National Aeronautics and Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771

December 4, 2015

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

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

On January 22, 2016, Sigma Space Corp. is hosting and sponsoring an annual reception at the Newton White Mansion in Mitchellville, Maryland. Sigma Space is an aerospace contractor that produces remote sensing instrumentation for NASA and other Federal agencies.

Approximately 350 guests have been invited to the reception, including individuals from the aerospace industry, other Federal agencies, academia, Congress, 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 programs and missions.

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.

R. Andrew Falcon