

July 6, 2023.

**THE CHAIRMAN
INVESTIGATORY CHAMBER
ETHICS COMMITTEE
FIFA**

Dear Sir,

INFRACTIONS COMMITTED BY MR. KURT E.S OKRAKU/ KURT EDWIN SIMEON-OKRAKU/ EDWIN SIMEON OKRAKU, PRESIDENT OF THE GHANA FOOTBALL ASSOCIATION AND PRESIDENT OF THE WEST AFRICAN FOOTBALL UNION ZONE B.

I write this petition having been emboldened by Article 60 of the FIFA Code of Ethics. I am encouraged to file a complaint to you regarding potential and actual breaches of the FIFA Code of Ethics, 2023 for immediate investigation and prosecution. The complaint is against, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku the President of the Ghana Football Association (GFA), who also doubles as President of the West African Football Union (WAFU) Zone B.

1. COMPETENCE OF THE FIFA ETHICS COMMITTEE TO HEAR THIS INSTANT PETITION

It is my humble submission that the FIFA Ethics Committee is competent to hear this petition because in my respectful view the GFA Code of Ethics, 2019 is invalid having been signed by Mr. Kurt E.S Okraku who also has a different identity as Kurt Edwin Simeon-Okraku and Edwin Simeon-Okraku. This is a case of triple identity, forgery and falsification under Article 25 of the FIFA Code of Ethics, 2023.

2. GROUNDS FOR THE PETITION

This petition is premised on five (5) grounds. They are:

- i. Breach of Article 25 of the FIFA Code of Ethics, 2023(Forgery and Falsification);
- ii. Breach of article 20 of the FIFA Code of Ethics,2023 (Conflicts of Interest)
- iii. Breach of Article 26 of the FIFA Code of Ethics, 2023(Abuse of position)
- iv. Breach of article 16 of the FIFA Code of Ethics,2023 (Duty of loyalty)
- v. Breach of article 30 of the FIFA Code of Ethics,2023 (Manipulation of football matches or competitions)

A. FORGERY AND FALSIFICATION-ARTICLE 25

It provides as follows:

“Persons bound by this Code are forbidden from forging a document, falsifying an authentic document or using a forged or falsified document.”

Mr. Kurt E.S Okraku, Kurt Edwin Simeon-Okraku and Edwin Simeon-Okraku are three (3) distinct, separate, independent and different names but referable, for unknown reasons to one and the same person. It's a case of triple identity, and use of a falsified document. These can be found on the following official documents:

KURT E.S. OKRAKU

This name appears on the GFA Statutes 2019, GFA Code of Ethics 2019, GFA Disciplinary code 2019, GFA Premier League Regulations 2019, GFA Division One League Regulations 2019, GFA Regional Football Associations Regulations 2021, GFA Women's Premier League Regulations 2019.

We attach a copy of the GFA Statutes 2019 marked as KESO-A

We attach a copy of the GFA Code of Ethics 2019 marked as KESO-B

We attach a copy of the GFA Disciplinary Code 2019 marked as KESO-C

We attach a copy of the GFA Premier League Regulations marked as KESO-D

We attach a copy of the GFA Division One League Regulations marked as KESO-E

We attach a copy of the GFA Regional Football Associations Regulations 2021 marked as KESO-F

We attach a copy of the GFA Women's Premier League Regulations, 2019 marked as KESO-G

KURT EDWIN-SIMEON OKRAKU

This name appears on the GFA Cup Regulations May, 2021. We attach a copy of the GFA Cup Regulations, 2021 marked as KESO-H

EDWIN SIMEON-OKRAKU

This name appears on his renewed Ghanaian Passport, with passport number G3181121 issued on 29th April, 2021 with details as follows:

Surname: Simeon-Okraku

Given Names: Edwin

We attach a copy of the Ghana Passport marked as KESO-I

His registration details in the Ghana Football Connect, which is linked to the FIFA Connect are as follows:

FIFA ID: 10R1309

Family Name: Simeon-Okraku

Given Name/s: Edwin

We attach a copy of the Ghana FIFA Connect registration details marked as KESO-J

It is inappropriate and illegal for one individual to create an ambivalent identity about himself on the minds of the public. The bearer of the names can only engage in this conduct to mislead, deceive, misrepresent, or cover up an unenviable past record, or brush with the law. The historical antecedents of this gentleman in the regime of falsification or forgery may best illustrate this point.

