

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



January 12, 2015

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Marshall Center Director and the  
Manager of the Space Launch System Program to  
Attend the Downtown Huntsville, Inc., Annual Meeting

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

The NASA Associate Administrator has been invited to speak, and the Marshall Center Director and the Manager of the Space Launch System (SLS) Program have been invited to attend the Downtown Huntsville, Inc., Annual Meeting Breakfast. This event will be at the Von Braun Center Atrium on January 16, 2015, at 7:30 a.m. Downtown Huntsville, Inc., is a 501(c)(3) non-profit organization. This event does not involve any fundraising.

This event is sponsored by Downtown Huntsville, Inc. (DHI), Aerojet Rocketdyne, Boeing, and Lockheed Martin. This event is open to all of DHI and its partner entity, Big Spring Partners' members, which include downtown property owners, business owners, business organizations, tourist attractions, advocacy groups, neighborhood associations, and residents from throughout the city. The co-sponsors, Aerojet Rocketdyne, Boeing, and Lockheed Martin, are NASA contractors.

The breakfast will be a widely-attended gathering of DHI and Big Spring Partners' members, federal, state, and local government officials and staff; corporate executives, representatives of aerospace and defense contractors, academia, aviation enthusiasts, and members of the press. Breakfast tickets cost \$38 per person and approximately 350 people are expected to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

The Marshall Center Director and the Manager of the SLS Program are similarly situated because they each have senior institutional or program responsibilities for NASA that may involve Aerojet Rocketdyne, Boeing, and Lockheed Martin's business interests.

I have determined that attendance of the Marshall Center Director and the Manager of the SLS Program at this event would be in the best interest of NASA, since it will further NASA programs and operations, help to raise NASA's profile with local business and governmental

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 the Marshall Center Director and the Manager of the SLS Program 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 Center Director and the Manager of the SLS Program may accept free attendance at the event.

DHI is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. Aerojet Rocketdyne, Boeing, and Lockheed Martin are lobbying organizations, 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 cost of the refreshments they consume at the reception.

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



Audrey D. Robinson  
Chief Counsel