

# WORLD CUP 2022: FROM FIFA TO TERRORISM

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“Each one of us needs to promise to himself every day to continue on the same path, sacrificing and moreover being creative about the ways to get rid of this entity [Israel], to get rid of this cancer, God willing. The Interior Ministry continues to sacrifice martyr after martyr.” - Fathi Hamad (friend of the chairman of the Qatar 2022 World Cup Supreme Committee's Security Committee during a speech in December 2012.)<sup>1</sup>

The Fédération Internationale de Football Association (FIFA) is the international governing body of the most popular sport on the planet – soccer. Every four years FIFA hosts the World Cup which is the largest soccer tournament in the world. Countries from six continents place bids for the privilege to host the tournament.<sup>2</sup> Recently, FIFA chose Qatar to host the 2022 World Cup, and this decision has given rise to a great deal of debate and

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<sup>1</sup> Martin Samuel, *New Qatar controversy as World Cup hosts are linked to terrorism*, JAMAICA OBSERVER (Mar. 19, 2014), <http://www.jamaicaobserver.com/search/New-Qatar-controversy-as-World-Cup-hosts-are-linked-to-terrorism>.

<sup>2</sup> See *About FIFA*, FIFA.COM, [http://www.fifa.com/about-fifa/who-we-are/explore-fifa.html?intemp=fifacom\\_hp\\_module\\_corporate](http://www.fifa.com/about-fifa/who-we-are/explore-fifa.html?intemp=fifacom_hp_module_corporate) (last visited Mar. 3, 2016).

controversy among the world's soccer-playing elite.<sup>3</sup> Not only was the selection of Qatar controversial because it is a country with harsh weather, a notable lack of soccer history, various human-rights issues, and because of the allegations surrounding the selection process; but mainly because of its alleged ties to the foreign terrorist organizations which loom over the Qatari soccer leadership.<sup>4</sup> Since announced in 2010, the decision, shrouded in skepticism and criticism, is in large part due to the FIFA president, Joseph S. Blatter and the Qatari leadership.

HAMAS is a Palestinian Islamic fundamentalist organization which has acted as the governing force on the Gaza Strip for about the last decade. Because of missile attacks, suicide bombings, kidnappings, and other international crimes, the United States, the United Kingdom, and the European Union among other countries across the world, consider HAMAS a terrorist group.<sup>5</sup> Both the United States and the European Union produce a list of all active foreign terrorist organizations on which HAMAS appears. It is illegal in the United States to provide material support to terrorists and it is in direct violation of the UK's Terrorism Act to do so as well: "The act of being a member of, supporting such a group . . . is sufficient to be prosecuted for a terrorist offense."<sup>6</sup>

The goal of this paper is to show that the selection of Qatar as the 2022 World Cup host will cause FIFA and those responsible for its controversial selection to indirectly fund terrorist organizations that pose a direct threat to the United States and its allies through the profits and exposure that accompany hosting

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<sup>3</sup> See *Russia and Qatar to host 2018 and 2022 FIFA World Cups, respectively*, FIFA.COM (Dec. 2, 2010), <http://www.fifa.com/worldcup/news/y=2010/m=12/news=russia-and-qatar-host-2018-and-2022-fifa-world-cups-respectively-1344971.html>.

<sup>4</sup> See Owen Gibson, *World Cup 2022: the when, why and what of a winter Qatar tournament*, GUARDIAN (Feb. 24, 2015, 6:35 AM), <http://www.theguardian.com/football/blog/2015/feb/24/world-cup-2022-winter-qatar-fifa-task-force-temperature>.

<sup>5</sup> See FOREIGN TERRORIST ORGANIZATIONS, <http://www.state.gov/j/ct/rls/other/des/123085.htm> (last visited Nov. 30, 2015) [hereinafter *List*]. See also OFFICIAL JOURNAL OF THE EUROPEAN UNION, COUNCIL DECISION (CFSP) 2015/1334, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015D1334&qid=1440691334018&from=EN> (last updated July 31, 2015).

<sup>6</sup> Terrorism Act 2000, ch. 11, § 12, schs. 1–15 (U.K.).

the World Cup. In *Holder v. Humanitarian Law Project*, the Supreme Court of the United States declared that it was within the federal government's power to prohibit providing material support to known terrorist organizations.<sup>7</sup> This was a landmark decision in that it was the first and only time that the Supreme Court passed a restriction on first amendment free speech—emphasizing the importance of the United States' fight against terrorism.

Preparations have already begun in Qatar for the tournament, while they maintain their direct relationship with Hamas and its leaders. Qatar officials blame Western propaganda against the Middle East for the negative feedback in response to their hosting the tournament. In contrast, Qatari officials cite a nationalist-like excitement and desire to have a positive impact on the world's view of the Middle East while taking pride as the World's host. Questions loom as to Qatar's true motivation to host this tournament and to what effect the World Cup will have on Qatar and conversely the rest of the World.

This paper examines Qatar and its on-going relationships with known designated terrorist organizations, specifically HAMAS, both economically and socially, past and present. In particular, in light of recent developments involving FIFA's bribery scandal, this paper aims to demonstrate that by granting Qatar the opportunity to host the 2022 World Cup, FIFA is in fact indirectly providing material aid and support to terrorist organizations – something that is illegal in both the United States and the European Union.

Part I begins with a brief history and overview of FIFA, including its goals and leadership. This section goes on to discuss how FIFA has failed to live up to its own standards and delves into the bribery scandal involving FIFA Ex-President, Sepp Blatter, which has recently become international news. Part II focuses on Qatar and its smaller and more obvious drawbacks as a host country for the 2022 World Cup including the country's physical, social, and political situations that cast shade on the country's name. It also covers the country's on-going involvement with known terrorist organizations by defining terrorism and

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<sup>7</sup> See *Holder v. Humanitarian Law Project*, 130 S. Ct. 2705 (2010).

Qatar's relationship with HAMAS. Part III examines terrorism as a whole and the potential threat and significance of an attack at a sporting event with the magnitude of the World Cup and its long-term effects by looking at the history of sporting event terrorism and figures from the most recent World Cup. Part IV connects the dots from FIFA to HAMAS through Qatar and their on-going relationship. It examines from a legal aspect the law on providing material support to terrorists and offers a possible solution to this problem.<sup>8</sup>

### I. FIFA AND ITS LEADERSHIP

In 1904, a group of Frenchmen aiming to establish “an umbrella organization” to encompass all the various national bodies of soccer throughout Europe, founded the Fédération Internationale de Football Association (FIFA).<sup>9</sup> Since its beginning, the sport of soccer has grown to become the most popular sport in the world in terms of fans, viewers, and participants and FIFA spread throughout the world along with it. FIFA is now comprised of 209 member associations divided into six confederations – roughly representing the six continents<sup>10</sup> and greater than the number of members in the United Nations General Assembly.<sup>11</sup> FIFA's Congress, comprised of delegates from throughout the world, represents these member associations on a per capita basis where they vote and elect the organization's President at their headquarters in Zurich, Switzerland.<sup>12</sup> The Congress has met annually since 1998, when they elected Joseph S. Blatter of Switzerland as President. Blatter served as the head of the executive committee, which is responsible for making the

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<sup>8</sup> See Randolph N. Jonakait, *Double Due Process Denial: The Crime of Providing Material Support or Resources to Designated Foreign Terrorist Organizations*, 48 N.Y.L. SCH. L. REV. 125, 125 (2003) (“The Anti-Terrorist and Effective Death Penalty Act, passed in 1996, criminalized the act of providing material support or resources to foreign terrorist organizations.”)

