



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

January 28, 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 Cheniere at
D.C. Mardi Gras Event on January 28, 2026

On January 28, 2026, Cheniere Energy, Inc. (Cheniere), an international energy company, will host a DC Mardi Gras celebration reception at the National Portrait Gallery, 8th and G Streets NW Washington, DC, from 7:00 – 10:00 p.m.

Approximately 1300 people have been invited to attend. Attendees will have a diversity of views or interests and will include representatives of state, local, and federal government, as well as legislative staff. The estimated cost of the event, including all food and beverages, is \$ 118 per person. Each guest will also be offered socks with a retail value of \$10.00 per pair, which may be accepted by under the exception allowing gifts not exceeding \$20 (including another pair for an accompanying guest), if the employee will not have accepted gifts from Cheniere exceeding \$50 in 2026.

Cheniere is in 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. 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 for themselves and a guest 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.

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