

Warning Notice

Issued under s76 – Football Governance Act 2025 to the following:

Morecambe Football Club Limited
Mr. Kuljit Singh Momi
Mr. Harjit Singh

14 July 2026

WARNING NOTICE

FAILURE TO COMPLY WITH A REQUEST FOR INFORMATION ISSUED UNDER SECTION 65 OF THE FOOTBALL GOVERNANCE ACT 2025

Introduction

1. This is a Warning Notice issued under section 76 of the Football Governance Act 2025 (the "**Act**"). It explains the action that the Independent Football Regulator (the "**IFR**") is minded to take against the following persons (together the "**Respondents**"):
 - a. Morecambe Football Club Limited (the "**Club**");
 - b. Mr. Kuljit Singh Momi (as an owner of the Club);
 - c. Mr. Harjit Singh (as an owner of the Club, and together with Mr. Kuljit Singh Momi, the "**Owners**").
2. For the reasons set out in further detail below, the IFR considers that each of the Respondents has breached information requirements imposed upon them without reasonable excuse.
3. In accordance with section 75 and Schedule 9 of the Act, the IFR is therefore minded to issue a censure statement against each of the Respondents.
4. Given the factual background described below (in particular that each of the Respondents failed to respond to aspects of the same information request), the IFR has issued this combined Warning Notice to each of the Respondents. For the purposes of allowing each of the Respondents to understand the IFR's concerns relating to their specific conduct, this Warning Notice distinguishes between them where appropriate. If any of the Respondents intends to make representations regarding the proposed sanction, they may do so by the procedure set out further below. The three Respondents should consider the IFR's concerns and whether they wish to make representations by reference to their individual conduct and circumstances. The IFR will have regard to any such representations

before making a final determination on the potential breach and the proposed sanction for each Respondent, further to section 76(4) of the Act.

Factual Background

5. On 20 February 2026, the IFR issued a request for information under section 65 of the Act to the Club, seeking information necessary for the IFR to establish and oversee its Owners, Directors and Senior Executives (ODSE) regime and to implement the additional duties regime under Part 5 of the Act (the **"20 February RFI"**). It required the Club to provide a response to the 20 February RFI by 20 March 2026. The Club failed to meet that deadline and therefore failed to comply with that RFI. The Club did not seek an extension to the 20 March deadline.
6. On 31 March 2026, a further request for information under section 65 was issued to each of the Respondents, seeking information relating to the financial position of the Club and its Owners necessary for the purpose of administering the ODSE regime. It required the Respondents to respond by 8 April 2026 (the **"31 March RFI"**, and together with the 20 February RFI, the **"RFIs"**). The 31 March RFI included a further request for responses from the Club to the questions set out in the 20 February RFI.
7. On 31 March 2026 the IFR also sent a separate letter addressed to the Club and Owners primarily relating to other matters. This letter included a reminder that the IFR was still awaiting responses to the 20 February RFI from the Club. The letter reminded the recipients that, as the request was issued under section 65 of the Act, it imposed a legal requirement to provide the information, and non-compliance could lead to a sanction.
8. On 8 April 2026 the IFR received an email from Kuljit Singh Momi stating *"Below is the information in relation to Morecambe Football Club Ltd"*. The email purported to provide answers to both RFIs, however the replies did not fully address the questions in either RFI. The responses were therefore not considered by the IFR to be adequate.
9. On 9 April 2026, the IFR responded to the above email explaining the serious deficiencies and missing information in the 8 April 2026 response.

The IFR requested all missing information to be provided by 14 April 2026. The Respondents failed to meet that deadline.

