



For the attention of
Investigatory Chamber
Ethics Committee
Fédération Internationale de Football Association

5 October 2026

Complaint under Article 60.1 of the FIFA Code of Ethics

I. Introduction and summary of request

1. The Norwegian Football Association ("NFF") submits this complaint to the Investigatory Chamber of the FIFA Ethics Committee under Article 60.1 of the FIFA Code of Ethics, 2023 edition (the "Code").¹
2. The complaint concerns three matters that came to public and institutional attention between November 2025 and August 2026: the creation and award of the "FIFA Peace Prize, Football Unites the World" to the President of the United States of America (the US President) (Matter A); the suspension of implementation of the automatic red card suspension incurred by United States men's national team forward Folarin Balogun during the 2026 FIFA World Cup (Matter B); and the "FIFA Forward Enterprise" project, a proposed restructuring of FIFA's commercial rights (Matter C, "FFE").
3. NFF requests that this complaint and the evidence submitted with it be evaluated in accordance with Article 61.1 of the Code. NFF further requests that, following that evaluation, the Chairperson instruct the secretariat to initiate a preliminary investigation pursuant to Article 61.2 into Mr. Gianni Infantino, FIFA President, and such other persons bound by the Code of Ethics as the Investigatory Chamber's own assessment may identify. Where that investigation establishes a prima facie case, investigatory proceedings should be opened in accordance with Article 62.1.
4. Given the seniority and positions of the persons whose conduct may require investigation, any preliminary investigation should be conducted with appropriate safeguards to ensure both actual and perceived independence. In particular, NFF respectfully requests that the Chairperson consider exercising the possibility expressly provided for in Article 61.2 of engaging third parties, under the leadership of the Chairperson, with investigative duties. In NFF's view, the use of independent third parties for the substantive investigative work would reduce the risk of actual or perceived pressure on FIFA employees arising from the seniority and position of the people whose conduct may fall within the scope of the investigation.
5. Material factual propositions are identified, where appropriate, as Established or Reported,² and the complaint distinguishes throughout between what is established, what remains to be verified and what requires investigation.

¹ FIFA Code of Ethics, 2023 edition, art. 60(1) (Annex NFF-1). Unless otherwise stated, references in this complaint to "Article" are to articles of the Code.

² Footnotes identify the source relied on for each material proposition. FIFA regulatory instruments are cited by edition and article and are reproduced at Annexes NFF-1 to NFF-5. FIFA circulars and member materials addressed to NFF are at Annexes NFF-6 to NFF-11. Official statements of FIFA, NFF and other football

6. In parallel with this complaint, NFF is submitting a separate referral to FIFA's Governance, Audit and Compliance Committee ("GACC").³ The two filings address different aspects of the three matters through different institutional channels and are intended to complement, not duplicate, one another.

II. The Complainant

7. NFF is the national football association of Norway and a member association of FIFA and UEFA. On 7 August 2026, the NFF Board adopted a formal decision that included an instruction that NFF raise its concerns regarding the three matters addressed in this complaint with FIFA's competent bodies. [Established]⁴

III. Competent body and jurisdiction

8. Article 31.1 defines the Ethics Committee's competence over conduct that has been committed by an individual who was elected, appointed or assigned by FIFA to exercise a function (Article 31.1(a)), that directly concerns that individual's FIFA related duties or responsibilities (Article 31.1(b)), or that is related to the use of FIFA funds (Article 31.1(c)).⁵ Mr. Infantino, as FIFA President, is an individual elected by FIFA to exercise a function,⁶ and the conduct addressed in this complaint concerns his FIFA related duties and responsibilities. The complaint accordingly falls within Article 31.1(a) and (b). The Investigatory Chamber's jurisdiction is not limited to Mr. Infantino. It extends to any other individual meeting the criteria in Article 31.1 whose conduct, identified in the course of the investigation, may be relevant to the matters raised in this complaint or may disclose a potential breach of the Code in connection with those matters.

IV. Standing

9. Article 60.1 provides that any person may file a complaint regarding potential breaches of the Code with the secretariat of the investigatory chamber.⁷ NFF, as a FIFA member association, is entitled to submit such a complaint. Article 60.1 imposes no requirement of direct injury or a specific nexus to the conduct complained of.
10. NFF notes, for completeness, Article 60.2, which provides that there is no entitlement for proceedings to be opened following the submission of a complaint, and Article 60.3, which sanctions a complaint lodged against a person known to be innocent or other malicious steps related to the initiation of proceedings.⁸ NFF files this complaint in good faith, on the basis of the evidence set out below. The matters set out in this complaint warrant substantive evaluation and preliminary investigation. They concern the conduct of FIFA's most senior office holder, and other senior officials directly involved in the matters under investigation, raise questions concerning political neutrality, institutional independence, the integrity of FIFA's decision-making processes and possible use of FIFA office or resources, and involve material facts and

bodies are at Annexes NFF-12 to NFF-26. Press reports are cited by publisher, author (where stated), title and date, and copies as accessed are compiled at Annexes NFF-27 to NFF-30. Online sources were last accessed 28 September 2026.

³ NFF referral to the FIFA Governance, Audit and Compliance Committee dated 2 October 2026.

⁴ NFF public statement of 7 August 2026, <https://www.fotball.no/tema/nff-nyheter/2026/nff-ber-fifa-presidenten-fratre-og-vil-ha-gjennomgang-av-fifa/> (Annex NFF-21).

⁵ Code, art. 31(1)(a) to (c) (Annex NFF-1).

⁶ FIFA Statutes, May 2024 edition, arts. 25 and 33 (Annex NFF-2) (election of the FIFA President by the Congress).

⁷ Code, art. 60(1) (Annex NFF-1).

⁸ Code, art. 60(2) and (3) (Annex NFF-1).

communications that can only realistically be established through access to FIFA's internal records and relevant witnesses. NFF therefore urges the Investigatory Chamber to act on this complaint and to exercise the investigative powers available to it under the Code.

V. Procedural background and sourcing methodology

11. This complaint relies on the FIFA Statutes, May 2024 edition,⁹ the Code of Ethics, 2023 edition,¹⁰ the FIFA Disciplinary Code, May 2026 edition, in force from 1 May 2026,¹¹ and the Regulations for the FIFA World Cup 26™, May 2026 edition,¹² and, where relevant to the independence requirements addressed below, the FIFA Governance Regulations July 2026 edition.¹³
12. The factual record draws on FIFA's own internal communications to member associations, in particular Circular no. 1968¹⁴ and the FFE Member Materials,¹⁵ both held directly by NFF; NFF's own public statements;¹⁶ FIFA's own public statements; and named, independent press reporting.

VI. Matters requiring investigation

VI.A Matter A, the FIFA Peace Prize matter

A) Factual background

13. The creation of the FIFA Peace Prize occurred against a closely preceding and relevant public context. The US President had openly sought the Nobel Peace Prize and had received public nominations and endorsements for that award.¹⁷ On 9 October 2025, the day before the Nobel Peace Prize was announced, Mr. Infantino publicly stated that the US President "definitely deserves the Nobel Peace Prize" for his role in the Gaza peace process. [Established/Reported, Mr. Infantino's public statement; Border Telegraph, 9 October 2025]¹⁸ On 10 October 2025, the Nobel Peace Prize was awarded to Ms. María Corina Machado rather than the US President,

⁹ FIFA Statutes, May 2024 edition (Annex NFF-2), <https://digitalhub.fifa.com/m/16d1f7349fa19ade/original/FIFA-Statutes-2024.pdf>.

¹⁰ FIFA Code of Ethics, 2023 edition (Annex NFF-1), <https://digitalhub.fifa.com/m/4f048486c1f7293c/original/FIFA-Code-of-Ethics-2023.pdf>.

¹¹ FIFA Disciplinary Code, May 2026 edition, in force from 1 May 2026 (Annex NFF-3), <https://digitalhub.fifa.com/asset/5bd452de-0dd6-4342-93d4-53122ccb75b9/FIFA-Disciplinary-Code-2026.pdf>.

¹² Regulations for the FIFA World Cup 26™, May 2026 edition (Annex NFF-4), https://digitalhub.fifa.com/m/636f5c9c6f29771f/original/FWC2026_regulations_EN.pdf.

¹³ FIFA Governance Regulations, July 2026 edition (Annex NFF-5), https://digitalhub.fifa.com/asset/e6706afd-1e4b-4403-855f-177e60918a10/FIFA-Governance-Regulations_July-2026.pdf.

¹⁴ FIFA Circular no. 1968 of 5 August 2026 (Annex NFF-10).

¹⁵ FIFA, "FIFA Forward Enterprise: Member Materials", July 2026, prepared with J.P. Morgan and distributed to member associations on 29 and 30 July 2026 (the "FFE Member Materials") (Annex NFF-11).

¹⁶ Annex NFF-21.

¹⁷ See, e.g., Fox News, L. Casiano, "Pakistan announces intention for second Nobel Peace Prize nomination for Trump over Gaza ceasefire role" (13 October 2025), referring to Pakistan's nomination of June 2025, <https://www.foxnews.com/politics/pakistan-announces-intention-second-nobel-peace-prize-nomination-trump-over-gaza-ceasefire-role> (Annex NFF-27.2).

