

FANTASY COURT

SYLLABUS

ADAM v. LOS ANGELES CHARGERS

Original petition for declaratory relief in Fan Court, a non-fantasy ancillary jurisdiction of the Fantasy Court

No. 26-1539-2. Heard and decided October 14, 2026

The Ringer Fantasy Football Show, “Bills-Rams Game of the Year, Power Ranking 9 Players Who Made the Leap, Fantasy Court, HBD Jerry Jones, and Introducing “Pelicaning”,” at 1:14:47–1:17:40

Petitioner Adam, a self-described lifelong San Diego Chargers fan, sought a determination as to the point at which he may permissibly renounce his fandom and declare free agency. Petitioner represented that the only remaining tie binding him to the franchise is that he attended the University of Oregon, of which quarterback Justin Herbert is an alumnus. Petitioner further inquired whether, should the Chargers acquire Ohio State wide receiver Jeremiah Smith, he would be permitted to return to the fold. The Court noted that the franchise’s relocation from San Diego to Los Angeles opened a recognized window for a change of allegiance, and the Justices variously suggested that Petitioner adopt a bottom-half-of-the-league team, slide into Rams fandom on geographic grounds, or look to familial or in-law connections for a new team.

Held: A franchise’s relocation opens a window in which its fans may renounce their allegiance and declare free agency, and a fan who leaves through that window retains a right of return. The window has been open since 2017, and petitioner may use it now.

Sitting in Fan Court, we held that fandom, like league membership, is a voluntary association, and that a franchise which leaves its city has repudiated the association first. Because the breach runs from the team to the fan, the fan’s departure is a response rather than a waiver, and the ordinary rule that an exiting member has no right of re-entry does not apply: he may leave now and may return later, including upon the acquisition of Jeremiah Smith. We declined to dictate a replacement team but

Syllabus

announced the no-island principle, under which a fan exercising free agency must choose a team to which he holds some real connection, and may not simply select the best one.

JUSTICE KELLY delivered the opinion of the Court, in which CHIEF JUSTICE HEIFETZ and JUSTICE HORLBECK joined. CHIEF JUSTICE HEIFETZ and JUSTICE HORLBECK each filed a concurring opinion.

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JUSTICE KELLY delivered the opinion of the Court, in which CHIEF JUSTICE HEIFETZ and JUSTICE HORLBECK joined. CHIEF JUSTICE HEIFETZ and JUSTICE HORLBECK each filed a concurring opinion.

Petitioner Adam is a lifelong San Diego Chargers fan. That is a condition, not a choice, and it has become harder to maintain since 2017, when the franchise removed the city from its name and itself from the city. Petitioner reports that the last thread connecting him to the team is that he attended the University of Oregon, as did quarterback Justin Herbert. He asks two questions. First, at what point may he renounce his fandom and declare free agency? Second, if he does, and the Chargers later acquire Ohio State wide receiver Jeremiah Smith, may he come back?

Neither question concerns a fantasy league. The petition was therefore docketed in Fan Court, the ancillary jurisdiction this tribunal exercises over disputes about rooting rather than rostering. We take it up because its principles are ours, and because the Court reached the answer before petitioner finished asking.

We hold that petitioner may leave now. The window for a change of allegiance opened the day the Chargers left San Diego, and nine seasons later it has not closed. We further hold that he may return. A fan who leaves because his team left him has not waived anything, and the franchise that caused the departure cannot be heard to object to the reunion.

Opinion of the Court

I

A word on jurisdiction, since the caption names an NFL franchise as respondent. This Court has held that it “sit[s] as a tribunal for fantasy football disputes, not as a court of general jurisdiction,” and that “Fantasy Court’s jurisdiction ends where NFL organizations begin.” *Nicholas et al. v. Kyle Shanahan*, 24-0846-1 (2024). Nothing we say today binds the Los Angeles Chargers, who did not appear. But petitioner does not ask us to order the Chargers to do anything. He asks us to declare his own rights, and a declaration of what a fan owes runs to the fan. That is within the ancillary jurisdiction, as this Court recognized when it took up a basketball league on the ground that “the principles of fantasy governance apply across sports.” *In re Rishawn Holmes Accidental Drop Controversy*, 21-1246-1 (2021). They apply to fandom too. The Chargers are a nominal respondent, and the case about them proceeds without them, as the last decade has.

II

We begin with what fandom is. This Court has long described fantasy leagues as “fundamentally voluntary associations” whose members “participate because they choose to, not because they hold some inalienable right to a roster spot.” *Commissioner v. Ex-Brother-in-Law*, 22-1175-1 (2022). Fandom is the same kind of association, with one difference. A league member who wants out announces it and leaves. A fan cannot. The ordinary rule is that you do not get to pick, and having picked once, usually at age seven, you do not get to pick again. The rule is strict for a reason: the entire value of being a fan lies in having stayed through the parts that were bad.

