REPUBLIC OF KENYA
IN THE SPORTS DISPUTES TRIBUNAL
AT NAIROBI
CLAIM NO. ……E091…… OF 2026

PATRICK KINYUA …… **CLAIMANT**

VERSUS

FOOTBALL KENYA FEDERATION (FKF)……1ST RESPONDENT

HUSSEIN MOHAMMED……2ND RESPONDENT

CHARLES NJAGI NJOKA……..…….3RD RESPONDENT

AHMEDQADAR MOHAMMED DABAR……..……..4TH RESPONDENT

CALEB AMWAYI……5TH RESPONDENT

PETER KAMAU……..…6TH RESPONDENT

ABDULLAHI YUSUF IBRAHIM……7TH RESPONDENT

KEN RUNGU……8TH RESPONDENT

McDONALD MARIGA WANYAMA…….9TH RESPONDENT

ROBERT KENNETH MACHARIA…….10TH RESPONDENT

BERNARD KORIR LAGAT……..…11TH RESPONDENT

VIOLET KERUBO MOMANYI……12TH RESPONDENT

COLLINS OPIYO KALEE……...13TH RESPONDENT

GABRIEL MGHENDI……...14TH RESPONDENT

DANIEL AKALA SHIKANDA……15TH RESPONDENT

FIFA……....16TH RESPONDENT

CONFEDERATION OF AFRICAN FOOTBALL (CAF)…….....…17TH RESPONDENT

THE SPORTS REGISTRAR ……..… 18TH RESPONDENT

CERTIFICATE OF URGENCY

I, **PATRICK KINYUA**, the claimant herein, do hereby certify that this matter is of the utmost urgency and requires the immediate attention of this Honourable Tribunal for the following reasons; -

1. **THAT** on the 7th day of November 2026 the Football Kenya Federation General Assembly, being the supreme decision-making organ of the Federation under the FKF Constitution, lawfully convened and held a Special General Meeting at the Three Steers Hotel in Meru County. The said meeting was convened by members of the FKF

Congress in accordance with Article 31(2) of the FKF Constitution and was attended by international observers from FIFA and CAF as well as the Acting Sports Registrar. At that meeting the General Assembly, by overwhelming majorities, resolved to dismiss the 9th to 15th Respondents from their positions as members of the National Executive Committee following deliberations on serious and repeated violations of the FKF Constitution and applicable FIFA regulations.

2. **THAT** Despite the clear, democratic and overwhelming will of the duly accredited delegates who voted at the Special General Meeting, the 9th to 15th Respondents have openly refused to respect, recognise or give effect to the resolutions of the General Assembly. They continue to hold themselves out to the public, to clubs, to stakeholders and to international bodies as members of the National Executive Committee, thereby creating a dual and conflicting power structure within the Football Kenya Federation. This state of affairs has resulted in institutional paralysis, uncertainty in decision-making, disruption of the Federation's activities, plans and processes, and serious prejudice to the proper administration of football in Kenya.

3. **THAT** the continued non-implementation of the resolutions of 7th November 2026 is causing immediate and ongoing harm to national team preparations, commercial partnerships, league operations and Kenya's readiness to co-host the 2027 Africa Cup of Nations. The Sports Registrar, who has a clear statutory duty under the Sports Act, 2013 to maintain an accurate and up-to-date register of the officials of registered sports organisations, has not yet effected the changes arising from the resolutions of the General Assembly. Unless this Honourable Tribunal intervenes urgently and grants the interim orders sought, the democratic will of the FKF General Assembly will be completely frustrated, the public interest in the orderly governance of football will suffer irreparable damage, and the Claimant's claim will be rendered nugatory.

4. **THAT** It is therefore just, necessary and in the public interest that this matter be certified as urgent and that the interim orders sought in the accompanying Notice of Motion be granted forthwith so as to preserve the status of the resolutions of 7th November 2026 and to direct the Sports Registrar to effect the necessary changes on the register pending the hearing and determination of the Claim.

DATED at Nairobi this …12th … day of ..November ….2026



……

PATRICK KINYUA
Claimant

DRAWN AND FILED BY:
PATRICK KINYUA
P.O. Box 24437-00100Nairobi,
TEL: 0748220144
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CONFEDERATION OF AFRICAN FOOTBALL (CAF)…….....…17TH RESPONDENT

THE SPORTS REGISTRAR ……..… 18TH RESPONDENT

NOTICE OF MOTION

(under Section 58 and Section 59 of the Sports Act, 2013, Rule 6 of the Sports Disputes Tribunal Rules, 2022 (Legal Notice 49 of 2022), the inherent powers of this Honourable Tribunal, Articles 22, 47, 48 and 258 of the Constitution of Kenya, 2010, and all other enabling provisions of the law)

TAKE NOTICE that this Honourable Tribunal will be moved on the …… day of ……2026 at 9:00 a.m. or so soon thereafter as the Claimant may be heard on an application **FOR ORDERS:**

1. **THAT** this application be certified as urgent and be heard ex-parte in the first instance due to the demonstrated urgency.

2. **THAT** Pending the inter-partes hearing and determination of the application herein, the 9th to 15th Respondents be restrained by way of an interim injunction from holding themselves out to any person, body, club, stakeholder or international organisation as members of the FKF National Executive Committee and from issuing any statements, circulars, directives, press releases or communications purporting to be on behalf of the Football Kenya Federation.

3. **THAT** Pending the hearing and determination of the Claim herein, this Honourable Tribunal be pleased to direct the 18th Respondent, the Sports Registrar, to immediately take all necessary steps and to effect the changes on the official register of the members of the FKF National Executive Committee by removing the names of the 9th to 15th Respondents in accordance with the resolutions of the FKF General Assembly made on the 7th day of November 2026.

4. **THAT** Pending the hearing and determination of the Claim herein, the Respondents be directed to take all necessary and immediate steps to give full effect to the resolutions of the FKF General Assembly of 7th November 2026 so that the democratic will of the delegates is respected and implemented without further delay.

