



July 17, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the
Farnborough Airshow and surrounding events July 18-19, 2026

Representatives from NASA have been invited to attend a series of events in conjunction with the Farnborough International Air Show 2026 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. SENEDIA New England Breakfast: July 18, 2026: SENEDIA, a non-profit organization under 501(c)(6) of the Internal Revenue Code, is hosting the SENEDIA New England Breakfast reception at One Marylebone, 1 Marylebone Rd, London from 9:00 a.m. to 11:30 a.m. Approximately 130 people are expected to attend the event. Attendees will have a diversity of views or interests and will include U.S. government officials, congressional members and staffers, local and city officials, and industry representatives. The cost of the event includes all food and beverages. SENEDIA is in control of the organization of this event. The purpose of this event is to provide attendees with an opportunity to engage with a broad cross-section of industry and government leaders. Guests are invited.
2. United Launch Alliance (ULA) and Venture Government Strategies Reception, July 18, 2026: ULA and Venture Government Strategies, a bipartisan government affairs and lobbying firm, are hosting a reception at Dartmouth House, 37 Charles St, London, from 5:00 p.m. to 7:00 p.m. Approximately 250 individuals from Congressional representatives and staff, state and local officials, industry representatives, NASA personnel, personnel from other federal agencies and members of the public have been invited to attend. The approximate cost is \$80 per person. Guests are invited.
3. Boeing and RTX Reception, July 18, 2026: Boeing and RTX are hosting a reception at Harrods, The Georgian, London, from 6:30 p.m. to 8:30 p.m. Approximately 75 individuals from state and federal agencies and industry, have been invited to attend. The approximate cost is \$150 per person. Guests are invited.
4. Rocket Lab and Voyager Technologies Reception, July 18, 2026: Rocket Lab and Voyager Technologies are holding a reception at King's Head Pub, London, from 2:00 p.m. to 4:30 p.m. Approximately 100 have been invited, including Congressional members and staff, industry representatives, NASA personnel, personnel from other federal agencies, and state and local officials. The approximate cost is \$27.50 per person.

5. North Alabama Reception, July 19, 2026: The City of Huntsville, Huntsville/Madison County Chamber, a non-profit organization under 501(c)(6) of the Internal Revenue Code, the Huntsville International Airport, Madison County Commission, Tennessee Valley Authority, and the University of Alabama in Huntsville are hosting a reception beginning at 6:00 p.m. at the Middle Temple, Middle Temple Ln., London. Approximately 300 people have been invited, including Members of Congress, other federal agencies, state and local officials, academia, and industry representatives. The approximate cost per person is \$175. The purpose of the event is to honor North Alabama.

6. Air Capital of the World Celebration, July 19, 2026: The Greater Wichita Partnership, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, and U.S. Senator Jerry Moran are holding a reception from 4:00 to 6:00 p.m. at the Devere Grant Connaught, 61-65 Great Queen St, London. Approximately 300 - 400 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 representatives from academia and industry. The estimated cost of the event, including all food and beverages, is approximately \$75 per person. The Greater Wichita Partnership is in control of the invitations for this event. The purpose of the event is to honor Kansas.

7. AIA President's Reception: July 19, 2026: Aerospace Industries Association (AIA) is hosting the AIA President's Reception at the Victoria and Albert Museum, Cromwell Rd, London from 6:45 p.m. to 7:30 p.m. for a VIP reception and from 7:15 p.m. to 10:00 p.m. for the main reception. Approximately 450 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, U.S. state and local officials, U.S. and 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. AIA is in control of the organization of this event. The purpose of this event is to focus on the U.S. and European issues and relations. The NASA Administrator has also been invited to speak at the event.

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.

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 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.

Kathleen T. Spear