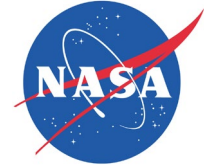


NATIONAL AERONAUTICS AND SPACE
ADMINISTRATION

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



June 12, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the
Paris Air Show and surrounding events June 13-19, 2025

Representatives from NASA have been invited to attend a series of events in conjunction with the 2025 Paris Air Show at Paris France. Foreign governments as well as individual corporations will host events throughout the Paris Air Show. Aerospace and government leaders from around the world will gather at this event to discuss the technological innovations in aeronautics and space conquest. The purpose of the Air Show is to bring experts from around the world together to provide a forum for discussions on the technical, scientific, and policy challenges of space travel. The following are events that NASA employees are attending.

- 1) Voyager Technologies, Rocket Lab, and Virgin Galactic, June 14, 2025, will host a joint reception from 2:00 to 4:00 p.m. at the Hotel Kimpton St. Honore' Montecito Room 27 – 29 Bd des Capucines, 75002 Paris, France. Approximately 50 – 60 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies and other U.S. public sector personnel, and from industry. The estimated cost of the event, including all food and beverages, is approximately \$45 per person. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.
- 2) United Launch Alliance (ULA) and Venture Government Strategies, June 14, 2025, will host a reception from 5:00 to 7:00 p.m. at the Hotel d'Evreux, 19 Place Vensome, 75001, Paris, France. Approximately 250 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies and other U.S. public sector personnel, and representatives from industry. The estimated cost of the event, including all food and beverages, is approximately \$80 per person. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.

- 3) Aerospace Alliance Seine River Cruise, June 15, 2025, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, is holding a river cruise reception at 11:00 a.m. to 2:00 p.m. meeting at the Paquebot, Yachts De Paris – Port de Javel Haut in Paris, France. Approximately 400 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies; state and local officials from Alabama, Florida and Louisiana and other U.S. public sector personnel; foreign government officials; and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is approximately \$200 per person. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.
- 4) U.S. Senator Jerry Moran and the Greater Wichita Partnership, June 15, 2025, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, are holding a reception from 4:00 to 6:00 p.m. at the Pavillon Gabriel, 5 Av. Gabriel, 75008 Paris, France. Approximately 150 - 200 people have been invited to the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies; state and local officials from Kansas and other U.S. public sector personnel; foreign government officials, and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. Senator Moran is in control of the invitations for this event. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.
- 5) Huntsville/Madison County Chamber, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, June 15, 2025, is holding a reception from 6:00 to 8:00 p.m. at the Hotel National des Invalides in Paris, France. Approximately 300 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies and other U.S. public sector personnel, and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is approximately \$51 per person. The Huntsville/Madison County Chamber is in control of the organization of this event. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.
- 6) Aerospace Industries Association (AIA), June 15, 2025, is holding its President's Reception¹ at the Baronne at Hotel Salomon de Rothschild, in Paris, France, from 7:00 p.m. to 9:00 p.m. Approximately 350 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies and other U.S. public sector personnel, foreign government officials, and representatives from academia and industry. The estimated cost of the

¹ For the AIA President's Reception, this determination also includes the VIP Industry Reception given by AIA, which is a pre-reception in the same venue with high level executives and officials from industry, the U.S. Government, and foreign delegations.

event, including all food and beverages, is approximately \$205 per person. The AIA is in control of the organization of this event. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.

- 7) Airbus Defence and Space, June 16, 2025, is holding a reception at the Paris Museum of Modern Art, in Paris, France, at 7:00 p.m. Approximately 500 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies and other U.S. public sector personnel, foreign government officials, and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is approximately \$254 per person. Airbus is in control of the organization of this event. The event is by invitation only.
- 8) U.S. Industry Reception, together with the Aerospace Industries Association (AIA), GE Aerospace, General Atomics Aeronautical, Sierra Nevada Corporation, and Oliver Wyman, June 16, 2025, are holding a reception at the Musee Rodin, 77 Rue de Varenne, 75007 Paris, France from 8:00 p.m. to 10:00 p.m. Approximately 1000 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies and other U.S. public sector personnel, and representatives from academia, and industry. The estimated cost of the event, including all food and beverages, is approximately \$238 per person.
- 9) On June 18, 2025, SaFran is holding a reception at the Cercle de l'Union Interalliee, 33, rue du Faubourg Saint-Honore', 75008 Paris, France at 7:30 p.m. Approximately 200 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, foreign representatives, academia, and industry. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.

I find that these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).² I further determine that there is an Agency interest in having NASA personnel attend these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA's policies, programs, and operations. Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the sponsors may accept an invitation for free attendance to the events where complimentary invitations have been issued. In those circumstances, I find that the Agency's interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties.

² When the gift of free attendance is to attend a foreign government's reception, such as the Italian government's reception on June 17, acceptance of the gift is authorized by the Foreign Gifts and Decorations Act up to a value of \$480.

However, NASA employees who have a significant role in any pending matter affecting the interests of any of the indicated organizations such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation of free attendance to 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.

Corporate Chalets. This determination does not include the chalets hosted by corporate sponsors. The chalets 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 chalets 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 reimburse the value to the corporate host.³

Adam F. Greenstone

³ Many U.S. Companies reserve chalets. Employees should consider declining otherwise permissible gifts if the context is such that a reasonable person with knowledge of the relevant facts would question the employee's integrity or impartiality due to accepting the gift. Reimbursements may be placed in an "honor basket" if present.