



**FIFA**

# International Seminar on Integrity and Prevention of Corruption in Sport: “Safeguarding Brazilian Sport”

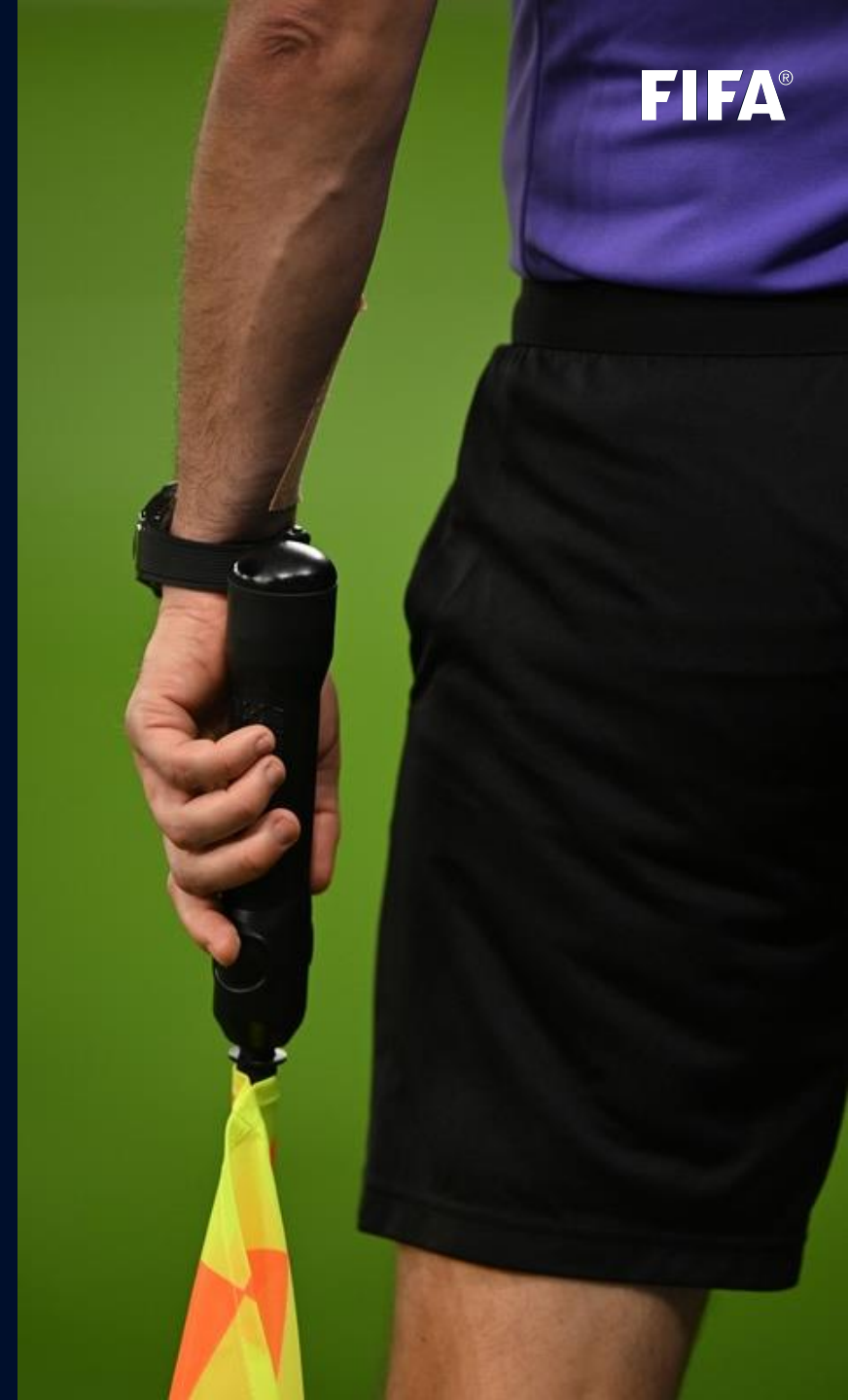
**Session 11: Prosecuting and Sanctioning Competition Manipulation**

