

September 29, 2016

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the 28<sup>th</sup> Annual Dr. Wernher Von Braun Memorial Dinner

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 28<sup>th</sup> Annual Von Braun Memorial Dinner sponsored by The National Space Club and Boeing. This event is scheduled for Thursday, October 27, 2016, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception at 5:30 p.m. and dinner at 7:00 p.m.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit organization under Section 501(c)(6) of the IRS code that does not employ lobbyists, and which has both individual and corporate members, including several NASA contractors.

This event will be a widely-attended gathering of NSC members, NASA and military officials, representatives or aerospace and defense industry contractors, federal, state and local government officials and staff, academia, as well as other community leaders. The event is valued at \$100 per person and approximately 800 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).

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 elected officials, military, 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 with no duties affecting NSC or Boeing who have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

NASA employees whose duties may substantially affect the NSC or Boeing 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.

The National Space Club is not a lobbying organization.

Boeing is a lobbying organization, 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 \$100 cost of the reception for themselves and their spouse.

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



Audrey D. Robinson  
Chief Counsel