

FOOTBALL KENYA FEDERATION

THE GENERAL ASSEMBLY

SUMMONS TO SHOW CAUSE AND NOTICE OF PROPOSED DISCIPLINARY ACTION

TO: Mr. Hussein Mohammed

POSITION: President, Football Kenya Federation

ISSUED BY: Representatives of the General Assembly of Football Kenya Federation

DATE: 27 October, 2026

REFERENCE: Proposed consideration of disciplinary action pursuant to Articles 21, 24, 30 and other applicable provisions of the FKF Constitution

SUBJECT: SUMMONS TO SHOW CAUSE WHY DISCIPLINARY ACTION, INCLUDING DISMISSAL FROM OFFICE, SHOULD NOT BE TAKEN AGAINST YOU FOR ALLEGED GROSS VIOLATIONS OF THE FKF CONSTITUTION, FIFA AND CAF STATUTES, FINANCIAL GOVERNANCE REQUIREMENTS, AND OTHER APPLICABLE LAWS AND REGULATIONS.

A. WHEREAS:

1. The Football Kenya Federation (hereinafter referred to as “FKF” or “the Federation”) is a National Sports Organisation established under the FKF Constitution (hereinafter referred to as “the Constitution”) and registered under the Sports Act, No. 25 of 2013, Laws of Kenya, to undertake the objectives stipulated under Article 2 of the Constitution, including the continuous development, promotion, organisation and regulation of football throughout the Republic of Kenya.
2. Article 21(1) and (2) of the Constitution establishes the General Assembly as the supreme and legislative body of FKF and the National Executive Committee (NEC) as its executive body, and provides for the convening of Annual and Special General Assemblies in accordance with the Constitution.
3. Article 24(c), (n) and (o) of the Constitution vests the General Assembly with powers and authority, inter alia, to dismiss the President and other members of the NEC, admit, suspend or expel members in accordance with the Constitution, and revoke the mandate of one or more members of an FKF body, subject to the applicable constitutional procedures.
4. Article 37(a) of the Constitution establishes the NEC as a principal governing organ of FKF, whose functions and powers are further prescribed under Article 39 and other relevant provisions of the Constitution.
5. Article 39(1)(n) of the Constitution vests the NEC with authority to delegate tasks within its mandate to other FKF bodies or third parties, while Article 42(2), including Article 42(2)(i), prescribes the President’s responsibilities in relation to the implementation of NEC decisions through the General Secretariat.
6. The Constitution establishes a framework of collective decision-making, accountability, transparency, financial prudence, institutional oversight and compliance with resolutions duly adopted by the competent organs of the Federation.
7. The Constitution further assigns specific responsibilities to the Finance Committee, other standing committees, the General Assembly and the NEC in relation to financial management, policy formulation, institutional administration, competition regulation and the constitution of the Federation’s judicial bodies.

8. FKF, as a member association of FIFA and CAF, is required to conduct its affairs in accordance with its own Constitution, the applicable FIFA and CAF Statutes and regulations, and the laws of Kenya.
9. In December 2024, the NEC established a Transitional Ad Hoc Committee to review the Federation's governance, financial management, human resource administration, procurement procedures and institutional structures. The Committee submitted its report to the President on 1 February 2025, and the report was subsequently considered and adopted by the NEC on 17 April 2025 for implementation.
10. Concerns have subsequently been raised by NEC members regarding the alleged non-implementation of adopted resolutions, exclusion of oversight organs, irregular financial and human resource practices, unilateral appointments, interference with competition rules, the constitution of judicial bodies and the utilisation of public funds.
11. The General Assembly representatives have considered the foregoing concerns, the correspondence exchanged within the Federation, relevant NEC minutes, committee reports, affidavits, financial records, litigation documents and other materials identified in the accompanying evidence schedule.
12. The General Assembly, being the supreme and legislative organ of FKF, is entitled to consider matters falling within its constitutional mandate, including the accountability of the President and other NEC members, subject to the Constitution, applicable law and the principles of natural justice.
13. The matters set out in this Summons are allegations requiring your response and determination through a fair and impartial process. They shall not be treated as established findings of misconduct merely by reason of their inclusion herein.
14. Accordingly, you are hereby summoned to show cause why disciplinary action, including dismissal from the office of President of FKF, reprimand or such other lawful and constitutionally permissible measure as may be determined by the General Assembly, should not be considered in respect of the matters set out below.