<sup>9</sup> See Ishaan Tharoor, *How FIFA became the world's most powerful and loathed sports organization*, WASH. POST (May 27, 2015), <https://www.washingtonpost.com/news/worldviews/wp/2015/05/27/how-fifa-became-the-worlds-most-powerful-and-loathed-sports-organization/>.

<sup>10</sup> See *Associations*, FIFA.COM, <http://www.fifa.com/associations/index.html> (last visited Nov. 29, 2015).

<sup>11</sup> See Tharoor, *supra* note 9.

<sup>12</sup> See *id.*

most important decisions on behalf of FIFA in accordance with its governing statutes; such as, the host country for each World Cup.

FIFA's mission throughout its existence has been to improve and promote soccer globally, organize international competition, and to safeguard the integrity of the game.<sup>13</sup> Blatter even coined FIFA's motto in 2007: "For the Game. For the World."<sup>14</sup> Despite Blatter's best intentions, with the growth of the popularity of the sport, the larger and more powerful FIFA became. Soon, after clashing with the Olympic Committee, FIFA hosted its first ever World Cup, an invitation-only international soccer tournament, in 1930.<sup>15</sup> Today, FIFA hosts the epic tournament every four years in a country that successfully wins a bidding process for the right to host the tournament. The President of FIFA and his executive committee oversee the selection process for the host country. First, FIFA sends requests out to all interested countries in order to gauge interest. After the countries which choose to respond do so, FIFA sends the proper documents and agreements for them to sign and place their bids. The members then return their bids to FIFA where the executive committee is responsible for evaluating the submissions and identifying the best candidate for approval. Most recently, FIFA announced that Qatar will host the 2022 World Cup.<sup>16</sup> This was a huge honor and achievement for a relatively small country amid a bidding class of much larger countries with World Cup and soccer-rich traditions. British soccer historian, David Goldblatt, once said of the World Cup that it is quite possibly one of the best "occasions during which humanity can be imagined community."<sup>17</sup> For example, the 2014 World Cup Final hosted by Brazil averaged 17,324,000 television viewers throughout the entirety of the match, thus setting the mark as the most-watched World Cup Final match ever among viewers.<sup>18</sup>

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<sup>13</sup> See About FIFA, *supra* note 2.

<sup>14</sup> *Id.*

<sup>15</sup> See Tharoor, *supra* note 9.

<sup>16</sup> See Russia and Qatar, *supra* note 3.

<sup>17</sup> *Id.*

<sup>18</sup> See Mike Hume, *2014 World Cup Final on ABC: Most-Watched Men's World Cup Championship Ever*, ESPNMEDIAZONE.COM, (July 14, 2014), <http://espnmediazone.com/us/press-releases/2014/07/2014-world-cup-final-on-abc-most-watched-mens-world-cup-championship-ever/>.

Unfortunately, with the growth of the sport and growing power of FIFA, came corruption and scandal. An investigation conducted by United States and Swiss authorities revealed on May 21, 2015, that nine high-ranking FIFA officials had allegedly been involved with “rampant, systematic and deep-rooted” corruption.<sup>19</sup> They were subsequently indicted on forty-seven counts of racketeering, wire fraud, and money laundering.<sup>20</sup> Among those high-ranking officials was the front-runner for the FIFA presidency in the upcoming election and current UEFA President, Michael Platini, who received a two million dollar payment from FIFA for “consulting work” done from 1998 to 2002.<sup>21</sup> In all, these investigations uncovered over \$150,000,000 worth of bribes and kickbacks involved in soccer-related deals dating as far back as 1991.<sup>22</sup> After the indictments, on October 8, 2015, Blatter, Platini, and FIFA’s Secretary General Jerome Valcke, were “provisionally banned” from the sport of soccer effective immediately.<sup>23</sup> Since then, FIFA has handed down revised punishments to Blatter and Platini with them each receiving six year bans from soccer.<sup>24</sup> This ban required a complete separation from the game while the investigation into Blatter’s alleged “criminal mismanagement” of FIFA continued.<sup>25</sup> Another prominent figure in the upcoming presidential race, South Korea’s Chung Mong-joon, was also banned for six years and fined \$103,000.<sup>26</sup> He was “found guilty of infringing FIFA’s

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<sup>19</sup> See Damien Gayle, *US indicts Fifa officials with ‘rampant, systemic and deep-rooted’ corruption*, GUARDIAN (May 27, 2015), <http://www.theguardian.com/football/2015/may/27/us-indicts-fifa-officials-rampant-systemic-deep-rooted-corruption>.

<sup>20</sup> See *id.*

<sup>21</sup> See Tim Witcher, *Chung to sue “liar and hypocrite” FIFA chief Blatter*, YAHOO!SPORTS.COM (Oct. 6, 2015), <http://sports.yahoo.com/news/chung-says-start-embezzlement-case-against-fifas-blatter-100345486—sow.html>.

<sup>22</sup> See *id.*

<sup>23</sup> See Sam Borden, *Sepp Blatter and Other Top Officials Are Suspended, Deepening FIFA’s Turmoil*, N.Y. TIMES (Oct. 8, 2015), [http://www.nytimes.com/2015/10/09/sports/soccer/sepp-blatter-michel-platini-jerome-valcke-fifa-suspended.html?\\_r=0](http://www.nytimes.com/2015/10/09/sports/soccer/sepp-blatter-michel-platini-jerome-valcke-fifa-suspended.html?_r=0).

<sup>24</sup> See Rob Harris, *FIFA reduces bans for Blatter, Platini from 8 to 6 years*, ASSOCIATED PRESS (Feb. 24, 2016), <http://news.yahoo.com/fifa-reduces-suspensions-blatter-platini-6-years-175125969—spt.html>.

<sup>25</sup> See Witcher, *supra* note 21.