¹⁸ G. Infantino, Instagram post of 9 October 2025: "President Donald J. Trump definitely deserves the Nobel Peace Prize for his decisive actions" (screen capture at Annex NFF-26); Border Telegraph, "Gianni Infantino says Donald Trump deserves Nobel Peace Prize after Gaza efforts" (9 October 2025), <https://www.bordertelegraph.com/sport/national/25531344.gianni-infantino-says-donald-trump-deserves-nobel-peace-prize-gaza-efforts> (Annex NFF-27.1). The post is also relied on in the FairSquare complaint (Annex NFF-31).

following which the White House publicly criticised the decision not to award the Prize to the US President. [Reported]¹⁹

14. Less than one month later, on 5 November 2025, FIFA announced the creation of the “FIFA Peace Prize, Football Unites the World”. The announcement generated immediate media attention and speculation that the US President would be the inaugural recipient. [Reported, Associated Press and The Guardian, 5 November 2025].²⁰ When Mr. Infantino was directly asked that day whether President Trump would receive the Prize, he did not rule it out, responding that the answer would be known on 5 December. Contemporary reporting also noted the US President’s expected attendance at the FIFA World Cup draw at which the Prize would be presented and highlighted the close relationship between Mr. Infantino and the US President. [Reported, Associated Press and The Guardian, 5 November 2025]²¹
15. On 5 December 2025, FIFA awarded the inaugural Prize to the US President during the FIFA World Cup Final Draw in Washington DC. [Established]²² “The award was introduced by video during FIFA’s official broadcast of the draw.²³ The video praises the US President and credits his leadership with having “ensured that peace exists between the Democratic Republic of Congo and Rwanda, Cambodia and Thailand, Kosovo and Serbia, India and Pakistan, Egypt and Ethiopia, and Armenia and Azerbaijan [and] Israel and Hamas”. In the video he’s also credited with “making a continued effort to bring a lasting peace between Russia and Ukraine”. It describes his term as “a presidency marked by actions to pursue peace around the world”. [Established, FIFA’s official broadcast]. Several of these statements concern ongoing international conflicts where the role of the US President has been controversial.” On presenting the award to the US President, Mr. Infantino stated: “You can always count, Mr President, on my support, on the support of the entire football community [...] to help you make peace and make the world prosper all over the world.” [Established, FIFA’s own contemporaneous publication of the remarks]²⁴

¹⁹ Norwegian Nobel Committee, announcement of the Nobel Peace Prize 2025, 10 October 2025, <https://www.nobelprize.org/prizes/peace/2025/press-release/> (Annex NFF-27.3); CNBC, “Nobel Peace Prize winner Machado praises Trump after White House criticizes snub” (10 October 2025), <https://www.cnbc.com/2025/10/10/trump-nobel-peace-prize-machado-cheung.html> (Annex NFF-27.4); Euronews, “White House slams Nobel committee’s decision not to award 2025 Peace Prize to Trump” (10 October 2025), <https://www.euronews.com/2025/10/10/white-house-slams-nobel-committees-decision-not-to-award-2025-peace-prize-to-trump> (Annex NFF-27.5).

²⁰ FIFA, “FIFA introduces the FIFA Peace Prize: an award to recognise exceptional actions for peace and unity”, media release, 5 November 2025, <https://inside.fifa.com/organisation/media-releases/peace-prize-award-football-unites-the-world-infantino> (Annex NFF-12); Associated Press, “FIFA announces new peace prize to be awarded at World Cup draw in Washington” (5 November 2025), as republished at <https://www.pbs.org/newshour/world/fifa-to-award-new-peace-prize-at-world-cup-draw-in-washington> (Annex NFF-27.6); The Guardian, “Trump ally Infantino to award first Fifa peace prize at World Cup draw in DC” (5 November 2025), <https://www.theguardian.com/football/2025/nov/05/fifa-peace-prize-world-cup-draw-trump> (Annex NFF-27.7).

²¹ Ibid. Mr. Infantino’s answer (“On the 5th of December, you will see”) and his description of the US President as “really a close friend” are also reported in NPR, “FIFA head says ‘you will see’ at World Cup draw if Trump receives new peace prize” (6 November 2025), <https://www.npr.org/2025/11/06/g-s1-96755/fifa-new-peace-prize> (Annex NFF-27.8).

²² FIFA, “President Donald J. Trump awarded ‘FIFA Peace Prize: Football Unites the World’”, 5 December 2025, <https://inside.fifa.com/campaigns/football-unites-the-world/news/president-trump-peace-prize-football-unites-the-world> (Annex NFF-13).

²³ See https://www.youtube.com/watch?v=9HX_tQBA-lw from minute 26.

²⁴ Ibid. FIFA’s publication records Mr. Infantino as stating: “You can always count, Mr President, on my support, on the support of the entire football community” (Annex NFF-13).

16. A senior FIFA official is quoted as saying that the FIFA Council was not consulted before the Prize's creation, and press reporting separately records that FIFA's vice presidents learned of its creation through a media release. [Reported, attributed to unnamed sources].²⁵
17. FairSquare has submitted a complaint concerning potential breaches of Article 15 of the Code arising from the creation and award of the Peace Prize and related public statements.²⁶ NFF supports an investigation into the issues raised by FairSquare, without repeating the contents of their submissions in full.

B) Provisions of the Code potentially engaged

18. Article 26.1 of the Code prohibits persons bound by the Code from abusing their position in any way, especially to take advantage of their position for private aims or gains.²⁷ The circumstances raise a question as to whether the creation of the FIFA Peace Prize and the selection of its inaugural recipient can be decided within the authority of the FIFA President. If the investigation establishes that the Prize was created, or its inaugural recipient selected, by Mr. Infantino without the involvement or approval of the competent FIFA body where such involvement or approval was required, the Investigatory Chamber should assess whether the use of presidential authority in those circumstances constituted an abuse of position under Article 26.1.
19. "In dealings with government institutions, national and international organisations, associations and groupings", article 15.1 requires persons bound by the Code to "remain politically neutral, in accordance with the principles and objectives of FIFA, the confederations, associations, leagues and clubs, and generally act in a manner compatible with their function and integrity".²⁸
20. NFF recognises that engagement with political leaders and support for peace is not in itself a breach of the duty to remain politically neutral. The question is whether Mr. Infantino's involvement in the creation of the FIFA Peace Prize and selection of its recipient, combined with his accompanying statements of praise and support for the US President, is consistent with the obligation of political neutrality in the FIFA Code of Ethics.

C) Why investigation is justified

21. The timing and sequence of these events warrant investigation into the circumstances in which the FIFA Peace Prize was conceived, authorised and implemented. Mr. Infantino reportedly created the FIFA Peace Prize, selected its recipient and presented the award in his official capacity as FIFA President. NFF considers the sequence relevant context in assessing the circumstances surrounding the subsequent creation of the Prize, the selection of its recipient and its presentation at that event. Mr. Infantino's statements combined praise for a serving political leader's achievement in world politics with assurances of his own personal support for the US President.

²⁵ The Athletic (The New York Times), reporting by A. Crafton, Human Rights Watch questions FIFA over 'Peace Prize,' receives no response (1 December 2025)

https://www.nytimes.com/athletic/6852219/2025/12/01/fifa-human-rights-watch-peace-prize/?eafs_enabled=false (Annex NFF-27.13), as cited in the FairSquare complaint (Annex NFF-31); see also The Nation, "FIFA Kisses Up to Trump With a 'Peace Prize'", <https://www.thenation.com/article/society/fifa-trump-infantino-peace-prize/> (Annex NFF-27.14).

²⁶ FairSquare, complaint to the Investigatory Chamber of the FIFA Ethics Committee dated 8 December 2025, and media release "FairSquare files ethics complaint over FIFA President's repeated breaches of political neutrality rules", <https://fairsq.org/fifa-ethics-complaint/> (Annex NFF-31).

²⁷ Code, art. 26(1) (Annex NFF-1).

²⁸ Code, art. 15(1) (Annex NFF-1).

22. In NFF's assessment, the combination of the award and the statements raises a concrete concern that FIFA's institutional platform was used to confer political endorsement of the US President, and it should be assessed whether such an endorsement is a breach of the FIFA Code of Ethics article 15.1.
23. In particular, the Investigatory Chamber should establish when the idea of creating the Prize first arose, who proposed it, what discussions preceded its public announcement on 5 November 2025, when the US President was first considered as a potential recipient, and whether the identity of the intended inaugural recipient played any role in the decision to create the Prize. This is particularly relevant given that Mr. Infantino had publicly stated on 9 October that the US President "definitely deserves the Nobel Peace Prize", the Nobel Peace Prize was awarded to another recipient the following day, FIFA announced the creation of its own Peace Prize less than one month later, and the US President ultimately received the inaugural award on 5 December. These circumstances provide a sufficient basis for the sequence and decision-making process to be investigated through FIFA's internal records and relevant witnesses.

