

Decision
of the
FIFA Appeal Committee

(composed of: Mr Thomas Bodström [SWE], Chairman;
Mr Neil Eggleston [USA], deputy Chairman;
Mr Randall Cunliffe [GUM], member)

at the Home of FIFA, Zurich, Switzerland
on 3 May 2019,

to discuss the case of:
The Football Association
(Decision 160621 APC ENG ZH)

regarding:

Appeal lodged by The Football Association against the decision passed by the FIFA
Disciplinary Committee on 9 January 2019

I. Inferred from the file

1. Below is a summary of the main relevant facts and allegations based on the documents pertaining to the file. Although the FIFA Appeal Committee (hereinafter, *the Committee*) has considered all the facts, legal arguments and evidence submitted by The Football Association (hereinafter also referred to as *The FA* or *the Appellant*), it refers in its decision only to submissions and evidence it considers necessary to explain its reasoning.
2. On 9 January 2019, the FIFA Disciplinary Committee passed the decision 160621 TMS ENG ZH (hereinafter, *the Appealed Decision*) against The FA. The Disciplinary Committee decided as follows:
 1. *The Football Association is declared liable for the violation of article 19 pars. 1 and 3 of the Regulations on the Status and Transfer of Players (RSTP), with respect to the international transfers and first registrations of minor players for the club Chelsea FC.*
 2. *The Football Association is declared guilty of the violations of article 19 par. 4 in conjunction with Annexes 2 and 3 of the RSTP (procedure relating to applications for the first registration and international transfer of underage players) and articles 5 par. 1, 9 par. 1 and 19bis par. 3 of the RSTP.*
 3. *The Football Association is ordered to pay a fine of CHF 510,000. The fine is to be paid within 30 days of notification of the present decision. Payment can be made either in Swiss francs (CHF) to the account no. 0230-325519.70J, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH85 0023 0230 3255 1970 J or in US dollars (USD) to the account no. 0230-325519.71U, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH95 0023 0230 3255 1971 U, with reference to case no. 160621 aja.*
 4. *In application of article 10 a) and 13 of the FIFA Disciplinary Code, The Football Association is warned on its future conduct. The Football Association is ordered to undertake all appropriate measures in order to guarantee that the FIFA regulations are strictly complied with. Should such incidents occur again in the future, the FIFA Disciplinary Committee may impose harsher sanctions on The Football Association.*
 5. *In application of article 10 b) and 14 of the FIFA Disciplinary Code a reprimand is issued against The Football Association.*
 6. *The Football Association is granted a period of 6 months to regularize the regulatory framework in England applicable to the international transfer of minor players and the first registration of foreign minor players in compliance with articles 1 par. 3 a) of the RSTP and 14 par. 1 d) of the FIFA Statutes.*

7. *The costs of these proceedings amounting to CHF 25,000 are to be borne by The Football Association and shall be paid according to the modalities stipulated under point 3. above.*
3. The Appealed Decision was notified to The FA on 11 March 2019.
4. On 13 March 2019, The FA informed the secretariat to the FIFA Appeal Committee (hereinafter, *the secretariat*) about its intention to appeal. Additionally, the Appellant requested to be granted an extension of the time limit to file its reasons for appeal until 27 March 2019. Moreover, The FA requested the stay of execution of the Appealed Decision and provided proof of payment of the appeal fee.
5. On 14 March 2019, the secretariat, on behalf of the Chairman of the FIFA Appeal Committee (hereinafter, *the Chairman*), informed The FA that the time limit to provide its reasons for appeal was exceptionally extended as per its request.
6. On 27 March 2019, The FA provided its reasons for appeal which can be summarized as follows. This summary does not purport to include every single contention put forth by The FA. However, the Committee has thoroughly considered in its discussion and deliberations any and all evidence and arguments submitted, even if no specific or detailed reference has been made to those arguments in the following outline of their positions and in their ensuing discussion on the merits:

Summary of The FA's reasons for appeal

- A. *Introductory remarks – proper interpretation of the rules and The FA's culpability*
 - According to Swiss law, the starting point of each interpretation is the wording of a rule. Additionally, there are two important concepts relevant to the interpretation of disciplinary rules: i) there should be no punishment without clear law and ii) there should be no punishment without culpability or guilt on the part of the defendant.
 - The FIFA Disciplinary Committee treated the breaches of Chelsea FC (hereinafter, *CFC*) as sufficient to constitute breaches by The FA, and based this findings on two reasons: i) the rules should be construed as imposing "ancillary obligations" on The FA to ensure compliance and ii) The FA is bound by art. 14 of the FIFA Statutes to cause its member clubs to comply with all rules. Neither of those is a legally permissible approach.
 - The legislator of the RSTP have specified the duties that are owed and the circumstances in which sanctions may be imposed in respect of a breach; the identification and application of further such duties and circumstances beyond those which were specified subverts the rules

rather than giving effect to them.

- The true effect of the various provisions in the RSTP is to impose certain obligations on identified participants in respect of certain things. It is not to impose a general obligation on the association either to ensure that there is never a breach by an association's members, or to assume the blame and the consequences any time a breach occurs.
- The FIFA Disciplinary Committee agreed with the reasoning of CAS 2014/A/3812 RFEF v. FIFA, however, there are three points in response: i) the applicable provision of the FIFA Statutes at that time required associations to "*ensure that their own members comply with the Statutes, regulations, directives and decisions of FIFA bodies*". By amendments made in 2016, that was amended to an obligation to "*cause*" compliance. In other words, it appears to have been recognized since the decision of CAS in the RFEF case that it would be inappropriate to impose an obligation on an association for ensuring matters that might be wholly outside its control. ii) The reasoning in the RFEF case was not that a breach by the clubs gave rise to a breach by the associations without more. iii) If, contrary to the above, the decision in the RFEF case does establish effectively strict liability on the part of an association for any breach by a member, it is wrong, as being contrary to the fundamental legal principles set out above.