In CAS2015/A4328 Tema Youth Football Club v Ghana Football Association, Mr. Kurt E.S Okraku otherwise known as Kurt Edwin Simeon-Okraku and Edwin Simeon-Okraku is a director and company secretary of Dreams Football Club. At the time of this case, he was the Executive Chairman of the club.

Under his directions and supervision Dreams FC engaged in the deliberate falsification, forgery, fictitious manipulation and illegal change of name of a player from his original name of Daniel Gozar to Cudjoe Mensah.

We attach the decision of CAS on the above case marked as KESO-K

In the 2013/14 season of the Ghana Football Association, Dreams FC acquired the services of Player Frederick Agyemang from Inter Allies FC with a date of birth of 28th October 1996. In consonance with the time-tested habit of Mr. Kurt E.S Okraku otherwise known as Kurt Edwin Simeon-Okraku and Edwin Simeone-Okraku, Dreams FC changed the player's name from Frederick Agyemang to Leonard Owusu. They also changed his date of birth from 28th October 1996 to 3rd June 1997.

Please find attached hereto the registration card of Inter Allies FC for Frederick Agyemang marked as KESO-L

Find attached hereto the registration card of Leonard Owusu of Dreams FC marked as KESO-M

B. CONFLICTS OF INTEREST

The definition of RELATED PARTY as number 6 in the definition column of the FIFA "Code of Ethics" states:

"Related party: any party related to persons bound by the Code shall be considered a related party if

they fulfil one or more of the following criteria:

- a) representative and employee;
- b) spouse and domestic partner;
- c) individual sharing the same household, regardless of the personal relationship;
- d) other family member with whom they have a close relationship within a third degree;
- e) legal entity, partnership and any other fiduciary institution, if the person bound by this Code or the person receiving an undue advantage alternatively:

- i) holds a management position within that entity, partnership or fiduciary institution;
- ii) directly or indirectly controls the entity, partnership or fiduciary institution;
- iii) is a beneficiary of the entity, partnership or fiduciary institution;
- iv) performs services on behalf of such entity, partnership or fiduciary institution, regardless of the existence of a formal contract.

Article 20 of the FIFA Code of Ethics, deal with “Conflicts of Interest” and in paragraph 1 of these Articles it states that:

1

Persons bound by this Code shall not perform their duties (in particular, preparing or participating in the taking of a decision) in situations in which an existing or potential conflict of interest might affect such performance. A conflict of interest arises if a person bound by this Code has, or appears to have, secondary interests that could influence his ability to perform his duties with integrity in an independent and purposeful manner. Secondary interests include, but are not limited to, gaining any possible advantage for the persons bound by this Code themselves or related parties as defined in this Code.

2.

Before being elected, appointed or employed, persons bound by this Code shall disclose any relations and interests that could lead to situations of conflicts of interest in the context of their prospective activities.

3.

Persons bound by this Code shall not perform their duties (in particular preparing, or participating in, the taking of a decision) in situations in which there is a danger that a conflict of interest might affect such performance. Any such conflict shall be immediately disclosed and notified to the organisation for which the person bound by this Code performs his duties.

4.

Violation of this article shall be sanctioned with an appropriate fine of at least GHc5,000 as well as a ban on taking part in any football-related activity for a maximum of two years. In serious cases and/or in the case of repetition, a ban on taking part in any football-related activity may be pronounced for a maximum of five years.

The GFA President, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku presided over the preparation and the decision to engage the undermentioned personalities who are “related parties” to him. This open display of conflicts of interest and clear case of “friends and cronies” or “family and friends” or nepotism is unacceptable and a blatant breach of Article 20 (Conflicts of Interest) of the FIFA Code of Ethics.