<sup>26</sup> See Borden, *supra* note 23.

ethics code in connection with the bidding process for the 2018 and 2022 World Cups,”<sup>27</sup> in which he and Platini each voted for Qatar.<sup>28</sup>

After Blatter’s suspension, Blatter spoke out against the controversial bid to Qatar and Platini in an interview with Russian news agency TASS.<sup>29</sup> Blatter indicated that in 2010, during the bid selection process, the committee had previously decided on Russia for the 2018 World Cup because it had never hosted the Tournament before, and the United States for 2022 in order to appease both world powers.<sup>30</sup> Blatter reported that everything was operating smoothly in FIFA and there were no issues with the upcoming World Cups “until the moment when [Nicolas] Sarkozy came in a meeting with the crown prince of Qatar, who is now the ruler of Qatar (Tamim bin Hamad Al Thani).”<sup>31</sup> After the meeting, FIFA decided to change the originally agreed upon plan and switch the location of the 2022 Tournament to Qatar. Blatter said that FIFA then conducted “[a]n election by secret ballot. Four votes from Europe went away from the USA and so the result was fourteen to eight [in favor of Qatar].”<sup>32</sup> The soccer-playing world and international news was suspect of Blatter’s FIFA before investigations brought the scandal to light and the indictments fell. These latest reports of secret elections, bribes, and indictments only reaffirmed the

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<sup>27</sup> *Id.*

<sup>28</sup> See Witcher, *supra* note 21.

<sup>29</sup> See SI Staff, *Blatter goes off on Platini, England; dishes on ‘18, ‘22 World Cup votes*, SPORTS ILLUSTRATED (Oct. 28, 2015), <http://www.si.com/planet-futbol/2015/10/28/sepp-blatter-interview-michel-platini-fifa-world-cup-qatar-england-2022-usa>.

<sup>30</sup> See *id.*

<sup>31</sup> *Id.*; see also John Lichfield, *Nicolas Sarkozy ‘colluded’ to get Qatar 2022 World Cup*, INDEPENDENT (Jan. 29, 2013), <http://www.independent.co.uk/news/world/europe/nicolas-sarkozy-colluded-to-get-qatar-2022-world-cup-8471758.html>. Allegedly, “Nicolas Sarkozy, the [then] French president, held a secret meeting in November 2010 which influenced the decision by football’s governing body to award the 2022 football World Cup to Qatar . . . ,” which Blatter’s interview corroborates. *Id.* The article cites a “[2]0-page investigation headlined “Qatargate”, [by] the respected magazine France Football [which] said that “acts of collusion and corruption” shaped the much-criticised FIFA decision to award the 2022 competition to the tiny, oil-rich Gulf state [of Qatar].” *Id.*

<sup>32</sup> *Id.*

soccer-world's fear of Blatter and his FIFA's integrity and hidden agenda.

## II. QATAR AND ITS ISSUES

FIFA and Blatter's executive committee granted Qatar the right to host the 2022 FIFA World Cup over seemingly more desirable countries such as the United States, South Korea, Japan, and Australia to the surprise of many around the soccer-playing world.<sup>33</sup> Subsequent reports raised more questions surrounding the decision alleging that Qatar paid FIFA officials more than \$5,000,000 seeking to secure Qatar's bid for the World Cup – a claim Blatter's later interview corroborated.<sup>34</sup> Qatar is the first Arab nation to ever receive the honor of host.<sup>35</sup> It is a small country on the Persian Gulf without a material soccer pedigree, having never even qualified for the World Cup Finals. It is a country ripe with social issues surrounding the treatment of immigrant workers and a less than desirable desert-like climate for hosting the World Cup.<sup>36</sup> Qatar, as ranked by the World Atlas Factbook, has the highest per-capita gross domestic product in the world with about fourteen percent of its population considered millionaires.<sup>37</sup> Qatar publically cites its natural resources and subsequent wealth, as well as two other main goals as reasons why it bid to host the Tournament. First and foremost, Qatar wants to eliminate the stigmas attached to it and other Middle-eastern countries and show the world that it is not involved with the on-going socio-political issues of the region.<sup>38</sup> This coincides

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<sup>33</sup> See James Montague, *Corruption allegations rock Qatar's successful 2022 World Cup bid*, CNN.COM (June 2, 2014), <http://edition.cnn.com/2014/06/02/sport/football/football-qatar-world-cup-sunday-times/>.

<sup>34</sup> See *id.*

<sup>35</sup> See Paul M. Brannagan & Jonathan Grix, *Qatar's Soft Power Gamble: The FIFA World Cup 2022* (Jan. 18, 2014), <http://www.e-ir.info/2014/01/18/qatars-soft-power-gamble-the-fifa-world-cup-2022/>.

<sup>36</sup> In fact, temperatures during the time of year the of Qatar World Cup average around fifty degree Celsius (or 122 degrees Fahrenheit) in Qatar – a factor many have complained about and eventually caused the tournament to be moved until later in the year around November and into December. See Gibson, *supra* note 4.

<sup>37</sup> Qatar's GDP as of 2014 was \$91,379 per capita. See WORLDATLAS, *The Richest Countries in the World*, <http://www.worldatlas.com/articles/the-richest-countries-in-the-world.html>.

<sup>38</sup> See Brannagan & Grix, *supra* note 35.



with one of the country's central objectives of expanding its tourism market according to Qatar's 2030 National Vision.<sup>39</sup> Qatar also hopes that by hosting the 2022 FIFA World Cup that the world-wide exposure that it will receive will "put the host's state on the map."<sup>40</sup>

Qatar is dedicated to hosting this Tournament as evidenced by the billions of dollars the country is pouring into construction of infrastructure and stadiums to accommodate the influx of attendees.<sup>41</sup> *USA Today* reported from Dubai in 2013 that "[a] report from Deloitte says the oil-and-gas rich nation of Qatar plans to spend 200 billion dollars over the next decade as it prepares to host the 2022 World Cup."<sup>42</sup> The concern is derived from the method Qatar is using to achieve this massive undertaking. As of 2015, Qatar is a country of almost 2.2 million people; however, Qatar only considers about thirteen percent of that number to be legitimate Qatari Nationals.<sup>43</sup> The remaining majority of the population consists of immigrant workers there to support burgeoning growth and specifically to help prepare for the World Cup.<sup>44</sup> The workers' labor conditions have sparked world-wide attention thanks in large part to an investigation in 2014 by *The Guardian*. This report stated that the conditions are reminiscent of slavery in that workers are not being paid on time or fair wages, they are not allowed to come and go freely often times being held in Qatar away from their families for long periods of time, all the while living in "cockroach-infested

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<sup>39</sup> *See id.*

<sup>40</sup> *Id.*

<sup>41</sup> *See Deloitte: Qatar to spend \$200 billion for World Cup*, USA TODAY (July 9, 2013, 11:29 AM EDT), <http://www.usatoday.com/story/sports/soccer/2013/07/09/deloitte-qatar-to-spend-200-billion-world-cup/2501815/>.

