



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

October 23, 2023

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: Pamela A. Bourque/LS01

SUBJECT: Approval for NASA Employees to Attend the
Annual Dr. Wernher 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 Dr. Wernher von Braun Memorial Dinner. This Dinner is sponsored by The National Space Club. It is scheduled for October 25, 2023, at the Von Braun Center. The evening begins with a reception at 5:30 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)(3) of the IRS code and does not employ lobbyists. The NSC has both individual and corporate members.

This event will be a widely-attended gathering of NSC members, NASA and military employees, aerospace and defense industry contractors, federal, state and local government officials and staff, academia, as well as other community leaders. The event is valued at \$200 per person and approximately 1200 people are expected to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). A space themed novelty gift valued at \$15 will also be provided to each guest.

I have determined that free attendance of NASA employees at the event is in the interest of the agency because it will further agency programs and operations. Their attendance 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 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,

these NASA employees may accept free attendance to the event. They may also accept invitations for an accompanying spouse or guest. The employees can also accept the space themed gift item valued at \$15.

NASA employees whose duties may substantially affect the National Space Club 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.

Note that NASA employees supporting active procurements should use care to avoid sitting at corporate tables of entities listed as interested parties in those procurements.

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

Pamela A. Bourque
Acting Chief Counsel