B. Specific findings: art. 5 of the RSTP

- The FIFA Disciplinary Committee wrongly considered the Premier League Games Programme (hereinafter, *PLGP*) to be organized football. The FA's position is that organized football means official matches played within a competitive framework, in compliance with the Laws of the Game, under the auspices of the relevant national association. It does not apply to i) trials or training; ii) friendly matches or trial matches; iii) other activity outside the scope of what is organized or required to be organized by a relevant association or confederation.
- The foregoing is supported by the explanation of art. 5 par. 1 of the RSTP provided in the FIFA Commentary, by the definition of official matches and by the content of art. 11 of the RSTP.
- The FIFA Disciplinary Committee appeared to have considered that matches organized by an entity that is subject to the authority of The FA, such as the Premier League, correspond to organized football even though they were not organized by The FA itself. This is unjustifiable, since the PLGP is effectively a training program operated by the Premier League and it is not authorized by The FA nor does The FA stipulate the structure and rules relating to it. Moreover, PLGP matches are not played in accordance with the Laws of the Game and therefore they do not

correspond to association football.

- The FIFA Disciplinary Committee wrongly held that art. 5 par. 1 of the RSTP, despite not purporting to impose any obligation on an association by its language, does not only impose and implied obligation on an association but imposes a strict liability obligation to ensure compliance. This conclusion is not supported by anything in the RSTP or in the FIFA Statutes.

C. Specific findings: art. 9 par. 1 of the RSTP

- From the content of the Appealed Decision it appears that the FIFA Disciplinary Committee's findings of breach of art. 9 par. 1 of the RSTP are based on the idea that an association is liable for a breach of said provision if either i) a player is transferred in a loose sense (without transferring his registration), or ii) a player participates in organized football (without being registered), in either case without an ITC having been issued. Both of those involve stretching art. 9 par. 1 of the RSTP beyond anything the text can bear.

D. Specific findings: art. 19 par. 1 of the RSTP

- Although the Appealed Decision does not address the fifteen contraventions specifically, or explain the findings by reference to any disputed issues of principle between the parties, it appears that the Appealed Decision is based on two conclusions: i) the prohibition of an international transfer does not extend only to transfers of registration, but includes much more loosely-defined movements of players from one country to another; ii) where the approval of the Sub-Committee is not required, there is an implied obligation on the association to perform the same task that the Sub-Committee would perform if its approval were required.
- The interpretation of art. 19 par. 1 of the RSTP suggested by the FIFA Disciplinary Committee, according to which the provision does not only apply to the transfer of a player's registration, is incorrect and unjustifiable. Such an interpretation, based on a loose concept of transfer, would be far too imprecise to be realistically capable of application. No association can, in practice, police the extent to which every club under their auspices has or does not have players within their discipline.
- With respect to those players below the age at which an ITC was required, the Appellant refers to CAS 2016/A/4785 Real Madrid Club de Fútbol v. FIFA and claims that there was no violation of art. 19 par. 1 of the RSTP.

- Finally, there is no good reason why the FIFA Disciplinary Committee should, in effect, hold an association liable for breach of a specific regulation for clubs.

E. Specific findings: art. 19 par. 3 of the RSTP

- The FA simply does not have the close contact with every single player which would enable it to police questions such as whether a player complied with one of the exceptions provided under art. 19 par. 2 of the RSTP without relying, in general and unless there is reason to believe that there is a systematic failure, on the clubs to provide information when necessary.
- Even if a breach has been committed, if (as appears to be the case) each of those players satisfied an exception in any event, the breach is a procedural one which has resulted in no prejudice: taking together (i) the fact that it was not clear, and has been acknowledged by CAS not to have been clear, that the obligation even existed, and (ii) the breach of that obligation has caused no harm, the contravention is at most *de minimi* (and should not result in any sanction even if there is a finding of culpability).

F. Specific findings: art. 19 par. 4 of the RSTP

- The Disciplinary Committee correctly found that the entity responsible for initiating the approval established under art. 19 par. 4 of the RSTP is the relevant association.
- Nevertheless, said provision can only be infringed where the club presents the association with a proposed transfer or first registration and the association either (i) refuses to act, or (ii) registers the player without properly commencing the required process. If there is no request from the club, there can be no breach by the relevant association.

G. Specific findings: art. 19bis par. 3 of the RSTP

- The obligation foreseen by the provision is imposed directly on the association. However, as a matter of plain language, it arises where a minor is in fact reported to the association by the club or academy.
- Therefore, in order for a breach of art. 19bis par. 3 of the RSTP to occur (i) the player must attend an academy, so as to require that that attendance be reported to the association under art. 19bis par. 1 of the RSTP; (ii) the club or academy must notify the association, so as to trigger the obligation under art. 19bis par. 3 of the RST to include it in the register; and, (iii) the association must fail to include the reported information in the register.

- Nothing in the context of art. 19bis par. 3 of the RSTP suggests that there is any obligation on the part of the association in respect of minors who have not been reported to the association.
- Moreover, the basis of the charge and of the Appealed Decision are both unclear.
- The FA agrees with Chelsea FC that the definition of academy in the RSTP makes clear that it is concerned with long-term training and does not apply to attendance at an academy for a trial period for the purposes of deciding whether to sign up to that long-term training.

H. As to the sanction

- The fine imposed is excessive. This is not a case where The FA has serially failed to bring its organizational arrangements in line with the standard required. It is a case where the requirements were wholly unclear, and where even FIFA appears to have had considerable difficulty articulating what they actually require.
 - Moreover, the charges stretch over a period of 10 years. Over that period was never any suggestion from FIFA that, for example, The FA arrangements in relation to the enforcement of art. 5 par. 1 of the RSTP were inadequate. If an issue had been raised, it could have been addressed; since it was not, it would be unjust to penalize The FA in respect of multiple charges accumulated over the lengthy period in which it was unaware that there was any disagreement between it and FIFA as to what it needed to do in order to comply.
 - If there is to be a fine, it should be a modest one to reflect (a) the fact that the breaches found involved little culpability on the part of The FA, and (b) the fact that The FA is and remains keen to obtain clear guidance from FIFA as to the changes FIFA considers it needs to make so that it can bring its arrangements into compliance with what FIFA requires and ensure that they remain world-leading in every respect.
7. On 3 May 2019, a hearing was held by the Committee at the Home of FIFA in Zurich. Together with the Committee and representatives of the secretariat, the following persons attended the hearing on behalf of the Appellant:
- Polly Handford, Legal & Governance Director of The FA
 - David Newton, Head of Player Status and Competitions at The FA
 - Kate Gallafent Q.C., External Counsel
 - Tom Cleaver, External Counsel.

8. During the hearing, The FA received the opportunity to provide its position and answer questions for the members of the Committee. Additionally, The FA confirmed that it had no objection with the composition of the Committee.

