



National Aeronautics and Space Administration  
George C. Marshall Space Flight Center  
Marshall Space Flight Center, AL 35812 September 29, 2015

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Attendance by NASA Employees Who Have Senior Institutional or Project Responsibilities at the 27<sup>th</sup> Annual 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 who have senior institutional or project responsibilities have been invited to attend the 27<sup>th</sup> Annual Dr. Wernher von Braun Memorial Dinner<sup>1</sup>. This event is sponsored by The National Space Club and Orbital ATK, and is scheduled for Thursday, October 29, 2015, at the U.S. Space & Rocket Center Davidson Center. 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

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<sup>1</sup> Center Director; Deputy Director; Associate Director, Technical; Associate Director; Chief Technologist; Senior Executive for Technology and Integration; Director and Deputy Director of the Office of Center Operations; Director and Deputy Director of the Office of Strategic Analysis & Communications; Director, Center Strategic Development Office; Director and Deputy of the Engineering Directorate; Chief Engineer; Chief Engineer, Exploration Systems Development; Manager and Deputy Manager Flight Programs and Partnerships Office; Director and Deputy Director of the Office of Human Capital; Director and Deputy Director of the Office of Chief Information Officer and for NEACC; Chief Counsel and Deputy Chief Counsel; Director and Deputy Director of the Office of Diversity and Equal Opportunity; Director and Deputy Director Office of Procurement; Small Business Specialist; Director and Deputy Director of Safety and Mission Assurance Office; Chief Financial Officer; Director and Deputy Director of Michoud Assembly Facility; Manager and Deputy Manager Science and Technology Office; Acting Manager and Associate Program Manager, Space Launch System (SLS) Program Office; Chief Engineer; Chief Safety Officer; SLS Program Office; Managers and Deputy Managers for SLS Offices as follows; Program Integration, Program Planning & Control, Boosters, Engines, Stages, and Deputy Manager, Spacecraft/Payload Integration & Evolution; Ground Operations Liaison; Director and Assistant Manager, Materials and Processes Laboratory; Director and Deputy Director of the Mission Ops Lab.

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.

Many of NSC's members and the sponsor of this event, Orbital ATK, are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future.<sup>2</sup> Some NASA personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to members of NSC and/or Orbital ATK in their pursuit to provide, or seek to provide, contractual services to NASA. These personnel are similarly situated in that they each have Senior Institutional or Project responsibilities that could significantly influence current or future contracts for a majority of the NSC's corporate members.

This event will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides more than 75 NASA employees, representatives of the U.S. Army Aviation and Missile Command, and the U.S. Army Missile Defense Agency, have been invited. It is also expected that community leaders, state and local officials, and representatives of private industry will be in attendance. The event is valued at \$100 per person and approximately 850 people are invited 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 of these senior institutional and project leaders at the event is in the interests of the agency because it will further agency programs and operations. The attendance of these NASA employees at the 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.

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 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 in the positions identified may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

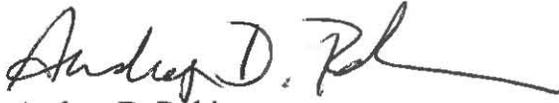
Orbital ATK is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge

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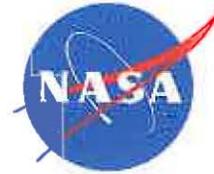
<sup>2</sup> See file for listing of NSC corporate membership.

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.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson". The signature is fluid and cursive, with a long horizontal stroke 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

September 29, 2015

LS01 (AMM)

Reply to Attn of:

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by  
NASA Employees at the 27<sup>th</sup> Annual 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 27<sup>th</sup> Annual Von Braun Memorial Dinner sponsored by The National Space Club and Orbital ATK. This event is scheduled for Thursday, October 29, 2015, 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 members, and state and local elected officials, as well as other community leaders. Besides more than 75 NASA employees, representatives of the U.S. Army Aviation and Missile Command, and the U.S. Army Missile Defense Agency have been invited. It is also expected that community leaders, state and local elected officials, and representatives of private industry will be in attendance. The event is valued at \$100 per person and approximately 850 people are invited 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 who have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

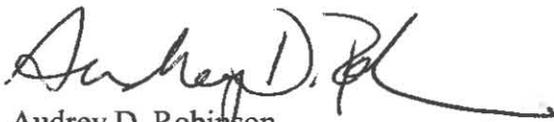
Accordingly, NASA employees whose duties do not substantially affect the NSC, a majority of its corporate members, or Orbital ATK who is sponsoring the event- may accept free attendance unless they are required to sign an ethics pledge under Executive Order 13490, in which case they must make arrangements to pay the sponsor to reimburse the \$100 cost of the reception.

NASA employees whose duties may substantially affect the NSC or Orbital ATK 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.

Orbital ATK 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.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Audrey D. Robinson  
Chief Counsel