

1 Shahrokh Mokhtarzadeh, Esq.  
2 Cal. State Bar No. 134095  
3 Law Offices of Shahrokh Mokhtarzadeh  
4 A Professional Law Corporation  
5 16130 Ventura Blvd., Suite 230  
6 Encino, CA 91436  
7 Tel. (818) 377-3830  
8 Email. [Shahrokh@smplcla.com](mailto:Shahrokh@smplcla.com)

Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
6/10/2026 9:59 AM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By S. Ruiz, Deputy Clerk

6 Attorney for Plaintiffs  
7 **SAM KERMANIAN, individually and**  
8 **INSTITUTE FOR VOICES OF**  
9 **LIBERTY, a California Corporation**

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES**  
12 **CENTRAL JUDICIAL DISTRICT**

13 No. **26STCV18475**

14 SAM KERMANIAN, an individual;  
15 INSTITUTE FOR VOICE OF  
16 LIBERTY, a California Corporation

17 Plaintiffs,

18 v.

COMPLAINT FOR:

1. Declaratory Relief;
2. Preliminary and Permanent Injunction;
3. Violation of Article I, Section 2 of the California Constitution;
4. Violation of California Civil Code §§ 51 and 52.1;
5. Unfair Business Practices (Bus. & Prof. Code §17200);
6. Damages;

20 FÉDÉRATION INTERNATIONALE DE  
21 FOOTBALL ASSOCIATION (FIFA);  
22 FIFA WORLD CUP 2026 LLC; STADCO LA,  
23 LOS ANGELES SPORTS & ENTERTAINMENT  
24 COMMISSION; LOS ANGELES WORLD CUP  
25 HOST COMMITTEE; HOLLYWOOD PARK  
26 LAND COMPANY LLC; CITY OF INGLEWOOD;  
27 COUNTY OF LOS ANGELES; LOS ANGELES  
28 COUNTY SHERIFF'S DEPARTMENT  
and DOES 1-100,

Defendants.

Plaintiffs, SAM KERMANIAN and INSTITUTE FOR VOICES OF LIBERTY, allege as

1 follows:

- 2 1. Plaintiff, SAM KERMANIN, (hereinafter "Plaintiff Kermanian") was and now is a resident  
3 in the City of Los Angeles, County of Los Angeles, State of California.
- 4 2. Plaintiff Institute for Voices of Liberty (hereinafter "Plaintiff IVOL") is a California  
5 nonprofit corporation formed and engaged in doing business in County of Los Angeles,  
6 State of California.
- 7 3. Plaintiff Kermanian and members of Plaintiff IVOL residing in the State of California are  
8 members of the Iranian-American community and are supporters of democratic reform  
9 and human rights in Iran. Plaintiff Kermanian is a member of Plaintiff IVOL.
- 10 4. Plaintiff Kermanian and Plaintiff IVOL (hereinafter collectively "Plaintiffs") and each of  
11 them as well as other members of Plaintiff IVOL, have attended numerous international  
12 sporting events and intend to attend one or more FIFA World Cup 2026 matches  
13 scheduled to occur in California, including matches at SoFi Stadium in Inglewood.
- 14 5. Plaintiff Kermanian and certain members of Plaintiff IVOL have purchased and intend to  
15 purchase additional tickets for FIFA World Cup matches involving the Iranian national  
16 team and other matches held in California.
- 17 6. Plaintiffs and each of them specifically intend to carry and display the historic Iranian  
18 Lion and Sun flag at FIFA World Cup matches as a means of expressing his political  
19 views regarding freedom, democracy, secular governance, and opposition to the current  
20 Iranian regime.
- 21 7. Plaintiffs' conduct and the conducts of each of them, constitutes protected symbolic and  
22 political speech.
- 23 8. As a direct result of defendant FIFA's announced policy and public reports indicating  
24 that FIFA intends to prohibit the Lion and Sun flag, Plaintiffs and each of them  
25 reasonably fears exclusion from stadiums, confiscation of his property, denial of entry,  
26 removal from venues, and other adverse action.
- 27 9. FIFA's conduct has already chilled Plaintiffs and each of them 's exercise of  
28 constitutional rights and has created a present and ongoing controversy requiring

1 immediate judicial intervention.

2 **I. INTRODUCTION.**

3 10. Plaintiffs are informed and believe and based thereon allege that Defendant,  
4 FÉDÉRATION INTERNATIONALE DE FOOTBALL ASSOCIATION (FIFA) (hereinafter  
5 "Defendant FIFA"), is a business entity, form unknown, engaged in doing business  
6 across the globe, including but not limited to Los Angeles County State of California, but  
7 primarily based for business in country of Switzerland. Defendant FIFA is the organizer  
8 and responsible party in connection with the World Cup tournament set to take place in  
9 U.S., Canada and Mexico in June and July 2026. Defendant FIFA is doing business in  
10 City and County of Los Angeles in June and July 2026, if not further.

11 11. Plaintiffs are informed and believe and based thereon allege that Defendant, FIFA  
12 WORLD CUP 2026, LLC (hereinafter "Defendant FIFA 2026 LLC"), is a business entity,  
13 form unknown, engaged in doing business in Los Angeles County, State of California,  
14 for purpose of providing assistance in course of World Cup 2026, which is set to take  
15 place during June through July 2026. Defendant FIFA is the organizer and responsible  
16 party in connection with the World Cup tournament set to take place in U.S., Canada  
17 and Mexico in June and July 2026. Defendant FIFA has organized multiple limited  
18 liability companies or other business entities to enable Defendant FIFA to proceed with  
19 the organization and implementation of FIFA World Cup 2026 in U.S., as well as in  
20 Mexico and Canada.

21 12. Plaintiffs are informed and believe and based thereon allege that Defendant, LOS  
22 ANGELES SPORTS & ENTERTAINMENT COMMISSION (hereinafter "Defendant LA  
23 Sports Commission"), is a business entity, form unknown, engaged in doing business in  
24 Los Angeles County, State of California, and formed, in part, for purpose of providing  
25 assistance in course of World Cup 2026, which is set to take place during June through  
26 July 2026.

27 13. Plaintiffs are informed and believe and based thereon allege that Defendant, CITY OF  
28 INGLEWOOD (hereinafter "Defendant City of Inglewood"), is a public entity wherein

1 SOFI Stadium is located and in which multiple FIFA World Cup matches are due to be  
2 played.

3 14. Plaintiffs are informed and believe and based thereon allege that Defendant, StadCo LA  
4 (hereinafter "Defendant Stadco"), is a business entity, form unknown, engaged in doing  
5 business in Los Angeles County, State of California and is the owner and operator of  
6 SOFI stadium, one of the venues for the upcoming FIFA World Cup matches are due to  
7 be played.

8 15. Plaintiffs are informed and believe and based thereon allege that that Defendant  
9 HOLLYWOOD PARK LAND COMPANY, LLC ("Defendant Hollywood") owns, develops,  
10 controls, manages, leases, operates, or otherwise participates in ownership and  
11 operation of the Hollywood Park development and SoFi Stadium facilities which are  
12 scheduled to host FIFA World Cup 2026 matches.

