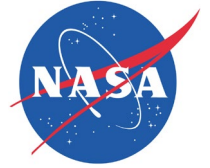


National Aeronautics and
Space Administration

Mary W. Jackson Building NASA Headquarters
Washington, DC 20546-0001



July 18, 2024

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance at Events Related to the Farnborough International Air Show 2024, July 20–21, 2024

Representatives from NASA have been invited to attend a series of events in conjunction with the Farnborough International Air Show 2024 at Farnborough, England. Aerospace and government leaders from around the world will gather at this event to discuss the technological innovations in aeronautics and space conquest. The following are events that NASA employees are attending:

1. ULA / Honorable Bud Cramer Reception with Tommy Quinn and Ryan Williams, July 20, 2024: United Launch Alliance (ULA), is holding a reception at Royal Automobile Club, Terrace Room, 89 Pall Mall, London SW1Y 5HS, from 5:00 p.m. to 7:00 p.m. Approximately 250 individuals from U.S. Government agencies, congressional members and staff, and industry. The approximate cost per person is \$80.

2. World of Aviation and Aerospace Reception, July 21, 2024: The Greater Wichita Partnership, a non-profit organization under 501(c)(6) of the Internal Revenue Code, along with Honorary Host Senator Moran, is holding a reception at 4:00 p.m. to 6:00 p.m. at the De Vere Grand Connaught Rooms, London. Approximately 150-200 have been invited, including representatives from U.S. Government agencies, state and local government, academia, the legislative branch, and industry. The approximate cost per person is \$75.

3. Huntsville/Madison Chamber of Commerce Reception, July 21, 2024: Huntsville/Madison County Chamber of Commerce, a non-profit organization under 501(c)(6) of the Internal Revenue Code, along with the Huntsville International Airport, Madison County Commission, Tennessee Valley Authority, and University of Alabama are hosting a reception at 6:00 p.m. – 8:00 p.m. at the Middle Temple, Middle Temple Ln., London EC4Y 9BT. Approximately 300 people have been invited, including U.S. and State Government personnel, industry representatives, academia, and community and business leaders from the Huntsville region. The approximate cost per person is \$31.22 (food) and \$26.00 (beverages). The Huntsville/Madison County Chamber is in control of the organization of this event. The purpose of the event is to honor Sen. Katie Britt for her service in the Senate and facilitate community interaction with aerospace industry leaders.

I find that these events meet the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because of NASA's interest in international collaboration and in the advancement and application of flight and related technologies, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors indicated on this memorandum may accept an invitation for free attendance at these events for themselves and an invited guest. NASA employees, whose duties may substantially affect these sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.

However, NASA employees in non-career positions who are required to sign an ethics pledge under Executive Order 13989 may only accept the invitation for event No. 1 (ULA's reception) if they reimburse the hosts the fair market value of the event.

Giveaways. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion and no more than \$50 from one source in a calendar year. Other than for presentation items with little intrinsic value and no additional function, such as pins or patches with mission emblems, NASA invitees must reimburse the sponsors for the full value of any gift items exceeding these caps distributed by the sponsors. Moreover, non-career NASA employees subject to the ethics pledge should reimburse sponsors which are lobbying organizations for purposes of the ethics pledge the full value of any such gift items accepted even if these monetary caps are not exceeded.

Corporate Hospitality Suites. This determination does not include the hospitality suites that may be hosted by corporate sponsors. The suites provide corporations with space to receive visitors and view Air show activities. NASA personnel should observe the exception to the gift rules that allows acceptance of gifts (including free refreshments and tangible gifts) with an aggregate value of \$20 or less per event from a single source, not to exceed \$50 per year from that source. NASA employees invited to and desiring to attend these associated corporate hospitality suites may accept free refreshments if the fair market value of the food and drink is less than \$20. If the fair market value is more than \$20, the employee should personally provide that amount to the corporate host as reimbursement. However, non-career NASA employees subject to the ethics pledge should reimburse the sponsors which are registered lobbying organizations for purposes of the ethics pledge for the fair market value of any refreshments consumed at any hospitality suite.

Adam F. Greenstone