

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



October 9, 2014

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by  
NASA Employees At the Annual Von Braun Memorial Dinner

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

Several NASA employees have been invited to attend the Annual Von Braun Memorial Dinner sponsored by The National Space Club, presenting sponsor Teledyne Brown Engineering, and other sponsors<sup>1</sup>. This event is scheduled for Wednesday, October 29, 2014, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception at 5:00 p.m. and dinner at 7:00 p.m.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit organization under Section 501(c)(6) of the IRS code that does not employ lobbyists, and which has both individual and corporate members, including several NASA contractors.

This event will be a widely-attended gathering of NSC members, NASA and military members, and state and local elected officials, as well as other community leaders. Besides more than 75 NASA employees, representatives of the U.S. Army Aviation and Missile Command, and the U.S. Army Missile Defense Agency have been invited. It is also expected that community leaders, state and local elected officials, and representatives of private industry will be in attendance. The event is valued at \$100 per person and approximately 800 people are invited to attend. 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. The attendance of

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<sup>1</sup> Platinum Sponsors for this event are ATK, Boeing, Dynetics, Lockheed Martin, Aerojet Rocketdyne, SAIC, and Jacobs. Platinum Sponsors have paid \$10,000 or more towards the cost of the dinner.

NASA employees at the event will help to raise NASA's profile with state and local elected officials, military, governmental, and community leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its activities. 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 employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Accordingly, NASA employees whose duties do not substantially affect the NSC or a majority of its corporate members – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation for free attendance to the dinner. NASA employees whose duties may substantially affect the NSC, Teledyne, the other Platinum sponsors, or a number of the NSC corporate sponsors, 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.

Additionally, Teledyne, Boeing, Lockheed Martin, Aerojet, SAIC, and Jacobs 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 \$100 cost of the reception.

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



Audrey D. Robinson  
Chief Counsel

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



October 9, 2014

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees Who Have Senior Institutional or Project Responsibilities At the Annual Von Braun Memorial Dinner

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

Certain NASA employees who have senior institutional or project responsibilities have been invited to attend the Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club, presenting sponsor Teledyne Brown Engineering, and other sponsors,<sup>1</sup> scheduled for Wednesday, October 29, 2014, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception at 5:00 p.m., and dinner at 7:00 p.m.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit organization under Section 501(c)(6) of the IRS code that does not employ lobbyists, and which has both individual and corporate members, including several NASA contractors.

This event will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides more than 75 NASA employees, representatives of the U.S. Army Aviation and Missile Command, and the U.S. Army Missile Defense Agency, have been invited. It is also expected that community leaders, state and local officials, and representatives of private industry will be in attendance. The event is valued at \$100 per person and approximately 800 people are invited to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

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<sup>1</sup> Platinum Sponsors for this event are ATK, Boeing, Dynetics, Lockheed Martin, Aerojet Rocketdyne, SAIC, and Jacobs. Platinum Sponsors have paid \$10,000 or more towards the cost of the dinner.

Many of NSC's members and the sponsors of this event listed above are companies that are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future.<sup>2</sup> Some NASA personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to members of NSC in their pursuit to provide, or seek to provide, contractual services to NASA.<sup>3</sup> These personnel are similarly situated in that they each have Senior Institutional or Project responsibilities that could significantly influence current or future contracts for a majority of the NSC's corporate members. Alternatively, they may have duties that could significantly affect the interests of the NSC itself.

I have determined that free attendance of these senior institutional leaders at the event is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the 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 senior institutional leaders 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 in the positions identified may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

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<sup>2</sup> See file for listing of NSC corporate membership.

<sup>3</sup> Center Director; Associate Director, Technical; Chief Technologist; Deputy Director; Senior Executive for Technology and Integration; Associate Director; Director and Deputy Director of the Office of Center Operations; Director and Deputy Director of the Office of Strategic Analysis & Communications; Director and Deputy of the Engineering Directorate; Chief Engineer; Manager and Deputy Manager Flight Programs and Partnerships; Director and Deputy Director of the Office of Human Capital; Director and Deputy Director of the Office of Chief Information Officer and for NEACC; Chief Counsel and Deputy Chief Counsel; Director and Deputy Director of the Office of Diversity and Equal Opportunity; Director and Deputy Director Office of Procurement; Small Business Specialist; Director and Deputy Director of Safety and Mission Assurance Office; Chief Financial Officer; Director and Deputy Director of Michoud Assembly Facility; Manager and Deputy Manager Science and Technology Office; Manager and Deputy Manager Space Launch System (SLS) Program Office; Chief Engineer and Deputy SLS Program Office; Supervisor, Program Support and Operations Office; Supervisor, Boosters Office; Supervisor, Engines Office; Supervisor, Stages Office; and Supervisor, Advanced Development Office.

Additionally, Teledyne, Boeing, Lockheed Martin, Aerojet, SAIC, and Jacobs 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 \$100 cost of the reception.

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



Audrey D. Robinson  
Chief Counsel