D) Evidence to be obtained

24. NFF requests the Investigatory Chamber, to the extent relevant to this investigation, to consider the evidence submitted by FairSquare and to:
 - (a) establish how and by whom the decision to create and award the FIFA Peace Prize was taken, including whether and when the Council or other relevant FIFA bodies were informed or consulted;
 - (b) establish when the trophy was commissioned, by whom, pursuant to what authority, the costs incurred by FIFA in connection with its design, production and presentation, and the approvals and payment processes followed;
 - (c) obtain the relevant records and interview all those FIFA officials and employees involved in the creation of the Prize, the commissioning of the trophy and in the decision to award it to the US President;
 - (d) establish when the concept of the FIFA Peace Prize was first proposed, by whom it was proposed, when the US President was first identified or discussed as a potential recipient, and whether a prospective recipient had been identified before the Prize was publicly announced;
 - (e) compile Mr. Infantino's public statements of support for the US President, to assess their full meaning and context, and
 - (f) establish who prepared the video, drafted the accompanying text and ultimately approved what was broadcast during the draw ceremony when the recipient of the FIFA Peace Prize was announced.

VI.B Matter B, the Balogun matter

A) Factual Background

26. Following a red card issued to United States men's national team forward Folarin Balogun, which under Article 10.5 of the Regulations for the FIFA World Cup 26™²⁹ carried an automatic suspension from his team's subsequent match, the US President personally telephoned Mr. Infantino to request review of the suspension. [Reported, BBC, ESPN]³⁰
27. The US President subsequently publicly confirmed his personal intervention in the matter. Speaking to reporters in the Oval Office on 6 July 2026, he stated that he had personally asked Mr. Infantino to review the red card, while maintaining that he had not instructed him what decision to take. The US President also publicly praised FIFA's subsequent decision to restore Balogun's eligibility and, when thanked during the same Oval Office event for having secured the removal of the suspension, responded by acknowledging the exchange. Associated Press reported that the US President took credit for having prompted FIFA to review the decision, while emphasising that the final decision had been FIFA's. [Established/Reported, Associated Press and The Guardian, 6 July 2026]³¹
28. Politico separately reported that the Balogun matter was the subject of four days of coordinated lobbying, legal manoeuvring and diplomacy involving senior United States government and football officials. According to that reporting, White House FIFA World Cup Task Force Executive Director Andrew Giuliani brought the suspension to the US President's attention shortly after the match; Mr. Giuliani, United States Commerce Secretary Howard Lutnick and senior United States Soccer Federation officials were involved in efforts concerning the challenge; and White House legal assistance was offered while United States Soccer prepared its appeal. Politico stated that its account was based on interviews with six United States government and football officials who were either directly involved in or briefed on the events. [Reported, Politico]³²

²⁹ Regulations for the FIFA World Cup 26™, May 2026 edition, art. 10.5 (Annex NFF-4).

³⁰ BBC Sport, K. MacDonald, "Donald Trump confirms he asked Fifa to review Folarin Balogun red-card ban" (6 July 2026), <https://www.bbc.co.uk/sport/football/articles/c1mykx0gmxo> (Annex NFF-28.3); ESPN, S. Borden, "Belgium furious over suspension of Balogun ban" (5 July 2026), https://www.espn.com/soccer/story/_/id/49279471/belgium-usa-folarin-balogun-ban-suspended-fifa-world-cup-2026 (Annex NFF-28.4). The call was first reported in The New York Times, T. Pager and T. Panja, "Trump Asked FIFA to Review U.S. Player's Suspension. Now He's Eligible to Play" (5 July 2026) (Annex NFF-28.1), and Associated Press, R. Blum and M. L. Price, "FIFA lifts US star striker Balogun's red card suspension at World Cup after Trump calls Infantino" (5 July 2026), <https://apnews.com/article/falorin-balogun-suspension-world-cup-e5a5cab5731a916808601be93cb36832> (Annex NFF-28.2).

³¹ Associated Press, "Trump praises 'really brilliant decision' on Balogun's red card after he called FIFA's Infantino" (6 July 2026), <https://www.pbs.org/newshour/politics/watch-trump-praises-really-brilliant-decision-on-baloguns-red-card-after-he-called-fifas-infantino> (Annex NFF-28.5); Associated Press, "Sen. Cruz thanks Trump for 'getting rid' of Folarin Balogun's World Cup red card" (6 July 2026), <https://www.pbs.org/newshour/politics/watch-sen-cruz-thanks-trump-for-getting-rid-of-folarin-baloguns-world-cup-red-card> (Annex NFF-28.6); The Guardian, "Explained: Folarin Balogun's World Cup red-card reversal, Trump's phone calls and Fifa's rationale" (6 July 2026), <https://www.theguardian.com/football/2026/jul/06/folarin-balogun-red-card-reversal-trump-calls-fifa-explainer> (Annex NFF-28.7). See also NBC News, M. Alba and M. Brand, "Trump says he asked FIFA to review U.S. soccer star Folarin Balogun's suspension" (6 July 2026), <https://www.nbcnews.com/politics/donald-trump/trump-fifa-review-folarin-baloguns-red-card-rcna353145> (Annex NFF-28.8).

³² POLITICO, "Inside the White House push to get Folarin Balogun back on the field" (6 July 2026), <https://www.politico.com/live-updates/2026/07/05/world-cup-2026/inside-the-white-house-push-on-balogun-00987540> (Annex NFF-28.9). POLITICO describes its sources as "a half-dozen U.S. government and soccer officials who were either directly involved in or briefed on the week's events".

29. It was further reported that the matter “quickly rose through FIFA’s legal and disciplinary channels” and that Emilio García, who oversees FIFA’s legal affairs (FIFA Chief Legal and Compliance Officer), became a central figure in advising Mr. Infantino on the available procedural options. According to the same reporting, Mr. García and other FIFA officials worked to determine whether the circumstances surrounding the incident met the standards that would permit the disciplinary decision to be revisited. FIFA maintained that the ultimate decision was taken independently by its Disciplinary Committee. [Reported, POLITICO]³³
30. The decision that followed was taken by the Disciplinary Committee Chairperson sitting alone as a single judge, a mode of decision making the Disciplinary Code expressly authorises.³⁴ Implementation of the automatic suspension was suspended under Article 27 of the Disciplinary Code,³⁵ clearing the player to feature in the following match. [Reported, BBC, ESPN, The Times]³⁶
31. The decision was controversial. UEFA publicly stated that the decision “crossed a red line”. [Established]³⁷
32. The disciplinary framework provides relevant context for the ethical questions raised by this matter. Article 10.5 of the Regulations for the FIFA World Cup 26™ provides that a player or team official sent off as a result of a direct or indirect red card is automatically suspended from the subsequent match. Article 27 of the FIFA Disciplinary Code permits a judicial body to suspend the implementation of a disciplinary measure, while Article 57.1 permits the Chairperson to rule alone as a single judge.³⁸ On the public reporting available to NFF, Article 27 was the provision relied upon in the Balogun matter.³⁹ The significance of the use of Article 27 in this context is better understood against FIFA’s longstanding treatment of automatic suspension following a red card.
33. The automatic nature of the suspension following a red card is not a new or uncertain feature of FIFA’s disciplinary framework. FIFA has repeatedly and expressly reinforced the principle for more than two decades. Circular no. 821 of 1 October 2002 reminded member associations that any player dismissed from the field of play is automatically suspended from the next match and stated that disciplinary bodies “may not breach this binding instruction”, subject to the identified exception concerning mistaken identity.⁴⁰ Circular no. 866 of 24 September 2003 followed what FIFA described as an intensive reconsideration of the issue and was expressly intended to “clarify any

³³ Ibid. (Annex NFF-28.9). As to FIFA’s position, see also the Statement from the Chairperson of the FIFA Disciplinary Committee of 6 July 2026 (Annex NFF-14).

³⁴ FIFA Disciplinary Code, May 2026 edition, art. 57(1) (Annex NFF-3).

³⁵ FIFA Disciplinary Code, May 2026 edition, art. 27 (Annex NFF-3).

³⁶ The Times, “Only one official involved in decision to waive Folarin Balogun ban” (12 July 2026), <https://www.thetimes.com/sport/football/world-cup/article/folarin-balogun-ban-world-cup-usa-25z8bfjg3> (Annex NFF-28.10); BBC Sport, D. Johnson, “Red card system in disarray over Trump, Fifa and Balogun decision” (6 July 2026), <https://www.bbc.com/sport/football/articles/cly99dxjkxxo> (Annex NFF-28.11); ESPN, S. Borden (5 July 2026) (Annex NFF-28.4). See also Statement from the Chairperson of the FIFA Disciplinary Committee, 6 July 2026, <https://media.fifa.com/en/tournaments/mens/fwc2026/news/statement-from-the-chairperson-of-the-fifa-disciplinary-committee-6-july-2026> (Annex NFF-14).

