Independent
Football
Regulator

Decision Notice

Issued under s77 – Football Governance Act 2025 to the following:

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

5th August 2026

DECISION NOTICE

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

Introduction

1. This is a Decision Notice issued under section 77 of the Football Governance Act 2025 (the "**Act**"). It explains the action that the Independent Football Regulator (the "**IFR**") is taking 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. This Decision Notice which represents the IFR's final decision following the Warning Notice issued to the Respondents on 14 July 2026[1], sets out:

   a. The factual and procedural background;
   b. The applicable law and guidance;
   c. The Respondents' representations in response to the Warning Notice;
   d. The IFR's assessment of the above representations; and
   e. The action the IFR is taking.

Factual and procedural background

3. 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

[1] The Warning Notice was published on 15 July 2026: Warning Notice: Morecambe Football Club Limited, Mr. Kuljit Singh Momi, Mr. Harjit Singh | Independent Football Regulator

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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

11. On 14 July 2026, the IFR issued a Warning Notice to the Respondents setting out why the IFR considered that each of the Respondents had breached information requirements imposed upon them without reasonable excuse. The Warning Notice was published on 15 July 2026.

12. The Warning Notice explained why the IFR was minded to issue a censure statement against each of the Respondents in accordance with section 75 and Schedule 9 of the Act, applying the process set out in section 4 of the IFR's Sanctions Guidance.

13. It explained that as of the date of the Warning Notice, the IFR still had 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. The Warning Notice explained that should any of the Respondents intend to make any representations regarding the content of the 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 no later than 5:00 pm on 28 July 2026.

15. On 28 July 2026, the Club's CEO sent an email to the IFR providing written representations in response to the Warning Notice (which are discussed further below).

Applicable law and guidance

16. 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 the Act.

17. 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".

18. Under paragraph 2 of Part 1 of Schedule 9 of the Act, the IFR may prepare and publish a censure statement against any person who has failed to comply with an information requirement without reasonable excuse. 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;

    c. explain why the IFR determined that P failed to comply with that requirement; and

    d. explain why the IFR considers it appropriate to publish a statement under this paragraph in respect of P.

19. The IFR also has the power to issue financial penalties for information breaches under paragraph 3 of Part 1 of Schedule 9.

20. 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.

21. Section 4 of the Sanctions Guidance sets out the IFR's approach to the above steps in further detail.

22. 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

23. 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 event and/or something beyond the control of the offending person led directly to the breach.

Warning Notice - Respondents' Written Representations

24. On 28 July 2026, the Club's CEO sent written representations to the IFR by email.

25. The representations put forward the following views on behalf of the Respondents:

    a. They inherited a club facing significant financial and operational challenges.

    b. They sought to engage openly, constructively and transparently with all relevant football authorities, including the Independent Football Regulator.

    c. They met with the IFR in person and openly shared both the challenges they had inherited and the plans they were implementing to address them.

    d. They have made every effort to provide the information requested by the IFR.

    e. They acknowledge that there were occasions when information was submitted later than requested and do not seek to dispute that fact, nor do they seek to avoid responsibility for those delays.

    f. The delays were never the result of any unwillingness to cooperate or any attempt to withhold information. Rather, they reflected the practical realities of managing a football club in exceptionally challenging circumstances.

    g. Whilst they accept shortcomings in relation to the timing of certain submissions, they expressed a concern that the IFR's proposed sanction was disproportionate to the nature of the breach and that the impact of the sanction would extend beyond the club's ownership, vis-a-vis supporter confidence, and discouraging existing and prospective commercial partners.

26. Looking ahead the representations also sought to highlight:

    a. ongoing efforts to stabilise the Club; and

    b. a commitment to working constructively with the IFR in the future and to strengthen internal processes to ensure that future information requests are met promptly and efficiently.

Warning Notice – IFR assessment of Respondents' Written Representations

27. The IFR has given careful consideration to the written representations provided on 28 July 2026.

28. The IFR's overall assessment of the written representations is that they do not set out any additional facts or circumstances over and above the information previously provided in the 16 June Response which causes the IFR to depart from the view set out in the Warning Notice (that the Respondents do not have a reasonable excuse for failing to comply with the RFIs).