B. PARTICULARS OF THE ALLEGED MISCONDUCT AND PROPOSED GROUNDS FOR DISCIPLINARY ACTION - SIX CHARGES AND PARTICULARS

For each charge, the allegation concerns your own identified decisions, directions, authorisations or failures to discharge duties within your authority. You may answer each numbered particular separately. The dates, transactions and records relied upon must be identified in the accompanying indexed evidence schedule. References below retain the annex and appendix numbering in the original supporting material.

CHARGE 1: ALLEGED FAILURE TO DISCHARGE LEADERSHIP AND CONSTITUTIONAL ACCOUNTABILITY DUTIES

Provisions relied upon: Articles 5, 8, 29, 30, 38(2), 39, 40 and 42(2)(i)–(iv).

It is alleged that, during January 2025 to date, you have failed to uphold constitutional governance obligations and bringing the game into disrepute. You failed to take reasonable and timely measures within your authority to ensure functional collective governance, annual accountability and implementation of duly adopted NEC decisions.

Particulars

i. Institutional leadership and resolution of the NEC impasse

1.1 Failing adequately to progress identified outstanding business concerning annual accountability, budgets, national-team administration, judicial bodies and domestic competitions.

1.2 Failing adequately to pursue a documented institutional response after the meetings or resolution initiatives failed.

1.3 Failing to provide members with an adequate account of unresolved business, institutional responsibilities and proposed remedial measures.

1.4 Failing adequately to pursue available dialogue, mediation or FIFA/CAF guidance where the NEC impasse prevented decisions.

1.5 Permitting identified governance problems to remain unresolved despite the requests and warnings particularised in the accompanying schedule.

1.6. Failing to implement duly adopted NEC resolutions, contrary to the constitutional framework governing the relationship between the President, the NEC and the General Secretariat. In particular, the NEC adopted the Transitional Ad Hoc Committee Report on as a reform instrument intended to strengthen governance, financial management, procurement, human resource administration and institutional accountability. Despite the adoption of the report, substantial recommendations are alleged to remain unimplemented, thereby perpetuating institutional weaknesses identified by the Committee.

1.7. Failing to facilitate the implementation of NEC decisions concerning financial oversight, banking mandates, human resource reforms and the constitution of judicial bodies.

ii. Annual General Assembly accountability

1.8 In your capacity as President of the Football Kenya Federation, you failed to take reasonable and necessary steps within your authority to facilitate the convening of the Federation's Annual General Meeting as required annually under Article 29 of the FKF Constitution after May 2025. That alleged failure, if established, contributed to a breakdown in constitutional governance and accountability, thereby undermining confidence in the administration of Kenyan football and bringing the Federation and the game into disrepute.

1.9 Failing to adequately facilitate preparation and presentation of the activity report, audited accounts and budget.

iii. Implementation of adopted NEC resolutions

1.10 Failing, without adequate explanation, to implement specified resolutions adopted by the NEC.

1.11 Failing to facilitate implementation of the Transitional Ad Hoc Committee recommendations formally adopted on 17 April 2025.

1.12 Failing adequately to progress adopted measures concerning financial controls, banking mandates and human resource reforms.

1.13 Failing to provide implementation reports or identify obstacles requiring further NEC action.

Supporting evidence:

1. Transitional Ad Hoc Committee Report 2025.
2. NEC Meeting Minutes of 17 April 2025, Agenda Item 2.
3. Finance Committee Correspondence on Operational and Financial Challenges.
4. NEC Meeting Minutes of 14 February 2025, Agenda Item 6.
5. Correspondence concerning interference with league structures and competition rules.
6. Last AGM notice and minutes, subsequent NEC records, members' requests and reporting correspondence.

CHARGE 2: ALLEGED CIRCUMVENTION OF FINANCIAL OVERSIGHT AND FAILURE TO ACCOUNT FOR FEDERATION FUNDS

Provisions relied upon: Articles 24, 42(2), 47, 72 and 74, according to their respective functions; identified NEC resolutions; applicable funding conditions and financial requirements.

