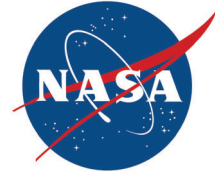


Lyndon B. Johnson Space Center

2101 NASA Parkway
Houston, TX 77058-3696



February 14, 2025

Reply to Attn of: AL-25-006

TO: Distribution

FROM: AL/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Blue Ghost Mission 1 Landing Viewing Event

On March 1-2, 2025, Firefly Aerospace will host a Blue Ghost Mission 1 Landing Viewing Event at Haute Spaute in Cedar Park, Texas from 11:00 p.m.- 3:30 a.m. Blue Ghost 1 is scheduled to land on the lunar surface early on March 2, 2025, at the Mare Crisium near Mons Latreille. The event is a watch party to observe the Firefly's first lunar landing. Firefly leadership and NASA employees will speak at the event. Firefly Aerospace will offer attendees light refreshments, coffee, soda, water, and energy drinks. Entertainment will also be provided. Firefly Aerospace also will give each attendee a mission patch, stickers, and a wristband.

Attendance at the event is by invitation only and approximately 1500 are expected to attend. Approximately 200 NASA employees and their guests are invited to attend. The invitees include federal, state, and local elected officials and their staff, members from industry, Firefly's mission partners, Firefly executives and members of Firefly's board of directors, and Firefly's vendors. The estimated value of event, including the entertainment, food and drinks, is approximately \$28 per person. Entertainment, food and refreshments cost approximately \$20 per person. The mission memorabilia is valued at \$8 per person.

This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the agency and its activities. This event will further agency programs or operations including promoting community relations and providing the opportunity for the exchange of views and information between leaders within the agency and a variety of government and business leaders. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

It is my determination that it is in the agency's interest for the invitees to attend this event. Their attendance outweighs any concern that the acceptance of any benefits may, or may appear to, improperly influence them in the performance of their official duties. Accordingly,

NASA employees who do not have a significant role in a matter affecting Firefly Aerospace may accept an invitation for free attendance for the event, including any food, refreshments, and entertainment offered in conjunction with this event for themselves and their invited guests.

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.

Randall Suratt Digitally signed by Randall Suratt
Date: 2025.02.14 10:04:35 -06'00'

Randall T. Suratt