



DEPARTMENT OF THE NAVY  
HEADQUARTERS UNITED STATES MARINE CORPS  
2 NAVY ANNEX  
WASHINGTON, DC 20380-1775

IN REPLY REFER TO:

5000

CL

13 Apr 04

MEMORANDUM FOR UNITED STATES MARINE CORPS INVITEES

Subj: BELL AND BOEING RECEPTION AT THE FARNBOROUGH AIR SHOW

Ref: (a) 5 C.F.R. 2635.204(g)(2)

1. The Bell and Boeing Companies and their V-22 Team Osprey subcontractors will host a reception in conjunction with the Farnborough Air Show. The event is scheduled for the evening of Sunday, 18 July 2004 at the Mandarin Oriental Hotel in London. Participants will be from throughout the aviation industry including various foreign government representatives.

2. Because it is expected that a large number of persons will attend and that persons with diverse views and interests will be present, this event qualifies as an exception to the gifts rules under reference (a). This memorandum further constitutes a finding that the Marine Corps interest in having its invitees attend this event outweighs concerns that the acceptance of the gift of free attendance from the Bell and Boeing Companies may appear to improperly influence them in the performance of their official duties.

3. Accordingly, Marine Corps invitees may accept free attendance, food, beverages, and entertainment furnished as an integral part of this event. In addition, Marine Corps invitees may accept items from the Bell and Boeing Companies with a cumulative value of \$20.00 or less.

4. Marine Corps personnel whose duties may substantially affect the Bell and Boeing Companies should seek an individual determination pursuant to 5 C.F.R 2635.204(g)(3)(i) regarding this event from their local ethics counselor.

PETER M. MURPHY  
Counsel for the Commandant  
Deputy Designated Agency  
Ethics Official