II. and considered

A. COMPETENCE OF THE FIFA APPEAL COMMITTEE AND ADMISSIBILITY OF THE APPEAL

1. According to art. 79 of the FDC, the Committee is responsible for deciding appeals against any of the FIFA Disciplinary Committee's decisions that FIFA regulations do not declare as final or referable to another body.
2. Art. 118 of the FDC establishes that an appeal may be lodged with the Committee against any decision passed by the FIFA Disciplinary Committee, unless the sanction pronounced is a warning, a reprimand, a suspension for less than three matches or of up to two months, a fine of up to CHF 15,000 imposed on an association or a club or of up to CHF 7,500 in other cases, or a decision passed in accordance with art. 64 of the FDC.
3. According to art. 120 par. 1 of the FDC, any party intending to appeal must inform the Committee of its intention to do so in writing within three days of the notification of the decision.
4. Furthermore, reasons for the appeal must then be given in writing within a further time limit of seven days. The seven-day period begins after the first deadline of three days has expired, in accordance with art. 120 par. 2 of the FDC.
5. Within the same time limit, the person wishing to lodge an appeal shall transfer an appeal fee of CHF 3,000 to FIFA's bank account, in accordance with art. 123 par. 1 of the FDC.
6. The Committee takes note that the sanctions imposed by the FIFA Disciplinary Committee in the Appealed Decision, duly communicated on 11 March 2019, are a fine of CHF 510,000, a warning and a reprimand.
7. Moreover, the Committee observes that on 13 March 2019 and, therefore, in due time (cf. art. 120 of the FDC), the Appellant announced its intention to appeal against the Appealed Decision and requested an extension of the deadline to submit its reasons for appeal. Said deadline was extended until 27 March 2019.
8. On 20 March 2019, FIFA received the payment of the appeal fee and on 23 March 2019, the Appellant filed its reasons for appeal.

9. Consequently, the Committee deems that it is competent to decide on the present appeal and that all the aforementioned procedural requirements have been fulfilled by the Appellant and, thus, declares the appeal admissible.
10. In accordance with art. 121 of the FDC, appeals lodged with the Committee may object to inaccurate representation of the facts and/or wrong application of the law by the first instance.
11. Having said that, the Committee will now analyze the arguments brought forward by the Appellant, to the extent those may be considered relevant.

B. MERITS

12. The Committee considers that, before analyzing the possible infringements committed by The FA, it has to examine whether the FIFA Disciplinary Committee has correctly interpreted and applied the relevant principles and provisions of the RSTP.
 - a) **Member associations' responsibility with respect to the rules governing the international transfer and first registration of minor players**
13. The Appellant submitted that the various provisions of the RSTP are not aimed at imposing a general obligation on each association either to ensure that there is never a breach by its members, or to assume the blame and the consequences any time a breach occurs.
14. In particular, the Appellant rejected the findings of CAS 2014/A/3812 RFEF v. FIFA because i) the current version of the FIFA Statutes requires association to "cause" compliance, whereas the previous one required associations to "ensure" compliance ; ii) the CAS' reasoning was not that a breach of a club gives rise to a breach of the association automatically; iii) if this was not the case, associations would be considered strictly liable for any breach by a member, which is not what the RSTP establish.
15. In this respect, the Committee believes that at no point during the proceedings before the FIFA Disciplinary Committee was the principle of strict liability applied. To the contrary, the FIFA Disciplinary Committee has constantly referred to the ancillary and supervisory role of The FA with respect to the correct application of the relevant provisions of the RSTP. At no point did the FIFA Disciplinary Committee rule that a breach by CFC automatically corresponded to a breach by The FA.
16. Notwithstanding the foregoing, the Committee wishes to clarify that, although the principle of strict liability is not applicable to the matter at hand, member associations still have certain duties and responsibilities.

17. Indeed, art. 14 par. 1 lit. (d) of the FIFA Statutes foresees that member associations have the obligation “to cause their own members to comply with the Statutes, regulations, directives and decisions of FIFA bodies”. It is therefore clear that member associations have a statutory responsibility to take affirmative steps to cause their members respect and comply with the regulations of FIFA, including the RSTP.
18. In this sense, the Committee is eager to clarify that the aforementioned provision of the FIFA Statutes reflects the natural repartition of obligation existing within the football pyramid. FIFA, the football world governing body, is responsible for adopting rules and principles within the football system as a whole and for guaranteeing that they are applied worldwide. In this context, member associations play an essential role in assuring that their respective members comply with said rules and principles.
19. The Committee takes note that, according to the Appellant, the changing the word “ensure” with “cause” in the aforementioned provision would suggest that the legislator acknowledged that it would be inappropriate to impose an obligation to ensure compliance with the regulations.
20. In this sense, the Committee strongly disagrees with the interpretation suggested by The FA. In fact, in the Committee’s opinion, whereas ensuring compliance refers to a mere supervisory role, requiring member associations to cause compliance with the FIFA regulations implies that member associations are requested to take concrete actions and measures so that their members respect the different rules implemented by FIFA.
21. Therefore, the Committee agrees with the considerations of the FIFA Disciplinary Committee, according to which The FA has a statutory ancillary duty to supervise and cause compliance among its members¹. Nevertheless, the Committee wishes to clarify that a violation committed by CFC does not automatically imply that The FA breached the RSTP: each violation committed by The FA shall be treated separately, always taking into account its ancillary and supervisory role as well as its obligation to cause compliance among its members.
22. After this preliminary clarifications, the Committee will now proceed with the analysis of the applicable provisions of the RSTP.

b) Interpretation and application of the relevant provisions

➤ Interpretation and application of art 5 par. 1 of RSTP

23. The Committee takes note that according to the Appellant, the FIFA Disciplinary Committee wrongly established that the Premier League Games Programme (hereinafter: *PLGP*) corresponds to organized football. The FA further claimed

¹ Par. II.86, 92, 103, 116, 120 of the Appealed Decision.

that organized football means official matches played within a competitive framework, in compliance with the Laws of the Game, under the auspices of the relevant association.