**Marta Ruiz Ayucar, Head of Ethics**



# 1

## MATCH MANIPULATION





# WHAT IS MATCH MANIPULATION

- An agreement, action or omission of an intentional nature with the aim of unlawfully altering the result or the course of a match or competition
- In order to eliminate the unpredictability of a match or competition

**Objective:** To gain an undue advantage

## Three Types

01

### **Match Fixing**

- Secretly conspiring to alter the final score of a match  
e.g. total goals scored in a game
- An agreement, action, or omission of an intentional nature

02

### **Spot Fixing**

- Secretly conspiring to manipulate actions and win bets  
e.g. yellow/red cards, corner kicks, penalties

03

### **Competition Manipulation**

- Secretly manipulate the outcome of a match, tournament, or competition

2

## **FIFA's LEGAL FRAMEWORK ON MATCH MANIPULATION**





## Article 2 FIFA Statutes FIFA Objectives



### 2. Objectives

- g) *To promote integrity, ethics and fair play with a view to preventing all methods or practices, such as corruption, doping or match manipulation, which might jeopardize the integrity of matches, competitions, players, officials and member associations or give rise to abuse of association football.*

**It is a FIFA statutory objective to promote integrity, ethics and fair play.**



## Article 20 FIFA Disciplinary Code Match Manipulation

### 20. Manipulation of football matches and competitions

1. Anyone who **directly or indirectly**, by an **act or omission**, unlawfully **influences** or **manipulates** the course, result or any other aspect of a match and/ or competition or **conspires or attempts** to do so by any means shall be sanctioned with a minimum five-year ban on taking part in any football related activity as well as a fine of at least CHF 100,000. In serious cases, a longer ban period, including a potential lifetime ban on taking part in an any football related activity, shall be imposed.

#### Sanction:

- Fine of at least **CHF 10,000**
- A ban from all football related activities for a **minimum of 5 years**.





## Article 20 FIFA Disciplinary Code

### Duty to Report

3. *Persons bound by this Code must cooperate fully with FIFA at all times in its efforts to combat such behaviour and shall therefore immediately and voluntarily report to the secretariat of the Disciplinary Committee any approach in connection with activities and/ or information directly or indirectly related to the possible manipulation of a football match or competition as described above. Any breach of this provision shall be sanctioned with a ban of at least two (2) years on taking part in any football related activity and a fine of at least CHF 15,000.*

#### Sanction:

- Fine of at least **CHF 15,000**
- A ban from all football related activities for a **minimum of 2 years**.







## Art. 20 of the FIFA Disciplinary Code

### Minimum sanctions

- A minimum **five-year ban** on taking part in any football-related activity as well as a fine of at least **CHF 100,000**
- **Serious cases:** a **longer ban** period, including a potential lifetime ban on taking part in any football-related activity, shall be imposed

### Liability of clubs/associations

- The club or association to which the player or official belongs may be sanctioned with the **forfeiting of the match** in question or may be **declared ineligible to participate in a different competition**, provided the integrity of the competition is protected

### Duty to cooperate and report

- Obligation to cooperate with FIFA and to **immediately and voluntarily report** any approach in connection with activities and/or information directly or indirectly related to the match-fixing.
- Minimum sanction: **ban of at least two years** on taking part in any football-related activity and a fine of at least **CHF 15,000**

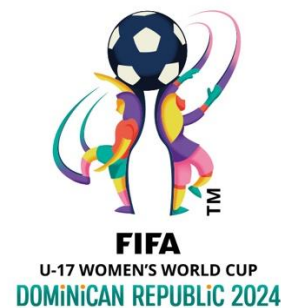
**Exclusive competence of the FIFA Disciplinary Committee (cf. also art. 30 FCE)**