13 16. Plaintiffs are informed and believe and based thereon allege that Defendant, County of  
14 Los Angeles, (hereinafter "Defendant LA County"), is a public entity, engaged in doing  
15 business in Los Angeles County, State of California and is involved in operating and  
16 assisting Defendant FIFA and/or other defendants identified in this Complaint with the  
17 different tasks operating and managing access to SOFI stadium, one of the venues for  
18 the upcoming FIFA World Cup matches are due to be played.

19 17. Plaintiffs are informed and believe and based thereon allege that Defendant, Los  
20 Angeles County Sheriff's Department (hereinafter "Defendant LA County Sheriff"), is a  
21 law-enforcement agency expected to provide crowd-control services, public-safety  
22 services, security operations, stadium-entry enforcement, spectator-removal operations,  
23 and related governmental services during FIFA World Cup 2026 events occurring in Los  
24 Angeles County.

25 18. This action is commercial in nature, and is not based on a retail installment sales  
26 contract, and is not subject to the provision of Civil Code Sections 1812.10 and/or  
27 2984.4.

28 19. At all times herein mentioned, defendants Does 1 - 100, and each of them were the

1 partners, officers, agents, employees, joint venturers, alter egos, assignees,  
2 successors in interest, heirs, heirs in law, trustees, executors, shareholders, and  
3 directors, of each of the other defendants identified above and in doing the things herein  
4 described were acting within the scope of their authority as such agent, employee, joint  
5 venturer, alter ego, shareholder, officer, director and partners.

6 20. Within the past six months of the date of filing this Complaint with this Court, Plaintiff  
7 Kermanian acquired and/or purchased ticket or tickets from Defendant FIFA, Defendant  
8 FIFA 2026 LLC, and/or Does 1 - 20 (hereinafter collectively "FIFA Defendants") in  
9 connection with the upcoming World Cup 2026 games to be held in Los Angeles  
10 County, State of California.

11 21. The documents provided to Plaintiff Kermanian by the FIFA Defendants include rules  
12 and regulations that specify that Plaintiff Kermanian is not allowed to carry with himself  
13 certain items, including but not limited to the flag of pre-revolutionary Iran, also known  
14 as the Lion and Sun flag identifying the country of Iran prior to the 1979 Islamic  
15 revolution. Plaintiff Kermanian, an Iranian-American intends to and wishes to exercise  
16 his rights of free speech as guaranteed by the laws of the State of California as well as  
17 the laws of the United States of America, by carrying a Lion and Sun flag of pre-  
18 revolutionary Iran with him to the game or games to which he has tickets and which will  
19 be played in County of Los Angeles, Sofi Stadium on June 15 and on June 21, 2026.

20 22. Plaintiff INSTITUTE FOR VOICES OF LIBERTY (hereinafter "Plaintiff IVOL") brings this  
21 action to prevent the FIFA Defendants and their affiliates and/or co-defendants who are  
22 assisting the FIFA Defendants in implementing the World Cup 2026 games, including  
23 but not limited to defendants STADCO LA, LOS ANGELES SPORTS &  
24 ENTERTAINMENT, COMMISSION, LOS ANGELES WORLD CUP HOST  
25 COMMITTEE; DEFENDANT HOLLYWOOD, CITY OF INGLEWOOD, COUNTY OF  
26 LOS ANGELES; DEFENDANT LA COUNTY SHERIFF and DOES 21-100 (hereinafter  
27 collectively referred to as "LA Defendants") from suppressing constitutionally protected  
28 political speech at FIFA World Cup 2026 events occurring within the State of California,

1 and in particular, with respect to the games played involving the Islamic Republic of Iran.

2 23. Plaintiff IVOL and Plaintiff Kermanian (hereinafter collectively "Plaintiffs") are informed  
3 and believe and thereon allege that FIFA Defendants have publicly announced and  
4 indicated that they intend to continue policies previously implemented during the 2022  
5 FIFA World Cup in Qatar prohibiting spectators from displaying the historic Iranian "Lion  
6 and Sun" flag and other political symbols critical of the current Iranian regime. The  
7 same intent has been stated in the documents provided by FIFA Defendants to the  
8 ticket holders for the games taking place in the County of Los Angeles and the State of  
9 California.

10 24. The Lion and Sun flag constitutes protected symbolic and political expression used by  
11 members of the Iranian-American community, political dissidents, human-rights  
12 advocates, and others to express opposition to the current Iranian government and  
13 support for democratic reform.

14 25. Plaintiff Kermanian has purchased tickets and intends to attend FIFA World Cup  
15 matches scheduled to occur at SoFi Stadium, including matches involving the Iranian  
16 national team.

17 26. Plaintiff Kermanian specifically intends to display the Lion and Sun flag and other  
18 expressive materials at those matches.

19 27. Plaintiff IVOL's members likewise intend to attend such matches and engage in  
20 protected expressive conduct.

21 28. Plaintiffs are presently forced to choose between refraining from protected speech or  
22 risking exclusion, removal, confiscation of expressive materials, denial of admission, or  
23 other adverse consequences.

24 29. An actual and ripe controversy therefore exists.

25 30. Plaintiffs need not await actual exclusion from the stadium before seeking judicial relief  
26 because the challenged policy presently chills protected expression.

27 31. Plaintiffs are informed and believe and thereon allege that FIFA Defendants intend to  
28 conduct World Cup matches at venues located in California, including SoFi Stadium in

1 Inglewood and Levi's Stadium in Santa Clara, while clearly violating the rights of the  
2 Plaintiffs and each of them as well as others similarly situated as the Plaintiffs herein.

3 32. Plaintiffs are informed and believe and thereon allege that FIFA Defendants along with  
4 the LA Defendants, including but not limited to local host committees, stadium  
5 operators, municipalities, and law-enforcement agencies will jointly participate in  
6 enforcing entry restrictions and spectator-screening policies governing World Cup  
7 attendees.

8 33. Such conduct constitutes state action, quasi-public action, or conduct occurring within  
9 public accommodations and public gathering places protected by California law.

10 34. Plaintiffs seek declaratory and injunctive relief prohibiting FIFA Defendants and LA  
11 Defendants (hereinafter collectively "Defendants") from restricting spectators from  
12 displaying the Lion and Sun flag or other peaceful political symbols based upon  
13 viewpoint or ideological content.

## 14 **II. JURISDICTION AND VENUE**

15 35. Jurisdiction exists pursuant to California Constitution Article VI.

16 36. This Court possesses authority to issue declaratory and injunctive relief under Code of  
17 Civil Procedure sections 526 and 1060.

18 37. Venue is proper in Los Angeles County because:

- 19 a. FIFA World Cup matches are scheduled to occur at SoFi Stadium in Inglewood;
- 20 b. Substantial acts giving rise to this action will occur within Los Angeles County;
- 21 c. Certain Defendants conduct business within Los Angeles County.

22 38. Defendants purposefully availed themselves of California by organizing, promoting,  
23 licensing, and conducting FIFA World Cup activities within the State of California.

## 24 **III. PARTIES**

25 39. Plaintiff IVOL is a California nonprofit corporation dedicated to advancing freedom of  
26 expression, democratic values, and civil liberties.