24. The FA further submitted that the concept of organized football does not apply to i) trials or trainings; ii) friendly matches or trial matches; iii) other activities outside the scope of what is organized by a relevant association or confederation.
25. The Committee rejects this argument, and agrees with the FIFA Disciplinary Committee that organized football is comprised of official matches, friendly matches and tournaments². In fact, the competitive nature of a match or tournament is not a factor to determine whether this has to be considered organized football or not.
26. Moreover, the Committee agrees with the FIFA Disciplinary Committee that *"the fact that a player is trialled by a club (e.g. CFC) in an organised football match does not change the qualification of such match to a "trial match""*³.
27. The Appellant also claimed that the FIFA Disciplinary Committee had wrongly ruled that matches organized by an entity that is subject to the authority of The FA, such as the Premier League, correspond to organized football even though they were not organized by The FA itself.
28. The Committee disagrees with the Appellant's narrow interpretation of organized football. In fact, according to the relevant definition provided in the RSTP, a match corresponds to organized football either if it is authorized by or if is organized under the auspices of, *inter alia*, a national federation. Therefore, a match is considered to be organized under the auspices of an association even if the association does not organize or authorize it directly.
29. In this respect, the Committee wishes to refer to the Appealed Decision, where it was explained *"the role of The FA within the Premier League where it acts as a special shareholder and, among other things, approves and sanctions the Premier League rules (including the Youth Development Rules) and ensures that rules and regulations on football in England are observed by officials, clubs and players"*⁴.
30. In this context, , the Committee has no doubt that the PLGP matches referred to in the Appealed Decision were organized under the auspices of The FA.
31. In the light of the foregoing, the Committee is comfortably satisfied that the PLGP matches referred to in the Appealed Decision shall be considered to be

² Para. II.74 of the Appealed Decision.

³ Para. II.75 of the Appealed Decision.

⁴ Para. II.81 of the Appealed Decision.

organized football in accordance with the relevant definition provided in the RSTP.

➤ Interpretation and application of art 19 of RSTP

32. According to The FA, the FIFA Disciplinary Committee erred in its interpretation and application of art. 19 of the RSTP in respect of players under the age of 18 absent any actual registration with CFC. The FA claimed that the interpretation of the provision suggested in the Appealed Decision, based on a loose concept of transfer, is too imprecise and cannot be realistically applied.
33. In this respect, the Committee wishes to recall that a correct interpretation of the FIFA regulations must show their true meaning. This is possible only through the analysis and the purpose sought, of the interest protected as well as of the intent of the legislator⁵.
34. In this sense, the Committee refers to the explanations provided by the FIFA Disciplinary Committee with respect to the history and content of this provision⁶. In particular, the Committee recalls that FIFA made clear in its circular no. 769 of 24 August 2001 that this prohibition was implemented in order to curb the abuses to which minors had been exposed.
35. There can be no doubt that the purpose sought by the legislator is to protect the adequate and healthy development of a minor as a whole. Therefore, the Committee considers that the arguments submitted by the Appellant, according to which no violation of art. 19 of the RSTP in the absence of an actual registration of the player, is to be rejected. Limiting the application of the ban only to those cases in which a mere administrative step (such as the registration of the player with the relevant association) has occurred would prevent the provision from protecting the interest sought and would contradict the essence of the rule. Also, such an interpretation would leave room for abuses and dangerous drifts, allowing clubs and associations to circumvent the prohibition, which would undermine the system built by FIFA to protect minor players.
36. In this respect, the Committee fully adheres with the CAS' position that *"In order for a violation of art. 19 (1) or (3) FIFA RSTP to be committed, the panel does not deem it necessary that minor players are registered with the national association concerned, but that the players have participated in organized football without complying with any of the substantive exceptions set out in art. 19 (2) FIFA RSTP. Moreover, the fact that a minor player participates in organised football for the club without being registered with the [association] and without any evidence of complying with any of the substantive exceptions for registration may indeed be perceived as an aggravating factor"*⁷.

⁵ CAS 2008/A/1673; CAS 2009/A/1810; CAS 2009/A/1811 ; CAS 2017/A/5173

⁶ Para. II. 15-33 of the Appealed Decision.

⁷ CAS 2016/A/4805 Club Atlético de Madrid SAD v. FIFA, para. 166.

37. In this context, and with regard to the content of art. 19 par. 1 of the RSTP, the Committee agrees with the FIFA Disciplinary Committee, according to which *“a transfer must be considered as the process which covers a player leaving a club (the club he is at, affiliated to or at which he is registered – known as the “former club”, i.e. the club that the player is leaving, pursuant to point 2 of the definitions section of the RSTP) and subsequently joins the discipline of a different club (known as the “new club” pursuant to no. 4 of the definitions section in the RSTP). The Committee considers important to clarify that this process is also guided by the physical movement of the player and, more specifically, the relocation of the player’s life and the key elements thereof”⁸.*
38. Likewise, the Committee concurs with the findings of the FIFA Disciplinary Committee that *“in order for it to be concluded that article 19 par. 3 of the RSTP has been breached by an association, the player concerned should have never been previously registered for a club at an association. Furthermore, - while still being younger than 18 - The player should have moved internationally and joined a club’s discipline that belongs to a different association than the one of which he is a national of”⁹.*
39. The Committee, taking into particular consideration the purpose sought by the legislator, is of the opinion that the application of art. 19 pars. 1 and 3 of the RSTP is not limited to those cases where a minor player has been officially registered with the association for the club.
40. Furthermore, the Committee recalls that, whenever a club wishes to internationally transfer or register for the first time a foreign minor player, it has to request and obtain the approval from the Sub-Committee (as established under art. 19 par. 4 of the RSTP) or the relevant association, depending on the player’s age. Such approval will be given only if it can be demonstrated that the player complies with one of the exceptions foreseen in art. 19 par. 2 of the RSTP.
41. Therefore, it is important to clarify that only the Sub-Committee and the relevant association are entitled to establish whether one of the exceptions provided under art. 19 par. 2 of the RSTP have been met. Also, the Committee wishes to point out that the relevant approval must be obtained before the international transfer or first registration takes place.
42. Likewise, these proceedings are not the correct forum to determine whether the players in question would have indeed complied with one of the exceptions under art. 19 par. 2 of the RSTP.
43. The Committee takes also note of the Appellant’s submission with respect to players under 12 and under 10.

⁸ Para. II.35 of the Appealed Decision (emphasis added).

⁹ Para. II. 44 of the Appealed Decision.