<sup>42</sup> *Id.* The Report indicated "\$140 billion of that will be for transportation infrastructure . . . [and] [a]nother \$20 billion will go to tourism infrastructure as the Persian Gulf nation expects the number of tourists to reach 3.7 million annually by 2022." *Id.*

<sup>43</sup> *See* THE WORLD FACTBOOK, <https://www.cia.gov/library/publications/resources/the-world-factbook/geos/qa.html> (last visited).

<sup>44</sup> With 18% of the population from India and Pakistan each, and 10% from Iran, only about 40% of Qatar's country is comprised of Qatari Arabs. *Id.* The remaining 10% is a mixture of the surrounding countries. *Id.*

lodgings” in close proximity to each other.<sup>45</sup> In part, because of these horrible conditions, Nepalese workers in Qatar are dying at a rate of one person every two days while preparing for the FIFA World Cup.<sup>46</sup> Another report indicates that a total of roughly 4,000 immigrant workers will die by the time the Tournament begins in 2022 – all the while Qatari officials are citing the deaths as “coronary illness” and unrelated to World Cup projects.<sup>47</sup> It is apparent that Qatar plans to host this tournament at all costs and is incredibly determined to achieve its goals. Despite the reports, FIFA is doing nothing to counteract or resolve the conditions in Qatar as long as the World Cup’s future is secure.

In aggregate, issues surrounding the bid selection scandal and subsequent indictments, lack of soccer history, climate issues, and human-rights problems in Qatar lead to questions surrounding its selection. Perhaps the most serious issue with its hosting the Tournament reigns supreme on the minds of the world: Qatar’s close working-relationships with known terrorist organizations and the threat it poses to the world. The United States’ Department of State, in accordance with federal law, designates groups as foreign terrorist organizations (FTO) if they meet three criteria: “it is a foreign organization, it engages in terrorist activity, and that its terrorist activity threatens the security of the U.S. nationals or the national security of the U.S.”<sup>48</sup> The federal law lists varied definitions of terrorism, but the federal criminal code’s definition is the one most relevant to this issue:

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<sup>45</sup> See Robert Booth & Pete Pattison, *Qatar World Cup: migrants wait a year to be paid for building offices*, GUARDIAN (July 28, 2014, 9:22 EDT), <http://www.theguardian.com/global-development/2014/jul/28/qatar-world-cup-migrants-not-paid-building-office>.

<sup>46</sup> “Figures sourced separately by the Guardian from Nepalese authorities suggest the total during that period could be as high as 188. In 2013, the figure from January to mid-November was 168.” Owen Gibson & Pete Pattison, *Death toll among Qatar’s 2022 World Cup workers revealed*, GUARDIAN (Dec. 23, 2014, 3:54 PM EST), <http://www.theguardian.com/world/2014/dec/23/qatar-nepal-workers-world-cup-2022-death-toll-doha>.

<sup>47</sup> See Martin Samuel, *New Qatar controversy as World Cup hosts are linked to terrorism*, DAILY MAIL (Mar. 18, 2014, 5:46 PM EST), <http://www.dailymail.co.uk/sport/worldcup2014/article-2583721/MARTIN-SAMUEL-The-World-Cup-hosts-bed-terrorists.html>.

<sup>48</sup> WAYNE MCCORMICK, LEGAL RESPONSES TO TERRORISM 2 (2d ed. 2008); see also 8 U.S.C. § 1189 (2016).

[V]iolent acts or acts dangerous to human life that are a violation of the criminal laws [and] appear to be intended: (i) to intimidate or coerce a civilian population (ii) to influence the policy of a government by intimidation or coercion; or (iii) to influence the policy of a government by mass destruction, assassination, or kidnapping.<sup>49</sup>

As of 2015, there are fifty-nine names of FTOs on the Department of State's published list that includes all known and designated terrorist groups around the world that meet the requirements.<sup>50</sup> The most relevant name on this list to Qatar and the 2022 FIFA World Cup is the Harakat al-Muqāwamah al-'Islāmiyyah Islamic Resistance Movement (HAMAS), which has been on the designated FTO list since October 8, 1997.<sup>51</sup> Similarly, HAMAS also appears on a list of proscribed terrorist organizations produced by the European Union.<sup>52</sup>

HAMAS, "a radical Islamic fundamentalist organization that has stated that its highest priority is a Jihad (holy war) for the liberation of Palestine ..." is a Sunni-Islamic organization based in Palestine, but spread throughout the Middle East – including Qatar.<sup>53</sup> A report of HAMAS actions from 2000 to 2004 revealed that during that time, "Hamis was responsible for killing nearly 400 Israelis and wounding more than 2,000 in 425 attacks, according to the Israeli Ministry of Foreign Affairs."<sup>54</sup> Later studies also indicated that "[f]rom 2001 through May 2008, Hamas launched more than 3,000 Qassam rockets and 2,500 mortar attacks against Israeli targets."<sup>55</sup> HAMAS itself is a designated terrorist organization in the United States, Canada, Israel, Egypt, Japan, and the entire European Union based on its

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<sup>49</sup> WAYNE MCCORMICK, *LEGAL RESPONSES TO TERRORISM* 2 (2d ed. 2008); *see also* 18 U.S.C. § 2332b (2016).

<sup>50</sup> *See List, supra* note 5.

<sup>51</sup> *See id.*

<sup>52</sup> *See id.*

<sup>53</sup> ANTHONY H. CORDESMAN, *PEACE AND WAR: THE ARAB-ISRAELI MILITARY BALANCE ENTERS THE 21ST CENTURY* 243 (2002).

<sup>54</sup> *Israel At 'War to the Bitter End,' Strikes Key Hamas Sites*, FOXNEWS (Dec. 29, 2008), <http://www.foxnews.com/story/2008/12/29/israel-at-war-to-bitter-end-strikes-key-hamas-sites.html>.

<sup>55</sup> *Id.*

actions.<sup>56</sup> In addition, its associated military wing, the Izz ad-Din al-Qassam Brigades, is a designated terrorist organization in Australia and the United Kingdom as well as completely banned in Jordan.<sup>57</sup> Coincidentally, neither of these groups are designated a terrorist organization in Qatar.