³⁷ UEFA, “UEFA statement on the Balogun case”, 6 July 2026: “Yesterday’s decision [...] crossed a red line”, <https://www.uefa.com/news-media/news/02a7-2109c8e9ef81-de5a993db109-1000--uefa-statement-on-the-balogun-case/> (Annex NFF-22).

³⁸ Regulations for the FIFA World Cup 26™, May 2026 edition, art. 10.5 (Annex NFF-4); FIFA Disciplinary Code, May 2026 edition, arts. 27 and 57(1) (Annex NFF-3). See also FIFA Disciplinary Code, art. 66(4): “A sending-off automatically incurs suspension from the subsequent match”.

³⁹ Statement from the Chairperson of the FIFA Disciplinary Committee, 6 July 2026 (Annex NFF-14).

⁴⁰ FIFA Circular no. 821 of 1 October 2002 (Annex NFF-6).

doubts” through an unambiguous statement of the principle: a player sent off “shall automatically be suspended for the following match”, and an appeal against that suspension does not have suspensive effect.⁴¹ Circular no. 948 of 11 January 2005 again described automatic suspension following a red card as the “basic principle” and confirmed its application to both direct and indirect red cards.⁴² Most recently, Circular no. 16 of 12 May 2026, sent to the member associations qualified for the FIFA World Cup and setting out the binding disciplinary rules applicable to the Competition, again stated that a player or official sent off as a result of a direct or indirect red card “will automatically be suspended” from the subsequent match.⁴³ Notably, in communicating the applicable disciplinary rules immediately before the Competition (FIFA Circular no 16 2026), FIFA itself gave specific visual emphasis to the automatic nature of that suspension. [Established, FIFA Circular nos. 821, 866, 948 and 16]. This consistent regulatory history is relevant because it demonstrates that the automatic suspension following a red card has long been treated by FIFA as a settled and binding element of its disciplinary framework rather than as a principle whose application to the following match ordinarily depended on discretionary interpretation.

B) Provisions potentially engaged

34. Article 26.1 of the Code prohibits persons bound by the Code from abusing their position in any way, especially to take advantage of their position for private aims or gains. If the investigation establishes that any person bound by the Code used the authority, access or influence arising from their FIFA position to intervene improperly in the disciplinary process following the external request concerning Mr. Balogun’s suspension, that conduct may engage Article 26.1.
35. Article 16.1 imposes a fiduciary duty to FIFA, encompassing conduct detrimental to FIFA’s interests or likely to damage its reputation.⁴⁴ The independence requirements applicable to FIFA judicial bodies, including Article 32 of the FIFA Disciplinary Code,⁴⁵ form part of the relevant institutional context in assessing whether any such conduct was improper.
36. Receiving or forwarding a request for review, or obtaining or providing legal advice does not in itself constitute a breach of the aforementioned duties. The question is whether the relevant disciplinary process was conducted independently and freely by the Disciplinary Committee, or if communications from or through the FIFA President’s Office, FIFA’s legal function or any other senior FIFA officials or employees were intended to influence, or did improperly influence, the disciplinary process in any way contravening Article 16.1 (duty of loyalty) or Article 26.1 (abuse of position). The reported circumstances may also warrant consideration under Article 15.1 concerning neutrality, insofar as the disciplinary process may have been exposed to intervention arising from political actors or political considerations.
37. The circumstances may also raise a question under Article 30 of the Code⁴⁶ concerning manipulation of football matches or competitions. In particular, if the investigation establishes that a person bound by the Code improperly intervened, directly or indirectly, in the disciplinary process in a manner that altered Balogun’s

⁴¹ FIFA Circular no. 866 of 24 September 2003 (Annex NFF-7).

⁴² FIFA Circular no. 948 of 11 January 2005 (Annex NFF-8).

⁴³ FIFA Circular no. 16 of 12 May 2026 (Annex NFF-9).

⁴⁴ Code, art. 16(1) (Annex NFF-1).

⁴⁵ FIFA Disciplinary Code, May 2026 edition, art. 32(1) (Annex NFF-3), which requires members of the FIFA judicial bodies to be impartial and to fulfil the independence criteria defined in the FIFA Governance Regulations (Annex NFF-5).

⁴⁶ Code, art. 30 (Annex NFF-1).

eligibility to participate in the following World Cup match, the Investigatory Chamber should assess whether the information obtained may relate to conduct falling within Article 30, including the improper alteration of an aspect of a football match or competition. Should information emerge in the course of the investigation that may relate to conduct falling within Article 30, NFF notes that Article 30.3 provides for such information to be transferred to the FIFA Disciplinary Committee.⁴⁷

C) Why investigation is justified

38. The reported facts warrant investigation to establish the nature and extent of the communications that occurred within FIFA following the external approaches concerning the Balogun suspension, including whether communications passed from or through the FIFA President's Office, FIFA's legal function or other senior FIFA officials or employees to the Chairperson or any other person involved in the disciplinary process, whether those communications reached or otherwise affected the disciplinary process, and whether they influenced or attempted to influence the exercise of disciplinary discretion under Article 27. The US President publicly confirmed that he personally asked Mr. Infantino to review the red card before the Chairperson's decision was taken. His subsequent public comments concerning the outcome, together with the reported involvement of FIFA's legal department described above, reinforce the need to establish what communications followed that intervention within FIFA and whether any such communications reached or affected the disciplinary process.
39. Three features warrant scrutiny of the process. First, the Chairperson's public statement⁴⁸ did not identify which factors justified the decision beyond a reference to unspecified particular circumstances. Second, the automatic suspension had already taken effect when its enforcement was temporarily suspended. This allowed the player to play in the very next match, a sporting consequence that cannot later be undone. Third, no published criteria exist by which any member association could assess when Article 27 will be applied to an automatic match suspension and when it will not.
40. An undisclosed rationale for a discretionary decision with an irreversible sporting consequence, taken close in time to a head of state's intervention and in the absence of any published criteria, provides sufficient grounds to investigate whether the disciplinary discretion under Article 27 was exercised independently and free from improper influence. The investigation should therefore establish not only whether the disciplinary discretion was exercised independently and free from improper influence, but also whether any person bound by the Code participated in a chain of intervention that resulted in an improper alteration of a sporting aspect of the competition, namely Balogun's eligibility to participate in the following FIFA World Cup match. That question is relevant to the potential application of Article 30 and should be examined accordingly.

D) Evidence to be obtained

41. NFF requests the Investigatory Chamber to obtain and preserve, as appropriate, the following evidence:
 - (a) the written decision and the reasoning underlying the suspension of implementation of the automatic suspension and/or any other notes or briefing memo;

⁴⁷ Code, art. 30(3) (Annex NFF-1).

⁴⁸ Statement from the Chairperson of the FIFA Disciplinary Committee, 6 July 2026 (Annex NFF-14).



- (b) communications concerning the Balogun matter exchanged between and not limited to Mr. Infantino, the FIFA President's Office, members of FIFA Judicial Bodies, other senior FIFA officials or employees and/or United States government officials, the United States Soccer Federation or their representatives;
- (c) communications between any such persons and the Chairperson or any other person involved in the disciplinary process before the relevant decision was taken;
- (d) records sufficient to establish the procedural route and case allocation process followed, to the extent relevant to the independence of the process;
- (e) recusal or non-participation of the Chairperson and Deputy Chairperson of the FIFA Appeals Committee and the legal basis on which the relevant member was appointed and authorised to act alone;
- (f) whether, and in what circumstances, FIFA judicial bodies have previously suspended the automatic implementation of a match suspension following a red card;
- (g) any internal criteria, guidance or legal analysis concerning the application of Article 27 to automatic match suspensions;
- (h) interviews with the Chairperson and the other relevant members of the disciplinary body to establish what they were told concerning the Balogun matter, whether they were consulted or informed, what communications they received from or concerning the FIFA President's Office, FIFA's legal function or other senior FIFA officials or employees, and the basis on which the Chairperson proceeded as a single judge;
- (i) records of any telephone calls, messages, WhatsApp communications, emails, meeting records or other communications concerning the Balogun matter involving Mr. Infantino, the FIFA President's Office, FIFA's legal function, members of FIFA judicial bodies or other relevant FIFA officials and employees during the period between Balogun's red card and the decision suspending implementation of the automatic suspension;
- (j) any internal legal advice, legal analysis, briefing notes, recommendations or other material prepared or provided by FIFA's legal function or any other FIFA official concerning the possibility of reviewing, suspending or otherwise altering the implementation of Balogun's automatic suspension;
- (k) records sufficient to establish when each relevant FIFA official and member of the judicial body first became aware of the US President's intervention and what action, if any, each person took following that awareness; and
- (l) any records or information sufficient to establish whether any person bound by the Code sought, requested, encouraged, facilitated or otherwise participated in an intervention that resulted in Balogun's eligibility to participate in the following World Cup match being altered, including for the purpose of assessing whether any information obtained may relate to conduct falling within Article 30 of the Code.