44. In this respect, it is first important to point out that, according to art. 19 pars. 1 and 3 of the RSTP, the general rule at stake is the prohibition of international transfer or first registration of minor players, whereas art. 9 par. 1 of the RSTP establishes a formal requirement for the registration of a player. It is therefore clear that both provisions refer to different obligations.
45. Therefore, the Committee strongly believes that there is no element suggesting that an exception of a purely formal obligation can be applied by analogy to a substantial prohibition, since it would deprive art. 19 of the RSTP of its *ratio legis*. Indeed, the Committee considers that there is no reasonable explanation justifying the exclusion of players under 12 (10) from the protection of minors guaranteed by art 19 of the RSTP.
46. In this sense, the Committee fully agrees with the reasoning of CAS in the case CAS 2014/A/3793, where it has clearly explained that it *"must privilege the interpretation that allows various provisions in a statute to coexist, and cannot and should not interpret one provision so as to eliminate the scope of another one [...] lead us to the following conclusion: no ITC was required when the transfers occurred for players below the age of 12; their transfer nevertheless can only be lawful if it complies with the requirements embedded in Art. 19.2 RSTP. In this way, both provision (Art. 9.4 and 19.2 RSTP) can enjoy their scope"*¹⁰.
47. Moreover, the Committee is eager to emphasize that the content of the FIFA Circular no. 1468 does not imply that the regulatory system in place at that time was unclear. The Committee endorses and welcomes the clarification provided to FIFA's direct and indirect members, and considers that this circular cannot be used by The FA to escape from its responsibilities.
48. With respect to the aforementioned circular, the Committee strongly believes that its content was crystal clear in emphasizing that as from 1 March 2015 *"if a member association intends to register players under the age of 10 [...], despite of the fact that no ITC and no application to the sub-committee appointed by the Players' Status Committee will be required, it is all the more the responsibility of this association to verify and ensure that the requirements for the protection of minors established in art. 19 par. 2 of the Regulations are met"*. Therefore, the Committee is of the firm opinion that the wording of the circular left no room for adducing that member associations had no obligation to verify the compliance with the rule.
49. Taking into account the foregoing, the Committee rejects The FA's arguments and rules that art. 19 pars. 1 and 3 of the RSTP also applies to players under 12 (10).
50. Subsequently, the Committee takes note that, according to the Appellant's submission, an association is responsible for a violation of art. 19 par. 4 of the

¹⁰ CAS 2014/A/3793 Futbol Club Barcelona v. FIFA, para. 9.8.

RSTP only when one of its affiliated club request to activate the process to for the approval of the Sub-Committee and the association does not act accordingly.

51. In this respect, the Committee refers to art. 19 par. 4 of the RSTP and recalls that, as already explained in details by the FIFA Disciplinary Committee, the wording of this provision clearly clarifies that the relevant association is the entity responsible for the initiation of the approval procedure. Furthermore, said provision *“operates as a basis for sanctions in the event of non-compliance with the procedural guidelines by clubs and associations involved and/or affected by an international transfer or first registration of a foreign minor player”*¹¹.
52. In this context, and taking into account the member associations’ obligation to cause compliance with the FIFA regulations among its members, the Committee rejects the Appellant’s argument that art. 19 par. 4 of the RSTP can be breached by an association only when a club proposes a transfer or first registration and the association either refuses to act or register the player without properly commencing the procedure required by the rule in question.
53. In this sense, the Committee endorses CAS’ position according to which *“Article 19.4 of the FIFA RSTP seems to have been drafted in such a manner that an association cannot avoid liability even if its members are largely responsible for its breach by stating “[a]ny violations of this provision will be sanctioned by the Disciplinary Committee in accordance with the FIFA Disciplinary Code”, with Annexe 2 Article 2.2 of the FIFA RSTP being clear that “[m]ember associations will be fully responsible for any procedural disadvantages that may arise due to a failure to respect paragraph 1”. [...] Article 19.4 of the FIFA RSTP and Annexe 2 and 3 thereof cannot be read in isolation. They must be read together with Article 13.1 (d) of the FIFA Statutes with a view to identifying the [federation]’s primary duty in relation to the transfer of the players in question. In this regard, had the Appellant been conducting impromptu spot checks on the activities of [the club], it could probably have been in a better position to ensure compliance with Article 19.4 of the FIFA RSTP and Annexes 2 and 3 thereof fulfilled its duties under Article 13.1 (d) of the FIFA Statutes”*¹².
54. In the light of the foregoing, the Committee, taking into account the concept of transfer set out above¹³ as well as the statutory obligations of member associations, is of the opinion that an association is responsible for a violation of art. 19 par. 4 of the RSTP whenever a player moves to its territory and joins the discipline of one of its affiliated clubs without the prior authorization of the Sub-Committee. The association’s responsibility is even more accentuated in all those cases in which the minor player participates in organized football – being

¹¹ Para. II.47 of the Appealed Decision.

¹² CAS 2014/A/3813 Real Federación Española de Fútbol v. FIFA, para. 250-251.

¹³ Cf. para. II.35-36 above.

therefore exposed to football organized by or played under the auspices of the association – without the prior approval of the Sub-Committee.

➤ Interpretation and application of art 9 of RSTP

55. In view of the reasoning set out above with respect to arts. 5 and 19 of the RSTP, the Committee considers that a club wishing to field in organized football matches a player who was previously registered with another association, shall first request and obtain the relevant ITC from the player's former association. The engaging club's association has the statutory duty to cause compliance with such regulations and guarantee that players can participate in organized football matches only after having obtained the ITC from their former association.

56. In this sense, the Committee agrees with the FIFA Disciplinary Committee and CAS that *"both the registration and the ITC are prerequisites for a player to be eligible to participate in organised football. A failure to obtain an ITC must therefore be regarded as a violation separate from the failure to validly register a player"*¹⁴ and that a *"club's failure to initiate the relevant procedure towards the association to obtain a player's ITC, does not prevent the association "from performing its supervisory duties, i.e. that of ensuring that its members complied with Article 9.1 of the RSTP as envisaged under Article 13.1 (d) of the FIFA Statutes [current article 14 par. 1 lit. d)]"*¹⁵.

57. Consequently, the Committee agrees with the interpretation and application of art. 9 par. 1 of the RSTP made by the FIFA Disciplinary Committee¹⁶.

