

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



June 22, 2015

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for MSFC Deputy Director to Attend the 2015  
Huntsville/Madison County Chamber of Commerce's  
Armed Forces Celebration Luncheon at the Von Braun Center

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

The NASA Marshall Space Flight Center (MSFC) Deputy Director has been invited to attend the Armed Forces Week Celebration Luncheon at the Von Braun Center North Hall on June 24, 2015, at 11:15 a.m.

Invited guests include Team Redstone officials, both active duty military and Department of Defense employees; local elected officials, including city council members and county commissioners; Chamber of Commerce leadership, community leaders including academia and aerospace industry leaders. I find that this event is a widely-attended gathering. A luncheon valued at \$35 per person will be served and approximately 400-500 people have been invited to attend. The luncheon is sponsored by the Chamber of Commerce of Huntsville/Madison County and presenting sponsor S3. Other sponsors include BAE Systems, Boeing, Dynetics, Lockheed Martin, PPG Aerospace, Redstone Federal Credit Union, and Yulista.<sup>1</sup>

Attendance of the NASA MSFC Deputy Director at this event would be in the best interest of NASA, since it will further NASA programs and operations. The Deputy Director may have, or soon may have, duties that involve frequent interaction with the Chamber of Commerce and may substantially affect the Chamber's interests or the interest of a majority of the Chamber's members. The Deputy Director has institutional responsibilities for MSFC that involve significant community relations responsibilities that could significantly influence Chamber programs and activities, as well as local government interests. In addition, the Deputy Director may have significant institutional responsibilities that may affect the business interests of one or more of the contractors, S3, BAE Systems, Boeing, Dynetics, and Lockheed Martin.

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<sup>1</sup> S3, BAE Systems, Boeing, Dynetics, and Lockheed Martin are contractors for NASA.

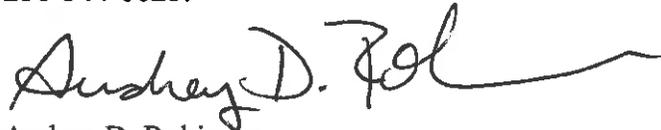
I have determined that attendance of the Deputy Director at the 2015 Armed Forces Celebration Luncheon is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with local business and governmental leaders, enhance community relations, and support 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 Deputy Director attend this event outweighs any concern that free attendance may or may appear to improperly influence her in the performance of her duties.

Accordingly, the Deputy Director may accept free attendance at the event.

The Huntsville/Madison County Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. BAE Systems, Boeing, Lockheed Martin, and PPG Aerospace 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.

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 flourish extending to the right.

Audrey D. Robinson  
Chief Counsel