◆ **Background**

Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku is a Director of Dreams Football Club as well as Director of Proton Sports Services.

The Directors of Dreams Football Club are:

- ⇒ Edwin Simeon-Okraku
- ⇒ Mohammed Alifoe
- ⇒ Prince Abdul Hamid

Mr. Kurt E.S Okraku/Edwin Simeon-Okraku is also the Company Secretary of Dreams FC.

The Company objects of Dreams FC at the Registrar Generals Office are:

- ◆ To carry on Business of Association Football
- ◆ Player Management

The Principal Activity of Dreams FC are:

- ◆ To carry on Business of Association Football
- ◆ Player Management

It is instructive to note that Dreams Football Club are engaged in the activity of player management against the Regulations of Association Football. What is more disturbing is the fact that the President of the GFA is part of this company.

We attach the company registration documents of Dreams FC marked as KESO-N

Proton Sports Services

Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku is a Director of Dreams Football Club as well as Director of Proton Sports Services.

The Directors of Proton Sports Services are:

- ⇒ Derrick Okraku
- ⇒ Daniel Yankey
- ⇒ Rebecca Simeon-Okraku
- ⇒ Edwin Simeon-Okraku

Derrick Simeon-Okraku is a cousin to Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, whiles Rebecca Simeon-Okraku is the spouse to Mr. Kurt E.S. Okraku/Edwin Simeon-Okraku.

The Objects of Proton Sports Services are:

- ◆ Fund Raising
- ◆ Sponsorship
- ◆ Marketing and Public Relations
- ◆ Sport Legal Services
- ◆ Players and match Agency
- ◆ Media Rights Syndication

The Principal Activity of Protons Sports Services are:

- ◆ Fund Raising
- ◆ Sponsorship
- ◆ Marketing and Public Relations
- ◆ Sport Legal Services
- ◆ Players and match Agency
- ◆ Media Rights Syndication

We attach the company registration documents of Proton Sports marked as KESO-O

CLUB CONSULT

There is one Company we need to mention at this stage of the Petition, which should be thoroughly investigated by the Ethics Committee.

This company is known as Club Consult. Mr. Michael Osekre, who is the Chief of Staff at the GFA is one of the Directors of Club Consult and owner of Vision Football Club.

Directors of Club Consult

- ⇒ Yussif Chibsah
- ⇒ Michael Osekre

Michael Osekre also doubles as Company Secretary.

The Objects of Club Consult are:

- ◆ Football Consultancy Services
- ◆ Player Management

The Principal Activity of the Company are:

- ◆ Football Consultancy Services
- ◆ Player Management

Conflicts of Interest at the GFA (Appointments at the GFA)

Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku must be elevated into the Guinness Book of Records in corporate governance practice in world football by his flagrant abuse and engagement in conflicts of interest in making 24 appointments to various positions at the Ghana Football Association known at the time of this petition. The movement of the staff at Dreams FC to the GFA can best be described as the biggest transfer to hit world football. They include the following:

Black Stars

1. Ameenu Shardow – Team Manager

Mr. Ameenu Shardow is presently the Team Manager of Ghana's Senior National Team, the Black Stars. It is important to underscore that he is also the General Manager of Dreams Football Club.

2. Daniel Yankey – Kit Manager

Mr. Daniel Yankey together with Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku are Directors of Proton Sports Services. Mr. Yankey was appointed to the position of Kit Manager at the Black Stars when Kurt assumed office as President of the Ghana Football Association (GFA). Mr. Yankey is a beneficiary of the appearance fees paid at the FIFA World Cup in Qatar.

3. Sulley Zampa -Kit Manager

Mr. Sulley Zampa is the personal driver to Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, who was also appointed Kit Manager at the Black Stars. In the past the position of Kit Manager was reserved for only one person. But as we speak, we have two Kit Managers at the Black Stars. Aside working for the Black Stars, Mr. Zampa also draws salary from the GFA as a staff. Mr. Zampa is a beneficiary of the appearance fees paid at the FIFA World Cup in Qatar.

