight industry and celebrate the New Glenn 1 inaugural flight.

The hosts have invited approximately 100 guests to attend the launch viewing event. Attendees include NASA personnel, DoD personnel, industry representatives, academia, Congressional, and other guests. The estimated cost of the event, including all food and beverages, is \$100 per person. Blue Origin is the sponsor for the event. Attendance at this event is for Blue Origin guests from industry, government, academia, and other attendees to have an event to view the upcoming New Glenn launch. 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). Blue Origin will be offering an optional gift bag valued at approximately \$40, civil servants may accept these gift bags only if they reimburse Blue Origin \$40. Otherwise, civil servants may accept any individually-offered items that, in the aggregate, have a fair market value of no more than \$20; that is, civil servants may decline any “distinct and separate” items in order to accept items aggregating \$20 or less. 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: 2025.01.09 22:50:28 -05'00'

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Charles A. Vinson  
Agency Designee