The rule has one well-recognized exception, which the Chief Justice attributed at argument to an older authority and which we now adopt as the law of this Court. When the team moves, the fan gets a window. The reason is not sentiment. It is contract. A franchise that leaves its city has repudiated the association; the fan did not stop showing up, the team did. In our league cases, a member who announces he is done and leaves the chat has repudiated, and the league may treat him accordingly. *In re the Prodigal League Member*, 26-1490-1 (2026). The Chargers did the

Opinion of the Court

institutional equivalent. They left the group chat, changed the name on the account, and moved into a stadium they share with the team that had already been there. Whatever a San Diego fan owed the San Diego Chargers, the San Diego Chargers ceased to exist as a party capable of collecting it.

Petitioner asks when the window opens. It opened in 2017. He has been standing in it for nine years; many fans mistake the window for a wall. The only thing he identifies as keeping him inside is that he and Justin Herbert attended the same university. We give that tie the respect it deserves, which is some. But an alumni connection is a connection to a player, not to a franchise, and it travels with the player. If Herbert is traded, the tie goes with him. A bond that would follow a quarterback to Jacksonville is not a bond to the Chargers. It is evidence that petitioner has already left and is looking for a reason to say so. We supply it.

III

The second question is harder in form than in substance. Petitioner asks whether, having left, he may return if the Chargers acquire Jeremiah Smith. Our league cases point against him. In *Prodigal League Member*, we held that “[n]othing in our law obliges a league to reopen a door a member slammed on his way out,” and that a member who has exercised his right to exit “has no corresponding right to re-entry.” *Prodigal*, 26-1490-1. One might think the same rule bars him from the Chargers.

It does not, and the distinction is the one that decides this case. In *Prodigal*, the member repudiated, and the league relied on it by giving his team away. The party in breach was the one seeking re-entry. Here the party in breach is the one that would be receiving him. The Chargers cannot invoke reliance; nobody reassigned petitioner’s seat, and it is not clear the franchise would notice it empty. A fan whose team left him is not a prodigal. He is the one who stayed home, and the house moved. The right of return therefore attaches to any departure made through the relocation window, and it may be exercised for any reason or none. Jeremiah Smith is a good reason. The Chief Justice put it with a concision we will not quote in full: the Chargers left San Diego, and the fan owes them nothing further on the question of timing.

Opinion of the Court

IV

That leaves where petitioner should go, which he did not ask and which consumed most of the argument. We decline to assign him a team. But free agency is not unlimited, and we announce one constraint that commanded the whole Court: the no-island principle. A fan exercising free agency may not simply select the best team available. Petitioner may not become a Buffalo Bills fan, and the fact that the Bills are the obvious choice is the reason he may not choose them. The point of fandom is to be a fan among others. A man who picks a team from a standings table has no one to text when it loses, and no one who believes him when he says he was there before it won. He is a fan on an island, and the Court does not place people on islands.

What satisfies the principle is a connection: geographic, familial, marital, or circumstantial. The Chief Justice would have petitioner take the nearest available team. Justice Horlbeck would have him look to his in-laws, or to the bottom half of the league. Each writes separately. The Court holds only that some such connection is required, that any one of them suffices, and that petitioner should pick before the Chargers make the choice for him again.

* * *

Petitioner is released from his allegiance to the Los Angeles Chargers effective immediately, with leave to return. He should go find a team that will notice when he arrives.

Petition granted. Free agency declared.

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CHIEF JUSTICE HEIFETZ, concurring.

I join the Court's opinion in full and write to say where petitioner should go, since the Court will not. He should become a Rams fan. The relocation window is a one-time pass, and the sensible use of a one-time pass is the nearest exit. The Rams are the other Los Angeles team. They are good. And petitioner has, uniquely, a clean excuse for taking them, because the Chargers did the moving. A Rams fan who arrived from San Diego by way of the Chargers' own relocation has a story. A Rams fan who arrived from nowhere has a hat.

I would also recognize, as a second route, what Justice Horlbeck describes from experience: marrying in. A fan who adopts his spouse's family's team is not a fair-weather fan. He is the sports equivalent of a man whose unknown relative left him three hundred million dollars. The money is real, nobody earned it, and nobody should pretend otherwise. I note only that it should be declared. Petitioner should pick a team and say why, on the record, so that when the Rams win he can prove he was not merely there for the parade.

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JUSTICE HORLBECK, concurring.

I join the Court's opinion in full. I write separately on two points, the second of which requires a disclosure.

First, the no-island principle should carry a ground-floor corollary. A free-agent fan should choose from the bottom half of the league. The Court bars the Bills because they are the best team; I would bar the top half for the same reason, scaled. Fandom acquired at the top is indistinguishable from fandom of winning, and the only way for a convert to prove otherwise is to buy in before the price rises. The Chief Justice's Rams prescription would fail this test, and I do not join it. Petitioner should find a team that needs him.

Second, the disclosure. I grew up an Oakland A's fan. The A's have since ceased to be a real professional baseball team; the city was removed from the name, and then the team was removed from the city. I now live in Los Angeles, and my in-laws are, to a person, lifelong Dodgers fans. I root for the Dodgers. A colleague who has lived here twenty years assures me that geography alone did nothing for him, and I concede it is thin. What excuses my file is the stacking: the abandonment, plus the geography, plus the family. Any one of those alone is thin. Together they satisfy the Court's principle, and I would hold that a fan who can show at least two of the three has made a lawful transfer. I offer my own file as the precedent. It is not a proud one, but it is on the record, and the Dodgers are in the postseason.