5. The costs of this application be provided for.

6. This Honourable Tribunal be pleased to make any other or further orders as it may deem just, fair and fit to grant in the circumstances of this case.

WHICH APPLICATION is based on the following grounds:

A. The Special General Meeting of the FKF General Assembly held on 7th November 2026 was lawfully convened under Article 31(2) of the FKF Constitution by members of the Congress and was attended by representatives of FIFA, CAF and the Acting Sports Registrar as observers. At that meeting the General Assembly deliberated on the conduct of the 9th to 15th Respondents and by overwhelming majorities resolved to dismiss them from the National Executive Committee on account of serious and repeated violations of the FKF Constitution and applicable FIFA regulations, including the purported resolution of 24th April 2026, repeated failure to attend duly convened NEC meetings, and unauthorised communication on behalf of the Federation.

B. Despite the clear and democratic resolutions of the supreme organ of the Federation, the 9th to 15th Respondents have refused to respect or give effect to those resolutions and continue to hold themselves out as members of the NEC. This conduct has created a dual power structure, institutional uncertainty and paralysis within FKF, and has resulted in active interference with the activities, plans and processes of the Federation to the prejudice of clubs, players, stakeholders and the public interest in the proper governance of football in Kenya.

C. The Sports Registrar has a clear statutory duty under the Sports Act, 2013 to maintain an accurate register of the officials of registered sports organisations. The failure to update the register in accordance with the resolutions of 7th November 2026 perpetuates the uncertainty and enables the 9th to 15th Respondents to continue claiming authority that they no longer lawfully possess. Unless the interim orders sought are granted, the democratic will of the FKF General Assembly will be completely frustrated, the Claim will be rendered nugatory, and the public interest will suffer irreparable harm that cannot be adequately compensated by damages.

D. The Claimant has established a strong prima facie case with a high probability of success, the balance of convenience tilts heavily in favour of granting the interim orders, and it is just, fair and in the public interest that the orders sought be granted pending the hearing and determination of the Claim.

AND WHICH APPLICATION is further supported by the Supporting Affidavit of **PATRICK KINYUA** sworn herewith, the Statement of Claim already filed herein, and the annexed official press releases of the FKF, and on such other grounds, reasons and arguments as may be adduced at the hearing hereof.

DATED at Nairobi this …12th … day of ..November ….2026

……
PATRICK KINYUA
Claimant

DRAWN AND FILED BY:
PATRICK KINYUA
P.O. Box 24437-00100Nairobi,
TEL: 0748220144
Email: pkimwa10@gmail.com

TO BE SERVED UPON:

1. **Football Kenya Federation (FKF)**
   Goal Project / Kandanda House, Kasarani
   P.O. Box 49911-00100, Nairobi
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2. **Hussein Mohammed**
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3. **Charles Njagi Njoka**
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4. **Ahmedqadar Mohammed Dabar**
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8. **Ken Rungu**
   Care of Football Kenya Federation
   Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

9. **McDonald Mariga Wanyama**
   Care of Football Kenya Federation
   Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

10. **Robert Kenneth Macharia**
    Care of Football Kenya Federation
    Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

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15. **Daniel Akala Shikanda**
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16. **FIFA**
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    P.O. Box 8044
    8044 Zürich, Switzerland

17. **Confederation of African Football (CAF)**
    3 Abdel Khalek Tharwat Street
    El Hay El Motamayez

P.O. Box 23
6th October City, Egypt
Email: info@cafonline.com

18. **The Sports Registrar**
    Office of the Sports Registrar
    State Department for Sports
    P.O. Box 49849-00100
    Nairobi
    (Physical: Kencom House, 2nd Floor / Talanta Plaza, Upper Hill)
    Email: info@sports.go.ke

NB: ***If any party mentioned above do not attend within the time and at the place hereinabove mentioned, the Court may make such orders and take proceedings as may be just and expedient, your absence notwithstanding.***

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THE SPORTS REGISTRAR ……..… 18TH RESPONDENT

SUPPORTING AFFIDAVIT

I, **PATRICK KINYUA**, of Post Office Box Number 24437-00100, Nairobi, in the Republic of Kenya, an adult male of sound mind and a Kenyan citizen, do hereby make oath and state as follows: –

1. **THAT** I am the Claimant herein. I am fully conversant with the facts of this matter and competent to swear this Affidavit in support of the Notice of Motion filed herewith. I have a bona fide and keen interest in sports governance, the rule of law,

constitutionalism, good governance, leadership and integrity, and the proper administration of football as a national sport of significant public importance in Kenya.

2. **THAT** I institute these proceedings in the public interest pursuant to Articles 22 and 258 of the Constitution of Kenya, 2010, Rule 6 of the Sports Disputes Tribunal Rules, 2022 (Legal Notice No. 49 of 2022), and the principles of good governance, leadership and integrity under Chapter Six of the Constitution. Although I am neither an elected delegate of the FKF General Assembly nor a member of the National Executive Committee, the proper democratic functioning, institutional stability and constitutional governance of the Football Kenya Federation (FKF) are matters of grave public interest affecting millions of Kenyans, national teams, clubs, players, fans, commercial partners and Kenya's readiness to co-host the 2027 Africa Cup of Nations.

3. **THAT** the 1st Respondent is the Football Kenya Federation, the national governing body for football in Kenya, registered under the Sports Act, 2013, and affiliated to FIFA and CAF. The 2nd to 8th Respondents are the members of the FKF National Executive Committee who remained in office following the Special General Meeting of 7th November 2026. The 9th to 15th Respondents are the seven members of the FKF National Executive Committee whose conduct was the subject of the said Special General Meeting and who were dismissed by resolutions of the FKF General Assembly on that date. The 16th and 17th Respondents are the international governing bodies of football to which FKF is affiliated. The 18th Respondent is the Sports Registrar established under the Sports Act, 2013, with the statutory duty to maintain an accurate and up-to-date official register of the officials of registered sports organisations.