It is alleged that you authorised, directed or permitted identified departures from required financial controls, or failed to discharge identified supervisory and reporting duties, thereby impairing lawful budgeting, financial oversight and accountability for Federation and Government funds.

Particulars

i. Expenditure approvals and budgetary oversight

2.1. You are alleged to have presided over, authorised, permitted or failed to prevent financial management practices that excluded members from meaningful oversight of the Federation's income, expenditure, liabilities and financial commitments.

2.2. You are alleged to have operated the Federation without a duly approved annual budget for the 2026 financial year, notwithstanding the constitutional and institutional requirements for financial planning, expenditure control and accountability.

2.3. The last NEC budget deliberation identified in the available records is the meeting of 4 February 2025, at which the National Teams budget was presented and considered. It is alleged that no subsequent comprehensive budget authorisation has been formally presented to and approved by the NEC.

2.4. You are alleged to have failed to ensure that the NEC received adequate information on significant financial transactions, expenditure commitments, procurement decisions and the status of Federation accounts.

2.5. If established, these actions and omissions would raise serious concerns regarding financial authorisation, segregation of duties, internal controls, auditability and the exercise of fiduciary responsibilities.

Constitutional and governance provisions implicated: Article 74(1) and other applicable provisions of the FKF Constitution governing financial management, budget approval and expenditure control; applicable FKF procurement procedures; and relevant FIFA and CAF financial governance requirements.

Supporting evidence:

- Finance Committee Correspondence on the FY 2026 Budget.
- NEC Meeting Minutes of 4 February 2025, Agenda Items 2 and 3.
- Affidavit of the Finance Committee Chairperson concerning alleged non-disclosure.
- Bank statements evidencing payments to non-prequalified entities.
- Prequalified suppliers list, consultant's contractual agreement, proof of payment and demand letter.
- Records concerning outstanding financial reports and Finance Committee deliberations.

ii. Marginalisation of The Finance Committee And Failure To Implement Approved Banking Mandates

Particulars

2.6. You are alleged to have failed to ensure the effective participation of the Finance Committee in financial planning, expenditure oversight and the monitoring of the Federation's financial obligations.

2.7. On 14 February 2025, the NEC reportedly adopted a resolution concerning the Federation's bank account signatory arrangements, including the designation of the Finance Committee Chairperson as a Category Two signatory. The said resolution is alleged not to have been implemented, resulting in the continued exclusion of the Finance Committee Chairperson from the approved financial authorisation framework.

2.8. It is alleged that these arrangements weakened the segregation of duties and reduced independent scrutiny of transactions and account operations.

2.9. If established, such conduct would constitute a serious failure to uphold institutional checks and balances and the financial oversight responsibilities prescribed under the Constitution.

Constitutional provisions implicated: Articles 42(2)(i) and 47(1), together with the relevant NEC resolutions and applicable financial control procedures.

Supporting evidence:

- Finance Committee Correspondence on Operational and Financial Challenges.
- NEC Meeting Minutes of 14 February 2025, Agenda Item 6.

iii. Alleged Misapplication or Irregular Utilisation of Government Funds Allocated for National Team Activities and Chan 2024 Preparations to Fund Women's FIFA Series 2026 and other Expenditures Without NEC Approval

Particulars

2.10. You are alleged to have presided over, authorised, permitted or failed to ensure proper accountability for the utilisation of public funds disbursed by the Ministry of Sports for national team activities and CHAN 2024 preparations.

2.11. The material submitted for consideration alleges that expenditure deviated from the implementation framework, designated service providers and conditions communicated by the Ministry of Sports.

2.12. It is alleged that funds remained unutilised for approximately five months and that an estimated Kshs. 30 million was subsequently expended outside the approved framework.

2.13. Concerns have also been raised regarding unexplained reductions in account balances, inconsistent supplier records, inadequate reconciliation and the absence of sufficiently documented oversight.

2.14. You are required to provide a comprehensive explanation of the receipts, bank accounts, expenditure, supplier engagements, authorisations, outstanding obligations and reconciliations relating to the funds in question.

2.15. The alleged irregularities may, if substantiated, constitute breaches of applicable public funding conditions, procurement procedures, financial controls and fiduciary obligations. Any allegation of misappropriation, fraud or criminal conduct must be determined through the appropriate investigative and adjudicative processes.