# Scope of application: substantive law

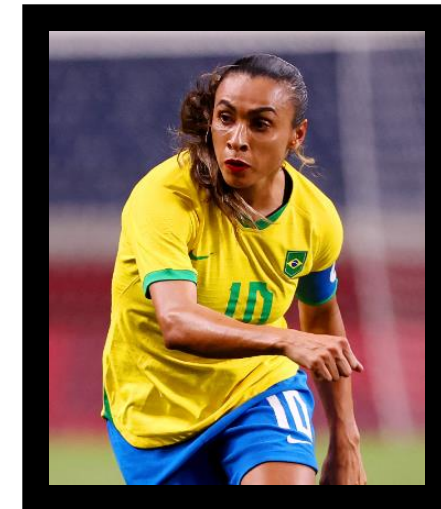
The Disciplinary Code applies to:

- Every match and competition organized by FIFA
- Every match that does not fall under the jurisdiction of the confederations/associations
- Breaches of FIFA's statutory objectives
- Breaches of FIFA regulations not subject to the jurisdiction of another FIFA body



# Scope of personal application

- Member Associations
- members of associations, in particular the clubs;
- officials;
- players;
- match officials;
- football agents licensed by FIFA;
- match agents licensed by FIFA;
- single-entity leagues;
- anyone elected or assigned by FIFA to exercise a function, in particular with regard to a match, competition or other event organised by FIFA.



## Article 30 FIFA's Code of Ethics

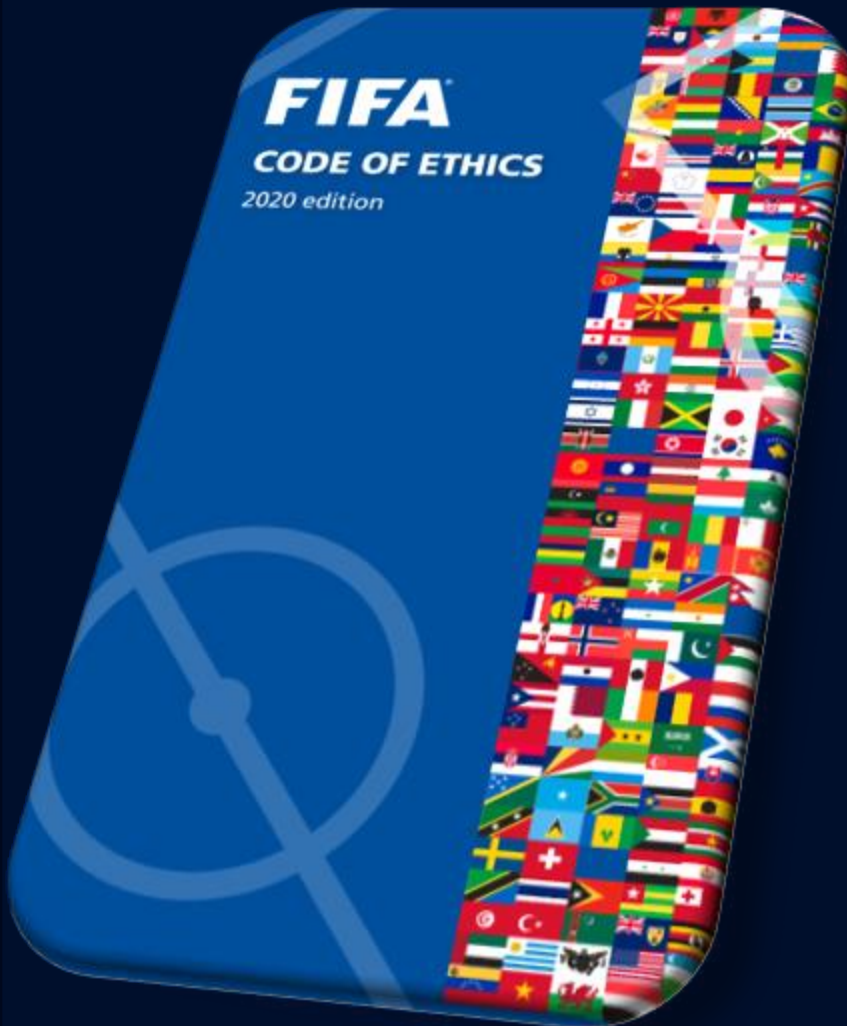
Manipulation of football matches or competitions