4. **THAT** on or about 24th April 2026, a faction of the FKF National Executive Committee, led by the 9th Respondent (McDonald Mariga Wanyama), purported to pass a resolution seeking the removal of the FKF President (the 2nd Respondent) and other federation officials. This purported resolution became a central issue of contention within FKF and formed part of the agenda for the subsequent Special General Meeting.

5. **THAT** throughout 2026 the leadership dispute within FKF escalated. The 9th to 15th Respondents repeatedly failed to attend duly convened National Executive Committee meetings, issued unauthorised communications on behalf of the Federation, and engaged in actions considered contrary to the FKF Constitution and applicable FIFA regulations. These matters formed the basis of the deliberations at the Special General Meeting.

6. **THAT** on 6th November 2026 the Football Kenya Federation issued an official statement announcing that a Special General Meeting of the FKF General Assembly would be held on Saturday, 7th November 2026 at the Three Steers Hotel in Meru. The statement expressly stated that the meeting had been convened by members of the FKF Congress in accordance with **Article 31(2)** of the FKF Constitution, 2017. The agenda included deliberation on the resolutions made by National Executive Committee members on 24th April 2026, their implications for FKF's operations, and the conduct of the following seven National Executive Committee members:
   - **a)** McDonald Mariga Wanyama – FKF Vice President;
   - **b)** Violet Kerubo Momanyi – FKF Women Representative;
   - **c)** Gabriel Mghendi – Coast NEC Member;

d) Daniel Akala Shikanda – Nairobi NEC Member;
e) Collins Opiyo Kalee – Nyanza NEC Member;
f) Robert Kenneth Macharia – Central NEC Member; and
g) Bernard Korir Lagat – Upper Rift Valley NEC Member.

The same statement confirmed that the Special General Meeting would be attended by international observers from FIFA and CAF, namely Bruno Comicholli (Senior MA Governance Service Manager, FIFA), David Ndayisenga (Lead, FIFA Regional Office, Kigali) and Nnaemeka A. Olu (Legal Manager, CAF), as well as by the Acting Sports Registrar, Chacha J. Maroa, accompanied by officials from the State Department for Sports.
(attached hereto and marked* "PK-1" *is a true copy of the official FKF statement dated 6th November 2026 evidencing the above.)

7. **THAT** on the morning of 7th November 2026, before the Special General Meeting could commence, officers from the Police Rapid Deployment Unit (RDU) moved into the meeting venue at the Three Steers Hotel in Meru and discharged teargas into the meeting room where duly accredited delegates of the FKF General Assembly were seated awaiting the start of proceedings. This incident disrupted a constitutional process convened by members of the FKF General Assembly in exercise of their mandate under the FKF Constitution. ***(Attached hereto and marked* "PK-2" *is a true copy of the official FKF update dated 7th November 2026 evidencing the above.)***

8. **THAT** I verily believe that the 9th Respondent (McDonald Mariga Wanyama), acting in concert with other members of his faction, interfered with the constitutionally convened Special General Meeting by causing or facilitating the deployment of the Rapid Deployment Unit to the venue, resulting in the teargassing of delegates. This action was a deliberate attempt to disrupt, intimidate and frustrate a constitutional process convened under Article 31(2) of the FKF Constitution.

9. **THAT** despite the disruption caused by the RDU operation and the teargassing of delegates, the Special General Meeting proceeded. The FKF General Assembly, being the supreme decision-making organ of the Federation under the FKF Constitution, deliberated on the conduct of the seven National Executive Committee members and resolved, by overwhelming majorities, to dismiss them from their positions.

10. **THAT** on the same day, 7th November 2026, the Football Kenya Federation issued an official statement confirming that the General Assembly had unanimously resolved to dismiss the seven National Executive Committee members over serious and repeated violations of the FKF Constitution and applicable FIFA regulations. The matters considered included;
a) the purported NEC resolution of 24th April 2026 seeking the removal of the FKF President and other federation officials;
b) repeated failure to attend duly convened National Executive Committee meetings;
c) unauthorised communication on behalf of the Federation; and
d) actions considered contrary to the FKF Constitution and applicable football regulations.

The Congress further resolved that the seven officials remain subject to any additional sanctions that may be imposed by the judicial bodies of FKF, CAF and FIFA. The

proceedings were attended by representatives of FIFA and CAF, alongside other relevant stakeholders. ***(Attached hereto and marked "PK-3" is a true copy of the official FKF statement dated 7th November 2026 evidencing the above.)***

11. **THAT** on 9th November 2026 the 9th Respondent (McDonald Mariga Wanyama), for and on behalf of the affected National Executive Committee members, issued a press statement on FKF letterhead rejecting the dismissal. In that statement the 9th Respondent claimed that seven National Executive Committee members and 32 duly accredited Congress delegates had been denied access to the venue, alleged collusion involving sections of FKF leadership, and contended that the process violated Article 41(4) and (5) of the FKF Constitution (the right to be heard and the mandatory secret ballot). He asserted that the affected members remain in office and called upon FIFA, CAF and the Sports Registrar to scrutinise the proceedings. ***(attached hereto and marked "PK-4" is a true copy of the press statement issued by McDonald Mariga Wanyama dated 9th November 2026 evidencing the above.)***

12. **THAT** on the same day, 9th November 2026, the Football Kenya Federation issued a clarification stating that it had not appointed any individuals to fill the positions left vacant by the dismissal of the seven National Executive Committee members, including the position of Vice President, and that any filling of vacancies would follow the well-established constitutional procedures and processes of the Federation and would be communicated through official channels. ***(Attached hereto and marked "PK-5" is a true copy of the official FKF clarification dated 9th November 2026 evidencing the above.)***

13. **THAT** despite the clear, democratic and overwhelming resolutions of the FKF General Assembly passed on 7th November 2026 in the presence of FIFA, CAF and Sports Registrar observers, the 9th to 15th Respondents have openly refused to respect, recognise or give effect to those resolutions. They continue to hold themselves out to the public, to clubs, to stakeholders and to international bodies as members of the National Executive Committee, thereby creating a dual and conflicting power structure within the Football Kenya Federation.