VI.C Matter C, the FIFA Forward Enterprise matter

A) Factual background

42. FIFA publicly announced the FFE project on 28 July 2026. Approximately 20 per cent of a new commercial subsidiary was to be sold to outside investors at a price of USD 4.2 billion. The project was tied to a conditional one-off payment of up to USD 20 million per member association and increased development funding for 2027 to 2030. [Established]⁴⁹
43. On 29 and 30 July 2026, FIFA distributed the FFE Member Materials to its 211 member associations, prepared with the involvement of J.P. Morgan, setting out a compressed approval timeline. [Established]⁵⁰
44. On 18 July 2026, the day before the World Cup Final, five FIFA management board directors met at the Waldorf Astoria in New York and voted three to two to approve the project. The project was approved by a 3–2 vote, with Secretary General, Chief Legal & Compliance Officer and Chief of Staff voting in favour, and Chief Operating Officer Kevin Lamour and Chief Financial Officer voting against. [Reported, New York Times].⁵¹ Mr. Infantino was not present. [Reported, New York Times]⁵² The Council was not consulted before this vote. [Reported and corroborated by Circular no. 1968 below]⁵³ On the same day, in an address to some FIFA member associations in New York, Mr. Infantino publicly stated his intention to “unleash the commercial potential and opportunity that FIFA has”. FIFA subsequently referred to that address in its 28 July announcement of FFE as preceding the consultation process concerning the project. [Established, FIFA, 18 and 28 July 2026]⁵⁴ The FFE concept was reportedly first discussed between Joshua Kushner of Thrive Capital and Greg Maffei in July 2025, and Mr. Infantino is reported to have already been discussing the concept with Mr. Kushner for close to a year by that point. Mr. Kushner is identified in press reporting as the central proponent and prospective lead investor, through Thrive Capital and Thrive Eternal, in the project that followed. [Reported, New York Times]⁵⁵ Mr. Kushner is the brother of Jared Kushner, the US President’s son in law and a former senior adviser in his administration. [Established, public record]⁵⁶

⁴⁹ FIFA, “FIFA intends to expand football development funding to over USD 10 billion subject to approval by FIFA Member Associations”, media release, 28 July 2026, <https://inside.fifa.com/organisation/media-releases/intends-expand-football-development-funding-usd-10-billion-subject-approval-member-associations> (Annex NFF-16); FFE Member Materials (Annex NFF-11).

⁵⁰ FFE Member Materials (Annex NFF-11). See also The Irish Times, “FAI among associations given 53 days by Fifa to sign up to controversial World Cup plans” (29 July 2026), <https://www.irishtimes.com/sport/soccer/2026/07/29/fifa-gives-associations-53-days-to-sign-up-to-controversial-world-cup-plans/> (Annex NFF-29.7).

⁵¹ The New York Times, T. Panja, “FIFA’s top executives were given an ultimatum to sell stake in World Cup” (6 August 2026), <https://www.nytimes.com/2026/08/06/business/fifa-world-cup-privatization.html> (Annex NFF-29.1).

⁵² Ibid. (Annex NFF-29.1).

⁵³ FIFA Circular no. 1968 of 5 August 2026 (Annex NFF-10); see paragraph 45 below.

⁵⁴ FIFA, “FIFA President Gianni Infantino aims to ‘unleash the commercial potential and opportunity that FIFA has’ after FIFA World Cup 2026™ success” (18 July 2026), <https://inside.fifa.com/organisation/president/news/gianni-infantino-world-cup-usd-15-billion-revenue-members> (Annex NFF-15); FIFA media release of 28 July 2026 (Annex NFF-16).

⁵⁵ The New York Times, Matt Slater, “FIFA plans to sell a stake in the World Cup: How much for and why is Gianni Infantino doing it?” (29 July 2026), https://www.nytimes.com/athletic/7475316/2026/07/28/fifa-world-cup-stake-sale-infantino/?eafs_enabled=false (Annex NFF-29.5).

⁵⁶ See, e.g., Fortune, profile of Joshua Kushner and Thrive Capital (13 November 2024), <https://fortune.com/2024/11/13/joshua-kushner-venture-empire-most-powerful-people-openai-sam-altman/> (Annex NFF-29.6).

45. FIFA Circular no. 1968 of 5 August 2026, addressed to all member associations, stated that FIFA acknowledges mistakes were made in the process of the proposed establishment of FFE, that it was certainly not the intention for the Council and member associations to feel excluded from the process and that it should have been handled differently, and that errors were also made after the “proposal” was leaked to the media. [Established]⁵⁷ The same circular also stated that although mistakes were made, everything that was done was done in full compliance with the FIFA regulatory framework. NFF treats the acknowledgement of mistakes as established fact, based on FIFA’s own contemporaneous statement. NFF treats the compliance assertion as FIFA’s own position rather than an established legal conclusion and submits that the two statements are difficult to reconcile without further explanation, given the Council’s role under Article 59.2 and the President’s role under Article 35 of the Statutes,⁵⁸ discussed below.
46. FIFA withdrew the FFE project on 31 July 2026. [Established]⁵⁹
47. According to reports concerning the proposed structure, Mr. Infantino was contemplated for an executive role within FFE carrying annual remuneration reported to be approximately USD 30 million, in addition to performance related bonuses, a level of compensation substantially exceeding his remuneration as FIFA President. [Reported, The Times, 3 August 2026].⁶⁰
48. Kevin Lamour’s departure from FIFA as Chief Operating Officer was confirmed on 17 August 2026. FIFA described this as the working relationship having ended, and the Secretary General separately described it as a mutual decision. [Established as to the fact, date and FIFA’s own characterisation]⁶¹ Several independent outlets reported it as a dismissal. [Reported]⁶² The departure followed, by around three weeks, Mr. Lamour’s dissenting vote at the Waldorf Astoria meeting and public statements attributed to him that FIFA staff had been misled, that the “proposal” was the project of one person and that staff deserved better than contempt and intimidation, statements reportedly made together with the remark that if that meant he lost his job,

⁵⁷ FIFA Circular no. 1968 of 5 August 2026 (Annex NFF-10).

⁵⁸ FIFA Statutes, May 2024 edition, arts. 35 and 59(2) (Annex NFF-2).

⁵⁹ FIFA, “Statement attributable to the FIFA President”, 31 July 2026, <https://inside.fifa.com/media-releases/statement-attributable-president> (Annex NFF-17).

⁶⁰ The Times, M. Ziegler, “Gianni Infantino clinging to power as efforts to oust him mount” (1 August 2026), <https://www.thetimes.com/sport/football/article/gianni-infantino-clinging-power-fifa-uefa-fa-98t6bvv9r> (Annex NFF-29.8), summarised by its author on publication as: “Infantino had his eyes on a \$30m salary plus bonuses for leading new FIFA enterprise, say whistleblowers” (M. Ziegler, post on X, 1 August 2026, <https://x.com/martynziegler/status/2083610019530969133>) (Annex NFF-29.8). See also HITC, “Gianni Infantino was eyeing a \$30 million salary in scrapped FIFA World Cup privatisation plan” (2 August 2026), <https://www.hitc.com/gianni-infantino-was-eyeing-a-30-million-salary-in-scrapped-fifa-world-cup-privatisation-plan/> (Annex NFF-29.10).

⁶¹ FIFA spokesperson statement of 17 August 2026, as reported in France 24, “FIFA chief operating officer leaves after criticising Infantino investor plan” (17 August 2026), <https://www.france24.com/en/sport/20260817-fifa-chief-operating-officer-leaves-after-criticising-infantino-investor-plan> (Annex NFF-18); ESPN report of the Secretary General’s communication to staff, “FIFA executive Kevin Lamour departs amid backlash over Infantino’s World Cup sale plan” (17 August 2026), https://www.espn.co.uk/football/story/_/id/49642660/fifa-executive-kevin-lamour-departs-amid-backlash-infantino-world-cup-sale-plan (Annex NFF-29.13), as also reported in Insider Sport, “FIFA sacks COO Lamour amid Infantino row” (21 August 2026), <https://insidersport.com/2026/08/21/fifa-sacks-coo-lamour-sideline-moves/> (Annex NFF-29.14).

⁶² Reuters, “Senior FIFA official Lamour exits after Infantino criticism” (17 August 2026) <https://www.reuters.com/sports/soccer/fifa-sacks-senior-executive-kevin-lamour-after-infantino-criticism-sky-news-2026-08-17/> (Annex NFF-29.12); Goal.com, “FIFA sack chief operating officer Kevin Lamour after he criticised Gianni Infantino’s plans to sell part of World Cup to investors”, <https://www.goal.com/en/lists/fifa-sack-chief-operating-officer-kevin-lamour-gianni-infantino-plans-world-cup-investors/bltcb4a8eb01b4f82c6> (Annex NFF-29.15); Insider Sport (21 August 2026) (Annex NFF-29.14).

then so be it. [Reported, consistently attributed]⁶³ His departure is relevant context bearing on the weight properly given to the account of FIFA's own Chief Operating Officer of the process by which FFE was advanced.