### Competence of the FIFA Disciplinary Committee



#### 30. Manipulation of football matches or competitions

1. *Persons bound by this Code* are forbidden from being involved in the manipulation of football matches and competitions, and shall immediately *report to the Ethics Committee* any approach in connection with activities and/or information *directly or indirectly related* to the possible *manipulation* of a football match or competition.
2. The competence to adjudicate on all conduct related to the manipulation of football matches or competitions, both on and off the field of play, remains reserved for the *FIFA Disciplinary Committee*.
3. The investigatory chamber shall *transfer to* the Disciplinary Committee any information obtained during its investigatory activity that might be related to conduct committed by any persons bound by this Code in violation of this article.







Provisional measures

## Reason 1

- To ensure the proper administration of justice

## Reason 2

- To maintain sporting discipline or to avoid irreparable harm

## Reason 3

- For reasons of security and safety

## Provisional measures



Issued by the Chairperson of the competent judicial body

Period of 90 days, which may be extended exceptionally for add. 90.

Special appeal procedure: grounds of appeal within 3 days of issuing of the decision, no appeal fee necessary





**Worldwide extension**



## Worldwide extension of sanctions (art. 70 FDC)

### Serious infringements

If the infringement is serious, **in particular but not limited to manipulation of football matches and competitions**, the associations, confederations, and other organising sports bodies **shall request that the Disciplinary Committee extend** the sanctions they have imposed so as to have worldwide effect.

### Limited scope of review

Approved if:

- the person sanctioned has been **cited** properly;
- they have had the **opportunity to state** their case (with the exception of provisional measures);
- the decision has been **communicated properly**;
- the decision is **compatible with the regulations of FIFA**;
- extending the sanction **does not conflict with public order** or with accepted standards of behaviour

### Consequences

- Sanction has the **same effect** in each association of FIFA, in each confederation and in FIFA itself as if the sanction had been imposed by any one of them
- If the extended decision is not yet final in a legal sense, any decision regarding extension shall **follow the outcome of the association's or confederation's current decision**.



## FIFA extends sanctions imposed by Brazilian FA due to match manipulation

FIFA has confirmed the worldwide extension of sanctions imposed on 11 players by the Brazilian Football Association (CBF) relating to incidents of match manipulation that took place in Brazilian football.

Following investigations by the Brazilian authorities and the disciplinary proceedings opened by the CBF, the following players have been banned from taking part in any kind of football-related activity:

- Ygor de Oliveira Ferreira (lifetime ban)
- Paulo Sérgio Marques Corrêa (600 days as of 26 May 2023)
- Gabriel Ferreira Neris (lifetime ban)
- Jonathan Doin (720 days as of 16 May 2023)
- Fernando José da Cunha Neto (360 days as of 16 May 2023)
- Eduardo Gabriel dos Santos Bauermann (360 days as of 16 May 2023)
- Matheus Phillipe Coutinho (lifetime ban)
- Mateus da Silva Duarte (600 days as of 26 May 2023)
- André Luiz Guimarães Siqueira Junior (600 days as of 26 May 2023)
- Onitlasi Junior Moraes (720 days as of 16 May 2023)
- Kevin Joel Lomónaco (360 days as of 16 May 2023)

As a result of the sound and exemplary cooperation with the CBF and in line with article 70 of the FIFA Disciplinary Code, the chairman of the FIFA Disciplinary Committee has decided to extend all of the above-mentioned sanctions to have worldwide effect.

FIFA will continue its ongoing efforts to combat match manipulation through a variety of initiatives, which include the monitoring of international betting markets, the confidential [FIFA Reporting Portal](#), the FIFA Integrity app, as well as several awareness and educational activities across the world.



# 3

## FIFA Judicial Bodies





The judicial bodies of FIFA are:  
(a) the Disciplinary Committee;  
(b) the Ethics Committee; and  
(c) the Appeal Committee

Art. 50 (1) of the FIFA Statutes

# Procedure before the Disciplinary Committee

## 1. First Instance: DISCIPLINARY COMMITTEE

The Secretariat to the Disciplinary Committee assists with the investigation and opening of disciplinary proceedings. An integrity expert may also be appointed by the Committee.