➤ Interpretation and application of art 19bis par. 3 of RSTP

58. The Committee takes note of the Appellant's submission, according to which in order for a breach of art. 19bis par. 3 of the RSTP to occur (i) the player must attend an academy, so as to require that that attendance be reported to the association under art. 19bis par. 1 of the RSTP; (ii) the club or academy must notify the association, so as to trigger the obligation under art. 19bis par. 3 of the RST to include it in the register; and, (iii) the association must fail to include the reported information in the register.

59. The FA agrees with Chelsea FC that the definition of academy in the RSTP makes clear that it is concerned with long-term training and does not apply to attendance at an academy for a trial period for the purposes of deciding whether to sign up to that long-term training.

¹⁴ CAS 2016/A/4805 Club Atlético de Madrid SAD v. FIFA, para. 306 as well as para. II.90 of the Appealed Decision.

¹⁵ CAS 2014/A/3813 Real Federación Española de Fútbol v. FIFA, para. 278 as well as para. II.91 of the Appealed Decision.

¹⁶ Para. II.64-66 of the Appealed Decision.

60. As to the first argument submitted by The FA, the Committee agrees with the FIFA Disciplinary Committee that *"the intent of the provision in question is to ensure that associations exercise detailed control over underage players within the country, which requires the association to be informed regularly and in detail of the minors players attending, among others, their affiliated club's academy"*¹⁷. It is also important to recall that associations' obligation established under art. 19bis par. 3 of the RSTP is completely unrelated to the obligation provided for under art. 19 of the RSTP.
61. In this context, the Committee considers that the Appellant's interpretation is to be rejected, since it would suggest that member associations are not required to take any active measure in order to guarantee that minors attending academies are regularly reported so that the relevant register is updated accordingly. Such a passive position of member associations cannot be accepted, since it contradicts the statutory obligation of member associations to cause compliance among its members as established under art. 14 par. 1 lit. d) of the FIFA Statutes.
62. With respect to the second argument submitted by the Appellant, the Committee considers it corresponds to a misinterpretation of the definition of academy. Indeed, the fact that a specific player attends an academy without taking part to a long-term training is not an element to take into consideration based on the relevant definition of academy.
63. An organization or independent legal entity is to be considered an academy if it has as primarily objective to provide player with long-term training, and the relevant association must keep a register of all minors attending it, regardless of whether they attend long-term trainings or not.
64. Therefore, the Committee concurs with the interpretation of art. 19bis par. 3 of the RSTP made by the FIFA Disciplinary Committee.

c) Violations of the relevant provisions

65. After having determined that the FIFA Disciplinary Committee has correctly interpreted and applied the relevant provisions of the RSTP and of the FIFA Statutes, the Committee will now analyze whether The FA had actually breached said provisions, taking into particular account The FA's statutory obligation.
66. In this respect, the Committee notes that the Appellant did not submit specific defenses for each player. Nevertheless, the Committee will refer, if deemed necessary, to the findings of a parallel appeal procedure involving Chelsea FC and to the relevant evidence and information submitted by the club.

¹⁷ Para. II.56 of the Appealed Decision.

➤ As to the violation of art 5 of RSTP

67. The Committee takes note that the FIFA Disciplinary Committee had found The FA in breach of art. 5 of the RSTP with respect to the following players: 1, 2, 4, 6, 7, 10, 11, 15, 16, 19, 20, 24, 27, 28, 31, 34, 35, 36, 38, 40, 42, 47, 49, 51, 52, 53, 54, 55, 56, 57, 59, 60, 62, 63, 64, 68, 71, 75, 78, 156 and 162).
68. Additionally, the Committee wishes to recall that it has been demonstrated that PLGP matches are to be considered as organized football.¹⁸
69. In this sense, the Committee notices that, based on the documents submitted by Chelsea FC in its appeal procedure, the player 15 played organized football only after having been registered with The FA. Therefore, no violation of art. 5 of the RSTP occurred with respect to him.
70. With regard to the remaining players, the Committee notes that they all took part to organized football without being properly registered with The FA. The Appellant is therefore held responsible for a breach of art. 5 of the RSTP with respect to those players.

➤ As to the violation of art 9 of RSTP

71. The FA was found guilty for a violation of art. 9 of the RSTP with respect to the following players: 1, 2, 4, 6, 7, 10, 11, 16, 19, 20, 28, 35, 38, 40, 52, 59, 60, 62, 63, 78.
72. In this sense, the Committee wishes to recall that all aforementioned players were registered with another association before moving to England and joining the discipline of Chelsea FC. Additionally, they played organized football prior to the approval of the Sub-Committee.
73. The Committee refers to the explanation set out above with respect to art. 9 par. 1 of the RSTP¹⁹, and underlines that if a club fails to initiate the relevant procedure to obtain the ITC, the association is not prevented from performing its statutory obligation defined under art. 14 par. 1 lit. d) of the FIFA Statutes²⁰.
74. In this context, the Committee finds that The FA failed to abide by its statutory duty and is therefore responsible for having breached art. 9 of the RSTP with respect to the aforementioned players.

¹⁸ Cf. para. II.23-31 above.

¹⁹ Cf. para. II.55-57 above.

²⁰ CAS 2014/A/3813 Real Federación Española de Fútbol v. FIFA, para. 278.

➤ As to the violation of art 19 par. 1 of RSTP

75. The Committee takes note that The FA was held liable for a breach of art. 19 par. 1 of the RSTP with respect to players 1, 2, 4, 6, 11, 16, 20, 25, 27, 30, 35, 40, 43, 68 and 78.

76. In this sense, the Committee notices that The FA does not contest that these players were previously registered with other associations before joining the discipline Chelsea FC. These players physically moved to England and/or spent there the majority of their time.

77. The FA rather claims that these players were not internationally transferred to Chelsea FC and contests the "loose concept" of international transfer suggested by the FIFA Disciplinary Committee.

78. In this respect, the Committee wishes to emphasize that if the ban foreseen by art. 19 par. 1 of the RSTP were applicable only when an administrative step (such as the registration of the player) took place, the same provision would be deprived of its own essence, leaving room to dangerous abuses and unlawful practices²¹.

79. Consequently, and taking into account the thorough explanation provided above with respect to the correct interpretation and application of the rule²², the Committee finds that the FIFA Disciplinary Committee have correctly found The FA in violation of art. 19 par. 1 of the RSTP since, "*as the body in charge of running football in England by virtue of its status as a member of FIFA, The FA was obliged by article 13 par. 1 lit. d) of the FIFA Statutes (article 14 par. 1 lit. d) of the applicable edition of the FIFA Statutes) to ensure full compliance of article 19 par. 1 of the RSTP by its members, in casu CFC*"²³.