27 40. Plaintiff Sam Kermanian is a resident of State of California, County of Los Angeles, and  
28 has acquired one or more tickets to attend the World Cup 2026 games including but not

1 limited to the June 15, 2026 game of the Islamic Republic of Iran versus New Zealand  
2 as well as the June 21, 2026 game of the Islamic Republic of Iran versus Belgium.

3 41. Plaintiff IVOL brings this action on behalf of itself and its members who intend to attend  
4 FIFA World Cup events and engage in protected political expression.

5 42. Defendant FIFA is a Swiss association headquartered in Zurich, Switzerland.

6 43. Defendant FIFA WORLD CUP 2026 LLC is responsible for organizing and administering  
7 FIFA World Cup activities within the United States.

8 44. Defendant LOS ANGELES SPORTS & ENTERTAINMENT COMMISSION ("LASEC")  
9 acts as the local organizing committee for Los Angeles-area World Cup events.

10 45. Defendant Stadco LA and Defendant Hollywood, are believed to be one or more of the  
11 one of the owners, managers and operators of the SOFI Stadium where the subject  
12 World Cup 2026 games are to be played.

13 46. Defendant LOS ANGELES WORLD CUP HOST COMMITTEE is responsible for local  
14 administration and implementation of World Cup operations.

15 47. Defendants CITY OF INGLEWOOD and COUNTY OF LOS ANGELES, own, control,  
16 regulate, authorize, or participate in public infrastructure, permitting, security, and  
17 governmental support connected with World Cup 2026 events.

18 48. Defendant County of Los Angeles Sheriff is also engaged in providing services and will  
19 enforce the rules dictated by FIFA Defendants in course of the upcoming World Cup.

20 49. Based on publicly available information, FIFA Defendants, including but not limited to  
21 FIFA World Cup 2026, LLC appears to be one of several FIFA-created U.S. entities  
22 established to organize, manage, and conduct the 2026 FIFA World Cup in the United  
23 States. Defendant FIFA has created separate North American operating entities for  
24 various tournament functions, including ticketing, hospitality, commercial operations,  
25 legal compliance, and host-city coordination.

26 50. Plaintiffs are not aware of the exact purpose of defendant FIFA World Cup 2026, LLC,  
27 but are informed and believe and thereon allege that FIFA Defendants and each of  
28 them, along with the LA Defendants and each of them, are working together and in

1 concert to bring about and allow the World Cup 2026 games to take place in Los  
2 Angeles County and State of California.

3 51. Plaintiffs are informed and believe and thereon allege that although FIFA Defendants do  
4 not publicly publish a detailed charter for FIFA World Cup 2026, LLC, the entity's  
5 apparent functions include:

- 6 -Planning and administration of FIFA World Cup 2026 operations in the United States;
- 7 -Coordination with host cities, stadiums, governmental entities, and vendors;
- 8 -Contracting and commercial activities related to the tournament;
- 9 -Management of ticketing, hospitality, sponsorship, and event logistics;
- 10 -Employment and engagement of personnel working on tournament preparations.

11 52. Plaintiffs are informed and believe and thereon allege that the 2026 World Cup is the  
12 largest FIFA tournament ever held, involving 48 national teams and 16 host cities in the  
13 United States, Canada, and Mexico. Defendants have therefore established substantial  
14 U.S.-based operations to administer the event.

15 53. Plaintiffs are further informed and believe and thereon allege that FIFA Defendants'  
16 principal U.S.-based World Cup entities are organized in the United States and operate  
17 from Florida. However, Plaintiffs have not been able to locate a publicly available filing  
18 definitively identifying the exact state of formation of "FIFA World Cup 2026, LLC" itself.

19 54. FIFA has established its principal North American legal and compliance headquarters in  
20 Miami: FIFA Corporate Office (United States); 396 Alhambra Circle, Coral Gables,  
21 Florida 33134 USA.

22 55. The above address is also listed as the principal address for FIFA-related World Cup  
23 entities operating in the United States.

#### 24 **IV. FACTUAL ALLEGATIONS**

25 56. On May 19, 2026, media reports stated that FIFA Defendants intended to prohibit  
26 spectators from displaying the pre-revolutionary Iranian flag during World Cup events.

27 57. Plaintiffs have further received notices from FIFA Defendants, upon purchase of tickets  
28 to attend the subject games, stating that FIFA Defendants indeed intend to prohibit

1 spectators from displaying the pre-revolutionary Iranian flag during World Cup events,  
2 including the games involving the Islamic State of Iran.

3 58. Plaintiffs are informed and believe and thereon allege that FIFA Defendants similarly  
4 implemented such restrictions during the 2022 World Cup in Qatar.

5 59. The Lion and Sun flag is widely recognized among Iranian-Americans as a symbol of  
6 political identity and opposition to the current Iranian regime.

7 60. FIFA Defendants intend to and have scheduled multiple matches to be played in the  
8 State of California and County of Los Angeles. FIFA Defendants will be hosting  
9 matches involving Islamic Republic of Iran and other national teams at multiple  
10 California venues.

11 61. Plaintiff IVOL's members intend to attend those matches.

12 62. Plaintiff Kermanian has obtained tickets from FIFA Defendants and/or LA Defendants  
13 and intends to attend matches including the games involving the Islamic Republic of  
14 Iran.

15 63. As a direct result of FIFA's announced policy and public reports indicating that FIFA  
16 intends to prohibit the Lion and Sun flag, Plaintiffs and each of them reasonably fear  
17 exclusion from stadiums, confiscation of their property, denial of entry, removal from  
18 venues, and other adverse action.

19 64. FIFA's conduct has already chilled Plaintiffs' exercise of constitutional rights and has  
20 created a present and ongoing controversy requiring immediate judicial intervention.

21 65. Plaintiff IVOL has associational standing because:

- 22 a. Its members include California residents who intend to attend FIFA World Cup  
23 events;
- 24 b. Such members intend to engage in protected political expression;
- 25 c. The interests at stake are germane to IVOL's organizational mission;
- 26 d. Neither the claims asserted nor the relief requested requires participation of  
27 every member.

28 66. Plaintiff Kermanian independently possesses standing because he faces a credible

1 threat of enforcement of FIFA's announced policies.

2 67. A plaintiff need not await arrest, exclusion, confiscation of property, or actual  
3 punishment before seeking judicial relief where protected speech is chilled by a credible  
4 threat of enforcement.

5 68. FIFA's public statements and previously enforced restrictions during the 2022 World  
6 Cup create a substantial and objectively reasonable fear of enforcement.

7 69. The injury is concrete, particularized, and imminent.

8 70. Unless restrained, Defendants will enforce the challenged restrictions during FIFA World  
9 Cup 2026 events occurring in California.

10 71. Plaintiffs and Plaintiff IVOL's members intend to display the Lion and Sun flag.

11 72. Plaintiff IVOL's members, and Plaintiff Kermanian reasonably fear exclusion,  
12 confiscation of expressive materials, denial of entry, removal from venues, or other  
13 adverse action.