4. Romeo Ricky Roy-Fitness Coach

Romeo works for Vision FC, a club owned by Mr. Osekre, the GFA Chief of Staff as Fitness Coach. He was brought in by Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, first as a Physical Trainer for the Black Satellites before his elevation to Black Stars Fitness Coach, a position he presently occupies.

5. Renee Opare-Otoo (Dietician)

Mrs. Opare-Otoo is the wife to Larry Opare-Otoo who is a long-standing family friend of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku.

CHAN Team

6. Haruna Seidu – Equipment Officer

Mr. Haruna Seidu works at Dreams FC as a masseur and was appointed as Equipment Officer to the CHAN Team of Ghana, when Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku, assumed office as President of the GFA.

Black Starlets

7. Abdul Karim Zito – Head Coach

Abdul Karim Zito is the Head Coach of Dreams FC and has been the greatest beneficiary in terms of coaching appointment ever since Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku, became President of the GFA. He was previously appointed as Head Coach to Ghana's U-20 Male Team, Black Satellites and recently reshuffled to the Black Starlets (Ghana U-17 Male Team), where he sits as Head Coach, whilst still working with Dreams FC as its Head Coach.

8. Winfred Dormon – Assistant Coach

Winfred Dormon is an Assistant Coach at Dreams FC and was appointed as one of the Assistant Coaches for the National U-17 Male Team, Black Starlets by Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku, upon assuming office.

9. Emmanuel Tagoe- Welfare Officer

Emmanuel Tagoe is the biological brother of Mrs. Rebecca Simeon-Okroku, wife of the GFA President, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku. Emmanuel Tagoe was firstly appointed as Welfare Officer for the National U-20 Male Team, Black Satellites, before his reshuffle to the National U-17 Male Team, where he currently serves as its Welfare Officer.

10. Malik Gullit Mumuni -Equipment Officer

Malik Gullit Mumuni is currently the Equipment Officer for Ghana's National -U17 Male Team, the Black Starlets. Malik is also the Welfare Officer of Dreams FC.

Black Satellites

11. Ibrahim Adam Dossey -Welfare Officer

Ibrahim Dossey is the Team Manager for Dreams FC and has been brought in by Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku, as the Welfare Officer for Ghana's National U-20 Male Team, the Black Satellites. It is important to underscore that in 2016, the GFA Appeals Committee banned Ibrahim Dossey for falsification and forgery of documents for 5 years. This was after the Court of Arbitration for Sports referred a matter concerning forgery of a player's registration documents by Dreams FC to the GFA to deal with. Mr. Dossey never served this ban as he was seen actively participating in football activities during the banned period.

12. Dr. Philemon Mensah -Team Physician

The self-acclaimed medical doctor for the team was appointed when Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraaku/ Edwin Simeon-Okraaku, took over as President of the GFA. Mr. Mensah has worked with Dreams FC as Team Doctor since 2015. He is also the CEO of Philteng Medical Centre. In 2019, upon a request for search to the Ghana Medical Association by one Ebenezer Y. Gyambrah, a private legal practitioner to confirm the status of Mr. Mensah as a qualified medical practitioner, the Ghana Medical Association responded that Mr. Mensah's name was not registered to practice medicine or dentistry in Ghana. Ironically, Mr. Mensah was firstly appointed as Team Physician of the Black Stars and later moved to the Black Satellites. When issues were raised by the Ghanaian public, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraaku/ Edwin Simeon-Okraaku, had to immediately replace him.

Black Maidens

13. Theresa Nelly Slippi-Mensah -Welfare Officer

Theresa is currently the Administrative Secretary/Finance Officer at Dreams FC. She was appointed to the position of Welfare Officer for the Black Maidens, Ghana's U-17 Female Team, a position she presently occupies.

Ghanaman Soccer Centre of Excellence, Prampram

14. Pastor Winifred Okraku- Director at the Centre

Winifred Okraku, also known as Mrs. Winifred Mawudeku is the Director of the Ghanaman Soccer Centre of Excellence, which is the Technical Centre of the GFA, which houses FIFA Projects. Winifred is the biological sister of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraaku/ Edwin Simeon-Okraaku, who has been entrusted with running the Technical Centre.

