

National Aeronautics and Space Administration

George C. Marshall Space Flight Center  
Marshall Space Flight Center, AL 35812



March 21, 2012

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Blanket Approval for NASA Employees to attend the U.S. Space and Rocket Center's 100 Years of von Braun Birthday Celebration

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Several NASA employees have been invited to attend the 100 Years of von Braun Birthday Celebration. This event is scheduled for Friday, March 23, 2012, at the U.S. Space & Rocket Center Davidson Center. There will be a cocktail hour at 6:00 p.m., dinner at 7:00 p.m., followed by music and dancing. The Guest Speaker will be Dr. Margrit von Braun, Dean of the College of Graduate Studies at the University of Idaho, and daughter of Dr. Wernher von Braun. This event is sponsored by Lockheed Martin.

This event is open to the public, and will be a widely-attended gathering of family members of Dr. Wernher von Braun, family members of the German Rocket Team, NASA retirees, NASA and military leaders, local elected officials, aerospace industry leaders, as well as other business and community leaders. About 550 guests are expected to attend. The event is valued at \$100.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

I have determined that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with state and local governmental and community leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its activities. Given the purpose of the event, the broad attendance anticipated, and the reasonable market value of this event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance at this event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect Lockheed Martin, are not covered in this

determination and should seek a specific determination from this office pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in this event.

Guests at this event will receive a commemorative book of Paul Calle's sketches of the Apollo astronauts made just prior to launch (which sells for \$5) and a booklet on the von Braun exhibit (which costs about \$2). NASA employees and/or their accompanying spouses or guests may accept unsolicited gifts having an aggregate market value of \$20 or less per source per occasion. See 5 C.F.R. § 2635.204(a). Accordingly, the NASA employee and his/her guest may accept these books since the aggregate value of these two items does not exceed \$20.00.

Lockheed Martin is a lobbying organization. As such, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, may only attend this event if they make arrangements to reimburse the sponsor the cost of the food consumed.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson", with a long horizontal line extending to the right.

Audrey D. Robinson  
Chief Counsel

National Aeronautics and Space Administration  
George C. Marshall Space Flight Center  
Marshall Space Flight Center, AL 35812



March 21, 2012

Reply to Attn of: LS01 (AMM)

**MEMORANDUM FOR RECORD**

**FROM:** LS01/Audrey D. Robinson

**SUBJECT:** Approval for NASA Employees with Senior Institutional and Program Responsibilities to attend the U.S. Space and Rocket Center's 100 Years of von Braun Birthday Celebration

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Several NASA employees with Senior Institutional and Program Responsibilities have been invited to attend the 100 Years of von Braun Birthday Celebration. This event is scheduled for Friday, March 23, 2012, at the U.S. Space & Rocket Center Davidson Center. There will be a cocktail hour at 6:00 p.m., dinner at 7:00 p.m., followed by music and dancing. The Guest Speaker will be Dr. Margrit von Braun, Dean of the College of Graduate Studies at the University of Idaho, and daughter of Dr. Wernher von Braun. This event is sponsored by Lockheed Martin.

This event is open to the public, and will be a widely-attended gathering of family members of Dr. Wernher von Braun, family members of the German Rocket Team, NASA retirees, NASA and military leaders, local elected officials, aerospace industry leaders, as well as other business and community leaders. About 550 guests are expected to attend. The event is valued at \$100.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Lockheed Martin has several NASA contracts and is a potential source for future Space Launch System (SLS) work. The senior NASA officials listed presently<sup>1</sup>, or may in the near future, have extensive involvement in matters relating to Lockheed Martin's business interests. These personnel are similarly situated in that they each have senior institutional or program responsibilities for NASA that may involve Lockheed Martin.

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<sup>1</sup> Acting Center Director; Associate Director; Manager, Space Launch Support Systems Program Office; Lead, Public Affairs Program Mgmt.; Supervisor, Office of Strategic Analysis and External Relations

I have determined that free attendance of these individuals at the von Braun Birthday Celebration is in the interest of the agency because it will further agency programs and operations. Their attendance at this event will help to raise NASA's profile with state and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Guests at this event will receive a commemorative book of Paul Calle's sketches of the Apollo astronauts made just prior to launch (which sells for \$5) and a booklet on the von Braun exhibit (which costs about \$2 to print). NASA employees and/or their accompanying spouses or guests may accept unsolicited gifts having an aggregate market value of \$20 or less per source per occasion. *See* 5 C.F.R. § 2635.204(a). Accordingly, the NASA employee and his/her guest may accept these books since the aggregate value of these two items does not exceed \$20.00.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these officials attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties. Accordingly, the listed employees may accept free attendance at the event. They may also accept attendance for a spouse or guest.

Lockheed Martin is a lobbying organization. NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, may only attend this event if they reimburse the sponsor the cost of the food consumed.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson". The signature is written in a cursive style and is positioned above the typed name and title.

Audrey D. Robinson  
Chief Counsel