HAMAS' ties to Qatar are a major factor in the public's concern with the World Cup host country. The President of the Qatari Football Association is Hamad bin Khalifa Al Thani – a sunni Muslim and former Emir of Qatar.<sup>58</sup> He maintains close ties with HAMAS and Iran even after he passed the Emir seat to his son, Tamim bin Hamad Al Thani.<sup>59</sup> Also part of the royal ruling family in Qatar, is Abdullah bin Nasser bin Khalifa Al Thani, Hamad's nephew, who serves as the Prime Minister of Qatar and Chairman of the 2022 FIFA World Cup Supreme Committee for Delivery and Legacy.<sup>60</sup> It is clear in both the national and the soccer realm that real leadership in Qatar has deep and long-time ties to HAMAS and other countries which support HAMAS' efforts. The Emir, former Emir, and the Prime Minister and Chairman of the FIFA World Cup Committee are not only blood-related and part of the same ruling family of the wealthiest country in the world, but they have direct ties to a group designated by the U.S. and EU, along with a host of other countries, as a terrorist organization with which they openly communicate while preparing to host the largest international soccer tournament in the world.

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<sup>56</sup> See *Profile: Hamas Palestinian movement*, BBC NEWS (July 11, 2014), <http://www.bbc.com/news/world-middle-east-13331522>.

<sup>57</sup> See Khaled Abu Toameh, *King Abdullah Says No To Hamas*, GATESTONE INSTITUTE (Sep. 17, 2013, 4:00 AM), <http://www.gatestoneinstitute.org/3978/king-abdullah-hamas>.

<sup>58</sup> QFA: BOARD OF DIRECTORS, <http://www.qfa.com.qa/board-of-directors/> (last visited Nov. 29, 2015).

<sup>59</sup> Laura Smith-Spark, *Qatar emir transfers power to son in historic transition*, CNN (June 26, 2013, 11:07 AM EST), <http://www.cnn.com/2013/06/25/world/meast/qatar-power-change/>.

<sup>60</sup> *Supreme Committee For Delivery & Legacy Holds 5th Executive Meeting*, QATARI FOOTBALL ASSOCIATION (Feb. 14, 2015), <http://www.qfa.com.qa/supreme-committee-for-delivery-legacy-holds-5th-executive-meeting/>.

## III. TERRORISM: ITS PAST AND POTENTIAL THREATS

Terrorism is a very real threat in today's world. Over the past half-century, the world experienced a shift in both the types of terrorism and the reasons for which terrorists operate. In the 1970s, terrorism centered around a more nationalist-separatist approach carried out by left-wing terrorists aiming to get their target audience's attention, not necessarily cause mass casualties.<sup>61</sup> This is what happened in 1972 at the Munich Olympic Games when eight members of Black September, a Palestinian terrorist organization, broke into the Olympic Village and kidnapped and took hostage seven Israeli athletes and coaches after killing two immediately upon arrival.<sup>62</sup> The "Munich Massacre," as it came to be known, was an attempt by Palestine to gain world-wide attention by kidnapping Jewish Olympic athletes in Germany and taking them into an Arab country as a bargaining chip for the release of Arab and German-Arab gang members and sympathizers from prison.<sup>63</sup> Ultimately the plan ended in a bloody massacre, but because an international event such as the Olympics draws massive amounts of media coverage, the terrorists accomplished their goal as the world received the terrorists' message of violence on a grand stage.

In the 1980s and 1990s, terrorism began to shift into more of a religion-oriented means of getting the attention of the targeted body while carrying out their goals of jihad. Groups with very real domestic and political goals like HAMAS and Hezbollah began to emerge. The focus of these groups was still that they wanted "a lot of people watching and listening [to their message], and not [necessarily] a lot of people dead."<sup>64</sup> Al Qaeda, in its rise to prominence, changed that with its attack on New York City on September 11, 2001, forever changing the modus operandi of jihadist terror. The intent of the operation was to kill thousands of innocent people.<sup>65</sup> This attack prompted heightened security and

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<sup>61</sup> ANTHONY RICHARDS, PETE FUSSEY & ANDREW SILKE, *TERRORISM AND THE OLYMPICS: Major Event Security and Lessons for the Future* 31 (2010).

<sup>62</sup> *Id.* at 1-2.

<sup>63</sup> *Id.* at 137.

<sup>64</sup> *Id.* at 5.

<sup>65</sup> Al Qaeda killed 2,977 American people on September 11, 2001, making it the largest terrorist attack to ever take place on United States soil. MATTHEW J. MORGAN,

anti-terrorism action not only in the United States, but also in Europe.<sup>66</sup>

This shift toward a goal of mass casualties and an increased use of the media by terrorist groups as a means of communicating their goals, drastically increases the appeal of a terrorist attack at an international soccer tournament with massive stadiums packed full of unsuspecting fans.<sup>67</sup> On November 13, 2015, as part of a coordinated terrorist attack throughout Paris, France, one that killed over 130 civilians and injured nearly 400 more, a terrorist attempted to enter the Stade de France where France and Germany were playing a soccer match before being discovered and turned away.<sup>68</sup> While the possibility of an attack on a stadium is concerning, the larger concern is the long term impact a tournament of the World Cup's magnitude can have on the host country and what that subsequent impact can mean for the rest of the world.

The most recent FIFA World Cup took place in twelve cities in twelve different stadiums throughout the country of Brazil in 2014.<sup>69</sup> From June 12 through July 13, 3,429,873 fans poured into the stadiums to watch 732 athletes from thirty-two countries and six continents play in the World Cup games.<sup>70</sup> During the tournament, there were a total of 3,127,674 concession stand transactions throughout the twelve stadiums.<sup>71</sup> Preparation for the Tournament created approximately 14,000,000 jobs from 2011 to 2014.<sup>72</sup> In all, there were over one billion viewers in attendance

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THE IMPACT OF 9/11 ON POLITICS AND WAR: THE DAY THAT CHANGED EVERYTHING 222 (2009).

<sup>66</sup> Terrorism Act 2000, ch. 11, §§ 1–131, schs. 1–15 (U.K.).

<sup>67</sup> Jamie Doward, *Media coverage of terrorism 'leads to further violence'*, GUARDIAN (August 1, 2015, 3:30 PM EDT), <http://www.theguardian.com/media/2015/aug/01/media-coverage-terrorism-further-violence>.

<sup>68</sup> Joshua Robinson and Inti Landauro, *Paris Attacks: Suicide Bomber Was Blocked From Entering Stade de France*, WALL ST. J. (Nov. 15, 2015, 2:21 PM ET) <http://www.wsj.com/articles/attacker-tried-to-enter-paris-stadium-but-was-turned-away-1447520571>.

<sup>69</sup> *The 2014 FIFA World Cup in Numbers*, FIFA (Sep. 24, 2014), [http://resources.fifa.com/mm/document/tournament/competition/02/44/29/89/fifaworldcupnumbers\\_120714\\_v7\\_eng\\_neutral.pdf](http://resources.fifa.com/mm/document/tournament/competition/02/44/29/89/fifaworldcupnumbers_120714_v7_eng_neutral.pdf).