49. The FFE project triggered an exceptional institutional response across FIFA's confederations. UEFA and its 55 member associations unanimously rejected the project and announced that their national teams would not participate in FIFA competitions for so long as the "proposal" remained active. Concacaf and its 41 member associations likewise rejected the project, expressing deep concerns regarding the lack of due process, the compressed timetable and the absence of review or approval by the relevant FIFA governance bodies. The AFC subsequently expressed solidarity with UEFA and Concacaf and stated that it shared serious concerns regarding both the introduction of private investment into FIFA's flagship competitions and the decision-making process surrounding FFE. [Established, UEFA, 30 July 2026; Concacaf, 30 July 2026; AFC, 31 July 2026]⁶⁴

B) Provisions potentially engaged

50. Article 26.1 of the Code prohibits persons bound by the Code from abusing their position in any way, especially to take advantage of their position for private aims or gains. If the investigation establishes that any person bound by the Code used the authority or influence arising from their FIFA position to develop or advance FFE outside the allocation of authority established by FIFA's Statutes, or did so while pursuing or expecting a personal or financial benefit connected with the proposed structure, that conduct may engage Article 26.1.
51. Article 16 of the Code requires persons bound by the Code to act consistently with their fiduciary duties to FIFA. If the investigation establishes that a project involving a significant interest in FIFA's commercial assets was deliberately advanced outside the governance structure prescribed by FIFA's Statutes, including without the involvement of the Council where required, that conduct may engage Article 16.
52. Code of Ethics Articles 20 and 26⁶⁵ concerning conflicts of interest and abuse of position may also be engaged if the investigation establishes that any person involved in advancing FFE had a personal or financial interest in the proposed structure, including any prospective compensation, remuneration or other financial benefit connected with FFE.
53. FIFA Statutes Article 59.2 forms part of the relevant institutional context. It assigns to the Council the decision as to how and to what extent FIFA's commercial rights are

⁶³ Associated Press, "Senior FIFA executive says staff were deceived over Infantino's World Cup sell-off plan" (31 July 2026), <https://www.pbs.org/newshour/world/senior-fifa-executive-says-staff-were-deceived-over-infantinos-world-cup-sell-off-plan> (Annex NFF-29.11).

⁶⁴ UEFA, "Statement on behalf of UEFA and its 55 national associations", 30 July 2026, <https://www.uefa.com/news-media/news/02a7-213a92896eb0-54dfbf454e3b-1000--statement-on-behalf-of-uefa-and-its-55-national-associations/> (Annex NFF-23); Concacaf, "Statement on behalf of Concacaf and its 41 Member Associations", 30 July 2026, <https://www.concacaf.com/competitions/concacaf/news/statement-on-behalf-of-concacaf-and-its-41-member-associations> (Annex NFF-24); AFC, "AFC stands in solidarity with UEFA and CONCACAF to protect the FIFA World Cup", 31 July 2026, https://www.the-afc.com/en/more/afc_news.html/news/afc-stands-in-solidarity-with-uefa-and-concacaf-to-protect-the-fifa-world-cup (Annex NFF-25).

⁶⁵ Code, arts. 20 and 26 (Annex NFF-1).

utilised and expressly provides that the Council shall decide alone whether those rights are utilised exclusively, jointly with a third party or entirely through a third party.⁶⁶

C) Why investigation is justified

54. The withdrawal of the project does not resolve the process question this complaint raises. The alleged breach lies in the process by which the project was developed and advanced, which occurred in full regardless of the outcome.
55. Public reporting has raised a further and specific issue concerning Mr. Infantino's potential personal financial interest in FFE. If accurate, these reports raise material questions as to whether Mr. Infantino had, or expected to obtain, a personal financial interest in the establishment and approval of FFE while participating in or influencing the development of the project in his capacity as FIFA President. NFF therefore urges the Investigatory Chamber to establish whether any role, remuneration, bonus arrangement, equity participation or other financial benefit for Mr. Infantino in connection with FFE was discussed, proposed, negotiated, approved or otherwise contemplated, when any such arrangement first arose, who participated in those discussions, and whether it was disclosed to and considered by the competent FIFA bodies.
56. The FFE matter rests to an unusual degree on FIFA's own contemporaneous statements. FIFA acknowledged in Circular no. 1968 that mistakes were made and that the Council and member associations felt excluded from the process. At the same time, the project had reportedly progressed to a management level vote and contemplated outside investment in FIFA's commercial rights structure before the Council had been involved. Against the allocation of authority in Article 59.2, those circumstances provide sufficient grounds to investigate who directed and authorised the development of FFE, whether the prescribed governance process was respected and whether any personal or financial interests affected the conduct of persons bound by the Code.

D) Evidence to be obtained

57. NFF requests the Investigatory Chamber to obtain and preserve, as appropriate, the following evidence:
 - (a) the minutes and materials relating to the 18 July 2026 management board meeting (including but not limited to interviewing the members at the meeting);
 - (b) the drafting history and supporting materials relating to the FFE Member Materials;
 - (c) any term sheet, valuation work, investor materials or related approvals;
 - (d) communications between Mr. Infantino, FIFA Senior Officials, Thrive Capital, Thrive Eternal and any other prospective investors or their representatives concerning the conception, development, structure, valuation or financing of FFE, including any discussions concerning any prospective role, remuneration or other financial interest for Mr. Infantino in connection with FFE;

⁶⁶ FIFA Statutes, May 2024 edition, art. 59(2): "The Council shall decide how and to what extent these rights are utilised and draw up special regulations to this end. The Council shall decide alone whether these rights shall be utilised exclusively, or jointly with a third party, or entirely through a third party" (Annex NFF-2).

- (e) an interview with Mr. Kevin Lamour, together with relevant records and communications, concerning the conception, development and approval process for FFE, the 18 July 2026 management board meeting and his dissenting vote, and the circumstances of his subsequent departure from FIFA;
- (f) all documents, communications, draft agreements, term sheets, remuneration proposals, compensation analyses, board or committee materials and other records concerning any actual or prospective role for Mr. Infantino in or in connection with FFE, including any proposed salary, bonus or incentive agreement, equity participation or other direct or indirect financial benefit or any other person falling within the competence of the Compensation Sub Committee in relation to compensation matters;
- (g) all records sufficient to establish when any such role or compensation arrangement was first proposed, by whom it was proposed, whether Mr. Infantino participated in or was informed of those discussions, and whether the proposed arrangement was disclosed to any FIFA body;
- (h) all records of any consideration of the proposed role or compensation by FIFA's Compensation Sub Committee or any other competent FIFA body, including any declaration or assessment of an actual, potential or perceived conflict of interest;
- (i) the internal review referred to in Circular no. 1968; and
- (j) records establishing when and how the Council was first informed of the project.

VI.D The relationship between the three matters

- 58. Each of the three matters addressed in this complaint is capable of standing on its own facts, under the provisions applicable to it, independently of any connection to the other two. Sections VI.A, VI.B and VI.C above are drafted on that basis, and none of the grounds for investigation identified in those sections depend on any relationship between the matters. NFF nevertheless considers that a recurring factual context connects the three matters and is itself relevant to the Investigatory Chamber's assessment.
- 59. The US President is directly connected to two of the three matters and indirectly (but closely) connected to the third one. He is the recipient of the Peace Prize addressed in Matter A. [Established, paragraph 15 above] He is reported to have personally telephoned Mr. Infantino to request review of the suspension addressed in Matter B. [Reported, paragraph 26 above and established, paragraph 27 above] Matter C includes the reported involvement of Joshua Kushner, the brother of Jared Kushner, the US President's son in law and a former senior adviser in his administration, who is reported to have proposed the FFE concept to Mr. Infantino and to be its prospective lead investor. [Reported as to Mr. Kushner's role, established as to the family relationship, paragraph 44 above]
- 60. NFF considers that the recurrence of this factual context across three separate matters, each of which independently raises questions concerning FIFA's decision-making processes, institutional safeguards or the exercise of authority at senior level, warrants examination as a potential recurring context. The three matters also raise a common question under Article 26.1 of the Code: whether FIFA office, authority or influence was used improperly in circumstances falling within the prohibition on abuse of position. NFF does not suggest that the same conduct or purpose underlies each matter; rather, the recurrence of the same potential ethical issue across three distinct

sets of facts reinforces the need for each to be investigated fully and for the Investigatory Chamber to consider whether, taken together, they disclose any broader pattern relevant under the Code.

61. NFF therefore urges the Investigatory Chamber to examine Matters A, B and C both individually, on the basis set out above, and together, to determine through investigation whether the recurring factual context and common question concerning the exercise of FIFA office and authority identified in this section have any broader significance under Article 26 or other applicable provisions of the Code. NFF cannot resolve that question from the public record alone. It is the kind of question a preliminary investigation under Article 61.2, with access to FIFA's own internal documents, communications and witnesses, is positioned to address.

VII. The procedural requests

62. This section sets out the stages through which this complaint will pass under the Code, identifies who is responsible for each, and states what NFF requests at each stage. NFF's central concern, explained at paragraph 71 below, is that because it is not a party under Article 38, it may otherwise learn nothing further once the complaint is filed.

Initial evaluation, Article 61.1

63. Upon the Chairperson's instruction, the secretariat of the Investigatory Chamber carries out an initial evaluation of the documents submitted with a complaint.⁶⁷ NFF requests that this evaluation be carried out and that receipt and transmission of the complaint to the Chairperson be confirmed to NFF.