14. **THAT** this state of affairs has resulted in institutional paralysis, uncertainty in decision-making, disruption of the Federation's activities, plans and processes, and serious prejudice to the proper administration of football in Kenya. The continued non-implementation of the resolutions of 7th November 2026 is causing immediate and ongoing harm to national team preparations, commercial partnerships, league operations and Kenya's readiness to co-host the 2027 Africa Cup of Nations.

15. **THAT** the Sports Registrar, who has a clear statutory duty under the Sports Act, 2013 to maintain an accurate and up-to-date register of the officials of registered sports organisations, has not yet effected the changes arising from the resolutions of the General Assembly. Unless this Honourable Tribunal intervenes urgently and grants the interim orders sought in the Notice of Motion, the democratic will of the FKF General Assembly will be completely frustrated, the public interest in the orderly governance of football will suffer irreparable damage, and the Claimant's claim will be rendered nugatory.

16. **THAT** the Special General Meeting of 7th November 2026 was lawfully convened by members of the FKF General Assembly under Article 31(2) of the FKF Constitution.

The resolutions dismissing the 9th to 15th Respondents were passed by the supreme organ of FKF after deliberation and in the presence of international and government observers. They are lawful, valid and binding.

17. **THAT** the 9th Respondent's interference with the meeting through the deployment of the Rapid Deployment Unit and the teargassing of delegates was an unlawful attempt to frustrate a constitutional process and cannot invalidate the subsequent resolutions of the General Assembly.

18. **THAT** the continued holding out by the 9th to 15th Respondents as members of the National Executive Committee, and their interference with the affairs of FKF, is unlawful, unconstitutional and contrary to the principles of good governance, leadership and integrity, and the supremacy of the General Assembly under the FKF Constitution.

19. **THAT** the Sports Registrar has a statutory duty under the Sports Act, 2013 to update the official register of FKF National Executive Committee members in accordance with the resolutions of the General Assembly. FIFA and CAF, having had representatives present as observers, have a responsibility to ensure that the democratic will of the FKF General Assembly is respected and implemented.

20. **THAT** I have established a strong prima facie case with a high probability of success. The balance of convenience tilts heavily in favour of granting the interim orders sought. It is just, fair, necessary and in the public interest that the orders sought in the Notice of Motion be granted pending the inter-partes hearing of the application and/or the hearing and determination of the Claim so as to preserve the status of the resolutions of 7th November 2026 and to direct the Sports Registrar to effect the necessary changes on the register.

21. **THAT** the facts deposed to herein are within my personal knowledge save where otherwise stated, in which case they are based on information received from sources I believe to be true and reliable, including the official statements issued by the Football Kenya Federation (annexed hereto) and contemporaneous reports of the events of 7th November 2026.

22. **THAT** I swear this Affidavit in support of the Notice of Motion filed herewith and in further support of the Certificate of Urgency and Statement of Claim already filed, and I verily believe that the interim orders sought are necessary to prevent further irreparable harm to the public interest in the orderly and constitutional governance of football in Kenya.

23. **THAT** what is deposed to herein is true to the best of my knowledge, information and belief, save where otherwise expressly stated.

SWORN by the said **PATRICK KINYUA**
at Nairobi this ...12th... day of .....November... 2026)
) .....
) **DEPONENT**

BEFORE ME

MENZU VICTOR ODANGA
Advocate & Commissioner For Oaths
P.O. BOX 19475-00400,
NAIROBI.

COMMISSIONER FOR OATHS

DRAWN AND FILED BY:

PATRICK KINYUA
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TO BE SERVED UPON:

1. **Football Kenya Federation (FKF)**
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2. **Hussein Mohammed**
   Care of Football Kenya Federation
   Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi
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9. **McDonald Mariga Wanyama**
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15. **Daniel Akala Shikanda**
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16. **FIFA**
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17. **Confederation of African Football (CAF)**
    3 Abdel Khalek Tharwat Street
    El Hay El Motamayez
    P.O. Box 23
    6th October City, Egypt
    Email: info@cafonline.com

18. **The Sports Registrar**
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    State Department for Sports
    P.O. Box 49849-00100
    Nairobi
    (Physical: Kencom House, 2nd Floor / Talanta Plaza, Upper Hill)
    Email: info@sports.go.ke

Friday 6 November 2026

FKF SPECIAL GENERAL MEETING TO BE ATTENDED BY FIFA, CAF AND GOVERNMENT OBSERVERS

The Football Kenya Federation (FKF) Special General Meeting (SGM) will be held on Saturday, 7 November 2026, at Three Steers Hotel in Meru, bringing together members of the FKF General Assembly, the federation's supreme decision-making organ.

The meeting will deliberate on the resolutions made by National Executive Committee (NEC) members on 24 April 2026, their implications for FKF's operations, and the conduct of NEC members, before considering the way forward and proposed resolutions.

The NEC members whose conduct will be considered include:

1. McDonald Mariga – FKF Vice President
2. Kerubo Momanyi – FKF Women Representative
3. Gabriel Mghendi – Coast NEC Member
4. Dan Shikanda – Nairobi NEC Member
5. Collins Opiyo Kalee – Nyanza NEC Member
6. Robert Macharia – Central NEC Member
7. Bernard Lagat – Upper Rift Valley NEC Member

The meeting will be attended by international observers from FIFA and the Confederation of African Football (CAF), including:

- Bruno Comicholi – Senior MA Governance Service Manager, FIFA.
- David Ndayisenga – Lead, FIFA Regional Office, Kigali.
- Nnaemeka A. Olu – Legal Manager, CAF.

Acting Sports Registrar Chacha J. Maroa will also attend, accompanied by officials from the State Department for Sports.

The SGM has been convened by members of the FKF Congress in accordance with Article 31(2) of the FKF Constitution, 2017.