## 2. Second Instance: APPEAL COMMITTEE

Internal Appeal Instance\*

## 3. Third Instance: COURT OF ARBITRATION FOR SPORT (CAS)

External Appeal Instance

*\*Not all decisions are subject to appeal*





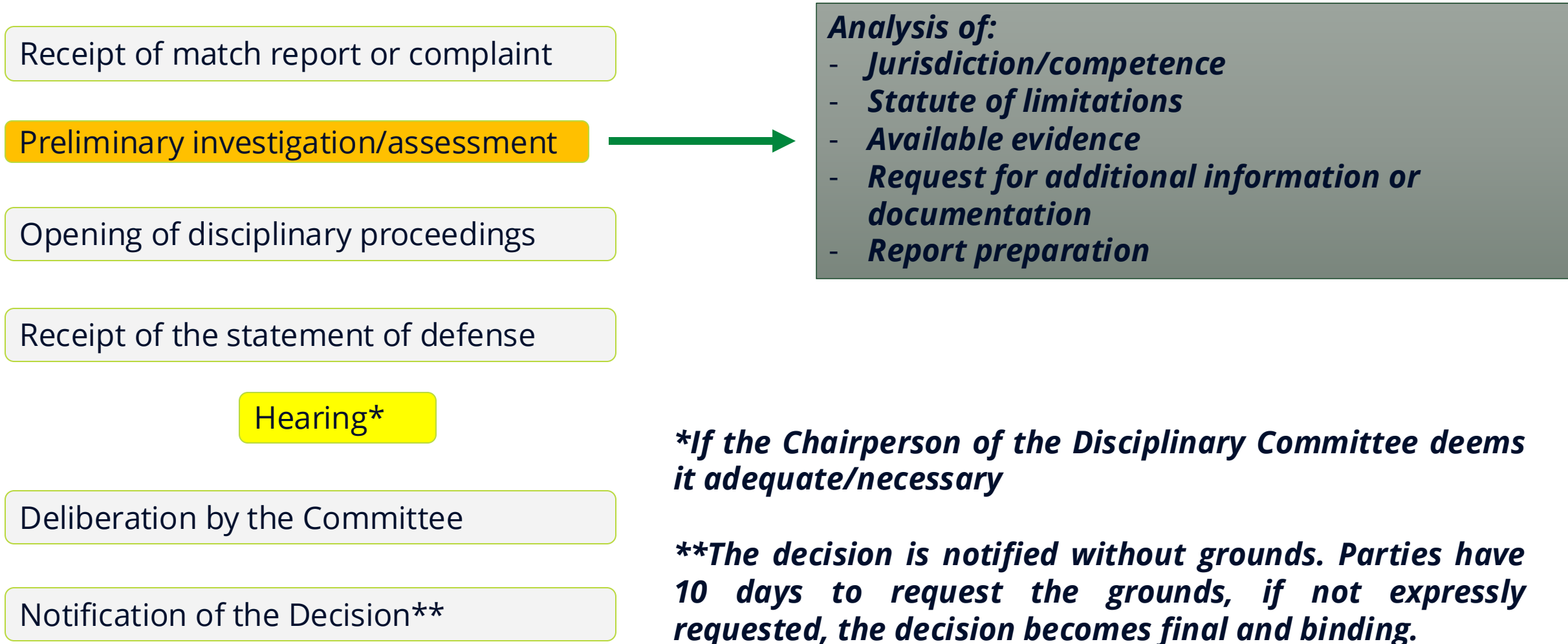
## 55. Commencement of proceedings

1. Proceedings are opened by the secretariat of the Disciplinary Committee:
  - a) on the basis of match officials' reports;
  - b) where a protest has been lodged;
  - c) at the request of the FIFA Council;
  - d) at the request of the integrity expert;
  - e) at the request of the Ethics Committee;
  - f) on the basis of a report filed by a FIFA body, committee, subsidiary, instance or by the FIFA administration;
  - g) on the basis of article 21 of this Code;
  - h) on the basis of documents received from a public authority;
  - i) *ex officio*.