Preliminary investigation, Article 61.2 and 61.3

64. The secretariat may initiate a preliminary investigation into a potential breach based on a filed complaint, and the Chairperson may initiate one at their own discretion at any time. Article 61.2 provides that this may include engaging third parties, under the Chairperson's leadership, with investigative duties, and appointing an integrity expert, with an express cross-reference to Article 36 of the FIFA Disciplinary Code, which establishes the Disciplinary and Ethics Prosecutor mechanism.⁶⁸ A Disciplinary and Ethics Prosecutor is appointed by the secretariat, must be impartial and fulfil the independence criteria defined in the Governance Regulations.⁶⁹
65. NFF urges the Investigatory Chamber to carry out a preliminary investigation. Several of the decisive factual questions in this complaint cannot be resolved by NFF because the relevant evidence, including the written Balogun decision, communications involving the President's office and other relevant FIFA officials, the FFE approvals and minutes, and the compensation and valuation material described above, is held within FIFA. NFF cannot compel this evidence itself.
66. Given the seniority of the individuals concerned, that the principal respondent is the sitting FIFA President, and that some of the relevant evidence may be held within the President's office or the general secretariat, NFF further urges the Chairperson to appoint an integrity expert or engage appropriately independent third parties under Article 61.2 for the preliminary investigation, and to ensure that equivalent

⁶⁷ Code, art. 61(1) (Annex NFF-1).

⁶⁸ Code, art. 61(2) and (3) (Annex NFF-1); FIFA Disciplinary Code, May 2026 edition, art. 36 ("Disciplinary and Ethics Prosecutors") (Annex NFF-3).

⁶⁹ FIFA Disciplinary Code, May 2026 edition, art. 36(3) (Annex NFF-3); FIFA Governance Regulations, July 2026 edition, art. 58.5 and Annexe 3 (Annex NFF-5).

independence safeguards continue if the matter proceeds to formal investigation under Article 66.3,⁷⁰ which permits a similar engagement of third parties by the chief of the investigation in complex cases.

Independence from the outset

67. Article 35.1 requires members of the Ethics Committee to manage their investigations and render their decisions entirely independently and impartially and to avoid third party influence.⁷¹ NFF urges that this standard, together with the withdrawal and challenge mechanism at Article 36,⁷² be applied from the moment the complaint is received, not only once formal investigation proceedings are opened, given that the preliminary stage is where several of the matters raised in this complaint may in practice be decided. NFF urges the Chamber to apply Articles 35 and 36 on its own motion. NFF specifically requests written confirmation that no FIFA official named in this complaint as a participant in the conduct at issue, including FIFA's Chief Legal and Compliance Officer, plays any role, directly or indirectly, in the substantive assessment, direction or handling of this complaint.

Evidence preservation

68. NFF requests the Investigatory Chamber to take all appropriate steps to ensure that potentially relevant evidence is preserved pending its assessment of this complaint, including phone records, WhatsApp conversations, and any other means of internal exchange.

Prima facie determination and opening of investigation proceedings, Article 62.1

69. If the preliminary investigation establishes a prima facie case, Article 62.1 provides that the Chairperson shall open investigation proceedings.⁷³ NFF considers that the facts, circumstances and supporting material set out in Section VI provide sufficient grounds for a preliminary investigation into Matters A, B and C, including the conduct of Mr. Infantino and any other person bound by the Code whose involvement may be identified in the course of that investigation. NFF further considers that the matters raised are capable, subject to the evidence obtained through the preliminary investigation, of establishing the prima facie case contemplated by Article 62.1 in respect of potential breaches of the Code. NFF therefore urges the Investigatory Chamber to carry out a preliminary investigation and, if it establishes a prima facie case, to open investigation proceedings in accordance with Article 62.1.

If investigation proceedings are opened

70. Articles 65 to 69 govern the conduct of investigation proceedings once opened, including the designation of a chief of the investigation, that person's investigative powers, and the conclusion of the investigation.⁷⁴ NFF requests that the evidence identified in Section VI be obtained during this phase, using the powers available under Articles 65 to 69, and that the independence safeguards requested above continue to apply.

⁷⁰ Code, arts. 61(2) and 66(3) (Annex NFF-1).

⁷¹ Code, art. 35(1) (Annex NFF-1).

⁷² Code, art. 36 (Annex NFF-1).

⁷³ Code, art. 62(1) (Annex NFF-1).

⁷⁴ Code, arts. 65 to 69 (Annex NFF-1).

Requests for information and procedural transparency

71. Article 38 provides that only the accused are deemed to be parties to proceedings.⁷⁵ NFF therefore recognises that, as complainant, it is not entitled to the procedural rights of a party or to receive confidential investigative material. NFF nevertheless requests the Investigatory Chamber, to the extent permitted under the Code, to inform NFF whether this complaint has been evaluated, whether a preliminary investigation has been initiated, whether a *prima facie* determination has been made and whether investigation proceedings have been opened, closed or otherwise concluded.
72. NFF requests the Investigatory Chamber to exercise, where appropriate, the discretion available to it under the Code to provide NFF with appropriate procedural information concerning the disposition of this complaint. It does not seek access to the investigation file, witness statements, the Chamber's deliberations or any other confidential material. Article 37.2 expressly contemplates that the investigatory or adjudicatory chamber may, where deemed necessary and in an appropriate form, inform the public about or confirm ongoing or closed proceedings.⁷⁶ NFF requires the Investigatory Chamber to consider exercising the discretion available to it under the Code to provide NFF with appropriate procedural information concerning the disposition of this complaint.

If the complaint does not progress

73. Article 64.2 provides that, where the Investigatory Chamber determines that there is no *prima facie* case, it shall not open investigation proceedings and shall close the case. The same provision contemplates communication following such a closure, including the possibility of sending a closing letter to an interested party.⁷⁷ If this complaint is closed at that stage, NFF urges the Investigatory Chamber to inform NFF of that procedural disposition and the basis for it.

VIII. Relationship to other proceedings

74. NFF is aware of the FairSquare complaint referred to at paragraph 17 above. As explained in Section VI.A, NFF supports investigation of the Article 15 issues raised in that complaint and addresses those issues to the extent relevant to NFF's own complaint, while not seeking to reproduce FairSquare's submissions in full.
75. NFF is aware that FIFA Circular no. 1968 records a commitment to an internal review of the FFE process, reporting to the Council.⁷⁸ That review is not an adjudicative process, has no power to sanction any individual, and does not extend to Matters A or B.
76. NFF is aware that the Union des Associations Européennes de Football has filed an application under 28 U.S.C. section 1782 in the United States District Court for the Southern District of Florida.⁷⁹ NFF notes this only as a matter of public record. NFF is not a party to that proceeding and does not rely on it for any proposition of FIFA regulatory law, all of which is cited directly to FIFA's own instruments in this complaint.

⁷⁵ Code, art. 38 (Annex NFF-1).

⁷⁶ Code, art. 37(2) (Annex NFF-1).

⁷⁷ Code, art. 64(2) (Annex NFF-1).

⁷⁸ FIFA Circular no. 1968 of 5 August 2026 (Annex NFF-10).

⁷⁹ In re Ex Parte Application of Union des Associations Européennes de Football, Case No. 1:26-mc-25872 (S.D. Fla., filed 27 August 2026). See also Reuters, "UEFA asks US court for FIFA documents in planned Swiss case against Infantino" (27 August 2026), <https://www.usnews.com/news/top-news/articles/2026-08-27/soccer-uefa-asks-us-court-for-fifa-documents-in-planned-swiss-case-against-infantino>. Cited for reference only; not annexed.

This complaint stands on NFF's own factual record and legal analysis, reflected in the public statements referred to at paragraph 12 above. NFF requests that, if that proceeding results in material relevant to Matters B or C, the Investigatory Chamber take that material into account as and when it becomes available, without delaying its own work pending that outcome.

IX. Requested findings and actions to be taken

77. On the basis of the facts, circumstances and supporting material set out in this complaint, NFF considers that there are sufficient grounds for the Investigatory Chamber to investigate the conduct of Mr. Infantino in relation to matters in which his conduct is identified in Section VI, and to determine whether that conduct involved breaches of the provisions of the Code of Ethics identified therein. NFF further considers that the investigation should extend to the conduct of any other FIFA official or person bound by the Code whose involvement in those matters is identified in the course of the investigation and whose conduct may disclose a breach of any obligation under the Code. NFF therefore urges the Investigatory Chamber to investigate the matters set out in this complaint fully and independently, including the respective roles, actions and responsibilities of Mr. Infantino and any other person bound by the Code whose conduct may be relevant, and to determine whether any breach of the Code has occurred.
78. In furtherance of that request, NFF urges the Investigatory Chamber to:
 - (a) confirm receipt of this complaint and its transmission to the Chairperson;
 - (b) carry out an initial evaluation under Article 61.1;
 - (c) carry out a preliminary investigation under Article 61.2, including the appointment of an integrity expert or the engagement of independent third parties for that purpose;
 - (d) apply the independence safeguards requested at paragraph 67 from receipt of this complaint onward;
 - (e) preserve, and request that FIFA preserve, the evidence identified in Section VI and at paragraph 68;
 - (f) carry out a proper prima facie assessment under Article 62.1 and, if the threshold is met, open investigation proceedings;
 - (g) if proceedings are opened, obtain the evidence identified in Section VI using the powers available under Articles 65 to 69;
 - (h) confirm, to the extent this can be done without disclosing confidential investigative material, whether this complaint was preliminarily investigated, whether a prima facie determination was made, and whether the matter was opened, closed or referred elsewhere; and
 - (i) if the complaint is not progressed or is closed, exercise the discretion contemplated by Article 64.2 to inform NFF of that procedural disposition and, without disclosing confidential investigative material, the basis for it.