➤ As to the violation of art 19 par. 3 of RSTP

80. The FA was found in violation of art 19 par. 3 of the RSTP with respect to the following players: 36, 37, 51, 55, 57, 58, 61, 65, 70, 71, 72, 75, 77 and 84.

81. The Committee notes that, based on the documents submitted by Chelsea FC in the context of the relevant appeal proceedings involving the club, the players 55 and 58 were British nationals when they joined the discipline of Chelsea FC. Therefore, The FA cannot be found in breach of art. 19 par. 3 of the RSTP with respect to these two players.

82. As to the remaining players, the Committee takes note that, according to the file at its disposal, they were never registered with another association before joining the discipline of Chelsea FC, are not British nationals, and there is no

²¹ Cf. para. II.35 above.

²² Cf. para. II. 32-54 above.

²³ Para. II.103 of the Appealed Decision.

evidence proving that one of the exception under art. 19 par. 2 of the RSTP nor the so-called "5-year rule" would apply. The FA did not submit any element suggesting otherwise.

83. Additionally, all players participated in football matches for Chelsea FC and, with the sole exception of player 65, were registered with the Premier League.

84. Therefore, and taking into consideration the reasoning above²⁴, the Committee considers that the FIFA Disciplinary Committee has correctly held the Appellant in breach of art. 19 par. 3 of the RSTP since it failed to cause the compliance of Chelsea FC with said provision, as required by art. 14 par. 1 lit. d) of the FIFA Statutes²⁵.

➤ As to the violation of art 19 par. 4 of RSTP

85. The Appellant was sanctioned for a violation of art. 19 par. 4 of the RSTP with respect to the players 1, 2, 4, 6, 11, 16, 20, 27, 35, 40, 58 and 78.

86. First of all, the Committee wishes to point out that, as set out above²⁶, no violation of art. 19 par. 4 of the RSTP occurred with respect to player 58, since he was a British national when he joined the discipline of Chelsea FC.

87. Subsequently, it must be pointed out that the remaining players joined the discipline of Chelsea FC and participated in organized football with its teams. Therefore, those players had to be properly registered with The FA in order to take part in those matches. Additionally, the registration with The FA could only occur after the Sub-Committee had authorized the international transfer or first registration of the players in question.

88. It is undisputed that the Sub-Committee did not authorize the international transfer or the first registration of any of the aforementioned players. Additionally, there is no evidence in the file suggesting that The FA sought at any time the approval of the Sub-Committee.

89. Moreover, the Committee considers important to underline that all those players participated in football matches that were played under the auspices of The FA.

90. In this sense, the Committee concurs with the FIFA Disciplinary Committee that *"any international transfer or first registration of an underage football player that may be permitted under the terms of article 19 of the RSTP must, **without exception**, comply with the procedural requirements laid down in article 19 par. 4 of the RSTP along with article 1 par. 1 of Annexe 2 and article 1 par. 3 of Annexe 3 of the RSTP. This includes in particular the prior approval of the*

²⁴ Cf. para. II.32-54 above.

²⁵ Para. II.110 of the Appealed Decision

²⁶ Cf. para. II.81 above.

international transfer or of the first registration by the Sub-Committee prior to the registration at the new club (CFC) and with the new association (The FA)”²⁷.

91. Therefore, and taking into account the member associations’ responsibility with respect to art. 19 par. 4 of the RSTP²⁸, the Committee is of the opinion that, in relation to the players in question, the Appellant failed to abide by its statutory duty and therefore breached art. 19 par. 4 of the RSTP as well as art. 1 par. 1 of Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP.

➤ *As to the violation of art 19bis par. 3 of RSTP*

92. Finally, the Appellant was sanctioned for a violation of art. 19bis par. 3 of the RSTP with respect to the players 1, 2, 4, 6, 11, 15, 16, 20, 25, 27, 30, 32, 33, 34, 35, 36, 37, 39, 40, 41, 43, 44, 45, 50, 51, 53, 54, 55, 57, 58, 61, 65, 68, 70, 71, 72, 73, 75, 77, 78, 84, 105, 122, 134, 135, 136, 138, 139, 140 and 152.

93. The Committee takes note that the following players joined the discipline of Chelsea FC but never took part to organized football or they did so only after being correctly registered with The FA: 15, 41, 65, 136, 138, 140 and 152.

94. With respect to the aforementioned players, the Committee considers that they were never exposed to football matches organized under the auspices or authorized by The FA. Therefore, the Committee is of the opinion that The FA was not in a position to cause compliance with the regulations and to perform its ancillary duty with respect to these players. Consequently, the Committee rules that the Appellant cannot be held in breach of art. 19bis par. 3 of the RSTP with respect to the aforementioned players.

95. Subsequently, and based on its reasoning set out above²⁹, the Committee takes note that the remaining players participated in organized football and/or were registered with the Premier League as academy players. Therefore, the Committee considers that for these players the Appellant was in a position to perform its duty and supervise that Chelsea FC was complying with the applicable rules as explained above.

96. In this context, the Committee confirms that the Appellant shall be held liable for a violation of art. 19bis par. 3 of the RSTP with respect to the players 1, 2, 4, 6, 11, 16, 20, 25, 27, 30, 32, 33, 34, 35, 36, 37, 39, 40, 43, 44, 45, 50, 51, 53, 54, 55, 57, 58, 61, 68, 70, 71, 72, 73, 75, 77, 78, 84, 105, 122, 134, 135 and 139.

²⁷ Para. II.115 of the Appealed Decision (emphasis added)

²⁸ Cf. para. II.42 above as well as CAS 2014/A/3813 Real Federación Española de Fútbol v. FIFA, para. 250-251

²⁹ Cf. para. II.58-64 above

Conclusions

97. In the light of the foregoing, the Committee confirms the findings of the FIFA Disciplinary Committee with the exception of players 55 and 58, where no violation of art. 19 pars. 3 and 4 of the RSTP was committed.

98. Additionally, the Committee considers that the Appellant did not breach art. 5 of the RSTP with respect to player 15.

99. Finally, the Committee rules that The FA is not to be held responsible for a violation of art. 19bis par. 3 of the RSTP with respect to players 15, 41, 65, 136, 138, 140 and 152.