15. David Alifoe -Deputy Director at the Centre

Mr. David Alifoe is the biological brother of Mohammed Alifoe, aka Jiji a Director and Club President of Dreams FC. David occupies the position of Deputy Director at the Ghanaman Soccer Centre of Excellence (GFA Technical Centre), which houses FIFA Projects.

16. Prosper Harrison Addo- General Secretary at the GFA

Mr. Addo is a long-standing friend of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraaku/ Edwin Simeon-Okraaku, who was Chairman of the GFA Disciplinary Committee when Dreams FC won a protest concerning the change of name of player Daniel Gozar/Cudjoe Mensah. That case dragged to the Court of Arbitration for Sports, where the court described the registration of the player as dubious and fictitious and questioned the ruling of the GFA Disciplinary Committee.

17. Michael Osekre (Chief of Staff)

Mr. Osekre is the owner of Vision Football Club, a Division One (second tier) Team affiliated to the GFA. Michael was appointed as Chief of Staff at the GFA. This position never existed in the governance structure of the GFA. It is troubling to note how a club official could be made a staff of the GFA who practically follows the GFA President around and sits in official meetings of the GFA. Sadly, Michael also owns a clearing agency in Ghana (Goldeght Royal

Freight), where a referee (Maxwell Hanson) for Ghana's Premier League is an employee. Mr. Osekre is also a Director of Club Consult, a football player agency.

18. Obed Tuffour- Integrity Officer at the GFA

The Integrity Officer at the GFA, Mr. Obed Tuffour was brought in by Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, upon assuming office as GFA President. Incidentally, Obed happens to be the brother of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, alleged fiancée.

19. Ama Brobbey – Events Manager at the GFA

Ama Brobbey is an alleged Fiancée to Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, who was appointed by the Kurt led administration as Events Manager and Head of Women Football Development at the GFA. Miss Brobbey brought in the company that offers cleaning service to the GFA, where she has a vested interest. Additionally, despite being a staff at the GFA she is also a Director and Club Official of Golden Hills Sports Academy and Golden Strikers FC.

20. Jamil Maraby- Marketing Manager at the GFA

Mr. Maraby is a long-standing friend of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, who worked closely with him to engineer many deals including the MTN deal through a company known as Global Avanti Solutions for the GFA. They worked together for a club called Sekondi XI Wise FC.

21. Henry Asante Twum- Director of Communications at the GFA

Mr. Twum before his appointment was the Communications Manager at Dreams FC. He was given his role at the GFA when Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, assumed office as President of the GFA.

22. Bernard Agbodza

Bernard is the Team Manager of Still Believe FC, a subsidiary of Dreams FC. He works with the Communications Department of Dreams FC as well. Upon his assumption as President of the GFA, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, brought in Bernard as a Cameraman at the GFA.

23. David Mawuko Kpelih

David used to work at the Communications Department of Dreams FC and now employed by Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku, as a Photographer at the GFA.

24. Naa Odofoley Nortey

She was a Member of the Normalisation Committee (NC) that supervised the election of the President and Members of the Executive Council in 2019. Even though as a Member of the NC, she was not eligible to offer herself for election, she prides herself as having assisted Mr.

Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku to win the election. In return, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, has appointed Miss Nortey as legal advisor of the GFA, CAF Women's Match Commissioner and Management member of the Senior Women's National Team, Black Queens. It is noteworthy that she was the very person who signed the letter to disqualify one of the aspirants for the GFA elections in 2019 and went ahead to defend the GFA, when the disqualified aspirant filed an appeal at the Court of Arbitration for Sports (CAS).

C.ABUSE OF POSITION – ARTICLE 26

It provides that:

“Persons bound by this code shall not abuse their position in any way to take advantage of their position for private aims or gains”.

At the 2022 FIFA World Cup in Qatar, the following friends and family members of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, represented Ghana at the competition in various capacities. They include but not limited to:

- i) Sulley Zampa – Personal driver of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, was one of the Kit Managers for the Black Stars at the World Cup.
- ii) Mr. Daniel Yankey, a director of Proton Sports Services was also at the World Cup as the second kits Manager. Mr. Yankey sits on the board of Proton Sports Services with Mrs. Rebecca Simeon-Okraku, spouse of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku and Derrick Okraku, cousin of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku.

