National Aeronautics and
Space Administration

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

October 23, 2026

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 following the Von Braun Memorial Dinner. The reception will be held on October 28, 2026, 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 of refreshments is estimated at $50 per person. Approximately 400 people are expected to attend. A space themed gift valued at $15 will also be provided to each guest. 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. NASA employees may also accept the space themed gift.

Note: NASA employees attending with a spouse may only accept one item per family to fit under the $20 exception to the gift prohibition, per 5 CFR Part 2635.204(a).

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.

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

PAMELA BOURQUE

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Pamela A. Bourque
Chief Counsel