

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



July 10, 2014

Reply to Attn of:

LS01

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for Marshall Senior Institutional and Program Officials to Attend a Reception and Program Hosted by Boeing in New Orleans

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

Certain Marshall officials, who have senior institutional and program responsibilities, have been invited to attend a reception and program sponsored by Boeing at Club XLIV and Encore on July 17, 2014, at 5:00 p.m.¹ This event is to be held in celebration of the region's significant role in space exploration and discovery, and our next steps into space with the Space Launch System.

This event will be a widely-attended gathering of aerospace industry representatives, state and local government leaders, and NASA employees. The reception is valued at \$50 per person and approximately 500 individuals have been invited to attend. I find that the reception and program meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

Boeing has several NASA contracts, including the Space Launch System (SLS) work. The NASA program officials listed presently have extensive involvement in matters relating to Boeing's business interests. These personnel are similarly situated in that they each have program responsibilities for NASA that involve Boeing.

I have determined that free attendance of these individuals at the reception is in the interest of the Agency because it will further Agency programs and operations. Their attendance at this 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.

¹ Center Director; Deputy Director; Director and Deputy Director, Michoud Assembly Facility (MAF); Deputy Chief Operating Officer, MAF; Manager and Deputy Manager, Space Launch Systems (SLS) Program; Chief Engineer and Deputy Chief Engineer for SLS Program; Deputy Manager, Flight Programs and Partnerships; Manager, SLS Stages Office; Stages Chief Engineer; Stages Element Core Stage Lead; Stages Manufacturing & Assembly Lead; Stages Element Contracting Officer; Director, Office of Procurement.

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 officials attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, the listed employees may accept free attendance at the event for themselves and their spouse or guest. Free attendance by employees whose duties do not affect the sponsor is addressed in a separate determination.

Additionally, 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 \$50 cost of the reception for themselves and their spouse or guest.

If you have questions about this determination please call the Office of Chief Counsel at 256-544-0010.



Audrey D. Robinson
Chief Counsel

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

July 10, 2014



Reply to Attn of:

LS01

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

Approval for NASA Employees to Attend a Reception and Program
Hosted by Boeing in New Orleans

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

Several NASA employees have been invited to attend a reception and program sponsored by Boeing at Club XLIV and Encore on July 17, 2014, at 5:00 p.m. This event is to be held in celebration of the region's significant role in space exploration and discovery, and our next steps into space with the Space Launch System.

This event will be a widely-attended gathering of aerospace industry representatives, state and local government leaders, and NASA employees. The reception is valued at \$50 per person and approximately 500 individuals have been invited to attend. I find that the reception 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 reception is in the interest of the Agency because it will further Agency programs and operations. The attendance of NASA employees at this 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 officials 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 may accept free attendance at the event. NASA employees who work on the Space Launch System Program and whose duties may substantially affect Boeing are not covered in this determination and should contact Pamela A. Bourque, at (256) 544-0024, to seek a determination pursuant to 5 CFR § 2635.204(g)(3)(i), regarding their participation in 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 \$50 cost of the reception.

If you have questions about this determination please call the Office of Chief Counsel at 256-544-0010.

A handwritten signature in blue ink, appearing to read "Audrey D. Robinson", with a long horizontal flourish extending to the right.

Audrey D. Robinson
Chief Counsel