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> *Id.*

through FIFA's Global Stadium – their social, online, and mobile hub.<sup>73</sup> By the tournament's end, FIFA grossed over two billion dollars from the World Cup, while Brazil was expected to receive approximately seven billion dollars in tax revenue as a result of investments in the Tournament on top of the payments from FIFA.<sup>74</sup> The 2014 FIFA World Cup was a world-wide spectacle that brought billions of people together from all over the world at the same time for the same reason.

The media exposure for an event of this magnitude cannot be over-stated – an unprecedented platform that would be invaluable to terrorists with a message they wanted the entire world to hear. The FIFA World Cup brings vast amounts of people, money, and media exposure to the host country. Not only for the month of time during the tournament, but starting with the date of the host country announcement, the country's world-wide exposure, and subsequently, popularity is forever changed. With this World Cup host in 2022, Qatar aims to increase their appeal to the Western world in hopes that it will cause an increase in tourism and business while softening the image of the Arab countries of the Middle East. The 2022 World Cup is a means to an end for Qatar. With the influx of money and popularity, Qatar's goal of a larger world-wide impact and the end of that means becomes all the more attainable for it and its allies.

#### IV. FIFA'S AID TO QATAR'S TERROR AND A POSSIBLE SOLUTION

Because of FIFA's controversial acceptance of Qatar's bid for the 2022 FIFA World Cup, money produced by the FIFA World Cup, the means, will be flowing into Qatar while it is receiving world-wide exposure. The larger question is what they will do with their money and exposure, the end, and FIFA's prior knowledge of their true intentions.

In *Humanitarian Law Project v. Reno*, the court applied the Antiterrorism and Effective Death Penalty Act of 1996 which authorizes the Secretary of State of the United States government to designate an organization as a foreign terrorist organization if, “[t]he organization is a foreign organization; [it] engages in

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<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

terrorist activities; and the terrorist activity of the organization threatens the security of United States nationals or the national security of the United States.”<sup>75</sup> HAMAS is a known foreign terrorist organization, which the United States designated more than two decades ago.<sup>76</sup> The Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA) prohibits “the act of giving material support to those on the designated list” because “[T]here is no constitutional right to facilitate terrorism by giving terrorists . . . resources” with which they perform terrorism.<sup>77</sup> Likewise, the Terrorism Act of 2000 passed in the United Kingdom also forbids providing material support to known terrorists:

A person commits an offense if he enters into or becomes concerned in an arrangement as a result of which money or other property is made available or is to be made available to another, and he knows or has reasonable cause to suspect that it will or may be used for the purposes of terrorism.<sup>78</sup>

Terrorism is a growing concern around the world and it is not just a Western propaganda attack as stated by the Middle East. Countries all over are taking extra precautions to limit terrorism.

Qatar, a country with direct past and on-going relations with HAMAS, continues to fund and support the efforts of HAMAS. In a speech in 2009, Hamad, the former Emir of Qatar and current President of the Qatari Football Association instructed his people to “[P]rotect [Hamis] and make their jihad operations easier to carry out.”<sup>79</sup> The United States’ government has a “legitimate interest in [preventing] the spread of international terrorism . . . .”<sup>80</sup> This restriction is not one that limits people’s beliefs or ideals, rather it places limits on people’s aiding of the actual terrorism itself by banning the issuance of material support to these types of

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<sup>75</sup> MCCORMICK, *supra* note 48 at 111. *See also* Humanitarian Law Project v. Reno, 205 F.3d 1130 (9<sup>th</sup> Cir. 2000).

<sup>76</sup> *List*, *supra* note 5.

<sup>77</sup> MCCORMICK, *supra* note 48, at 112.

<sup>78</sup> Terrorism Act 2000, ch. 17 (U.K.).

<sup>79</sup> David Schenker, *FIFA Has a Terrorism Problem*, TIMES OF ISRAEL (Jan. 23, 2014), file:///C:/Users/Brantley%20Adams/Downloads/fifa-has-a-terrorism-problem.pdf.

<sup>80</sup> MCCORMICK, *supra* note 48, at 113.



organizations.<sup>81</sup> FIFA chose to accept a bribe from Qatar and issue its support to Qatar as the host country of the FIFA World Cup, providing them with an enormous economic opportunity and world-wide exposure.

In order to be guilty of providing material support to a terrorist organization, Section 2339B of the U.S. Code requires that the party in question have knowledge that the organization's designation as a foreign terrorist organization by the Secretary of State or that the donor had knowledge of the unlawful activities for which the organization intended to use the donation.<sup>82</sup> Both the United States and the European Union publically produce such lists. In *Holder v. Humanitarian Law Project*, the Supreme Court of the United States held that it defied federal law to consciously provide "material support or resources to a foreign terrorist organization."<sup>83</sup> In *Kadi v. Council and Commission*, a case decided by the European Court of Justice, the U.N. Security Council sanctioned Yassin Abdullah Kadi and Al Barakaat International Foundation by freezing their funds for violating a regulation of the Council of the European Union by associating with known terrorist Osama bin Laden and his terrorist group, Al Qaeda.<sup>84</sup> It is illegal in both the United States and Europe to knowingly provide material support to terrorist organizations like the ones Qatar so shamelessly support.

Since Qatar's selection in 2010, its leadership has not been shy about its connections and on-going relationships with HAMAS and other U.S. designated foreign terrorist organizations. In 2011, Qatar, in direct violation with *Holder* and *Kadi*, funded and provided material support to numerous revolts of Islamic groups in the Middle East linked to the Egyptian Muslim Brotherhood.<sup>85</sup> Reports began to surface and gain world-wide attention when the

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<sup>81</sup> *Id.* See also, <http://beta.foreignassistance.gov/>. The United States is planning to provide \$33,729,168,000.00 in Foreign Aid in 2016 to countries all over the world, none of which is going to Qatar. In fact, the United States has not allocated aid money to Qatar in the last decade.

<sup>82</sup> *Id.* at 117.

<sup>83</sup> *Holder v. Humanitarian Law Project*, 130 S. Ct. 2705 (2010).

<sup>84</sup> *Joined Cases C-402 & C-415/05 P, Kadi, Al Barakaat Int'l Found. v. Council*, [2008] E.C.R. I-6351.