Constitutional and legal framework implicated: Applicable FKF financial governance provisions, the Sports Act, 2013, relevant public finance and procurement requirements applicable to the funds, and the conditions imposed by the Ministry of Sports.

Supporting evidence:

- Bank statements and supporting narratives concerning disputed transactions.
- Documentation from the former CEO, including expenditure reports, Ministry approvals and related correspondence.
- Prequalified suppliers list, contractual documentation, proof of payment and demand letter.

CHARGE 3: ALLEGED UNILATERAL INTERFERENCE WITH LEAGUE STRUCTURES AND COMPETITION RULES

You are alleged to have directed the implementation of league structures and competition rules for the 2025/2026 and 2026/2027 seasons without completion of the requisite NEC approval and General Assembly ratification processes, where such approvals were constitutionally required.

Particulars

3.1. The Leagues and Competitions Committee reportedly submitted proposals concerning league structures and competition rules to the NEC on 19 September 2025.

3.2. It is alleged that the NEC deliberations did not conclusively determine the proposals because members raised substantive constitutional and procedural concerns, including stakeholder consultation and General Assembly ratification.

3.3. Notwithstanding those concerns, communication directing implementation of the rules was reportedly issued to clubs by the General Secretary/CEO on 23 September 2025, after the season had commenced.

3.4. The material further alleges the introduction of new regional zones for Division One without the requisite institutional approvals.

3.5. These actions have reportedly contributed to disputes before the Sports Disputes Tribunal and other competent forums, including proceedings concerning play-offs, promotions, relegations and the validity of the applicable competition regulations.

3.6. If established, such conduct would raise serious concerns regarding sporting integrity, procedural legitimacy, regulatory certainty and the protection of clubs' and players' interests.

Constitutional and governance provisions implicated: Applicable FKF constitutional provisions on the functions of the NEC, competition regulation, committee mandates and General Assembly authority, together with relevant FIFA and CAF governance requirements.

Supporting evidence:

- Consolidated litigation involving FKF members and stakeholders concerning league structures and competition rules.
- Sports Disputes Tribunal ruling concerning the 2025 league rules.
- Correspondence from NEC members, branch and club chairpersons, and the FKF Monitoring and Evaluation Officer.

CHARGE 4: ALLEGED IRREGULAR HUMAN RESOURCE ADMINISTRATION AND FAILURE TO ENSURE LAWFUL SECRETARIAT CONTINUITY

Provisions relied upon: Articles 39(1)(f), 42(2)(i)–(iii), 42(4) and 63(5); identified NEC decisions; applicable employment instruments, human resource policies and employment law.

Particulars

It is alleged that you directed, authorised or permitted identified irregularities in employment administration, failed adequately to progress duly adopted human resource reforms.

i. General Secretary vacancy and administrative continuity

4.1. Following expiry of the acting appointment on 5th August, 2026, failing adequately to pursue a documented proposal for lawful administrative continuity.

4.2. Failing adequately to seek appropriate guidance when the NEC could not reach a decision.

4.3. Failing to communicate clearly the authority under which affected administrative functions continued.

ii. Senior National Men's Team Technical Bench

4.4 You are alleged to have done arbitrary appointments of the harambee stars national team head coach without relevant working documents, more so, the work permit for foreigners.

CHARGE 5: ALLEGED UNILATERAL AND IRREGULAR APPOINTMENT OF THIRD PARTIES TO FEDERATION COMMITTEES AND ASSIGNMENTS

Particulars

5.1. You are alleged to have nominated or appointed third parties to significant Federation committees, assignments and national team functions without prior NEC deliberation, approval or documented delegation of authority.

5.2. The appointments in question reportedly include individuals assigned to CHAN 2024 and AFCON 2027 committees and national team delegation functions.

5.3. It is alleged that the NEC was not afforded an opportunity to consider or approve the nominations and that the criteria applied in selecting the individuals were not adequately disclosed.

5.4. If established, these actions would raise concerns regarding collective governance, institutional accountability, transparency and compliance with the NEC's constitutional mandate.

Constitutional provision implicated: Article 39(1)(n) and other applicable provisions governing delegation, committee appointments and NEC authority.