100. Consequently, the Committee finds that the Appellant violated:

- i. the ban on international transfers of underage players laid down by article 19 par. 1 of the RSTP in fifteen (15) cases (players 1, 2, 4, 6, 11, 16, 20, 25, 27, 30, 35, 40, 43, 68 and 78);
- ii. the ban on the first registration of foreign underage players laid down in article 19 par. 3 of the RSTP in relation to the provisions of article 19 par. 1 of the RSTP in twelve (12) cases (players 36, 37, 51, 57, 61, 65, 70, 71, 72, 75, 77 and 84);
- iii. the procedural rules laid down in article 19 par. 4 of the RSTP in conjunction with Annexe 2 of the RSTP and article 1 par. 3 of Annexe 3 of the RSTP in eleven (11) cases (players 1, 2, 4, 6, 11, 16, 20, 27, 35, 40 and 78);
- iv. the provisions of article 19bis par. 3 of the RSTP in forty-three (43) cases (players 1, 2, 4, 6, 11, 16, 20, 25, 27, 30, 32, 33, 34, 35, 36, 37, 39, 40, 43, 44, 45, 50, 51, 53, 54, 55, 57, 58, 61, 68, 70, 71, 72, 73, 75, 77, 78, 84, 105, 122, 134, 135 and 139);
- v. the provisions of article 9 of the RSTP in twenty (20) cases (players 1, 2, 4, 6, 7, 10, 11, 16, 19, 20, 28, 35, 38, 40, 52, 59, 60, 62, 63 and 78);
- vi. the provisions of article 5 of the RSTP in forty (40) cases (players 1, 2, 4, 6, 7, 10, 11, 16, 19, 20, 24, 27, 28, 31, 34, 35, 36, 38, 40, 42, 47, 49, 51, 52, 53, 54, 55, 56, 57, 59, 60, 62, 63, 64, 68, 71, 75, 78, 156 and 162);

d) Determination of the sanction

101. After having established the violations committed by the Appellant, the Committee will now proceed to assess the sanctions imposed by the FIFA Disciplinary Committee.

102. The Committee notes that CFC was sanctioned with a fine of CHF 510,000, a reprimand and a warning.
103. The Committee agrees with the FIFA Disciplinary Committee that the infractions committed by The FA are inexcusable and shall be punished accordingly. Additionally, the Committee strongly believes that a sanction, in order to be effective, must have both a punitive and a deterrent effect.
104. However, the Committee believes that The FA, although it has the ancillary duty to cause compliance among its members, was not directly involved in the breach of the relevant provisions of the RSTP. In the Committee's opinion, The FA rather felt short in implementing measures in order to guarantee compliance and supervise the actions of Chelsea FC.
105. Therefore, the Committee considers that the fine imposed on the Appellant should be reduced. In this sense, and taking into account all circumstances of the case, the Committee decides the appropriate fine to be imposed should be in the amount of CHF 350,000.
106. Moreover, the Committee confirms the warning and reprimand imposed on the Appellant by the FIFA Disciplinary Committee.
107. Finally, the Committee takes note that the Appellant was granted a period of 6 months to regularize the regulatory framework in England applicable to the international transfer of minor players and the first registration of foreign minor players. The Committee decides that said period shall start from the date of the notification of this decision.

e) Costs

108. The Committee decides based on art. 105 par. 1 of the FDC that the costs and expenses of these proceedings amounting to CHF 3,000 shall be borne by The FA.
109. In this sense, the Committee notes that the Appellant has already paid the appeal fee of CHF 3,000 and decides that the aforementioned costs and expenses of the proceedings are set off against this amount.
110. Finally, the Committee wishes to clarify that the costs of the proceedings before the FIFA Disciplinary Committee amounting to CHF 50,000 are confirmed and therefore are to be borne by The FA.

III. therefore decided

1. The appeal lodged by The FA is partially upheld.
2. The decision of the FIFA Disciplinary Committee rendered on 9 January 2019 is modified as follows:
 1. *The Football Association is declared liable for the violations of article 19 pars. 1 and 3 of the Regulations on the Status and Transfer of Players (RSTP), with respect to the international transfers and first registrations of minor players for the club Chelsea FC.*
 2. *The Football Association is declared guilty of the violations of article 19 par. 4 in conjunction with Annexes 2 and 3 of the RSTP (procedure relating to applications for the first registration and international transfer of underage players) and articles 5 par. 1, 9 par. 1 and 19bis par. 3 of the RSTP.*
 3. *The Football Association is ordered to pay a fine of CHF 350,000. The fine is to be paid within 30 days of notification of the present decision. Payment can be made either in Swiss francs (CHF) to the account no. 0230-325519.70J, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH85 0023 0230 3255 1970 J or in US dollars (USD) to the account no. 0230-325519.71U, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH95 0023 0230 3255 1971 U, with reference to case no. **160621 aja**.*
 4. *In application of article 10 a) and article 13 of the FIFA Disciplinary Code, The Football Association is warned on its future conduct. The Football Association is ordered to undertake all appropriate measures in order to guarantee that the FIFA regulations are strictly complied with. Should such incidents occur again in the future, the FIFA Disciplinary Committee may impose harsher sanctions on The Football Association.*
 5. *In application of article 10 b) and article 14 of the FIFA Disciplinary Code a reprimand is issued against The Football Association.*
 6. *The Football Association is granted a period of 6 months to regularize the regulatory framework in England applicable to the international transfer of minor players and the first registration of foreign minor players in compliance with articles 1 par. 3 a) of the RSTP and 14 par. 1 d) of the FIFA Statutes.*
 7. *The costs of this proceeding amounting to CHF 25,000 are to be borne by The Football Association and shall be paid according to the modalities stipulated under point 3. above.*
3. The costs and expenses of these proceedings in the amount of CHF 3,000 are to be borne by The FA. This amount is set off against the appeal fee of CHF 3,000 already paid by The FA.

LEGAL ACTION

According to art. 58 par. 1 of the FIFA Statutes, this decision may be appealed against before the Court of Arbitration for Sport (CAS). The statement of appeal must be sent to the CAS directly within 21 days of receipt of notification of this decision. Within another 10 days following the expiry of the time limit for filing the statement of appeal, the appellant shall file a brief stating the facts and legal arguments giving rise to the appeal with the CAS.

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FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION



Thomas Bodström
Chairman of the FIFA Appeal Committee