10. On 4 June 2026, the IFR issued an investigation notice to the Respondents (the “**Investigation Notice**”). In that Investigation Notice, the IFR explained that there are reasonable grounds for suspecting that the Respondents have failed to comply with information requirements imposed on them by virtue of the RFIs without reasonable excuse. The Investigation Notice required the Respondents to provide the missing information, and explanations for their non-compliance, by 12 June 2026.
11. On 6 June 2026, the Club was formally relegated from the National League to the National League North as part of the National League’s Annual General Meeting. This meant that the Club was no longer a regulated club for the purpose of the IFR’s ODSE regime.
12. The Respondents did not respond by the deadline of 12 June 2026, instead Kuljit Singh Momi sent an email to the IFR on that date stating that “detailed and comprehensive responses” would be provided to the IFR by 15 June. On 16 June 2026, the Respondents responded to the Investigation Notice (the “**16 June Response**”). In that correspondence, the Respondents provided some of the missing information, while leaving several questions unanswered.
13. As of the date of this Warning Notice the IFR still has not received complete answers to the following questions in each of the RFIs:
 - a. From the Club: The 20 February RFI: Requests 2(a), 2(b) and 2(c);
 - b. From the Owners: The 31 March RFI: Request 1.
14. Following consideration of all the relevant circumstances, including the representations made in the 16 June Response, and having regard to the applicable law and IFR’s sanctions guidance (the “**Sanctions Guidance**”),¹ the IFR considers that each of the Respondents has breached information

¹ The IFR’s Sanctions Guidance is available on its website at this link:
<https://www.footballregulator.org.uk/sanctions>

requirements imposed upon them by the IFR under section 65 of the Act without reasonable excuse.

Applicable law and guidance

15. Under section 65 of the Act, the IFR may give a person an information notice requiring that person to give specified information to the IFR where the IFR considers that the information is necessary for the purpose of exercising the IFR's functions under this Act.
16. Section 75(1) of the Act states that the IFR may take any of the actions set out under Part 1 of Schedule 9 where it has determined that a person has, without reasonable excuse, failed to comply with an information requirement. Section 75(2) clarifies that any requirement to provide information under section 65 is an "information requirement".
17. Under paragraph 2 of Part 1 of Schedule 9 of the Act, the IFR may prepare and publish a censure statement. Such a statement must:
 - a. state the identity of the person ("P") whom the IFR has determined to have failed to comply with an information requirement without reasonable excuse;
 - b. state the information requirement that the IFR has determined that P has failed to comply with or the offence that the IFR is satisfied P has committed;
 - c. explain why the IFR determined that P failed to comply with that requirement or is satisfied that P committed the offence (as the case may be); and
 - d. explain why the IFR considers it appropriate to publish a statement under this paragraph in respect of P.
18. The IFR also has the power to issue financial penalties for information breaches under paragraph 3 of Part 1 of Schedule 9.

19. The IFR's Sanctions Guidance explains the process the IFR will ordinarily follow to determine whether a breach has occurred without reasonable excuse, and if so, how it will determine what sanction should be imposed. In particular, the Sanctions Guidance explains that the IFR will apply the following steps to determine the type of sanction and the level of any penalty it imposes:
- a. **Step 1:** Determine the seriousness of the breach, by reference to: (i) the type of breach; (ii) the impact of the breach; and (iii) factors related to the conduct and the circumstances surrounding the breach.
 - b. **Step 2:** Consider whether any adjustments are appropriate for aggravating or mitigating factors.
 - c. **Step 3:** Consider the proportionality of the proposed sanction at the end of Step 2.
 - d. **Step 4 (for financial penalties only):** The IFR will apply downward adjustments as required to ensure that the proposed penalty does not exceed the maximum financial penalty permitted under Schedule 9 of the Act.
20. Section 4 of the Sanctions Guidance sets out the IFR's approach to the above steps in further detail.
21. Upon consideration of these factors, the IFR will categorise the seriousness of the breach according to the following levels:
- a. **Level 1:** breaches with a lower level of seriousness
 - b. **Level 2:** breaches with a medium level of seriousness
 - c. **Level 3:** breaches with a higher level of seriousness
22. As to determining whether any reasonable excuse exists in connection with a breach, paragraphs 6.7-6.12 of the Sanctions Guidance explain that the circumstances that constitute a reasonable excuse are not fixed and the IFR will consider whether any reason for a breach amounts to reasonable excuse on a case-by-case basis. It also explains that the IFR will apply an objective test as to whether an excuse put forward by an offending person is reasonable, and that in doing so, the IFR will consider whether a significant and genuinely unforeseeable event, an unusual
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event and/or something beyond the control of the offending person led directly to the breach.