Supporting evidence:

- Government Gazette Notice concerning CHAN 2024 committees.
- Composition of CHAN 2024 functional committees.
- NEC correspondence challenging unilateral nominations and appointments.

CHARGE 6: Manipulation of NEC Minutes

Particulars

6.1. You are alleged to have manipulated official NEC minutes, actions which undermine institutional integrity, transparency, and accountability within the Federation. There is credible evidence suggesting that official NEC records have been manipulated to remove critical financial oversight provisions, thereby facilitating unilateral control over financial processes and eroding established governance safeguards.

6.2. This conduct is inconsistent with Article 42(2)(i), which requires the President to implement decisions passed by the National Executive Committee through the General

Secretariat. Any alteration, omission, or deviation from duly recorded NEC resolutions compromises the fidelity of institutional records and undermines the lawful implementation of collective decisions.

i. Undermining of Approved Financial Control Framework (December 14, 2024 Resolution)

6.3. The NEC unanimously resolved on December 14, 2024 that bank signatories include; the President, Vice President, CEO, and Finance Director, establishing a multi-layered financial control mechanism. There has been a deviation from this structure without NEC approval, occasioned by the unprocedural and irregular removal of a key Category One signatory (the Finance Director) and the deliberate failure to effect a replacement for over one year. This constitutes breach of FKF Constitution (NEC authority over financial governance) and violation of FIFA Financial Governance Regulations on internal controls and segregation of duties.

ii. Use of Unconfirmed NEC Minutes in Judicial Proceedings (Draft February 14, 2026 Minutes)

6.4. On June 12, 2026, the President and the Acting General Secretary relied on altered and unconfirmed NEC minutes, which were subsequently presented in court proceedings against the former General Secretary without the knowledge or approval of NEC members

6.5. It is further noted that these were draft minutes of the most recent NEC meeting and had not been tabled before the NEC for confirmation.

6.6. The minutes in question had been unprocedurally signed off as “confirmed” by the Acting General Secretary, who was not present at the meeting, and the President, thereby misrepresenting the deliberations and resolutions of the NEC members. This raises serious concerns of:

- a) Misrepresentation of official records, contrary to FIFA Code of Ethics.
- b) Falsification of documents, undermining institutional credibility.
- c) Breach of FKF Constitution provisions on record integrity and collective decision-making.

Supporting Document

- Unconfirmed and Altered Draft NEC Meeting Minutes of; 6 February 2026 & 19 September 2025 (Zoom Meeting), Presented in Court Proceedings on 12 June 2026 & 26 June 2026 Respectively.

These developments represent a serious breakdown in governance, record integrity, and financial control systems, exposing the Federation to significant legal, financial, and reputational risks.

C. GENERAL PARTICULARS AND AGGRAVATING GOVERNANCE CONSIDERATIONS

12. The allegations set out above are to be considered collectively and individually, with particular regard to whether the conduct complained of reflects a persistent failure to discharge the constitutional responsibilities of the office of President.
13. In determining whether any misconduct has been established, the General Assembly should consider:
 - a. Whether the decisions or omissions complained of were within your authority or were undertaken without the necessary constitutional approvals;
 - b. Whether relevant NEC resolutions were implemented or disregarded, and the reasons for any failure to implement them;
 - c. Whether adequate information was provided to the NEC and the relevant committees to enable effective oversight;
 - d. Whether the Federation's financial, procurement, human resource and competition management procedures were followed;
 - e. Whether any alleged irregularities resulted from your own decisions, directions, authorisations, omissions or failures of supervision, as distinct from acts independently undertaken by other officers;
 - f. Whether the conduct complained of caused or exposed the Federation to material financial loss, litigation, operational disruption, audit risk or reputational harm; and
 - g. Whether any established conduct is sufficiently serious to warrant reprimand, removal from office or another measure permitted under the Constitution.
14. For the avoidance of doubt, responsibility for an act undertaken by the General Secretary/CEO, another employee, committee member or third party shall not automatically be attributed to you solely by virtue of your office. The relevant evidence must establish your personal involvement, direction, authorisation, knowledge, failure to discharge a specific duty or other legally relevant basis of responsibility.

