



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

June 11, 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
FUSE Ventures Event on June 24, 2026

On June 24, 2026, FUSE Ventures (FUSE), a venture capital firm in commercial space, will host “For All Mankind: A Private Dinner on the Orbital Economy” at Osteria Mozza in Washington, DC, from 6:30 p.m. to 9:30 p.m. The purpose of the dinner is to facilitate discussion and exchange of perspectives on developments in space, communications, national security, and related policy issues.

Approximately 120 people have been invited to attend. Guests of NASA personnel are not invited.¹ Attendees will have a diversity of views or interests and will include representatives of the legislative branch, defense and aerospace companies, policy/research institutes, other federal agencies, and international entities. The estimated cost of the event, including all food and beverages, is \$200 per person.

FUSE will provide notebooks and pens for notetaking purposes, which jointly have a retail value of \$10. NASA employees may accept gifts under the \$20 gift exception set forth at 5 C.F.R. § 2635.204(a), which allows the employee to accept gifts not exceeding \$20 in the aggregate if the employee will not have accepted gifts from the one source exceeding \$50 in 2026.

FUSE is in exclusive control of the organizing, planning and invitations for this event. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs and obtain perspectives on NASA’s policies and plans. I find that the event meets 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 the event because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs and operations. NASA employees who do not have a significant role in a matter affecting the interests of the sponsor may accept an invitation for free attendance to the event. 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.

¹ NASA invitees are advised not to provide recommendations to the host on other invitations to the event.

However, NASA employees who have a significant role in any pending matter affecting the interests of FUSE, 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.

Adam F. Greenstone