FKF COMMUNICATIONS TEAM

This is the Exhibit Marked, DK-1
Referred to in the Annexed Affidavit/Declarations
of Patrick Gathu
Sworn/Declared before me this 12th
day of Nov 2026 at Nairobi
Commissioner for Oaths

P. O. Box 49511-00100, Nairobi | Tel: +254 [illegible]
Email: info@footballkenya.org | Website: www.footballkenya.org

November 7, 2026

UPDATE ON THE FKF SGM

The FKF Special General Meeting (SGM) is yet to commence following an incident in which officers from the Police Rapid Deployment Unit (RDU) moved into the meeting venue and discharged teargas into the meeting room, where delegates were seated awaiting the start of proceedings.

The incident has disrupted a constitutional process convened by members of the FKF General Assembly in exercise of their mandate under the FKF Constitution.

FKF is concerned by the circumstances surrounding the RDU operation and the resulting interference with the meeting.

Further updates will be provided in due course.

FKF COMMUNICATIONS TEAM

This is the Exhibit Marked, PK-2
Referred to in the Annexed Affidavit/Declarations
of Patrick Onyonka et al
Sworn/Declared before me this 11
day of Nov 2026 at Nairobi
Commissioner for Oaths

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7 NOVEMBER 2026

FKF CONGRESS RESOLVES TO DISMISS SEVEN NEC MEMBERS

The Football Kenya Federation (FKF) General Assembly, the federation's supreme decision-making organ, has unanimously resolved to dismiss seven members of the National Executive Committee (NEC) following deliberations at the Special General Meeting (SGM) held in Meru on Saturday, 7 November 2026.

The resolution follows consideration of allegations of serious and repeated violations of the FKF Constitution and applicable FIFA regulations relating to the conduct of the seven officials and their actions within the federation.

Those affected are:

1. McDonald Mariga Wanyama – FKF Vice President
2. Robert Kenneth Macharia – Central NEC Member
3. Bernard Korir Lagat – Upper Rift Valley NEC Member
4. Violet Kerubo Momanyi – FKF Women Representative
5. Collins Opiyo Kalee – Nyanza NEC Member
6. Gabriel Mghendi – Coast NEC Member
7. Daniel Akala Shikanda – Nairobi NEC Member

The matters considered included the purported NEC resolution of 24 April 2026 seeking the removal of the FKF President and other federation officials, repeated failure to attend duly convened NEC meetings, unauthorized communication on behalf of the federation and actions considered contrary to the FKF Constitution and applicable football regulations.

The Congress further resolved that the seven officials remain subject to any additional sanctions that may be imposed by the judicial bodies of FKF, the Confederation of African Football (CAF) and FIFA, in accordance with the applicable statutes and regulations.

The proceedings were attended by representatives of FIFA and CAF, alongside other relevant stakeholders.

FKF remains committed to constitutional governance, institutional accountability and the stability of football administration in Kenya.

The federation will communicate further on the implementation of the resolutions and the resulting administrative arrangements.

FKF COMMUNICATIONS TEAM

This is the Exhibit Marked DK-3
Referred to in the Annexed Affidavit/Declarations
of Patrick Kinyua
Sworn/Declared before me this 11
day of Nov 2026 at Nairobi
Commissioner for Oaths

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PRESS STATEMENT

FOR IMMEDIATE RELEASE

MERU SGM

Nairobi, 9 November 2026

This is the Exhibit Marked, PK-4
Referred to in the Annexed Affidavit/Declarations
of Patrick Cinyu
Sworn/Declared before me this
day of NOV 20 26 at Nairobi
Commissioner for Oaths

We wish to address football stakeholders, FKF members, clubs, players and the general public following the events surrounding the Football Kenya Federation (FKF) Special General Meeting held in Meru on Saturday, 7 November 2026.

What transpired in Meru was a deliberate attempt to silence elected leaders who have consistently championed accountability, transparency and good governance within FKF.

In an unprecedented turn of events, seven NEC members, alongside 32 duly accredited Congress delegates, were denied access to the venue. We are deeply concerned by the collusion involving sections of FKF leadership, and individuals engaged to frustrate their participation.

A PROCESS FUNDAMENTALLY FLAWED AND UNCONSTITUTIONAL

The purported dismissal of seven elected NEC members was conducted in blatant disregard of Article 41(4) and (5) of the FKF Constitution, which guarantees the right to be heard and prescribes the procedure for dismissal.

Indeed, FIFA's intervention in May 2026 expressly emphasized that Article 41 and its due-process safeguards, particularly the right to be heard, must be respected irrespective of an official's position or the nature of the allegations. FIFA made it clear that this right is fundamental to the legitimacy of decisions taken by FKF's governing organs. The Meru proceedings disregarded that very guidance.

More fundamentally, Article 41(5) expressly provides that a dismissal motion **SHALL be decided by secret ballot.** This is a mandatory constitutional requirement, not an optional procedure. The purported dismissal resolutions were instead adopted through acclamation, in direct violation of this express provision. A resolution reached through acclamation cannot substitute for the secret ballot expressly required by the Constitution.

The legitimacy of the proceedings is further undermined by the exclusion of 32 legitimate Congress delegates and credible evidence of impersonation and unauthorized representation. Individuals who were not duly mandated representatives of legitimate FKF members participated as delegates. These irregularities raise serious questions about

the authenticity of the attendance register, the legitimacy of the quorum and whether any constitutionally prescribed voting threshold was attained.

OUR POSITION IS CLEAR

In light of these fundamental violations:

1. We reject the purported dismissal of the seven NEC members and shall not recognize resolutions arising from proceedings conducted in breach of the FKF Constitution.
2. The affected NEC members remain in office, and their constitutional mandates cannot be extinguished through an unlawful process.
3. We call upon FIFA, CAF and the Sports Registrar to urgently scrutinize the Meru proceedings, including delegate credentials, attendance, quorum and the purported voting process.
4. We reserve the right to pursue all available constitutional remedies to challenge the purported resolutions.

THE FIGHT FOR ACCOUNTABILITY CONTINUES

Our position has never been about protecting individual positions. It is about safeguarding FKF as an institution and defending the constitutional rights of its members. No leadership can claim legitimacy by excluding duly entitled participants, admitting unauthorized representatives or disregarding mandatory constitutional procedures.