14 73. On May 20, 2026 and June 3, 2026, Plaintiffs demanded that FIFA Defendants rescind  
15 any such policy and provide written assurances that spectators would not be prohibited  
16 from displaying the Lion and Sun flag. A true and accurate copy of Plaintiffs' written  
17 demands provided to FIFA Defendants are attached hereto and are incorporated by  
18 reference herein respectfully as **Exhibit A** (May 20, 2026 notice) and **Exhibit B** (June 3,  
19 2026 notice) and are incorporated by reference herein.

20 74. FIFA Defendants failed to respond or to provide the requested assurances of any kind.

21 75. Under California law, its free-speech protections are broader than the protections  
22 afforded under the First Amendment to the United States Constitution.

23 76. Under California law, privately operated facilities that function as public gathering places  
24 may not arbitrarily suppress protected expression.

25 77. FIFA World Cup 2026 matches are public events marketed to millions of members of  
26 the general public.

27 78. Spectators attend such events not merely as consumers of entertainment but as  
28 participants in a significant public and cultural gathering.

- 1 79. FIFA World Cup 2026 events in California are not purely private undertakings.
- 2 80. The tournament depends upon extensive governmental cooperation, public funding,  
3 public infrastructure, governmental permitting, transportation planning, emergency  
4 services, law-enforcement participation, and municipal support.
- 5 81. Defendants City of Inglewood and County of Los Angeles have committed substantial  
6 governmental resources toward the planning, administration, transportation, security,  
7 emergency-response, and operational needs associated with World Cup activities.
- 8 82. Defendants Los Angeles Sports & Entertainment Commission and Los Angeles World  
9 Cup Host Committee coordinate governmental and private participation relating to  
10 tournament operations.
- 11 83. Defendant Hollywood Park Land Company, LLC participates in ownership, operation,  
12 management, development, and administration of facilities designated for use during  
13 FIFA World Cup 2026.
- 14 84. Defendant LA County Sheriff is expected to provide security services, crowd-control  
15 functions, law-enforcement support, and enforcement of spectator-entry restrictions.
- 16 85. Public resources worth millions of dollars are expected to be devoted to transportation  
17 improvements, infrastructure projects, policing, emergency services, crowd  
18 management, and related public functions associated with World Cup activities.
- 19 86. Any exclusion of spectators, confiscation of expressive materials, denial of entry,  
20 removal from venues, or enforcement of spectator restrictions will occur through the  
21 coordinated efforts of FIFA Defendants, stadium operators, host committees,  
22 municipalities, and law-enforcement agencies.
- 23 87. Defendants are therefore engaged in joint action and substantial entanglement with  
24 governmental entities.
- 25 88. Such conduct constitutes state action under California law and under the joint-action,  
26 nexus, entanglement, and public-function doctrines.
- 27 89. Alternatively, California constitutional free-speech protections apply because FIFA  
28 World Cup venues function as large public gathering places open to the general public.

- 1 90. The World Cup constitutes one of the largest public events in the world and attracts  
2 members of the public from throughout California, the United States, and internationally.
- 3 91. Defendants may not selectively suppress political viewpoints while permitting other  
4 forms of expression.
- 5 92. Defendants' anticipated prohibition of the Lion and Sun flag constitutes content-based  
6 and viewpoint-based discrimination.
- 7 93. The Lion and Sun flag constitutes protected symbolic speech under California law.
- 8 94. Defendants permit other national, cultural, and political symbols while selectively  
9 prohibiting the Lion and Sun flag.
- 10 95. Such selective treatment constitutes unlawful viewpoint discrimination.
- 11 96. Defendants therefore may not engage in viewpoint discrimination concerning peaceful  
12 political speech.
- 13 97. Plaintiffs have no adequate means of obtaining certainty regarding their rights except  
14 through judicial intervention.
- 15 98. Waiting until spectators are denied entry or removed from stadiums would effectively  
16 deprive Plaintiffs of meaningful relief.
- 17 99. Because the World Cup is a unique and time-limited international event, post-event  
18 damages cannot adequately compensate for the loss of constitutional rights.
- 19 100. Immediate adjudication is therefore necessary and appropriate.
- 20 101. Plaintiff is informed and believes and thereon alleges that FIFA World Cup matches in  
21 California will occur only through extensive cooperation among FIFA Defendants, local  
22 host committees, municipalities, law-enforcement agencies, transportation agencies,  
23 and publicly funded governmental entities, identified herein as LA Defendants.
- 24 102. Plaintiffs are further informed and believe and thereon allege that SoFi Stadium is  
25 located within the City of Inglewood and cannot host FIFA World Cup matches without  
26 extensive governmental permits, security coordination, traffic management,  
27 emergency-response services, and public infrastructure support.
- 28 103. Numerous governmental entities are expected to participate in planning and execution

1 of World Cup operations, including but not limited to Defendant, City of Inglewood,  
2 Defendant, Los Angeles County and other affiliated city or county agencies.

3 104. Plaintiff is informed and believes and thereon alleges that public resources worth  
4 millions of dollars will be devoted to transportation planning, policing, crowd control,  
5 emergency services, security, and infrastructure improvements associated with FIFA  
6 World Cup 2026 events in County of Los Angeles and State of California.

7 105. Defendants and each of them will utilize governmental authority and public resources to  
8 implement stadium-entry procedures and spectator-screening policies.

9 106. Any exclusion of spectators, confiscation of expressive materials, denial of entry, or  
10 removal from venues based upon political viewpoint will therefore constitute action  
11 undertaken jointly with governmental actors.

12 107. Such conduct constitutes state action under the joint-action, nexus, entanglement, and  
13 public-function doctrines.

14 108. Alternatively, California constitutional free-speech protections apply independently  
15 because FIFA World Cup 2026 venues, including but not limited to SoFi, function as  
16 large public gathering places open to members of the general public.

17 109. An actual controversy therefore exists.

18 110. Absent judicial intervention, Plaintiff and its members as well as Plaintiff Kermanian  
19 and/or others similarly situated will face irreparable injury to their individual and/or other  
20 constitutional rights.

21 111. Plaintiffs and each of them further submit and seek relief for protection of their  
22 constitutionally protected rights as follows:

23 A. California Constitutional Protection of Speech.

24 Article I, Section 2(a) of the California Constitution provides:

25 "Every person may freely speak, write and publish his or her sentiments on all  
26 subjects..." and "[a] law may not restrain or abridge liberty of speech or press."

27 B. California courts have repeatedly held that the California Constitution provides  
28 broader protection for speech than the federal First Amendment.

1 C. Displaying a flag is generally recognized as symbolic speech. A flag  
2 communicates political, cultural, historical, and national identity and is therefore  
3 expressive conduct protected by constitutional free-speech principles.

4 D. The Lion and Sun Flag Is Protected Political Expression

5 E. The Lion and Sun flag is not a prohibited symbol under California law, federal  
6 law, or any U.S. criminal statute.

7 F. For many Iranian Americans, the Lion and Sun flag represents Persian cultural  
8 heritage; Iranian national identity; Opposition to the current government of  
9 Iran; Historical and political viewpoints.

10 112. Plaintiffs are informed and believe and thereon allege that the fact that a symbol  
11 conveys a political message places it at the core of constitutional speech protection.  
12 The California Constitution protects speech regardless of whether the message is  
13 popular or controversial.