Grounds on which this Warning Notice is issued

Breach of information requirements

23. As set out in the "Factual Background" section above, the Respondents did not provide complete responses to the RFIs either by the statutory deadlines or the further deadlines of 14 April and 12 June.
24. The IFR's Sanctions Guidance (paragraph 3.4) makes it clear that *"it is essential for the IFR to be able to rely on information that is accurate and complete, and to receive that information as quickly as possible. In light of this, the IFR will take material breaches of Information Requirements very seriously"*.
25. The Respondents' failure to provide the required information by the statutory deadlines set under the RFIs prevented the IFR from performing its statutory functions in a timely manner.

No reasonable excuse

26. The Club made representations in the 16 June Response setting out why the Respondents "struggled to meet a number of previous deadlines".
27. In summary, those representations relied on:
 - a. A difficult situation at the Club, which was particularly acute over Christmas (of 2025) and the new year through to February 2026 as a result of significant changes at senior management and board level;
 - b. Having to deal with a very large number of issues at once;
 - c. Having to take "full stock of the situation at the club which made meeting deadlines difficult"; and

- d. The ill-health of senior personnel during the above period.
28. The IFR has given careful consideration to the reasons provided by the Respondents in the 16 June Response. On balance the IFR does not accept that those reasons amount to a reasonable excuse for any of the individual Respondents' failures to comply with their obligations under the RFIs for the following reasons:
- a. The IFR expects clubs, owners, officers and other relevant persons to be *"familiar with the rules, obligations and other requirements placed upon them under the Act"* (as mentioned in paragraph 6.11 of the Sanctions Guidance), and that they remain compliant with those requirements even during times where they are having to deal *"with a very large number of issues at once"*.
 - b. The IFR provided a reasonable period of time to respond to both RFIs. In the case of the 20 February RFI, the Club was given a full month to respond. The IFR's Sanctions Guidance makes clear that *"Clubs, owners, officers and other persons should make known any difficulties and raise any queries with the IFR as soon as possible."* In this case, neither the Club nor the Owners raised issues with the IFR in advance, or sought an extension to the deadlines; and
 - c. Even after providing additional time to provide complete responses, firstly until 14 April and then 12 June, the Respondents still did not provide complete responses to the RFIs as set out at paragraph 12 (a) and (b) above.
29. In addition to the above points, both the RFIs included an appendix with a summary of the relevant legal provisions which included information setting out the possible consequences of non-compliance, which in the case of a failure to comply with an information notice could result in a censure statement or financial penalty.

Determining the sanction

Step 1 – Determining Seriousness

Step 1 (A): Type of breach

30. As set out further above the breach involved a failure to comply with information requirements imposed on the Club and its Owners (see the Factual Background section).

Step 1(B): Impact of the breach

31. The purpose of sending the RFIs was to enable the IFR to receive information from the Club and its Owners to allow the IFR to oversee the ODSE regime as it relates to incumbent owners and officers of clubs, as well as to assist the IFR with its preparations for (i) the full implementation of the ODSE regime (for regulated clubs) under Part 4 and (ii) the later commencement of the additional duties on clubs under Part 5 of the Act.
32. The lack of timely responses to the RFIs negatively impacted the IFR's ability to understand aspects of the Club's and the Owners' finances and other matters relevant to its oversight of the Owners' suitability under its ODSE regime. This also negatively impacted the IFR's ability to take preparatory steps/assessments ahead of the commencement of the ODSE regime in relation to prospective owners and officers and the additional duties under Part 5.
33. However, as set out above, the Club was formally relegated from the National League on 6 June 2026 (albeit the Club's relegation became inevitable from 11 April 2026). Confirmation of the Club's relegation to the National League North meant that the Club and its Owners were no longer subject to the IFR's ODSE regime.
34. As the IFR no longer requires the ODSE related information that was requested in the RFIs (given the Club's relegation) there is no ongoing impact on the IFR's ability to carry out its functions under the Act in the present case.