We will not be intimidated, silenced or coerced into abandoning our responsibility to Kenyan football. The events in Meru will not extinguish our mandate or derail the struggle for accountability, constitutionalism and good governance in FKF.

The Constitution must prevail over individual interests. The fight for accountable football governance continues.

ENDS

ISSUED BY:

MACDONALD MARIGA – VICE PRESIDENT, FKF
For and on behalf of the affected FKF National Executive Committee Members.

9 NOVEMBER 2026

OFFICIAL STATEMENT

CLARIFICATION ON VACANT NEC POSITIONS

The Football Kenya Federation (FKF) wishes to clarify that it has not appointed any individuals to fill the positions left vacant following the dismissal of seven National Executive Committee (NEC) members at the Special General Meeting (SGM) held in Meru on Saturday, 7 November 2026.

Contrary to reports and claims doing the rounds, no appointments have been made to fill the vacant positions, including that of the Vice President.

The federation has well-established constitutional procedures and processes that guide its operations, including the filling of vacant leadership positions. Any decisions in this regard will be undertaken in accordance with the FKF Constitution and applicable regulations and communicated through official federation channels.

FKF also reminds members of the Fourth Estate of their responsibility to uphold professional standards, verify information and ensure accuracy before sharing it with the public. The spread of misinformation and propaganda serves no purpose and is detrimental to the interests of Kenyan football.

The federation remains committed to transparency, accountability and due process in the discharge of its mandate.

FOOTBALL KENYA FEDERATION

This is the Exhibit Marked, PK-5
Referred to in the Annexed Affidavit/Declarations
of Patrick Icinyua
Sworn/Declared before me this 11th
day of NOV 2026 at Nairobi
Commissioner for Oaths

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REPUBLIC OF KENYA
IN THE SPORTS DISPUTES TRIBUNAL
AT NAIROBI
CLAIM NO. …… OF 2026

PATRICK KINYUA …… **CLAIMANT**

VERSUS

FOOTBALL KENYA FEDERATION (FKF)……1ST RESPONDENT

HUSSEIN MOHAMMED……2ND RESPONDENT

CHARLES NJAGI NJOKA……..…….3RD RESPONDENT

AHMEDQADAR MOHAMMED DABAR……..……..4TH RESPONDENT

CALEB AMWAYI……5TH RESPONDENT

PETER KAMAU……..…6TH RESPONDENT

ABDULLAHI YUSUF IBRAHIM……7TH RESPONDENT

KEN RUNGU……8TH RESPONDENT

McDONALD MARIGA WANYAMA…….9TH RESPONDENT

ROBERT KENNETH MACHARIA…….10TH RESPONDENT

BERNARD KORIR LAGAT……..…11TH RESPONDENT

VIOLET KERUBO MOMANYI……12TH RESPONDENT

COLLINS OPIYO KALEE……...13TH RESPONDENT

GABRIEL MGHENDI……...14TH RESPONDENT

DANIEL AKALA SHIKANDA……15TH RESPONDENT

FIFA……....16TH RESPONDENT

CONFEDERATION OF AFRICAN FOOTBALL (CAF)…….....…17TH RESPONDENT

THE SPORTS REGISTRAR ……..… 18TH RESPONDENT

STATEMENT OF CLAIM

A. The Parties

1. The Claimant is an adult male of sound mind, a Kenyan citizen, and a person with a keen and bona fide interest in sports governance, the rule of law, constitutionalism, good governance, leadership and integrity, and the proper administration of football as a national sport of significant public importance in the Republic of Kenya.

2. The 1st Respondent is the Football Kenya Federation (FKF), the national governing body for football in Kenya, registered under the Sports Act, 2013, and affiliated to FIFA and CAF.
3. The 2nd to 8th Respondents are the members of the FKF National Executive Committee (NEC) who remained in office following the Special General Meeting of 7th November 2026.
4. The 9th to 15th Respondents are the seven members of the FKF NEC whose conduct was the subject of the Special General Meeting and who were dismissed by resolutions of the FKF General Assembly on 7th November 2026.
5. The 16th and 17th Respondents are the international governing bodies of football to which FKF is affiliated, and whose representatives attended the Special General Meeting as observers.
6. The 18th Respondent is the Sports Registrar established under the Sports Act, 2013, with the statutory duty to maintain the official register of sports organisations and their officials.

B. Locus Standi

7. The Claimant institutes this Claim in the **public interest** pursuant to Articles 22 and 258 of the Constitution of Kenya, 2010, Rule 6 of the Sports Disputes Tribunal Rules, 2022, and the principles of good governance, leadership and integrity under Chapter Six of the Constitution.
8. Although the Claimant is not an elected delegate of the FKF General Assembly, nor a member of the National Executive Committee, nor a person directly removed by the resolutions of 7th November 2026, the Claimant has the requisite locus standi for the following reasons:
    a) The Football Kenya Federation is the national governing body for the most popular sport in Kenya. Its proper governance, democratic functioning, and institutional stability are matters of significant public interest affecting millions of Kenyans, national teams, clubs, players, fans, commercial partners, and Kenya's co-hosting of the 2027 Africa Cup of Nations.

    b) The continued refusal by the 9th to 15th Respondents to respect the clear will of the General Assembly has created a dual power structure, institutional paralysis, and uncertainty that prejudices the public interest in the orderly administration of football in Kenya.

    c) Rule 6 of the Sports Disputes Tribunal Rules, 2022 provides that "a person" may institute a claim in matters concerning the governance of national sports organisations where public interest is engaged.

C. Jurisdiction

9. This Honourable Tribunal has jurisdiction under Section 58(b) of the Sports Act, 2013, and Rule 6 of the Sports Disputes Tribunal Rules, 2022, to hear and determine this sports-related dispute concerning the governance of a national sports organisation.