14 113. Plaintiffs are informed and believe and thereon allege that under the principals stated in  
15 the United States Supreme Court's decision in Pruneyard Shopping Center v. Robins,  
16 447 U.S. 74 (1980), are relevant and material here and that Plaintiffs and each of them,  
17 including but not limited to IVOL's members as well as general public, are entitled to  
18 assert their rights to free speech and to exercise the same at SOFI Stadium located in  
19 Los Angeles County and City of Inglewood, as well as operated and/or controlled by LA  
20 Defendants.

21 114. Plaintiffs are informed and believe and thereon allege that the California Supreme Court  
22 held that speech rights protected by the California Constitution may extend onto certain  
23 privately owned property that functions as a public gathering place. The United States  
24 Supreme Court affirmed California's ability to provide these broader protections.

25 115. Plaintiffs are informed and believe and thereon allege that under California law, the  
26 Courts in California may protect speech, petitioning activity, distribution of literature,  
27 even on certain privately owned properties open to the public.

28 116. Plaintiffs are further informed and believe and thereon allege that SoFi Stadium is being

1 opened to the general public in course of the upcoming World Cup 2026. Said stadium  
2 is functioning as a public assembly venue. The World Cup is one of the largest public  
3 events in the world. California's constitutional protections should apply to attendees  
4 engaging in peaceful expressive conduct. As FIFA Defendants are affiliated and are  
5 working with LA Defendants and each of them, such government involvement in World  
6 Cup 2026, clearly indicates that FIFA Defendants conduct can be and must be  
7 considered and treated as "state action."

8 117. Plaintiffs are informed and believe and thereon allege that FIFA Defendants as well as  
9 the LA Defendants, in setting up and implementing the 2026 World Cup are utilizing  
10 resources of the State of California, including but not limited to Public financing of  
11 transportation and security; Participation of the Los Angeles Sports & Entertainment  
12 Commission; Participation of the Los Angeles County Sheriff's Department;  
13 Participation of the City of Inglewood; Public infrastructure expenditures; Government  
14 permits and operational support. The implemental of World Cup 2026 by FIFA  
15 Defendants is dependant upon and requires the existence and reliance on conduct by  
16 LA Defendants and in particular, the public entities involved.

17 118. Plaintiffs are informed and believe and thereon allege that reports published in May  
18 2026 indicate that FIFA Defendants intend to prohibit the Lion and Sun flag and related  
19 apparel at World Cup venues including the venues in Los Angeles County and/or the  
20 State of California. FIFA Defendants reportedly characterize the subject flag as political  
21 expression. Plaintiffs have further noted the rules and regulations provided by FIFA  
22 Defendants to those who have purchased tickets to attend the games in California,  
23 which have received the same rules and regulations confirming FIFA Defendants'  
24 prohibition of the use of such flags.

25 119. Plaintiffs are informed and believe and thereon allege that FIFA Defendants' Stadium  
26 Code of Conduct reportedly prohibits flags, banners, and other items deemed "political"  
27 or "discriminatory."

28 120. Plaintiffs and each of them, including the members of Plaintiff IVOL are seeking and

1 requesting a judicial declaration providing that (1) the display of the Display of the Lion  
2 and Sun flag constitutes protected speech; (2) FIFA Defendants' ban violates  
3 California public policy; (3) FIFA Defendants and LA Defendants may not selectively  
4 suppress particular viewpoints.

5 121. Plaintiffs and each of them, including Plaintiff IVOL's members and other individuals  
6 similarly situated, are further seeking issuance of injunctive relief and/or orders  
7 prohibiting FIFA Defendants and LA Defendants including the stadium operators and/or  
8 their affiliated employees, agents or related individuals from: (a) confiscating the flag; (b)  
9 denying entry because of the flag; ( c ) ejecting spectators for displaying the flag.

10 122. Plaintiffs and each of them, including Plaintiff IVOL's members and other individuals  
11 similarly situated, are further seeking issuance of injunctive relief and/or orders  
12 prohibiting FIFA Defendants and LA Defendants including the stadium operators and/or  
13 their affiliated employees, agents or related individuals from the above described  
14 conduct before the date and time the World Cup matches are set to proceed, seeking  
15 emergency relief to obtain orders.

#### 16 **FIRST CAUSE OF ACTION**

17 Declaratory Relief (CCP §§1060 et seq.) against all Defendants

18 123. Plaintiffs hereby reallege and incorporate by reference, each and every allegation set forth  
19 in paragraphs 1 - 96 herein.

20 124. An actual controversy exists concerning whether Defendants or any one of them may  
21 prohibit spectators attending California World Cup events from displaying the Lion and  
22 Sun flag.

23 125. Plaintiffs and each of them contend that such restrictions violate California law and its  
24 constitutional protections. Defendants and each of them contend otherwise.

25 126. Plaintiffs seek a declaration that such restrictions are unlawful and unenforceable in  
26 California.

27 Wherefore, Plaintiffs and each of them seek relief as more fully set forth below.

28 \\\

**SECOND CAUSE OF ACTION**

Preliminary and Permanent Injunction directed against all Defendants

127. Plaintiffs hereby reallege and incorporate by reference, each and every allegation set forth in paragraphs 1 - 100 herein.

128. An actual controversy exists concerning whether Defendants or any one of them may prohibit spectators attending California World Cup events from displaying the Lion and Sun flag.

129. Plaintiffs and each of them lack an adequate remedy at law.

130. Plaintiffs and each of them submit that the loss of constitutional rights constitutes irreparable harm.

131. Plaintiffs and each of them submit that the balance of hardships strongly favors Plaintiffs and each of them and others similarly situated herein.

132. The public interest favors protection of free expression.

133. Plaintiffs and each of them seek preliminary and permanent injunctions prohibiting Defendants and each of them from:

- a. Denying entry into the stadiums where the World Cup 2026 matches are to be played, including but not limited to SOFI, based upon the possession of the Lion and Sun flag;
- b. Confiscating such flags inside such stadiums or any one of them, including but not limited to SOFI, and/or at or about the vicinity of such stadiums;
- c. Removing spectators from the subject stadiums, including but not limited to SOFI or their vicinity because of such flags;
- d. Enforcing viewpoint-based restrictions;
- e. Directing agents or security personnel at the subject stadiums including but not limited to SOFI to engage in such conduct.

Wherefore, Plaintiffs and each of them seek relief as more fully set forth below.

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∥

1 **THIRD CAUSE OF ACTION**

2 Violation of California Constitution, Article I, Section 2 against all Defendants

3 134. Plaintiffs hereby reallege and incorporate by reference, each and every allegation set forth  
4 in paragraphs 1 - 107 herein.

5 135. California's free-speech protections are broader than the federal protections.

6 136. The World Cup venues constitute public gathering places.

7 137. Defendants' conduct constitutes state action and/or conduct subject to California  
8 constitutional protections.

9 138. Defendants' restrictions as identified above, constitute viewpoint discrimination and prior  
10 restraint.

