

United States Senate

SELECT COMMITTEE ON ETHICS

June 9, 2026

Dear Colleague:

The Select Committee on Ethics (the Committee) is issuing this letter to provide guidance to Senate Members, officers, and employees who may be offered free attendance at FIFA World Cup 2026 (the World Cup) matches or other events held in conjunction with the World Cup. As explained below, because it is unlikely that an exception to Senate Rule 35's prohibition on accepting gifts would apply, Members, officers, and employees of the Senate—and their families—are advised to pay fair market value for tickets (typically defined as the ticket's face value) and to contact the Committee before accepting any offers of free attendance.

Guidance Regarding the FIFA World Cup 2026

The World Cup will be hosted by 16 cities across the United States, Canada, and Mexico, on June 11–July 19, 2026. Each of the 11 host cities in the United States have established their own individual host committees, which contract directly with FIFA, to provide the resources necessary to hold the matches in their city. The host committees have also partnered with both private and public organizations, including major corporations and local, state, and federal government agencies, for the funding, coordination, and facilitation of their home World Cup matches and associated events. Despite the significant and important coordination between host city governments and the host committees, it is important to note that the host committees are not government entities. All the U.S. host committees are registered as tax exempt organizations under § 501(c) of the Internal Revenue Code retaining federally registered lobbyists.

Tickets to all World Cup matches are sold directly by FIFA. Additionally, each host city will sponsor World Cup-related events featuring live match broadcasts, live entertainment, interactive fan experiences, and food and other refreshments. Entry to these events varies by host city.

In accordance with Senate Rule 35, Members, officers, and employees are prohibited from accepting any gift, including free attendance or discounted attendance at an event, from registered lobbyists, agents of a foreign principal, or private entities that retain or employ registered lobbyists or foreign agents unless the gift is permitted by one of the enumerated exceptions in the Rule. If there is no applicable exception, Members, officers, and employees may pay fair market value for a ticket. In accordance with the Honest Leadership and Open Government Act of 2007, the fair market value of a ticket to an entertainment or sporting event is the face value of the ticket. In the case of a ticket without a face value, the value of the ticket would be considered the highest face value of a ticket for that event.¹ Members are advised to consult the Federal Election Commission for questions regarding the use of campaign committee funds to purchase tickets for the World Cup or events connected with the World Cup.

¹ Honest Government and Open Leadership Act of 2007, Pub. L. 110-81, 121 Stat. 735 (2007).

The exceptions most likely to apply to World Cup match attendance or events held in connection with the World Cup are:

Gifts offered by government entities. Acceptance of free or discounted attendance offered by any unit of federal, state, or local government is permissible. In contrast, Rule 35 does not permit acceptance of free or discounted attendance offered by a host committee or acceptance of a ticket paid for by a federal, state, or local government official.

Widely available opportunities or benefits. Acceptance of free or discounted attendance available to the public or to a class consisting of all federal government employees or offered to members of a group or class in which membership is unrelated to congressional employment is permissible.

Widely attended event. Attendance at a widely-attended event at the invitation of the event sponsor. This exception applies to events with expected attendance including at least 25 non-congressional guests and the event is not a sporting, entertainment, or recreational event. Accordingly, the widely attended event exception may apply to some events sponsored by host committees connected to the World Cup (i.e. FIFA Fan Festivals and Fan Zone events) but would not apply to accepting World Cup match tickets.

Representative or ceremonial functions. In limited circumstances, Rule 35 also permits attendance at an event when the Member is “performing a ceremonial function appropriate to the Member’s . . . official position; or . . . attendance at the event is appropriate to the performance of the official duties or representative function of the Member. . .”² This exception is appropriate for events that require significant hosting or ceremonial responsibilities and usually include event credentials or a formal invitation from the organizing committee. The exception is not available to accept attendance at an event that merely provides the opportunity to discuss official matters with other attendees.

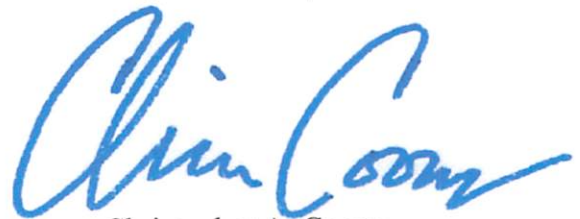
Finally, any gift offered to a family member of a Member, officer, or employee, or a gift to any other individual based on that individual’s relationship with the Member, officer, or employee, is considered a gift to the Member, officer, or employee if the gift was given with the knowledge and acquiescence of the Member, officer, or employee and the Member, officer, or employee has reason to believe the gift was given because of their official position.

This guidance highlights general issues that may arise in connection with the World Cup but is not intended to address all issues that Members, officers, and employees may encounter. Please do not hesitate to contact the Committee if you have additional questions.

Sincerely,



James Lankford
Chairman



Christopher A. Coons
Vice Chairman

² Senate Rule 35.1(d)(1).