D. YOUR REQUIRED RESPONSE

15. You are hereby required to submit a written response to each of the charges and particulars set out in this Summons.
16. Your response should:
 - a. Admit or deny each material allegation and provide your explanation;
 - b. Identify the constitutional provisions, NEC resolutions, delegations or other authority relied upon in support of the decisions or actions complained of;

- c. Provide copies of relevant minutes, correspondence, approvals, financial records, employment records, contracts, procurement documents and other material supporting your response;
- d. Explain any circumstances that prevented implementation of NEC resolutions or compliance with the relevant procedures;
- e. Identify any witnesses or additional records you consider material to a fair determination of the matters; and
- f. State any preliminary objections concerning jurisdiction, procedure, the sufficiency of the particulars or the competence of the proposed proceedings.

- 17. Your written response shall be delivered to the designated Secretary of the General Assembly at Munene.isaac@yahoo.com **within seven (7) days of service of this Summons**, or by 4th November, 2026, whichever is expressly specified in the accompanying notice.
- 18. You shall also be afforded an opportunity to appear before the General Assembly at the duly convened Special General Meeting scheduled for **7 November 2026 at Three Steers Hotel, Meru, Kenya**, the applicable constitutional procedures and the agenda duly communicated to members.
- 19. At the hearing, you shall be entitled to present your response, submit relevant documents, address the allegations, challenge the evidence relied upon and exercise any applicable procedural rights under the Constitution and the rules governing the proceedings.
- 20. You may be accompanied or represented by an advocate, where permitted under the applicable Constitution and procedural rules. Any request for additional time, disclosure of further material or other procedural accommodation shall be submitted promptly and considered fairly.
- 21. The documents relied upon in support of the allegations shall be made available to you, subject to lawful restrictions, confidentiality requirements and appropriate redaction of protected personal information, so that you have a meaningful opportunity to respond.

E. PROPOSED RESOLUTION FOR CONSIDERATION BY THE GENERAL ASSEMBLY

- 22. Upon consideration of your written response, oral representations, the evidence produced and any submissions by the parties, the General Assembly may, within its constitutional powers and subject to the applicable procedures, consider whether:
 - a. The allegations have been substantiated, wholly or in part;
 - b. Any established conduct constitutes a breach of the FKF Constitution, applicable governance requirements or duties attached to the office of President;
 - c. A formal reprimand, corrective direction or other lawful measure is appropriate;
 - d. The seriousness of any established misconduct warrants dismissal from the office of President under Article 24(c) of the FKF Constitution; or

23. No final determination of misconduct shall be made solely on the basis of the allegations contained in this Summons. The General Assembly shall consider the evidence and your response before making any decision within its lawful mandate.

F. NOTICE OF CONSEQUENCES OF FAILURE TO RESPOND OR ATTEND

26. If you fail to submit a response or attend the duly convened proceedings without reasonable explanation, the General Assembly may consider the matter on the basis of the material lawfully available to it, provided that proper service, adequate notice and the applicable requirements of procedural fairness have been satisfied.
27. Any decision taken in your absence shall remain subject to the Constitution, applicable law and the requirement that the General Assembly establish a proper basis for its decision.
28. Nothing in this Summons shall be construed as a finding of criminal liability or as prejudging any proceedings before a court, the Sports Disputes Tribunal, FIFA, CAF, the Directorate of Criminal Investigations, the Ethics and Anti-Corruption Commission or any other competent authority.

G. RESERVATION OF RIGHTS

29. The General Assembly reserves the right, within the limits of the Constitution and applicable law, to consider any additional particulars that are properly notified to you, supported by relevant evidence and accompanied by a fair opportunity to respond.
30. Any amendment or addition to the charges shall be communicated to you with sufficient time to prepare a response. No materially new allegation shall be determined against you without adequate notice and an opportunity to answer it.
31. This Summons is issued to facilitate an orderly, transparent and constitutionally compliant process for considering matters of governance and accountability affecting the Federation.

TAKE NOTICE ACCORDINGLY.

Personal Service of particulars and evidence documentation will be done within 24 hours through your last known address, or through print or electronic media.

Issued at Nairobi on this 27th of November 2026.

**BY ORDER OF THE MEMBERS OF THE FKF GENERAL ASSEMBLY
REPRESENTATIVES, ACTING WITHIN THEIR LAWFUL AND
CONSTITUTIONAL MANDATE.**