

REF: PPRA/4/01/01 (12)

22nd June, 2026

Dennis Gicheru

Ag. General Secretary/CEO
Football Kenya Federation
P.O. Box 49911-00100

NAIROBI

Email: info@footballkenya.org

Dear **CEO,**

RE: REQUEST FOR INVESTIGATION INTO ALLEGED IRREGULAR PROCUREMENT, CONFLICT OF INTEREST AND MISAPPLICATION OF FUNDS IN THE CHAN 2024 INSURANCE ARRANGEMENT BY FOOTBALL KENYA FEDERATION

We are in receipt of your letter Ref: FKFGS/MISC/EXT/182 dated 8th June, 2026 which was in response to our letters Ref: PPRA/4/01/01 (9) & (10) of 5th May and 3rd June, 2026 respectively, on the above matter.

We have reviewed your response and noted the following:

- 1. The procurement process for the CHAN 2024 insurance arrangements, under which M/s Riskwell Insurance Brokers Limited was engaged, was undertaken within the framework of the CAF Procurement Guidelines and funded through a CAF-controlled account.*
- 2. No public funds appropriated by Parliament, county governments, or any Kenyan public entity were utilized in the procurement process. All funds utilized originated from CAF and were administered in accordance with CAF's financial and procurement procedures.*
- 3. FIFA statutes and CAF regulations require member associations to independently manage their affairs free from third-party interference. Furthermore, any attempt by a public regulatory body to supervise, review, or direct procurement activities financed and governed exclusively by FIFA or CAF would be inconsistent with the obligations imposed upon member associations under those frameworks. In support of this, they referred to the provisions of Articles 14 and 19 of the FIFA Statutes.*

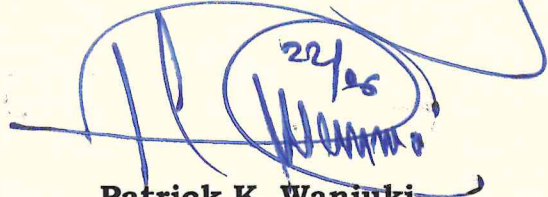
In handling this complaint, the Authority took into consideration that while the FKF is not inherently categorized as a public entity under Section 2 of the Public Procurement and Asset Disposal Act, Cap. 412C (the Act), the same section defines "public procurement" as procurement undertaken using public funds. Consequently, to the extent that the FKF utilizes public funds for any procurement activity, the Authority would be mandated to provide oversight for that specific transaction to ensure compliance with Article 227 of the Constitution of Kenya and the provisions of the Act.

In light of the response provided, the Authority finds that public funds were not utilized in the subject procurement. As such, the transaction is not governed by the Act, and the Authority has no jurisdiction to further investigate the concerns raised in the complaint. The Authority has therefore proceeded to close this matter.

This response is issued pursuant to Section 9(h) of the Act on the basis of the information contained in the documents presented to the Authority and that have specifically been cited for the purposes of this letter and does not in any way discharge personal responsibility to all those that have been involved in the procurement process should new information come to the attention of this office.

Yours

Sincerely



Patrick K. Wanjuki
DIRECTOR GENERAL

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