D. Detailed Facts

10. On or about 24th April 2026, a faction of the FKF National Executive Committee, led by the 9th Respondent (McDonald Mariga Wanyama), purported to pass a resolution seeking the removal of the FKF President (the 2nd Respondent) and other federation officials. This purported resolution became a central issue of contention within FKF and formed part of the agenda for the subsequent Special General Meeting.

11. The leadership dispute escalated throughout 2026. The 9th to 15th Respondents repeatedly failed to attend duly convened NEC meetings, issued unauthorised communications on behalf of the Federation, and engaged in actions considered contrary to the FKF Constitution and applicable FIFA regulations.

12. On 6th November 2026, the Football Kenya Federation issued an official statement announcing that a Special General Meeting of the FKF General Assembly would be held on Saturday, 7th November 2026, at the Three Steers Hotel in Meru. The statement expressly stated that the meeting had been convened by members of the FKF Congress in accordance with **Article 31(2)** of the FKF Constitution, 2017. The agenda included deliberation on the resolutions made by NEC members on 24th April 2026, their implications for FKF's operations, and the conduct of the following seven NEC members:

- **A.** McDonald Mariga Wanyama – FKF Vice President
- **B.** Violet Kerubo Momanyi – FKF Women Representative
- **C.** Gabriel Mghendi – Coast NEC Member
- **D.** Daniel Akala Shikanda – Nairobi NEC Member
- **E.** Collins Opiyo Kalee – Nyanza NEC Member
- **F.** Robert Kenneth Macharia – Central NEC Member
- **G.** Bernard Korir Lagat – Upper Rift Valley NEC Member

13. The same statement confirmed that the Special General Meeting would be attended by international observers from FIFA and CAF, namely:

- **A.** Bruno Comicholli – Senior MA Governance Service Manager, FIFA
- **B.** David Ndayisenga – Lead, FIFA Regional Office, Kigali
- **C.** Nnaemeka A. Olu – Legal Manager, CAF and by the Acting Sports Registrar, Chacha J. Maroa, accompanied by officials from the State Department for Sports.

14. On the morning of 7th November 2026, before the Special General Meeting could commence, officers from the Police Rapid Deployment Unit (RDU) moved into the meeting venue and discharged teargas into the meeting room where duly accredited delegates of the FKF General Assembly were seated awaiting the start of proceedings.

15. The Claimant avers that the 9th Respondent (McDonald Mariga Wanyama), acting in concert with other members of his faction, interfered with the constitutionally convened Special General Meeting by causing or facilitating the deployment of the Rapid Deployment Unit to the venue, resulting in the teargassing of delegates. This action was a deliberate attempt to disrupt, intimidate, and frustrate a constitutional process convened by members of the FKF General Assembly under Article 31(2) of the FKF Constitution.

16. Despite the disruption caused by the RDU operation and the teargassing of delegates, the Special General Meeting proceeded. The FKF General Assembly, being the supreme decision-making organ of the Federation, deliberated on the conduct of the seven NEC members and resolved, by overwhelming majorities, to dismiss them.

17. On the same day, 7th November 2026, the Football Kenya Federation issued an official statement confirming that the General Assembly had resolved to dismiss the

seven NEC members over serious and repeated violations of the FKF Constitution and applicable FIFA regulations. The matters considered included:

a. the purported NEC resolution of 24 April 2026 seeking the removal of the FKF President and other officials;
b. repeated failure to attend duly convened NEC meetings;
c. unauthorised communication on behalf of the Federation; and
d. actions considered contrary to the FKF Constitution and applicable football regulations.

18. The Congress further resolved that the seven officials remain subject to any additional sanctions that may be imposed by the judicial bodies of FKF, CAF, and FIFA. The proceedings were attended by representatives of FIFA and CAF, alongside other relevant stakeholders.

19. On 9th November 2026, the 9th Respondent (McDonald Mariga Wanyama), for and on behalf of the affected NEC members, issued a press statement on FKF letterhead rejecting the dismissal. In that statement, the 9th Respondent claimed that seven NEC members and 32 duly accredited Congress delegates had been denied access to the venue, alleged collusion, and contended that the process violated Article 41(4) and (5) of the FKF Constitution (right to be heard and mandatory secret ballot). He asserted that the affected members remain in office and called upon FIFA, CAF, and the Sports Registrar to scrutinise the proceedings.

20. On the same day, 9th November 2026, the Football Kenya Federation issued a clarification stating that it had not appointed any individuals to fill the positions left vacant by the dismissal of the seven NEC members, including the position of Vice President, and that any filling of vacancies would follow constitutional procedures.

21. Despite the clear and democratic resolutions of the FKF General Assembly passed on 7th November 2026 in the presence of FIFA, CAF, and Sports Registrar observers, the 9th to 15th Respondents have refused to respect or give effect to those resolutions. They continue to hold themselves out as members of the National Executive Committee, thereby creating a dual power structure, interfering with the activities, plans, and processes of FKF, and undermining the supremacy of the General Assembly under the FKF Constitution.

22. The continued non-implementation of the resolutions has caused, and continues to cause, institutional uncertainty, paralysis in decision-making, prejudice to national team preparations, commercial partnerships, and Kenya's readiness to co-host the 2027 Africa Cup of Nations.

E. Grounds

23. The Special General Meeting of 7th November 2026 was lawfully convened by members of the FKF General Assembly under Article 31(2) of the FKF Constitution.

24. The resolutions dismissing the 9th to 15th Respondents were passed by the supreme organ of FKF after deliberation and in the presence of international and government observers. They are lawful, valid, and binding.

25. The 9th Respondent's interference with the meeting through the deployment of the Rapid Deployment Unit and the teargassing of delegates was an unlawful attempt to frustrate a constitutional process and cannot invalidate the subsequent resolutions of the General Assembly.

26. The continued holding out by the 9th to 15th Respondents as members of the NEC, and their interference with the affairs of FKF, is unlawful, unconstitutional, and contrary to the principles of good governance, leadership and integrity, and the supremacy of the General Assembly.

27. The Sports Registrar has a statutory duty under the Sports Act, 2013, to update the official register of FKF NEC members in accordance with the resolutions of the General Assembly.

