

National Aeronautics and Space Administration

George C. Marshall Space Flight Center  
Marshall Space Flight Center, AL 35812

April 23, 2015



LS01 (AMM)

Reply to Attn of:

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Institutional, Program and Procurement Employees to Attend the Retirement Celebration of Virginia Barnes At the U.S. Space and Rocket Center

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

Certain NASA employees with institutional, program, and procurement responsibilities have been invited to attend the Retirement Celebration of Boeing employee Virginia Barnes, Vice President and Program Manager, Space Launch System, Space Exploration, who is retiring after 34 years of service. The event will be at the U.S. Space and Rocket Center on April 28, 2015, at 6:00 p.m.<sup>1</sup> The event is sponsored by Boeing, and is to provide tribute and recognition to Ms. Barnes, and extend best wishes to her on her retirement.

This event will be a widely-attended gathering of aerospace industry leaders, Boeing employees and guests, and NASA employees and guests. The event is valued at \$30.00 per person and approximately 200 people have been invited to attend. Invitees are encouraged to bring a guest with them. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

The identified employees are senior institutional, Space Launch System (SLS) program management, and procurement employees. These employees are similarly situated in that they each have senior institutional, SLS program management, or procurement responsibilities for NASA that could influence Boeing's business interests. I have determined that attendance of these employees at this event is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with aerospace industry representatives, enhance

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<sup>1</sup> Center Director; Deputy Director; Associate Director; Director, Safety and Mission Assurance Directorate; Director, Engineering Directorate; Chief Engineer; Manager, Flight Programs and Partnerships Office; Director, Office of Procurement; Procurement Small Business Specialist; Director, Office of Center Operations; Manager, Space Launch System (SLS) Program; Deputy Manager, SLS; Manager, SLS Stages Office; Associate Program Manager, SLS; Supervisor and Deputy, SLS Advanced Development Office; and Director, Michoud Assembly Facility.

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 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, these NASA employees may accept free attendance for themselves and a spouse or guest at this event.

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 \$30 cost of the dinner for themselves and their spouse or guest.

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

  
Audrey D. Robinson  
Chief Counsel

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



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SUBJECT: Approval for NASA Employees to Attend the Retirement  
Celebration of Virginia Barnes At the U.S. Space and Rocket Center

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

Certain NASA employees have been invited to attend the Retirement Celebration of Boeing employee Virginia Barnes, Vice President and Program Manager, Space Launch System, Space Exploration, who is retiring after 34 years of service. The event will be at the U.S. Space and Rocket Center on April 28, 2015, at 6:00 p.m. The event is sponsored by Boeing, and is to provide tribute and recognition to Ms. Barnes, and extend best wishes to her on her retirement.

This event will be a widely-attended gathering of aerospace industry leaders, Boeing employees and guests, and NASA employees and guests. The event is valued at \$30.00 per person and approximately 200 people have been invited to attend. Invitees are encouraged to bring a guest with them. 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 this event is in the interest of the Agency because it will further agency programs and operations, help to raise NASA's profile with state and local business and government 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 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 that have been invited to attend may accept free attendance at the event. They may also bring a spouse or guest.

*NASA employees whose duties may substantially affect Boeing, are not covered in this determination and should seek a specific determination from this office pursuant to 5 C.F.R. § 2635.204 (g)(3)(i) regarding their participation in this event.*

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

  
Audrey D. Robinson  
Chief Counsel