11 139. Plaintiffs and each of them as well as their members and others equally situated, have  
12 suffered and will continue to suffer injury and denial of their Constitutionally protected rights  
13 before and/or during the matches at issue herein, and in particular with regard to the  
14 matches set to proceed on June 15, 2026 and June 21, 2026, set to take place in SOFI,  
15 located in City of Inglewood, County of Los Angeles involving the team of Islamic Republic  
16 of Iran.

17 Wherefore, Plaintiffs and each of them seek relief as more fully set forth below.

18 \\\

19 **FOURTH CAUSE OF ACTION**

20 Violation of Civil Code §52.1 (Bane Act) against all Defendants

21 140. Plaintiffs hereby reallege and incorporate by reference, each and every allegation set forth  
22 in paragraphs 1 - 113 herein.

23 141. Defendants and each of them threaten interference with constitutional rights of Plaintiffs  
24 and each of them as well as individuals similarly situated, through intimidation, coercion,  
25 exclusion, confiscation, and removal of attendees.

26 142. Defendants threaten exclusion from public events, denial of admission, confiscation of  
27 expressive materials, ejection from stadium facilities, and law-enforcement intervention for  
28 the purpose of preventing Plaintiffs and similarly situated individuals from exercising

1 constitutionally protected speech rights.

2 143. Such conduct by Defendants and each of them violates the provisions of State of California  
3 Civil Code section 52.1.

4 144. Plaintiffs and each of them including the members of Plaintiff IVOL and each of them, as  
5 well as individuals similarly situated, seek damages, injunctive relief, and attorney's fees  
6 and costs incurred and sought to be recovered herein in a sum according to proof but  
7 believe to be in excess of \$100,000.

8 Wherefore, Plaintiffs and each of them seek relief as more fully set forth below.

9 \\\

10 **FIFTH CAUSE OF ACTION**

11 Violation of Unruh Civil Rights Act (Civ. Code §§51, 52) against all Defendants

12 145. Plaintiffs hereby reallege and incorporate by reference, each and every allegation set forth  
13 in paragraphs 1 - 117 herein.

14 146. Defendants and each of them are in the process of organizing, managing, and  
15 implementing the World Cup 2026 in the State of California and County of Los Angeles.  
16 Defendants and each of them operate or participate in places of public accommodation.

17 147. Spectators, including Plaintiffs and each of them and members of Plaintiff IVOL and others  
18 similarly situated, constitute members of the public entitled to equal access.

19 148. Defendants selectively prohibit expression associated with opposition to the Iranian regime  
20 while permitting comparable national, political, and cultural expression by other attendees.

21 149. Such selective treatment constitutes arbitrary discrimination within a California business  
22 establishment and violates Civil Code sections 51 and 52.

23 150. Restricting political expression based upon viewpoint constitutes arbitrary discrimination.

24 151. Plaintiffs and each of them, including the members of Plaintiff IVOL, and those similarly  
25 situated, seek recovery of statutory damages and equitable relief as more fully set forth  
26 herein.

27 Wherefore, Plaintiffs and each of them seek relief as more fully set forth below.

28 \\\

1 **SIXTH CAUSE OF ACTION**

2 Unfair Competition - (Bus. & Prof. Code §17200) Against all Defendants.

3 152. Plaintiffs hereby reallege and incorporate by reference, each and every allegation set forth  
4 in paragraphs 1 - 122 herein.

5 153. Plaintiffs and each of them submit that Defendants' conduct, and that of each of them, as  
6 outlined above, is unlawful, unfair, and fraudulent under the terms of California law as  
7 outlined above.

8 154. Defendants' and each of them are implementing policies following FIFA Defendant's rules  
9 and regulations, which violate California constitutional and statutory protections.

10 155. Plaintiffs and each of them seeks injunctive relief and restitution.

11 Wherefore, Plaintiffs and each of them seek relief as more fully set forth below.

12 \\\

13 **PRAYER FOR RELIEF**

14 Plaintiffs and each of them, seek relief and pray for relief as follows:

15 1. For a declaration that Defendants and each of them may not prohibit spectators from  
16 displaying the Lion and Sun flag or other peaceful political symbols at FIFA World Cup 2026  
17 events conducted within the State of California, including but not limited to the matches set  
18 to proceed on June 15, 2026 or June 21, 2026 involving the Islamic Republic of Iran which  
19 are due to take place at SOFI stadium in City of Inglewood, County of Los Angeles, State  
20 of California;

21 2. For a declaration that Defendants' prohibition of the Lion and Sun flag constitutes unlawful  
22 viewpoint discrimination under California law.

23 3. For a declaration that Defendants' enforcement of such restrictions through governmental  
24 cooperation constitutes state action subject to constitutional limitations.

25 4. For an order directing Defendants to notify security personnel, contractors, volunteers,  
26 stadium personnel, and law-enforcement agencies that spectators may possess and display  
27 the Lion and Sun flag and other peaceful political symbols.

28 5. For an order requiring all Defendants to provide written notice to employees, contractors,

1. The first part of the document is a letter from the Secretary of the State to the Governor, dated the 10th of January, 1862, in which he informs him of the receipt of a copy of the report of the Board of Commissioners of the State, relative to the condition of the State, and of the measures proposed to be taken for the relief of the people.

2. The second part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

3. The third part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

4. The fourth part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

5. The fifth part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

6. The sixth part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

7. The seventh part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

8. The eighth part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

9. The ninth part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

10. The tenth part of the document is a report of the Board of Commissioners of the State, dated the 10th of January, 1862, in which they state the condition of the State, and the measures proposed to be taken for the relief of the people. The report is divided into two parts, the first of which relates to the condition of the State, and the second to the measures proposed to be taken for the relief of the people.

1 security personnel, volunteers, and law-enforcement personnel that spectators may  
2 possess and display the Lion and Sun flag and other peaceful political symbols.

3 6. For an order prohibiting Defendants from confiscating, destroying, retaining, or interfering  
4 with possession of such flags.

5 7. For an order requiring Defendants to preserve all electronically stored information, emails,  
6 text messages, directives, memoranda, policies, communications, agreements, and records  
7 concerning spectator-expression policies and enforcement.

8 8. For nominal damages, compensatory damages, statutory damages, punitive damages  
9 where permitted by law, attorneys' fees, and costs.

10 9. For issuance of a Temporary Restraining Order;

11 10. For issuance of a Preliminary Injunction;

12 11. For issuance of a Permanent Injunction;

13 12. For compensatory damages according to proof;

14 13. For statutory damages under Civil Code sections 52 and 52.1;

15 14. For restitution and disgorgement under Business and Professions Code section 17200;

16 15. For attorney's fees and costs;

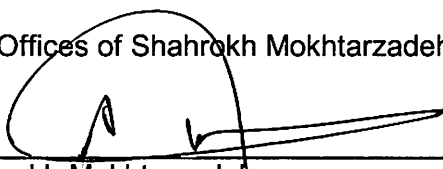
17 16. For pre-judgment and post-judgment interest;

18 17. For such other and further relief as the Court deems just and proper.

