

National Aeronautics and Space Administration

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

May 2, 2014



LS01 (AMM)

Reply to Attn of:

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees with Senior Institutional Responsibilities to Attend the National Space Club - Huntsville Breakfast with Marshall Space Flight Center Director Patrick Scheuermann

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

NASA employees with senior institutional responsibilities have been invited to attend the National Space Club - Huntsville Chapter Breakfast with Marshall Center Director Patrick Scheuermann on May 13, 2014, at the Dynetics Solutions Complex in Huntsville.

The National Space Club - Huntsville Chapter was founded in 1985 to further the aims locally of the National Space Club. The National Space Club endeavors to foster excellence in space activity through interaction between industry and government, and through a continuing program of educational support. Through its programs, activities, and awards, it works to promote space leadership and education. Its members include numerous NASA contractors.

This event will be a widely-attended gathering of NASA personnel, aerospace and defense industry representatives, community leaders, elected officials, and military and NASA leaders. Breakfast tickets cost \$20 per person and approximately 200 individuals have been invited to attend. The breakfast is funded by the National Space Club - Huntsville Chapter.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

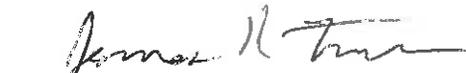
The invited MSFC employees are Center Director, Deputy Director, and all direct reports and deputies. These employees are similarly situated in that they each have senior institutional responsibilities for NASA that may involve significant community relations responsibilities that could influence Space Club programs and activities. Some of these individuals may have duties affecting members of the Space Club. I have determined that attendance of these senior institutional employees at the breakfast is in the interest of NASA 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 with senior institutional responsibilities 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 at the event.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

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


Audrey D. Robinson
Chief Counsel