

**Union des Associations Européennes de Football ("UEFA")**

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Switzerland

*To the attention of Mr Aleksander Čeferin, President of UEFA  
With copy to the members of the UEFA Executive Committee*

30 January 2024

***CEASE & DESIST LETTER******Immediate cessation of anti-competitive behaviour vs. A22 Sports Management, S.L.***

Dear Sirs,

We are writing to express our profound concern regarding UEFA's behaviour toward the business initiatives of A22 Sports Management, S.L. ("**A22**"). This behaviour has already caused material damages to A22 (and other parties), damages which continue to increase.

The business of A22 relates to the design, promotion and organisation of, among other things, interclub competitions of European football clubs. A22 is entitled to carry out these activities without limitation other than applicable laws. In particular (as you well know), A22's business activities include advising the European Super League Company, S.L. (the "**Super League Company**") and any other party it may deem appropriate from time to time, in projects which may compete in the market with competitions promoted by UEFA.

Since April 2021, UEFA's anticompetitive behaviour and actions towards A22 (supported by a number of domestic federations and leagues acting in a coordinated manner with UEFA), have been targeted to frustrate the business initiatives of A22. Such actions have been varied and widespread. They include the constant and unacceptable denigration of A22's reputation in the media and elsewhere and the pressuring and threatening of European clubs behind the scenes to prevent them from considering potential projects involving A22 and to push them to announce their public support of UEFA competitions.

These actions have only one aim, to exclude A22 from the European market for cross border competitions in which UEFA has a monopoly. Such actions are being taken by UEFA in blatant breach of the protective injunction issued in April 2021 for the benefit of the Super League Company and its participants, an injunction which was issued by the court of first instance and later restated by the appellate level Madrid High Court (*Audiencia Provincial de Madrid*) in January 2023. The terms of the protective injunction are clear, precise and attached in Appendix 1 for your reference.

In addition to ignoring a valid court order, UEFA's behaviour and abuse of its dominant position has also had the effect of inducing various counterparties to breach private contracts which is an obvious and textbook example of tortious interference as well as a breach European Union competition law.

As stated in the very clear ruling issued by the Court of Justice of the European Union on 21 December, 2023 in the case of the Super League Company /A22 vs. UEFA/FIFA (the "**CJEU Ruling**"), A22 has the unquestionable right to freely operate in the European Union on an equal footing with UEFA with respect to the organisation of football competitions.

Given the protective injunction referred to above and the CJEU ruling, we are shocked to see that UEFA has continued, and even escalated, its anticompetitive behaviour toward A22 on all fronts and we have sufficient evidence of UEFA's behaviour and the threats of sanctions directed toward a number of European clubs.

**Consequently, we hereby demand that UEFA and its executives, with immediate effect, a) cease and desist from any form of anticompetitive action against A22, its business initiatives, its partners and directors, and b) instruct any third party affiliated to UEFA or acting under its influence or direction (including but not limited to domestic leagues and domestic federations) to do the same. Continued anticompetitive actions taken by UEFA with the ultimate goal to exclude competitors like A22 from the European market for interclub competitions are illegal and will compound the already substantial damages incurred by UEFA as a result of its prior actions.**

**We fully reserve all rights to bring any appropriate steps in all relevant jurisdictions against UEFA and, as applicable, relevant UEFA executives, seeking both relevant corrective measures and the corresponding compensation for the material damages that such anticompetitive behaviour has already caused and continues to cause to A22, its projects and its partners.**

Yours sincerely,

John Hahn  
*Co-founder*

Anas Laghrari  
*Co-founder*

Bernd Reichart  
*Chief Executive Officer*

## Appendix

### **Protective Injunction restored by the Madrid High Court**

1. Order FIFA and UEFA, while the main proceedings are being heard, to refrain from taking any measure or action and from issuing any statement or communiqué that directly or indirectly prevents or hinders the preparation of the European football Super League.
2. Order FIFA and UEFA, while the main proceedings are being heard, to take any measure or action, when so required, and to issue, when so required, any statement or communiqué that neither directly nor indirectly prevents or hinders the preparation of the European football Super League.
3. Order FIFA and UEFA, while the main proceedings are being heard, to refrain from taking any measure or action and from issuing any statement or communiqué that directly or indirectly prevents or hinders the launch and development of the European football Super League and the participation of football clubs and players in it.
4. Order FIFA and UEFA, while the main proceedings are being heard, to take any measure or action, when so required, and to issue, when so required, any statement or communiqué that neither directly nor indirectly prevents or hinders the launch and development of the European football Super League.
5. Prohibit FIFA and UEFA, while the main proceedings are being heard, from directly or indirectly (through their affiliated members, confederations, licensee clubs or national or domestic leagues) announcing, threatening, preparing, commencing and/or adopting any disciplinary or sanctioning measures (or, directly or indirectly, inciting or causing such disciplinary or sanctioning measures to be announced, threatened, prepared, commenced and/or adopted by third parties) in relation to the clubs, managers and employees of the clubs and/or the players who are taking part in the preparation of the European football Super League.
6. Order FIFA and UEFA to refrain, directly or indirectly (through their affiliated members, confederations, licensee clubs or national or domestic leagues), from excluding the clubs and/or players who are taking part in the preparation of the European football Super League from any of the national or international club competitions in which they have been competing regularly or for which they meet the necessary requirements to do so.
7. Order FIFA and UEFA, while the main proceedings are being heard, by means of their own regulatory instruments, guides, decisions and guidelines –in the sense of Article 52 of the UEFA Statutes– and, as the case may be, by requiring compliance with these if they are not abided by or upheld, to instruct their affiliated members (including national federations), confederations, licensee clubs and national or domestic leagues, to comply with the orders and prohibitions contained in the foregoing sections and, in particular, that they be informed that no breach of the FIFA or UEFA Statutes or rules or those of their affiliated members (including national federations), confederations or national or domestic leagues deriving from the preparation, launch or participation in the European football Super League can be invoked by the affiliated members of FIFA or UEFA or by the confederations, licensee clubs or national or domestic leagues as grounds for sanctions, exclusions, claims or any other similar measure in relation to the clubs or players in international or domestic competitions.

8. Order FIFA and UEFA are ordered, in the event that any of the conduct described in the preceding sections is carried out prior to a decision being handed down on this application for interim injunctions, to take the necessary actions to remedy such conduct and render it immediately without effect.