**Facts contained in match officials' reports are presumed to be accurate. Proof of their inaccuracy may, however, be provided.**



# Procedural steps



# Disciplinary measures

## Natural persons

- suspension for a specific number of matches or for a specific period;
- ban from dressing rooms and/or team bench;
- ban on taking part in any football-related activity;
- community football service;
- suspension or withdrawal of a football agent licence;
- suspension or withdrawal of a match agent licence.

## Both

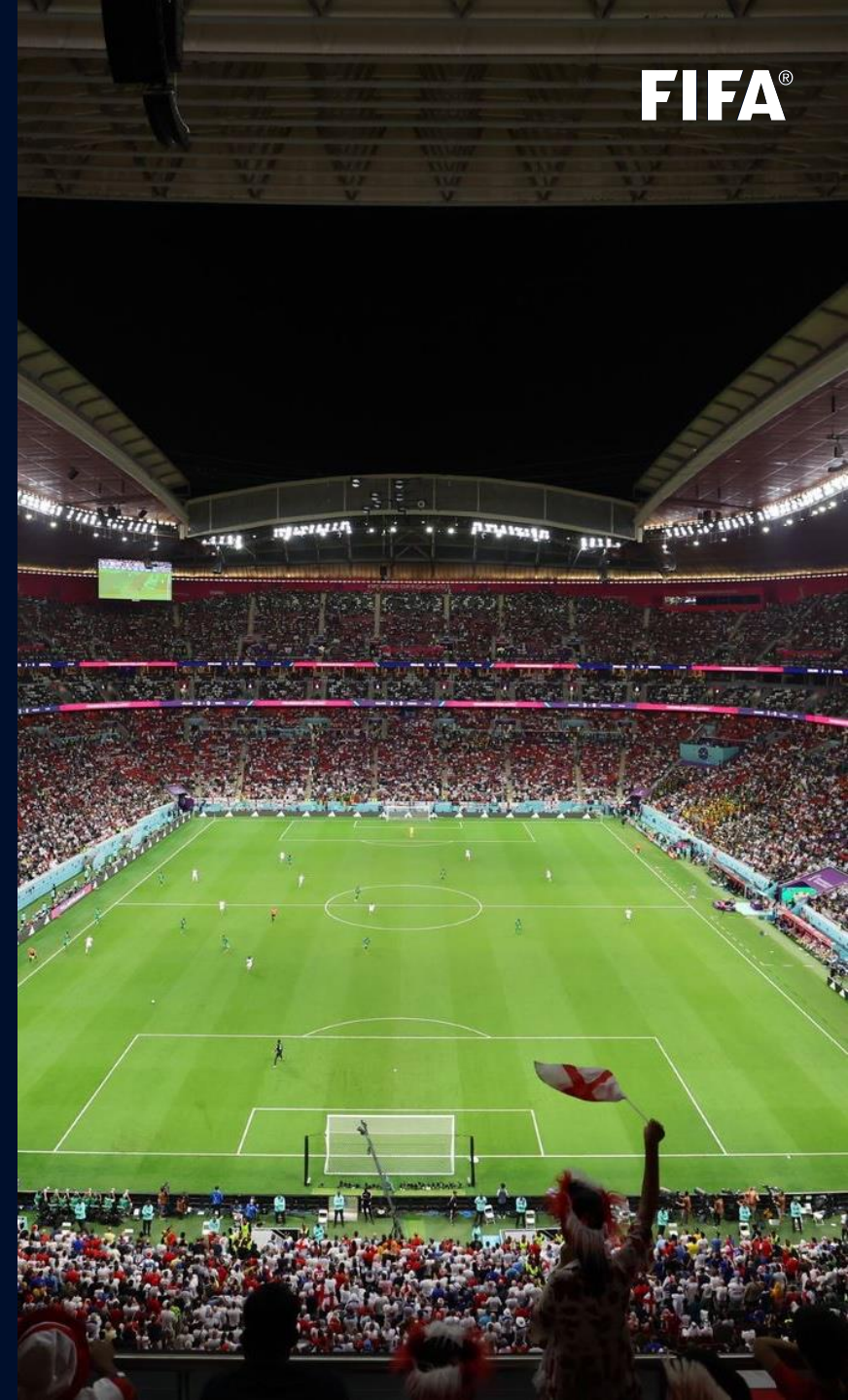
- warning;
- reprimand;
- fine or any other pecuniary measure;
- return of awards;
- withdrawal of a title;
- order to fulfil a financial obligation arising or existing in the context of a trial.