<sup>85</sup> Andrew Hammond, *Qatar's Leadership Transition: Like Father, Like Son*, 95 EUR. COUNCIL FOREIGN AFFAIRS 1, 3 (2014).

former Emir of Qatar, Hamad, visited the Hamas-run Gaza Strip.<sup>86</sup> This occurred shortly after Gaza attacked and severely wounded an Israeli soldier on the border of the two countries.<sup>87</sup> The Emir went to Gaza in order to launch a \$254,000,000 reconstruction project to strengthen the area amid retaliatory attacks from U.S. allies.<sup>88</sup> Also during his visits to Gaza, the Emir of Qatar visited with HAMAS' militant wing, Izzad-Din al-Qassam.<sup>89</sup> Later in the same year, *The New York Times* reported that Hamad funded the Al-Nusra front whom the United States' President Barack Obama declared a foreign terrorist organization because of its direct ties to Al-Qaeda in Iraq and the fear it could "hijack the revolution and emerge as the dominant force in Syria. . . ."<sup>90</sup> In January of the following year, French newspaper *Le Canard enchaîné* quoted French military intelligence by stating that, "The MNLA [National Movement for the Liberation of Azawad], al Qaeda-linked Ansar Dine, and MUAJO [Movement for Oneness and Jihad in West Africa] have all received [material support] from [Qatar]."<sup>91</sup>

Because Qatar so openly provided material support for these FTOs, it is reasonable to believe that FIFA, a body comprised of individuals from all over the world, had knowledge of Qatar's actions prior to taking a bribe from and selecting them as the host for the 2022 World Cup. The law criminalized this activity because "the threat of harm outweighs the social utility of the . . . conduct."<sup>92</sup> Therefore, because FIFA is taking money from and supporting a country with direct ties to a designated foreign terrorist organization by illegally granting them the right to host the 2022 FIFA World Cup amid factual reports of their dealings with terrorists organizations, it poses a direct threat the security of the United States and EU as well as its allies and any future

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<sup>86</sup> *Qatar's Emir crosses into Hamas-run Gaza on landmark visit*, AL ARABIYA NEWS (Oct. 23, 2012), <https://english.alarabiya.net/articles/2012/10/23/245464.html>.

<sup>87</sup> *Id.*

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

<sup>90</sup> *Al-Qaeda in Syria*, N.Y. TIMES, Dec. 11, 2012, at A30.

<sup>91</sup> Ségolène Allemandou, *Is Qatar fuelling the crisis in north Mali?*, FRANCE24 (Jan. 23, 2013), <http://www.france24.com/en/20130121-qatar-mali-france-ansar-dine-mnla-al-qaeda-sunni-islam-doha>.

<sup>92</sup> *Id.* at 92.

American or European citizens that visit Qatar as an attendee of the 2022 World Cup.

Once Hamad stepped down and handed the role of Emir of Qatar to his son, Tamim, the on-going relationships with known FTOs did not stop there.<sup>93</sup> Since, “[Qatar] provided the political and financial muscle for armed rebellions that brought down . . . Muammar al-Gaddafi in Libya . . . [and] have targeted his other former friend, Bashar Assad in Syria.”<sup>94</sup> In December of 2014, the U.S. Treasury Department designated Qatari academic and businessman, Abd al-Rhman al-Nuaymi to a list of known terrorists after he “ordered the transfer of \$600,000 to alQa’ida” through its representative in Syria.<sup>95</sup> Qatar and its government has also “[P]rovided loans, hand-outs, and promises of massive investment to the Ennahdha-led government in Tunisia, the Hamas-run government in Gaza, the Syrian Brotherhood . . . and Islamist parties in Libya, Yemen, and Morocco.”<sup>96</sup> In February of 2015, *The Wall Street Journal* reported that the United States confirmed that Qatar supplied HAMAS, Al Qaeda, and the Islamic State.<sup>97</sup> In fact, Qatar has contributed an exorbitant amount, hundreds of millions, of dollars to HAMAS in aid.<sup>98</sup> Qatari leadership is obviously not afraid to aid causes they support, including hosting the FIFA World Cup. Media allegations from all over the world have surfaced tying Qatar to the corruption in the FIFA bid selection process for the 2022 World Cup: an “avalanche of media disclosures that suggest massive violation of world soccer body FIFA’s bidding rules, involving substantial payments to soccer officials across the globe, vote swapping, and shady political

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<sup>93</sup> Hammond, *supra* note 85.

<sup>94</sup> *Id.*

<sup>95</sup> Matthew Levitt, *Terrorist Financing and the Islamic State*, TESTIMONY SUBMITTED TO THE HOUSE COMMITTEE ON FINANCIAL SERVICES (Nov. 13, 2014), <http://www.washingtoninstitute.org/uploads/Documents/testimony/LevittTestimony20141113.pdf>.

<sup>96</sup> *Id.*

<sup>97</sup> Jay Solomon & Nour Malas, *Qatar’s Ties to Militants Strain Alliance*, WALL ST. J. (Feb. 23, 2015), <http://www.wsj.com/articles/qatars-ties-to-militants-strain-alliance-1424748601>.

<sup>98</sup> Lori Plotkin Boghardt, *Qatar Is a U.S. Ally. They Also Knowingly Abet Terrorism. What’s Going On?*, NEW REPUBLIC (last accessed Oct. 6, 2014), <http://www.newrepublic.com/article/119705/why-does-qatar-support-known-terrorists>.

deals between FIFA president Sepp Blatter and the Qatari leadership.”<sup>99</sup>

The United States has a legitimate interest in protecting its citizens and the country from terrorists’ threats and actions.<sup>100</sup> In order to do so, the U.S. can take legal action against those posing a threat. In *United States v. Yunis*, under the “universal principle” theory of international law, “[S]tates may prescribe and prosecute ‘certain offenses recognized by the community of nations as of universal concern, such as piracy, slave trade . . . and perhaps certain acts of terrorism’ even absent any special connection between the state and the offense.”<sup>101</sup> In addition, in the same case, “[A] state may punish non-nationals for crimes committed against its nationals outside of its territory, at least where the state has a particularly strong interest in the crime.”<sup>102</sup> Section 402 of the Foreign Relations Law of the United States states that:

[A] state has jurisdiction to prescribe law with respect to . . . conduct outside its territory that has or is intended to have substantial effect within its territory; the activities, interests, status, or relations of its nationals outside as well as within its territories; and certain conduct outside its territories directed against the security of the state or against a limited class of other state interests.<sup>103</sup>

Even without any special relationship to Qatar or FIFA on the part of the U.S., the fact that FIFA and Qatar are perpetrating

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<sup>99</sup> James Dorsey, *Qatari Promises of Labor Reform Ring Hollow Amid Revived Corruption Allegations*, HUFFINGTON POST (last accessed May 4, 2015, 11:15 PM EDT), [http://www.huffingtonpost.com/james-dorsey/qatari-promises-of-labour\\_b\\_7209936.html](http://www.huffingtonpost.com/james-dorsey/qatari-promises-of-labour_b_7209936.html).

<sup>100</sup> Sahar Aziz, *Laws on Providing Material Support to Terrorist Organizations: The Erosion of Constitutional Rights or a Legitimate Tool for Preventing Terrorism*, 9 Tex. J. C.L. & C.R. 45, 27 (2003) (There is some concern on whether this restriction to certain groups violates the First Amendment right to free speech; however, “[a]ny effects on speech that might result [are] merely incidental and [are] not substantially more than necessary to further the government’s legitimate interest in preventing terrorism.”)

