

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



January 19, 2016

Reply to Attn of: LS01 (LLD)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for MSFC Acting Center Director and Guest to Attend the 2016 Madison State of the City Dinner – Connect 2016

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

The NASA MSFC Acting Center Director has been invited to attend the Madison State of the City Dinner – Connect 2016. This event is scheduled for Friday, January 29, in the Davidson Center at the U.S. Space & Rocket Center, Huntsville, AL. There will be a cocktail reception at 5:30 p.m., a dinner and the State of City Address at 7:00 p.m., followed by a Twilight Social at 8:30 p.m.

This event will be a widely-attended gathering of local, state, and federal elected officials, Madison Chamber of Commerce members and employees, community and business leaders, private industry, and local media. The event is valued at \$75.00 per person and \$145 per couple. Approximately 500 people are expected to attend. I find that the event meets the requirements of a “widely attended gathering” as defined in 5 CFR §2635.204(g)(2).

This event is sponsored by the Madison Chamber of Commerce and many area businesses.¹ The following businesses, which are NASA prohibited sources, are co-sponsors of this event: The Boeing Company, Colsa Corporation, Lockheed Martin Corporation, Northrop Grumman Corporation, and Wyle CAS Group.

Several of the sponsors of this event are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future. The Acting Center Director

¹ Businesses include: AEGIS Technologies Group, Inc., BNI, Colsa Corp., Fantastic Plastic, First Commercial Bank, Focus Radio, Hexagon, iHeart Media, Intergraph, Landers McLarty of Huntsville, Lockheed Martin Corp., Madison County Commission Chairman Dale Strong, Madison Hospital, Madison Publications, LLC, Minuteman Press, Northrop Grumman Corp., Port of Huntsville, Progress Bank, Redstone Federal Credit Union, Republic Services, SEL and Associates, STI Electronics, WDRM Radio, WEKI 1490 am-94.7 fm, WTKI 1450 am-92.9 fm, and Wyle CAS Group.

presently, or may in the near future, have extensive involvement in matters relating to the Madison Chamber of Commerce or these companies in their pursuit to provide services, or in their contractual relationship with NASA. The Acting Center Director has Senior Institutional and external relationship responsibilities that could significantly influence current or future programs or activities of Chamber of Commerce programs and contracts of the listed companies.

I have determined that attendance of the Acting Center Director at the Madison State of the City Dinner is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state and local business and governmental leaders, enhance community relations, and support NASA's statutory mandate to disseminate information about its programs.

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 the Acting Center Director attend this event outweighs any concern that free attendance may or may appear to improperly influence him in the performance of his duties. His attendance at this event will be in the best interest of NASA, since it will further NASA programs and operations. Accordingly, he may accept free attendance at the event for himself and his spouse.

The Madison Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. However, several of the corporate sponsors are lobbying organizations, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the dinner for themselves and their spouse or guest.²

Questions about this determination may be addressed to Laura Donegan at 256-544-0012.



Audrey D. Robinson
Chief Counsel

² Sponsors identified as lobbying organizations are: Aegis Technologies Group, Inc., The Boeing Company, Northrop Grumman Corporation, and Wylie CAS Group.