## Legal persons

- ban on registering new players;
- playing a match without or limited nr. of spectators/neutral territory;
- ban on playing in a particular stadium;
- annulment of the result of a match;
- deduction of points or relegation
- expulsion from a competition (in progress of future
- forfeit;

5

## **Global Approach on Match Fixing: Intelligence and collaboration**



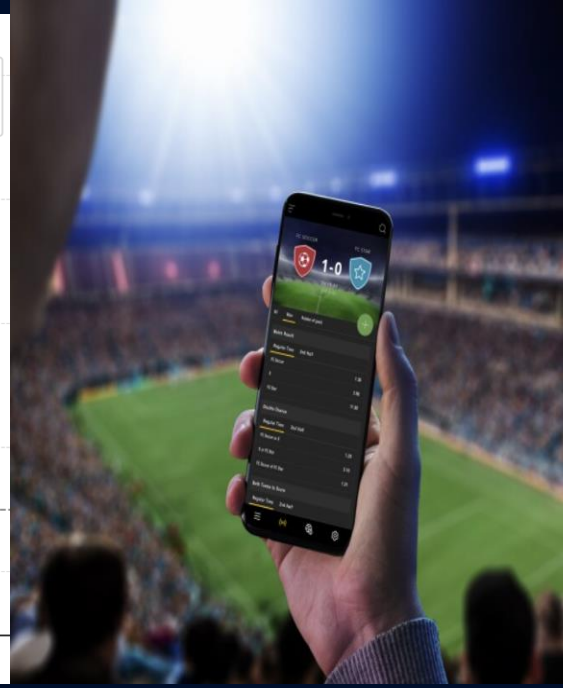
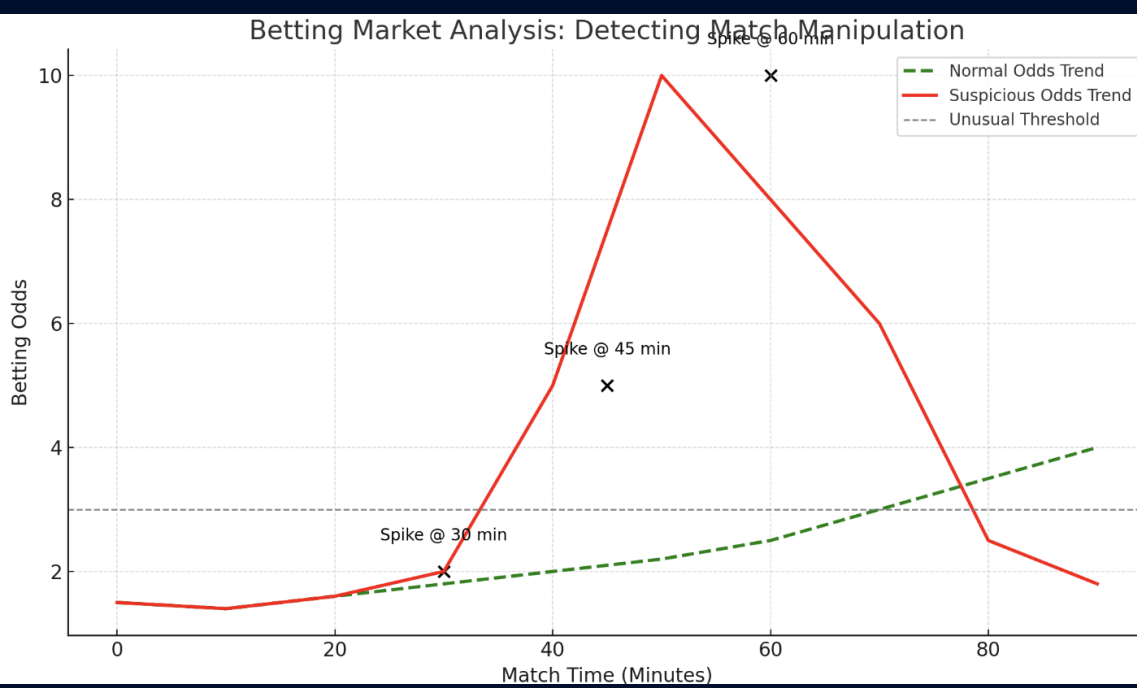