<sup>101</sup> MCCORMICK, *supra* note 48, at 27. See also Restatement (Third) of the Foreign Relations Law of the United States §§ 404, 423 (1987). See also *United States v. Yunis*, 288 U.S. App. D.C. 129; 924 F.2d 1086 (D.C. Cir. 1991).

<sup>102</sup> *Id.*

<sup>103</sup> MCCORMICK, *supra* note 48, at 33. See also Restatement (3<sup>rd</sup>) of Foreign Relations of the United States § 402.

terrorism jointly poses a threat to U.S. nationals outside of the U.S. and that the U.S. has a particularly strong interest in protecting itself from terrorism, the U.S. has jurisdiction to prescribe law. The court in *United States v. Yousef* held the exercise of extraterritorial jurisdiction was justified because the crimes it aims to prevent have a “substantial, direct, and foreseeable effect” on the United States and its interests as international law would require.<sup>104</sup>

The precedent is clear on the matter and in this case. FIFA, the party in question, is indirectly funding HAMAS, a known foreign terrorist organization through the World Cup. Not only is it bad policy by FIFA to host the largest international soccer tournament in the world in a country with so many social and legal issues, but it is also legally immoral. Qatar is a direct supporter of HAMAS and various other terrorist and radical groups to which it has a long history of providing material support as indicated by numerous international reports. FIFA’s officials that accepted the bribe from Qatar, did so from the Emir of Qatar, whose royal family publically and personally interacts with and financially supports HAMAS. With so many other viable options to host the World Cup, FIFA should not continue down this road with Qatar.

FIFA’s mission throughout its existence has been to improve and promote soccer globally, organize international competition, and to safeguard the integrity of the game.<sup>105</sup> In regards to safeguarding the integrity of the game, FIFA failed under Blatter’s leadership. FIFA has proven corrupt and untrustworthy in their dealings with Qatar which remains directly tied to terrorist organizations around the world. Qatar essentially bought the 2022 FIFA World Cup bid from FIFA and its leadership, namely Blatter, in an attempt by Qatar to attract the attention of billions around the world while collecting revenue and gaining popularity from the World Cup. Direct links between Qatar and known foreign terrorist organizations indicate Qatar has been, is currently, and plans to continue providing material support to these organizations. Despite all of this, FIFA still accepted Qatar’s

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<sup>104</sup> MCCORMICK, *supra* note 48, at 48. See also *United States v. Yousef*, 927 F. Supp. 673 (S.D.N.Y. 1996).

<sup>105</sup> FIFA, *supra* note 2.

bid (and bribes) and is thus facilitating Qatar's providing of material support to these groups with funds and media attention produced by the World Cup. The United States has reason to be concerned with a beneficiary of so many terrorist plots hosting the largest tournament of the most popular sport in the world - a tournament in which the U.S. plans to participate. As this beneficiary, Qatar is playing into that stigma it claimed to wanted to avoid.<sup>106</sup> Qatar is part of the on-going socio-political problem in the Middle East and as a beneficiary, FIFA should hold Qatar accountable, not reward it. The U.S. has a legitimate interest in preventing terrorist attacks aimed at its soil, its people, and its allies. The threat of terrorism is real in Qatar, both among its own leadership, as well as the organizations, namely HAMAS, it funds. These groups have proven to be incredibly dangerous; particularly the attacks, revolts, and murders of Americans and American allies. FIFA is indirectly funding known terrorists through the 2022 FIFA World Cup host country of Qatar and their radical partners.

There is a problem with Qatar hosting the 2022 World Cup.<sup>107</sup> FIFA has publically acknowledged wrong-doing and issues with the manner in which Qatar was even chosen to host. By virtue of FIFA's own motto "For the Game. For the World." and the United States' and European Union's desire to prohibit and restrict terrorism, it goes against all logic to host the World Cup in a country whose government has on-going, direct relationships with terrorists around the world.<sup>108</sup> The United States is planning to provide \$33,729,168,000.00 in Foreign Aid in 2016 to countries all over the world, but none of the money is allocated to Qatar. In fact, the United States has not allocated aid money to Qatar in the last decade.<sup>109</sup> Not only is it bad policy since Qatar is a country ripe with social injustice, but participating in the World Cup there and thus providing Qatar with an income to fund terrorism with

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<sup>106</sup> Brannagan, *supra* note 38.

<sup>107</sup> "There's simply too much we do not know about the workings of the insular country, and there's very little trust in its leadership from organizations across the world." Korman, Chris, *You can't take FIFA change seriously until 2022 World Cup is moved from Qatar*, USA TODAY (last accessed June 3, 2015), <http://ftw.usatoday.com/2015/06/qatar-world-cup-fifa-corruption>.

<sup>108</sup> FIFA, *supra* note 2.

<sup>109</sup> Foreign Assistance, *supra* note 81.

defies international law.<sup>110</sup> FIFA has already admitted fault in their decision to accept a bribe and grant Qatar the host country. These issues could be resolved and all participating countries and FIFA could avoid liability by simply choosing a different venue for the Tournament, at least until Qatar is ready and willing to cut all ties and denounce its terrorist allies.

Not only should FIFA take the World Cup host away from Qatar, but it actually could according to FIFA's Executive Committee.<sup>111</sup> If FIFA were to void its contract with Qatar, it would need substantial proof of corruption in order for the decision to be valid. The way in which Qatar received its bid, through the bribes accepted by Sepp Blatter and his team, would suffice as ample proof – proof which FIFA has already admitted to be true as evidenced by Blatter's banishment.<sup>112</sup> Once FIFA has taken away the World Cup, Qatar would inevitably challenge in the Court of Arbitration for Sport (CAS) which would take quite some time to complete, but since the Qatari World Cup is not scheduled until the end of 2022, there is ample time for a hearing.<sup>113</sup> A tournament of this magnitude, of this much importance to human beings all over the world, legally cannot, and should not be hosted in Qatar.

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<sup>110</sup> Holder, *supra* note 7.

<sup>111</sup> XIII FIFA Statute § 85 (2015). "Unforeseen Contingencies and Force Majeure: The Executive Committee shall have the final decision on any matters not provided for in these Statutes or in cases of force majeure."

<sup>112</sup> Harris, *supra* note 24.

<sup>113</sup> Reeve, James, *Could Fifa really take the World Cup from Russia or Qatar?*, BBC NEWS (last accessed June 8, 2015), [HTTP://WWW.BBC.COM/NEWS/WORLD-EUROPE-33044898](http://www.bbc.com/news/world-europe-33044898).