19 Respectfully submitted,

20 Law Offices of Shahrokh Mokhtarzadeh, a PLC

21 Dated: June 9, 2026

22   
23 \_\_\_\_\_  
24 Shahrokh Mokhtarzadeh  
25 Attorney for Plaintiffs  
26 Institute for Voices of Liberty, and Sam Kermanian  
27  
28

**Exhibit A**

LAW OFFICES OF  
**SHAHROKH MOKHTARZADEH**  
A PROFESSIONAL LAW CORPORATION

TEL: (818) 377-3830

16130 VENTURA BLVD. No. 230  
ENCINO, CA 91436  
EMAIL: SHAHROKH@SMPLCLA.COM

TEL: (310) 286-1200

May 20, 2026

**VIA EMAIL AND CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
[Legal@fifa.org](mailto:Legal@fifa.org)

Fédération Internationale de Football Association (FIFA)  
FIFA-Strasse 20  
P.O. Box  
8044 Zurich  
Switzerland

Re: Demand to Retract and Cease Enforcement of Any Rule, Policy, Practice, or Restriction Prohibiting Display of Flags, Including the Pre-Revolutionary Iranian "Lion and Sun" Flag, at FIFA World Cup 2026 Events Held in the United States and California.  
Los Angeles County Superior Court Action No. [to be assigned]  
Our File No. 501-IVOL

To FIFA and Its Authorized Representatives:

Please be advised that this office represents INSTITUTE FOR VOICES OF LIBERTY ("IVOL").

I am writing this letter pursuant to reports in the U.S Media as well as social media, reporting that FIFA intends to prohibit spectators from displaying or carrying the pre-revolutionary Iranian flag, commonly referred to as the "Lion and Sun" flag, during FIFA World Cup events in the United States. According to reports published on May 19, 2026 by The New York Times and other media outlets, FIFA allegedly intends to continue policies previously enforced during the 2022 World Cup in Qatar, whereby spectators displaying the pre-revolutionary Iranian flag or criticism of the current Iranian regime were denied entry into stadiums and/or were subjected to censorship by FIFA in Qatar.

Needless to state, California and the United States of America are not Qatar and do not allow such restraint of free speech on their soil. Any such policy, rule, directive, practice, or enforcement action within the United States and particularly within the State

Ex A

of California would raise grave constitutional, statutory, and public-policy concerns.

The display of flags constitutes core symbolic and political speech protected under the First Amendment to the United States Constitution and Article I, Section 2 of the California Constitution. The pre-revolutionary Iranian flag is widely recognized as a symbol of political identity, opposition to the current Iranian regime, and support for democratic and secular principles among members of the Iranian diaspora and others.

A policy permitting the official flag of the Islamic Republic of Iran while prohibiting the pre-revolutionary Iranian flag constitutes impermissible viewpoint discrimination and selective suppression of political expression.

The United States Supreme Court repeatedly has recognized that symbolic speech, including the display of flags and political symbols, is constitutionally protected. See, *inter alia*:

- *Texas v. Johnson*, 491 U.S. 397 (1989);
- *Spence v. Washington*, 418 U.S. 405 (1974);
- *Tinker v. Des Moines Independent Community School District*, 393 U.S. 503 (1969);
- *Matal v. Tam*, 582 U.S. 218 (2017).

California constitutional protections for speech are even broader than those afforded under the federal Constitution. California courts have repeatedly extended expressive protections into privately operated venues functioning as public gathering places. See *Robins v. Pruneyard Shopping Center*, 23 Cal.3d 899 (1979), *aff'd*, 447 U.S. 74 (1980).

Importantly, many FIFA World Cup venues in California and throughout the United States are publicly owned, publicly financed, or operated in coordination with governmental entities and law-enforcement agencies. To the extent FIFA, stadium operators, local host committees, security personnel, municipalities, or law-enforcement agencies participate in excluding spectators or confiscating flags based upon political viewpoint, such conduct may constitute state action subject to constitutional scrutiny and civil-rights liability under 42 U.S.C. § 1983 and California law.

Moreover, any effort to prohibit the pre-revolutionary Iranian flag while permitting other political, national, or ideological symbols would strongly support claims for:

1. Viewpoint discrimination;
2. Prior restraint of protected speech;
3. Violation of the First Amendment;
4. Violation of Article I, Section 2 of the California Constitution;
5. Declaratory and injunctive relief;
6. Civil-rights damages and attorneys' fees.

As you know, there are multiple World Cup games set to proceed in California. Specifically, the games in Los Angeles County's SoFi Stadium (Inglewood) - host to Iran matches, which is the site of massive local Iranian diaspora interest - and Levi's Stadium (Santa Clara). Both such sites being used by FIFA, are either owned by public interest agencies (such as the public Santa Clara Stadium Authority (a governmental entity) and governed by the City Council), on public land, with historical public financing elements. This creates a clearer public-entity nexus.

As for the SoFi Stadium, while it was developed primarily privately, there have been and there are extensive governmental coordination and entanglement required for a FIFA World Cup mega-event: municipal permits, Inglewood/Los Angeles County/LAPD (or equivalent) involvement in security screening, traffic, crowd control, and enforcement; public infrastructure support and tax arrangements; and involvement of local host committees that function as public-private partnerships.

As such, the joint action and conduct required of both public and private entities involved in the World Cup games to be played in California sites and the symbiotic relationship as well as the pervasive entwinement between FIFA, stadium operators, and governmental actors in implementing and enforcing entry rules, require FIFA to comply with existing California law regarding Free Speech and to make sure that FIFA will take no steps to refrain free speech. Even without full federal action, the State of California's constitutional and common-law protections apply more broadly to expressive activity in venues that function as public gathering places or are open to the public for major events.

Ticketed mega-events during a publicly promoted international tournament are distinguishable from purely private commercial activity.

Needless to state, under California law, any FIFA or ticket contractual provisions purporting to authorize viewpoint-based suppression of protected speech or to waive constitutional rights are clearly and patently unenforceable as against California public policy and constitute unconstitutional terms and conditions that will not prevent the individual's rights to free expression.

Please further be advised that California residents and attendees of FIFA World Cup events likely possess standing to seek immediate judicial intervention, including Temporary Restraining Orders and Preliminary Injunctions, in both California state courts and the United States District Court for the Central District of California and other federal jurisdictions.

Accordingly, DEMAND IS HEREBY MADE that FIFA immediately:

1. Retracts and rescinds any rule, policy, guideline, directive, or informal practice prohibiting the display of the pre-revolutionary Iranian flag or other peaceful political symbols;
2. Confirm in writing that spectators attending FIFA World Cup events in the

United States and California will not be prohibited from displaying flags or symbols based upon political viewpoint or ideological content;

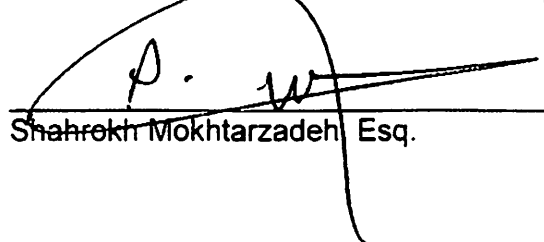
3. Instruct all stadium operators, security contractors, volunteers, local organizing committees, and governmental partners that peaceful political expression and lawful symbolic speech shall not be suppressed;
4. Preserve all communications, directives, memoranda, emails, policies, agreements, and records concerning:
  - (a) flag restrictions;
  - (b) Iranian political symbolism;
  - (c) coordination with governmental agencies;
  - (d) stadium security enforcement;
  - (e) spectator screening policies;
  - (f) communications with the Iranian Football Federation or governmental representatives.

