National Aeronautics and Space Administration

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

November 6, 2014

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees to Attend a Reception and Dinner Sponsored by the North Alabama Chapter of the Federal Bar Association in Honor of the Chief, Command and General Counsels of the Multiple United States Army Redstone Arsenal Commands and NASA Marshall Space Flight Center

The North Alabama Chapter (NAC) of the Federal Bar Association (FBA) is holding its Forty-Second Annual Symposium on Government Acquisition Recent Developments in Government Contracting on November 12-13, 2014, at the Huntsville Marriott, Huntsville, AL.
The symposium capitalizes on the expertise from renowned private and federal sector attorneys and permits local private and federal sector attorneys and other members of the acquisition community to further develop their technical skills while earning continuing legal and acquisition education credits.

On November 12, 2014, the NAC FBA is hosting a cocktail reception and dinner in Honor of the Chief, Command and General Counsels of the Multiple United States Army Redstone Arsenal Commands and NASA Marshall Space Flight Center at the U.S. Space and Rocket Center Mission Control Center Floor and Mars Dining Room. The reception and dinner is open to FBA members, symposium speakers, private sector attorneys who are admitted to practice law before a federal court, and attorneys employed by local federal government agencies, to include The U.S. Army Materiel Command, The U. S. Army Space and Missile Defense Command, The Missile Defense Agency, The U.S. Army Aviation and Missile Command, The U.S. Army Contracting Command, The U.S. Army Expeditionary Contracting Command, The U. S. Army Corps of Engineers, and The National Aeronautics and Space Administration. It is anticipated that about 60 private and federal sector attorneys will attend the event. The dinner is free to those in attendance. The value of the cocktail reception and the meal is $50 per person.

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), 14 CFR 1207.103 (c)(4), I have determined that this event will be a widely attended gathering of federal and private sector attorneys, and it is in the best interest of NASA to permit employees who receive invitations to attend the reception and dinner. The event will provide NASA attorneys an opportunity to network with other federal sector attorneys, as well as private sector attorneys, and to discuss current legal issues pertaining to federal procurement.

Each year, the NAC FBA sponsors the Federal Acquisition Symposium and the Federal Labor Law Symposium. Attorneys from the MSFC's Office of Chief Counsel (OCC) typically attend one or both symposia. Funds for such attendance are approved by the Chief Counsel. The total cost to send attorneys to the symposia is only a small part of OCC's annual training budget. While NASA is providing a speaker for the symposium, NASA is not a co-sponsor of the symposium.

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 invitees, accompanied by a spouse or other guest, may attend this event.

NASA employees whose duties may substantially affect the FBA 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.

FBA is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. Therefore, this opinion is applicable to any "Schedule C', non-career appointees who may be invited to the event.

Audrey D. Robinson
Chief Counsel

National Aeronautics and Space Administration

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

November 6, 2014

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Attorneys to Attend Speaker's Dinner Sponsored By the North Alabama Chapter of the Federal Bar Association

The North Alabama Chapter (NAC) of the Federal Bar Association (FBA) is holding its Forty-Second Annual Symposium on Government Acquisition Recent Developments in Government Contracting on November 12-13, 2014, at the Huntsville Marriott, Huntsville, AL. The symposium capitalizes on the expertise from renowned private and federal sector attorneys and permits local private and federal sector attorneys and other members of the acquisition community to further develop their technical skills while earning continuing legal and acquisition education credits.

On November 13, 2014, the NAC FBA is hosting a Speaker's Dinner at the Grille 29 in Huntsville. There are approximately twenty invitees, including six NAC FBA officers and one guest each, and six symposium speakers and one guest each. Of the invitees, the following are NASA attorneys; Sumara Thompson-King, General Counsel, and Monica Aquino-Thieman, Attorney Adviser for Contracts, NASA Headquarters, who are speakers at the Symposium, and Patricia Watson, Attorney Adviser for General Law at NASA MSFC; who will be attending in her capacity as an officer of the NAC FBA. The estimated cost is approximately $49 per person.

In accordance with 5 C.F.R. 2635.204(g)(3), 14 CFR 1207.103 (c)(4), I have determined that this event will be a widely attended gathering of federal and private sector attorneys, and that it is in the best interest of NASA to permit these NASA attorneys to attend the dinner. The event will provide NASA attorneys an opportunity to network with other federal sector attorneys, as well as private sector attorneys, and to discuss current legal issues pertaining to federal procurement.

Each year, the NAC FBA sponsors the Federal Acquisition Symposium and the Federal Labor Law Symposium. Attorneys from the MSFC's Office of Chief Counsel (OCC) typically attend one or both symposia. Funds for such attendance are approved by the Chief Counsel. The total cost to send attorneys to the symposia is only a small part of OCC's annual training budget. Likewise, while the NAC FBA relies on attendance fees to sponsor the symposia, it receives other sources of funding and would continue to exist as a professional organization without the attendance of MSFC attorneys at the two symposia.

Because the dinner will be attended by private attorneys and legal experts in the federal procurement profession, I have determined that NASA's interest in these three attorneys participation in the Speakers Dinner outweighs the concern that acceptance of the dinner may improperly influence them in the performance of their official duties. Therefore, these attorneys may attend the dinner.

FBA is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Audrey D. Robinson
Chief Counsel