



October 29, 2024

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: Pamela A. Bourque

SUBJECT: Approval for NASA Employees to Attend the Blue Origin-KBR  
Reception Following the 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 Blue Origin-KBR Reception (Reception) following the Von Braun Memorial Dinner. The Reception will be held on October 30, 2024, at Baker & Able at the 106 Jefferson Hotel in Huntsville.

This event will be a widely attended gathering of aerospace industry members, federal government representatives, local elected officials, academia, and other guests from the community. The cost for refreshments is estimated at \$40 per person. Approximately 200 people are expected to attend. This event is sponsored by Blue Origin and KBR, both of which are NASA contractors. 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 of NASA employees 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 federal governmental leaders, 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 Reception. They may also accept invitations for an accompanying spouse or guest.

It is our understanding that the event sponsors will also be offering a portable device charger valued at \$16 to each attendee of this event. Assuming that the value of this item is truly \$20 or less, NASA employees may accept the portable device charger under the authority of 5 CFR § 2635.204(a), provided that the aggregate market value of gifts received by the employee from the event sponsors does not exceed \$50 in this calendar year. Further, before

using the portable device charger with NASA portable devices or other Information Technology (IT) resources, employees should ensure that the Office of the Chief Information Officer (OCIO) has approved this portable device charger for such usage.

NASA employees whose duties may substantially affect Blue Origin or KBR 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: Employees who have duties related to the ESSCA II procurement, where KBR is an interested party, are not covered by this memo and may not attend this event.

Blue Origin and KBR are lobbying organizations and as such NASA employees who are in non-career positions for which Executive Order 13770 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$40 cost of the ticket for themselves and their spouse or guest.

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

Pamela A. Bourque  
Chief Counsel