

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



June 18, 2014

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees with Senior Institutional Responsibilities to Attend the National Space Club - Huntsville Luncheon

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 Luncheon with DARPA Deputy Director Steven Walker on June 25, 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. Luncheon tickets cost \$20 per person and approximately 200 individuals have been invited to attend. The luncheon 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 luncheon 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.

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

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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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 the above mentioned 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.

*NASA employees whose duties may substantially affect the National Space Club, or a majority of its members, 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.

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Audrey D. Robinson  
Chief Counsel