As part of the company objects of proton sports services, they are engaged in player Management services and match agency.

a. Player/Match Agency

One of the company objects and principal activities of Dreams FC is player management. Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku acts as Director of Dreams FC. On what basis can a GFA President be involved in player management?

Proton Sports Services a company which has his wife, cousin and Kit Manager of the Black Stars as Directors, are related parties to him in this instant petition. Proton Sports Services has its company objects and principal activity as “**Match Agency**”. As earlier stated in the definition of Related Party, it is fundamentally wrong for the Kit Manager of the Black Stars who is linked to Mr. Kurt E.S Okraku/Edwin Simeon-Okraku to have ties with the national team.

It is well known in Ghana that from 2019 to date the performances of our national football teams at major football competitions have taken a nose dive. The reasons for this unfortunate

and bizarre development are not far-fetched. The selection of technical handlers has been demonstrated to be based on considerations of family and friends. The association of persons linked to player management companies like Proton Sports Services, Club Consult and Dreams FC have also contributed to influences on coaches and player selections.

In a given case, Mr. CK Akunnor a former head coach of the Black Stars publicly shared his frustrations with interferences of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku and his cohorts in the selection of players to the national team. This allegation has remained uncontroverted up to date.

We attach hereto an audio of Mr. CK Akunnor on interferences of his job as national team coach and marked as KESO-P

Spocs Global Sports

This Company is a player Management and Match Agency in Germany. Until his election in 2019, Mr. Kurt E.S Okraku/Kurt Edwin Simeon-Okaku/Edwin Simeone-Okaku is alleged to have worked with the agency as a staff.

Although his name has officially been deleted on the website of this company, it's still the official player Manager for most former players of Dreams FC.

As at now, Spocs Global Sport is a consultant to the Ghana Football Association and Dreams FC as listed on their website. Were they appointed through an advertised competitive bidding process? Their appointment was undeniably linked to the position of Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku.

D. DUTY OF LOYALTY – ARTICLE 16

It provides that:

“Persons bound by this code shall have a fiduciary duty to FIFA, the confederations, Associations, Leagues or clubs.”

‘A breach of fiduciary occurs when inter alia, someone who is placed in a position of responsibility or acts in a way that is detrimental to the interests of FIFA, the confederations, Associations, Leagues or clubs or is likely to damage their own reputation.”

Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okaku/ Edwin Simeon-Okaku has acted improperly and in a manner that is detrimental to the interests of the Ghana Football Association in the following ways:

- i) By making appointments to various positions at the Ghana Football Association on the basis of friends and family.
- ii) He has damaged his reputation and by association the reputation of the Ghana Football Association through engaging in triple identity, misrepresentation of

identity, falsification of identity, forgery of identity, manipulation of identity and the concealment of identity with the aim to mislead the football body politic and the general public

- iii) Deceit of the football body politic and the general public by falsely representing that he had been co-opted unto the Executive Committee of CAF which fact he knew was palpably false. We attach a copy of the 13th May, 2022 publication of the GFA on its website www.ghanafa.org with the headline “ *Kurt E.S Okraku, Five other’s co-opted to CAF Executive Committee*”. This was after he had informed the GFA Executive Council of his elevation to the CAF Executive Committee. The story, which was full of untruths and factual inaccuracies went viral. I am reliably informed that CAF instructed him to pull the story down and that was done immediately. This again demonstrates the deceitful nature of the GFA President.

We attach a copy of the GFA story on the subject matter marked as KESO-Q

E. MANIPULATION OF FOOTBALL MATCHES OR COMPETITIONS – ARTICLE 30

It provides that:

“Persons bound by this code are forbidden from being involved in the manipulation of football matches and competitions and shall immediately report to the ethics committee any approach in connection with activities and/or information directly or indirectly related to the possible manipulation of a football match or competition.”