28. FIFA and CAF, having had representatives present as observers, have a responsibility to ensure that the democratic will of the FKF General Assembly is respected and implemented.

29. The Claimant has locus standi to bring this Claim in the public interest as pleaded in paragraph 2 above.

F.Reliefs Sought

The Claimant prays for orders that:

A. A declaration that the resolutions of the FKF General Assembly passed on 7th November 2026 dismissing the 9th to 15th Respondents are lawful, valid, and binding.

B. An order directing the 9th to 15th Respondents to cease holding themselves out as members of the FKF National Executive Committee and to refrain from interfering in any manner with the activities, plans, processes, bank accounts, or administration of the Football Kenya Federation.

C. An order directing the 18th Respondent (the Sports Registrar) to immediately update the official register of FKF National Executive Committee members by removing the names of the 9th to 15th Respondents and reflecting the current lawful composition of the NEC.

D. An order directing the 16th and 17th Respondents (FIFA and CAF) to recognise and give effect to the resolutions of the FKF General Assembly of 7th November 2026.

E. Costs of this Claim.

F. Any other or further relief that this Honourable Tribunal may deem just and fit to grant.

DATED at Nairobi this …12th … day of ..November ….2026

……

PATRICK KINYUA

Claimant

DRAWN AND FILED BY:
PATRICK KINYUA
P.O. Box 24437-00100Nairobi,
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Email: pkimwa10@gmail.com

TO BE SERVED UPON:

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    Tel: +254 759 910 866 / +254 709 699 000

20. **Hussein Mohammed**
    Care of Football Kenya Federation
    Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi
21. **Charles Njagi Njoka**
    Care of Football Kenya Federation
    Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

22. **Ahmedqadar Mohammed Dabar**
    Care of Football Kenya Federation
    Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

23. **Caleb Amwayi**
    Care of Football Kenya Federation
    Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

24. **Peter Kamau**
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25. **Abdullahi Yusuf Ibrahim**
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26. **Ken Rungu**
    Care of Football Kenya Federation
    Goal Project, Kasarani, P.O. Box 49911-00100, Nairobi

27. **McDonald Mariga Wanyama**
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28. **Robert Kenneth Macharia**
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    Care of Football Kenya Federation
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30. **Violet Kerubo Momanyi**
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31. **Collins Opiyo Kalee**
    Care of Football Kenya Federation
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32. **Gabriel Mghendi**
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33. **Daniel Akala Shikanda**
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34. **FIFA**
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35. **Confederation of African Football (CAF)**
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36. **The Sports Registrar**
    Office of the Sports Registrar
    State Department for Sports
    P.O. Box 49849-00100
    Nairobi
    (Physical: Kencom House, 2nd Floor / Talanta Plaza, Upper Hill)
    Email: info@sports.go.ke

REPUBLIC OF KENYA
IN THE SPORTS DISPUTES TRIBUNAL
AT NAIROBI
CLAIM NO. …… OF 2026

PATRICK KINYUA …… **CLAIMANT**

VERSUS

FOOTBALL KENYA FEDERATION (FKF)……1ST RESPONDENT

HUSSEIN MOHAMMED……2ND RESPONDENT

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FIFA……....16TH RESPONDENT

CONFEDERATION OF AFRICAN FOOTBALL (CAF)…….....…17TH RESPONDENT

THE SPORTS REGISTRAR ……..… 18TH RESPONDENT

VERIFYING AFFIDAVIT

I, **PATRICK KINYUA**, of P.O. Box 24437-00100, Nairobi, in the Republic of Kenya, do hereby make oath and state as follows:

1. **THAT** I am an adult male of sound mind, a Kenyan citizen, and the Claimant herein. I am fully conversant with the facts of this matter and competent to swear this Affidavit.

2. **THAT** I have a keen interest in sports governance, the rule of law, constitutionalism, good governance, leadership and integrity, and the proper administration of football as a national sport of significant public importance in Kenya.

3. **THAT** I institute this Claim in the public interest pursuant to Articles 22 and 258 of the Constitution of Kenya, 2010, Rule 6 of the Sports Disputes Tribunal Rules, 2022, and the principles of good governance. Although I am not an elected delegate or a member of the FKF National Executive Committee, the proper governance of the Football Kenya Federation is a matter of significant public interest affecting millions of Kenyans, national teams, and Kenya's co-hosting of the 2027 Africa Cup of Nations. I therefore have the requisite locus standi to bring this Claim.

4. **THAT** I have read and understood the Statement of Claim filed herein and verify that the contents thereof are true to the best of my knowledge, information and belief.

5. **THAT** the facts deposed to in the Statement of Claim are within my personal knowledge save where otherwise stated, in which case they are based on information received from sources I believe to be true and reliable, including official statements issued by the Football Kenya Federation and media reports of the Special General Meeting held on 7th November 2026.

6. **THAT** on 7th November 2026 the FKF General Assembly resolved by overwhelming majorities to dismiss seven members of the National Executive Committee.

7. **THAT** despite the clear democratic will of the delegates, the 9th to 15th Respondents have refused to respect or give effect to the said resolutions and continue to hold themselves out as members of the NEC.

8. **THAT** the continued non-implementation of the resolutions has created uncertainty, competing claims to authority, and prejudice to the proper administration of football in Kenya.

9. **THAT** I swear this Affidavit in support of the Statement of Claim and the Certificate of Urgency filed herewith, and in verification of the truth of the matters stated therein.

10. **THAT** what is deposed to herein is true to the best of my knowledge, information and belief, save where otherwise stated.

SWORN by the said **PATRICK KINYUA**
at Nairobi this ...12th day of... November....2026) .....
) **DEPONENT**
BEFORE ME)

CHANZU VICTOR ODANGA
Advocate & Commissioner For Oaths
P.O. Box 10475-00400,
NAIROBI

COMMISSIONER FOR OATHS

DRAWN AND FILED BY:
PATRICK KINYUA
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TO BE SERVED UPON:

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    8044 Zürich, Switzerland

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