If FIFA fails to immediately retract such restrictions and provide written assurances that constitutionally protected speech will not be suppressed, this office is prepared to proceed on behalf of its client, IVOL, and/or its members, and/or officers, to pursue all available legal remedies in California state and federal courts, including emergency injunctive relief, declaratory relief, civil-rights litigation, and claims for substantial financial remedies, including but not limited to attorneys' fees and costs.

Nothing contained herein constitutes a waiver of any rights, remedies, claims, or causes of action, all of which are expressly reserved. GOVERN YOURSELVES ACCORDINGLY.

Sincerely,

Law Offices of Shahrokh Mokhtarzadeh, a PLC



Shahrokh Mokhtarzadeh Esq.

cc: Client.  
[Media@fifa.org](mailto:Media@fifa.org)  
[Info@fifa.org](mailto:Info@fifa.org)  
[Info@LASEC.US](mailto:Info@LASEC.US)

**Exhibit B**

LAW OFFICES OF  
**SHAHROKH MOKHTARZADEH**  
A PROFESSIONAL LAW CORPORATION

TEL: (818) 377-3830

16130 VENTURA BLVD. No. 230  
ENCINO, CA 91436  
EMAIL: SHAHROKH@SMPLCLA.COM

TEL: (310) 286-1200

June 3, 2026

**VIA EMAIL AND CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
[Legal@fifa.org](mailto:Legal@fifa.org)

Fédération Internationale de Football Association (FIFA)  
FIFA-Strasse 20  
P.O. Box  
8044 Zurich  
Switzerland

Re: Demand to Retract and Cease Enforcement of Any Rule, Policy, Practice, or Restriction Prohibiting Display of Flags, Including the Pre-Revolutionary Iranian "Lion and Sun" Flag, at FIFA World Cup 2026 Events Held in the United States and California.  
Los Angeles County Superior Court Action No. [to be assigned]  
Our File No. 501-IVOL

To FIFA and Its Authorized Representatives:

As you know, this office this office represents INSTITUTE FOR VOICES OF LIBERTY ("IVOL").

I am writing this letter to follow up may letter of May 20, 2026, to which I have received no response to date. A copy of said letter is enclosed herewith for your convenience.

I would appreciate hearing from you or your legal representatives regarding FIFA's position on this issue and to either confirm or deny the reports received as well as information available over social networks with speculations regarding FIFA's intentions. In order to avoid legal proceedings and unnecessary expenditure of legal and juridial resources, I am requesting that FIFA and/or its legal representatives clear their position on this issue and provide a clear and succint response to the undersigned.

If I receive no response to my this letter, I will conclude that FIFA in fact intends to prevent football fans from using the pre-revolutionary Iranian flags or other similar symbols and will commence proceedings to address said issues accordingly. As I advised you previously, California residents and attendees of FIFA World Cup events in fact possess standing to seek immediate judicial intervention, including Temporary Restraining Orders and Preliminary

Ex B

Injunctions, in both California state courts and the United States District Court for the Central District of California and other federal jurisdictions.

Accordingly, DEMAND IS HEREBY MADE that FIFA immediately:

1. Retracts and rescinds any rule, policy, guideline, directive, or informal practice prohibiting the display of the pre-revolutionary Iranian flag or other peaceful political symbols;
2. Confirm in writing that spectators attending FIFA World Cup events in the United States and California will not be prohibited from displaying flags or symbols based upon political viewpoint or ideological content;
3. Instruct all stadium operators, security contractors, volunteers, local organizing committees, and governmental partners that peaceful political expression and lawful symbolic speech shall not be suppressed;
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I look forward to receiving your response to the foregoing.

Sincerely,

Law Offices of Shahrokh Mokhtarzadeh, a PLC

  
Shahrokh Mokhtarzadeh, Esq.

cc: Client.  
[Media@fifa.org](mailto:Media@fifa.org)  
[Info@fifa.org](mailto:Info@fifa.org)  
[Info@LASEC.US](mailto:Info@LASEC.US)

LAW OFFICES OF  
**SHAHROKH MOKHTARZADEH**  
A PROFESSIONAL LAW CORPORATION

TEL: (818) 377-3830

16130 VENTURA BLVD. No. 230  
ENCINO, CA 91436  
EMAIL: SHAHROKH@SMPLCLA.COM

TEL: (310) 286-1200

May 20, 2026

**VIA EMAIL AND CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
[Legal@fifa.org](mailto:Legal@fifa.org)

Fédération Internationale de Football Association (FIFA)  
FIFA-Strasse 20  
P.O. Box  
8044 Zurich  
Switzerland

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1. Viewpoint discrimination;
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Needless to state, under California law, any FIFA or ticket contractual provisions purporting to authorize viewpoint-based suppression of protected speech or to waive constitutional rights are clearly and patently unenforceable as against California public policy and constitute unconstitutional terms and conditions that will not prevent the individual's rights to free expression.

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2. Confirm in writing that spectators attending FIFA World Cup events in the

United States and California will not be prohibited from displaying flags or symbols based upon political viewpoint or ideological content;

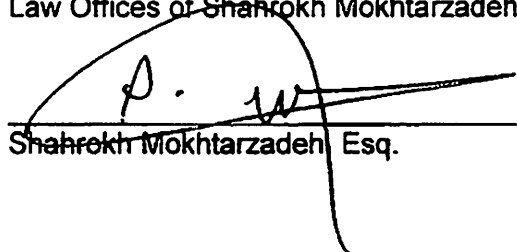
3. Instruct all stadium operators, security contractors, volunteers, local organizing committees, and governmental partners that peaceful political expression and lawful symbolic speech shall not be suppressed;
4. Preserve all communications, directives, memoranda, emails, policies, agreements, and records concerning:
  - (a) flag restrictions;
  - (b) Iranian political symbolism;
  - (c) coordination with governmental agencies;
  - (d) stadium security enforcement;
  - (e) spectator screening policies;
  - (f) communications with the Iranian Football Federation or governmental representatives.

If FIFA fails to immediately retract such restrictions and provide written assurances that constitutionally protected speech will not be suppressed, this office is prepared to proceed on behalf of its client, IVOL, and/or its members, and/or officers, to pursue all available legal remedies in California state and federal courts, including emergency injunctive relief, declaratory relief, civil-rights litigation, and claims for substantial financial remedies, including but not limited to attorneys' fees and costs.

Nothing contained herein constitutes a waiver of any rights, remedies, claims, or causes of action, all of which are expressly reserved. GOVERN YOURSELVES ACCORDINGLY.

Sincerely,

Law Offices of Shahrokh Mokhtarzadeh, a PLC



Shahrokh Mokhtarzadeh Esq.

cc: Client.  
[Media@fifa.org](mailto:Media@fifa.org)  
[Info@fifa.org](mailto:Info@fifa.org)  
[Info@LASEC.US](mailto:Info@LASEC.US)