



January 4, 2012

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at Sigma
Space Reception

On the evening of Friday, January 20, 2012, Sigma Space Corporation is hosting a reception at the Newton White Mansion in Mitchellville, MD. Sigma Space is an aerospace contractor that produces remote sensing instrumentation for NASA and other Federal agencies.

Approximately 450 guests have been invited to the reception, including individuals from the aerospace industry, Federal agencies, including NASA and NOAA, universities, and local officials. The estimated cost per person of the reception is approximately \$45. Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's space and earth science programs.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect Sigma Space may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

However, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse Sigma Space the cost of refreshments consumed by themselves and their accompanying guests. Moreover, NASA employees whose duties substantially affect Sigma Space, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens".

Robert M. Stephens