79. The need for prompt consideration of this complaint is particularly acute in light of the forthcoming FIFA presidential election. The matters raised in this complaint concern the conduct of the incumbent FIFA President, together with the conduct of any other persons bound by the Code whose involvement may be identified through the investigation. In the case of Mr. Infantino, the need for expedition is further reinforced by the fact that FIFA has confirmed that the presidential election will take place at the 77th FIFA Congress on 18 March 2027,⁸⁰ and Mr. Infantino has publicly announced his intention to stand for re-election.⁸¹
80. The matters concerning Mr. Infantino should therefore be investigated and, to the extent permitted by the applicable procedures, determined sufficiently in advance of that election. At the same time, the potential investigation into any other persons concerned should proceed on the same expedited timetable, so that the matters raised in this complaint can be examined coherently and on the basis of the complete factual record. Expedition is also necessary in the interests of procedural fairness to the person(s) whose conduct is under investigation. In particular, any first-instance determination concerning Mr. Infantino should be reached sufficiently early to allow him a reasonable opportunity to exercise any applicable rights of appeal before the presidential election. Any other person against whom proceedings may be opened should likewise be afforded the same procedural safeguards and a reasonable opportunity to exercise any applicable rights of appeal.
81. FIFA's own previous practice demonstrates that proceedings concerning its most senior officials can be conducted on an expedited basis where the circumstances require it. In September 2015, following the opening of proceedings by the Office of the Attorney General of Switzerland, the Investigatory Chamber initiated preliminary investigations concerning then FIFA President Joseph S. Blatter.⁸² By 28 September 2015, it had determined that a *prima facie* case existed and opened formal investigation proceedings. Mr. Blatter was interviewed on 1 October and provisionally banned from all football related activity for 90 days on 8 October. The investigation was concluded and the final report transmitted to the Adjudicatory Chamber on 20 November, adjudicatory proceedings were opened on 23 November, and a hearing followed on 17 December 2015, with the first instance decision on 21 December 2015.⁸³ The entire process from the opening of formal investigation proceedings to the first instance decision therefore took approximately twelve weeks. The precedent therefore demonstrates FIFA's institutional capacity to investigate allegations

⁸⁰ FIFA, "FIFA President Gianni Infantino tells 76th FIFA Congress he will stand for re-election in 2027", <https://inside.fifa.com/organisation/president/news/gianni-infantino-president-reelection-2027-congress-vancouver> (Annex NFF-19).

⁸¹ Ibid. (Annex NFF-19); see also Euronews, "FIFA chief Gianni Infantino to stand for re-election" (8 September 2026), <https://www.euronews.com/2026/09/06/fifa-chief-gianni-infantino-to-stand-for-re-election> (Annex NFF-30.1).

⁸² Office of the Attorney General of Switzerland, media release of 25 September 2015; see CNN, "Sepp Blatter: Swiss open criminal proceedings" (25 September 2015), <https://www.cnn.com/2015/09/25/football/sepp-blatter-fifa-swiss-prosecutors/index.html> (Annex NFF-30.3); FIFA Ethics Committee media releases of September to December 2015 (Annex NFF-34).

⁸³ CAS 2016/A/4501 Joseph S. Blatter v. FIFA, award of 5 December 2016, paras 7-18 (Annex NFF-33); FIFA Ethics Committee media releases of 8 October, 20 and 23 November and 21 December 2015 (Annex NFF-34); see also Al Jazeera, "FIFA chief Blatter and Platini given provisional bans" (8 October 2015), <https://www.aljazeera.com/sports/2015/10/8/fifa-chief-blatter-and-platini-given-provisional-bans> (Annex NFF-30.4); iSportConnect, "FIFA Ethics Committee Opens Formal Proceedings Against Blatter and Platini" (23 November 2015), <https://www.isportconnect.com/fifa-ethics-committee-opens-formal-proceedings-against-blatter-and-platini/> (Annex NFF-30.5); Honolulu Star-Advertiser, "Sepp Blatter faces judgment by FIFA ethics court he created" (17 December 2015), <https://www.staradvertiser.com/2015/12/17/sports/sports-breaking/sepp-blatter-faces-judgment-by-fifa-ethics-court-he-created/> (Annex NFF-30.6); Sports Illustrated, "FIFA ethics committee bans Sepp Blatter, Michel Platini for eight years" (21 December 2015), <https://www.si.com/soccer/2015/12/21/fifa-ban-sepp-blatter-michel-platini-soccer> (Annex NFF-30.7).

concerning its most senior office holders, including its President, within a compressed timeframe where the circumstances require it.

82. The parallel proceedings concerning Michel Platini provide further relevant institutional context. Mr. Platini was at the time President of UEFA, a FIFA Vice President and a member of the FIFA Executive Committee, and formal investigation proceedings against him were opened on 28 September 2015. He was also subjected to a provisional 90-day ban during the investigation. The proceedings thereafter continued on an expedited basis and culminated in a hearing on 18 December 2015 and a first instance decision on 21 December 2015.⁸⁴ The subsequent CAS award records expressly that the Adjudicatory Chamber declined a request to postpone the hearing until January 2016 because, at Mr. Platini's express request and in light of the specific circumstances of the case, the proceedings were being conducted on an expedited basis.⁸⁵ Taken together, the Blatter and Platini proceedings demonstrate FIFA's institutional capacity to investigate and determine serious ethics matters concerning senior office holders on an expedited basis where the circumstances require it.
83. Against that background, NFF requests the Investigatory Chamber to proceed on an expedited basis and requests that it seek, to the extent permitted by the applicable procedures, to follow the indicative timetable set out below based on the precedent established by FIFA in the 2015 ethics proceedings concerning Mr. Blatter and Mr. Platini described above:
- (a) the initial evaluation under Article 61.1 be completed by **12 October 2026**;
 - (b) a decision on whether to commence a preliminary investigation under Article 61.2 be taken by **19 October 2026**;
 - (c) the preliminary investigation and prima facie assessment under Article 62.1 be completed, and a determination made as to whether formal investigation proceedings should be opened, by **16 November 2026**;
 - (d) if formal investigation proceedings are opened, the investigative phase be conducted on an expedited basis with a view to its completion and the transmission of any final report to the Adjudicatory Chamber by **22 December 2026**; and
 - (e) subject to the applicable procedural rights of all persons concerned and the competence of the Adjudicatory Chamber, the adjudicatory proceedings be conducted on an expedited basis with a view to first instance determinations being rendered by **22 January 2027**, thereby allowing a reasonable period for the exercise of any applicable internal appeal rights and, specifically in the case of Mr. Infantino, approximately two months before the FIFA presidential election on 18 March 2027.
84. NFF considers that this timetable appropriately balances the need for expedition with the procedural rights of all persons concerned. It is not intended to predetermine either the outcome of the investigation or the position of any individual. Rather, it is intended to allow the Ethics Committee process to proceed within a reasonable and effective

⁸⁴ CAS 2016/A/4474 Michel Platini v. FIFA, award of 9 May 2016 paras. 65, 70, 81, 84 and 93–94. (Annex NFF-32); FIFA Ethics Committee media releases of 2015 (Annex NFF-34); LawInSport, "How will Blatter and Platini challenge the decision of the FIFA Ethics Committee?", <https://www.lawinsport.com/topics/item/how-will-blatter-and-platini-challenge-the-decision-of-the-fifa-ethics-committee> (Annex NFF-30.8) (hearing on 18 December 2015; decision announced on 21 December 2015); Annexes NFF-30.6 and NFF-30.7.

⁸⁵ CAS 2016/A/4474, award of 9 May 2016, para. 84 (Annex NFF-32).

timeframe, to afford Mr. Infantino and any other person concerned a reasonable opportunity to exercise any applicable internal appeal rights, and, specifically in relation to Mr. Infantino, to provide sufficient procedural clarity before FIFA's member associations exercise their electoral responsibilities on 18 March 2027.

X. Annexes

85. The documents relied on in this complaint are listed in the Index of Annexes below and are cited in the footnotes by annex number.

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XI. Signature

Respectfully submitted on behalf of Norges Fotballforbund,



Lise Klaveness
President
Norges Fotballforbund



Karl-Petter Løken
General Secretary
Norges Fotballforbund