On 18th June 2023, Dreams FC played against King Faisal FC in the FA Cup final match of the season. Dreams FC won 2-0. Soon after the match very serious allegations of match manipulation were leveled by Alhaj Ahmed Abdul Karim aka Alhaji Gruzah, President of King Faisal FC against Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku. Alhaji Gruzah made damning allegations that prior to the match with Dreams FC, Mr. Okraku invited him through Alhaj Mohammed Alifoe, aka JIJI, a Director and President of Dreams FC to a meeting to discuss the pre-determined outcome of the match. This was in consideration that Alhaji Gruzah would accept to lose the match at the score line of 2-0 and in return be assisted or helped to win a pending appeal case at the GFA Appeals Committee between King Faisal FC and Tamale City FC. A victorious outcome in the appeal was expected to help King Faisal FC to avoid relegation and maintain their status in the Ghana Premier League. According to Alhaji Gruzah, he honored his part of the bargain whereas Mr. Okraku reneged on his promise by failing to help King Faisal to win their case at the Appeals Committee.

After receiving the alleged raw deal from Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okraku/ Edwin Simeon-Okraku, Alhaj Gruzah went to town by spilling the beans on the alleged plot, conspiracy, abetment and fraudulent scheme to manipulate the outcome of the match.

We attach a copy of the audio interview of Alhaji Gruzah on the subject marked as KESO-R

Officials and players of both clubs were aware of this plot before the match.

I wish to assure FIFA of my preparedness to provide further evidence on this subject when a full-scale investigation is open into the matter.

It is instructive to note that since the publication of this highly explosive subject in the Ghana media space, Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku has maintained a loud and deafening silence over the issue especially against challenges thrown at him by Alhaji Gruzah that they should publicly swear by the Quran and the Bible, - the faith books of the 2 protagonists - to speak the truth.

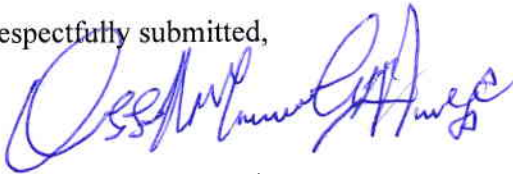
Conclusion

In view of the seriousness of the infractions stated above, I respectfully urge the FIFA Ethics Committee to thoroughly investigate the matters raised without fear or favour and pronounce the appropriate sanctions.

In the meantime, I pray the FIFA Ethics Committee to impose a temporal suspension on Mr. Kurt E.S Okraku/ Kurt Edwin Simeon-Okroku/ Edwin Simeon-Okroku while investigations are conducted into the very serious allegations.

In accordance with articles 10,11&12 of the FIFA Code of Ethics, the strictest and highest sanctions should apply to Mr. Okraku.

Respectfully submitted,



Akwasi Ossei Nkrumah

NB: The Petitioner is a whistleblower. He is a sports enthusiast and advocate for social and community development through sports. He is also a prolific writer on youth, sports and community development.

LIST OF ATTACHMENTS

1. GFA Statutes, 2019 marked as KESO -A
2. GFA Code of Ethics, 2019 marked as KESO-B
3. GFA Disciplinary Code, 2019 marked as KESO-C
4. GFA Premier League Regulations, 2019 marked as KESO-D
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6. GFA Regional Football Associations Regulations marked as KESO-F
7. GFA Womens Premier League Regulations, 2019 marked as KESO-G
8. GFA Cup Regulations, 2021- marked as KESO-H
9. Passport Biodata page marked as KESO-I
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11. CAS Ruling in Tema Youth v GFA marked as KESO-K
12. Registration Details of Frederick Agyemang marked as KESO-L
13. Registration Details of Leonard Owusu marked as KESO-M
14. Company Registration Documents of Dreams FC marked as KESO-N
15. Company Registration Documents of Proton Sports marked as KESO-O
16. Audio Recording of Mr. C.K Akunnor marked as KESO-P
17. www.ghanafa.org marked as KESO-Q
18. Audio Interview of Alhaji Grusah marked as KESO-R

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