Step 1 (C): Surrounding Circumstances

35. As set out above, the IFR has concluded that the reasons provided for missing the IFR's deadlines in the 16 June Response do not amount to a reasonable excuse.
36. The IFR accepts that the Club and its Owners did engage with the RFIs, however substantive responses were not provided until 16 June 2026.

Seriousness Categorisation

37. Having considered the facts and circumstances set out above, the IFR concludes that the failures to comply with the RFIs by the Club and the Owners amount to a level 1 breach.
38. The IFR proposes to issue a censure statement to:
- a. The Club: for failing to provide a timely and complete response to the 20 February RFI; and
 - b. The Owners and Club: for failing to provide a timely and complete response to the 31 March RFI.

Step 2 - Adjustments for aggravating or mitigating factors

39. The IFR does not consider that there are any aggravating factors in this case.
40. As to mitigating factors, the IFR notes that the level 1 seriousness categorisation combined with the proposed censure statements together amount to the lowest level of seriousness and sanction which could be applied to a failure to comply with an information requirement.
41. In reaching this view, the IFR has therefore taken into account that the Club and its Owners did engage with and provide some substantive responses to the RFIs by 16 June 2026, however they did not do so in a timely manner.

Step 3 – Proportionality

42. In accordance with the Sanctions Guidance, the IFR has taken a step back to consider whether the proposed sanction is proportionate in light of all the circumstances. The IFR considers that the proposed sanctions are proportionate, taking into account all the circumstances of the case including the seriousness of the infringement and the size and financial resources of the Club, and the circumstances at the time of the RFIs.

Opportunity to provide representations

43. Should any of the Respondents intend to make any representations regarding the content of this Warning Notice, including whether the Respondents consider that a reasonable excuse exists based on their individual circumstances (and if so the nature of that excuse), they must do so within **14 days, and by no later than 5:00 pm on 28 July 2026**. Any such representations can be provided either individually or collectively.
44. All representations in response to this Notice should be sent to (redacted) and (redacted). Please arrange for all information and documents to be sent in a format compatible with Microsoft Office programmes.
45. If you consider any information to be provided in response to this Notice to be confidential and that its disclosure would significantly harm the legitimate personal and/or commercial interests of any person to which the information relates, please identify that information when responding to this Notice. Please include an explanation as to why disclosure would have such effects. The IFR will not accept unsubstantiated or blanket confidentiality claims.

Decision-making

46. Pursuant to paragraph 18 of Schedule 2 of the Act, the Board has delegated its functions relating to the making of final determinations under section 77 of the Act, and the imposition of sanctions under section 75 and schedule 9 of the Act, to IFR staff at the grade of Deputy Director.
47. The final determination in this case will be made by the Deputy Director of Enforcement, plus another IFR staff member at the grade of Deputy Director or above.

Legal effect of this Notice

48. The issuance of this Warning Notice does not mean that some form of sanction will be imposed. However, and for the reasons set out above, the IFR is minded to issue a censure statement against each of the Respondents.
49. In deciding whether to issue a censure statement, the IFR will have regard to any representations made by the Respondents in accordance with this Notice.²
50. As soon as reasonably practicable after the deadline for making representations in accordance with this Notice has passed, the IFR will issue a Decision Notice in accordance with section 77 of the Act.

**John Thorp****Deputy Director, Investigations and Enforcement**

² Prior to issuing this Notice the IFR's Enforcement Team held a call with the Club and Owners on 19 June 2026 and the Club on 14 July 2026 to explain the process to be followed by the IFR before issuing a Decision Notice.
