

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



April 17, 2014

Reply to Attn of: LS01 (KMH)

MEMORANDUM FOR RECORD

FROM: . LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Space Launch Systems (SLS) Program Manager and the Advanced Development Office Manager for SLS to Attend the "Research Week Awards" Reception, Dinner, & Research Awards Gala at Auburn University on April 17, 2014

On April 17, 2014, Vice President for Research and Economic Development at Auburn University (Auburn) will host its "Research Week Awards" reception, dinner, and research awards gala at the Hotel at Auburn University and Dixon Conference Center in Auburn, Alabama, beginning at 6:00 PM.

NASA Space Launch Systems (SLS) Program Manager, Todd May, and Advanced Development Office Manager for SLS, Chris Crumbly, are invited to attend the reception, dinner, and awards gala. Attending the event will be representatives from NASA, Department of Defense agencies, and local municipal officials, local economic development officials, and industry. Approximately 450 people have been invited and are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$25 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

Auburn has numerous NASA contracts and agreements, and is a potential source for additional NASA procurements. Mr. May and Mr. Crumbly presently, or may in the near future, have extensive involvement in matters relating to Auburn's business interests. Attendance at the reception will allow Mr. May and Mr. Crumbly to discuss NASA's program plans with other guests. I have determined that free attendance of Mr. May and Mr. Crumbly at the reception is in the interest of the agency because it will further agency programs and operations, and will help to raise NASA's profile with national governmental leaders and industry leaders.

Auburn is a registered 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 \$25 cost of the reception.

Given the purpose of this event, the broad attendance anticipated, and the reasonable market value of this event, I have determined that the value to the agency of having Mr. May and Mr. Crumbly attend this event outweighs any concern that the free attendance may appear to improperly influence them in the performance of their duties.

Questions about this determination may be addressed to Kristine Hamilton at 256-544-0011.



Audrey D. Robinson
Chief Counsel