29. The written representations, as a whole, seek to emphasise the overriding point previously made in the 16 June Response, namely that the Respondents took over the Club in challenging circumstances.

30. In setting out the proposed sanction, the Warning Notice took on board the circumstances surrounding the Club at the time of the RFIs at step 3 (proportionality). As set out in the Warning Notice, the IFR's level 1 seriousness categorisation, combined with the proposed censure statements, amount to the lowest level of seriousness and sanction which could be applied to a failure to comply with an information requirement.

31. The IFR remains of the view that the Respondents could and should have done more to engage with the IFR in relation to both RFIs in a timely manner. The annexes to the RFIs clearly set out the likely consequences of non-compliance, of which the Respondents should therefore have been aware. The IFR further notes the Respondents' acknowledgment that there were occasions when information was submitted later than requested.

32. In summary, the IFR concludes that the written representations do not provide a reasonable excuse for the information breaches, nor do they alter the IFR's proposed sanction, which as stated above, is the lowest form of sanction which could be applied.

IFR Action

33. The IFR's final decision in this matter as explained in further detail below is:

    a. The Respondents committed information breaches (without reasonable excuse); and

    b. The appropriate sanction is a censure statement.

Breach of Information Requirements

34. As set out in the "Factual and procedural 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 2026.

35. Paragraph 3.4 of the IFR's Sanctions Guidance 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 which "the IFR will take material breaches of Information Requirements very seriously".

36. 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 (for the reasons previously explained in paragraphs 31-32 of the Warning Notice).

No reasonable excuse

37. Paragraphs 26-27 of the IFR's Warning Notice summarised the representations in the 16 June Response setting out why the Respondents "struggled to meet a number of previous deadlines".

38. Paragraph 28 of the Warning Notice set out why the IFR did not accept that those reasons amounted to a reasonable excuse for any of the

individual Respondents' failures to comply with their obligations under the RFIs.

39. For the reasons set out above, the IFR does not consider that the Respondents' further written representations establish a reasonable excuse for the non-compliance.

The appropriate sanction

40. The IFR's view remains that a censure statement is the appropriate sanction. The IFR relies on the reasoning set out in the Warning Notice, which for completeness is set out below.

Step 1 – Determining Seriousness

Step 1 (A): Type of breach

41. As set out above, the breach involved a failure to comply with information requirements imposed on the Club and its Owners (see the "Factual and procedural background" section).

Step 1(B): Impact of the breach

42. 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.

43. 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.

44. 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.

45. 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

46. As set out in the Warning Notice, the IFR concluded that the reasons provided for missing the IFR's deadlines in the 16 June Response do not amount to a reasonable excuse.

47. As also stated in the Warning Notice, 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

48. 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.

49. The IFR has decided to issue a censure statement to:

   a. The Club: for failing to provide a timely and complete response to the 20 February RFI and the 31 March RFI; and

   b. The Owners: for failing to provide a timely and complete response to the 31 March RFI.

Step 2 - Adjustments for aggravating or mitigating factors

50. The IFR does not consider that there are any aggravating factors in this case.

51. 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.

52. 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

53. In accordance with the Sanctions Guidance, the IFR has taken a final step back to consider whether the proposed sanctions are 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 breaches and the size and financial resources of the Club, and the circumstances at the time of the RFIs.

Decision-making

54. 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.

55. The final determination in this case has been made by the Deputy Director of Enforcement and the Deputy Director for Regulatory Policy.

Right to request an internal review

56. The IFR's decision to impose a censure statement against the Respondents is a reviewable decision under Schedule 10 of the Act. The IFR considers that each of the Respondents is a concerned person for the purpose of section 81 of the Act in relation to this decision.

57. In accordance with section 81 of the Act, the IFR confirms that the Respondents have the right to request a review of the IFR's decision by an applicable reviewer (which in this case will be a committee consisting of members of the Expert Panel). Concerned persons, or any other person with a sufficient interest, may also appeal the decision of the applicable reviewer to the Competition Appeal Tribunal.

58. The IFR has published its Internal Reviews Procedural Framework and Costs Rules setting out the approach to receiving and conducting internal review requests: Internal Reviews | Independent Football Regulator.

John Thorp

Deputy Director, Investigations and Enforcement