A photograph of three soccer players from behind, walking on a green field. The player on the left wears a yellow jersey with 'LEAI' and the number '10'. The player in the middle wears a yellow jersey with 'JAVIN' and the number '5'. The player on the right wears a dark blue jersey with 'F. PRESENTADO' and the number '19'. The background is a large, colorful geometric mural in shades of blue, green, yellow, and red. A white mouse cursor is visible on the left side of the image.

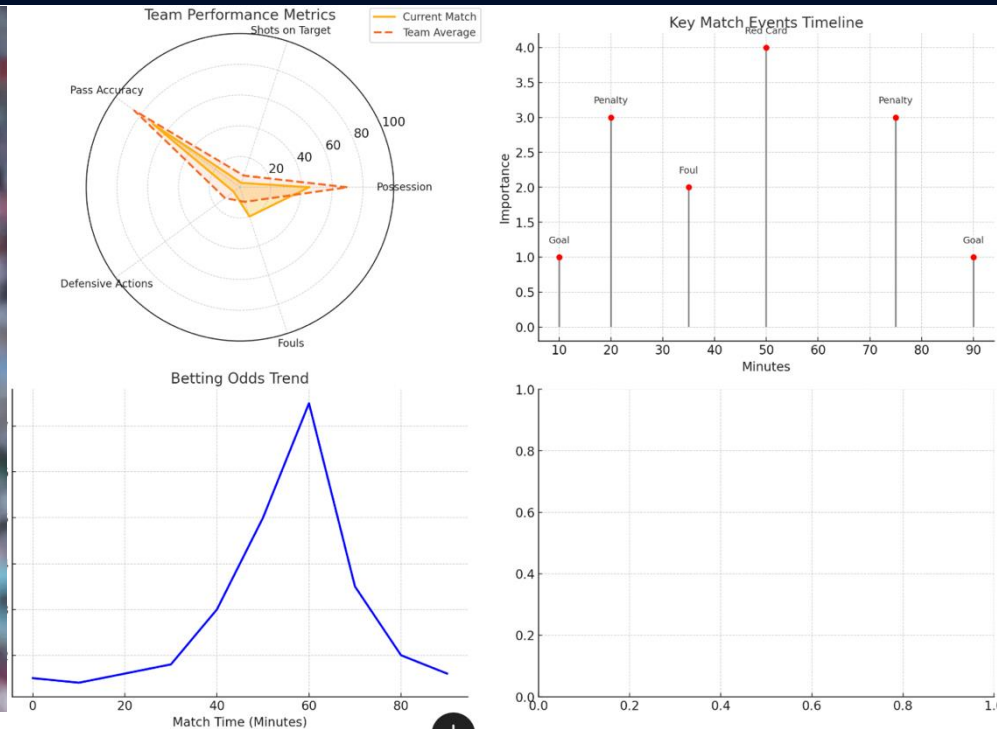
## Reporting Mechanisms

### Reporting Mechanism

- FIFA requires reporting of any match manipulation, but tool can be used for any other report.
- Reliable information is crucial.
- Informants are protected.
- Confidential reporting systems, including an anonymous online whistleblowing system.



## Betting Market Analysis



## Performance Analysis



# FIFA Integrity Task Force

- During competitions monitor the FIFA World Cup™ and FIFA Women's WC to scrutinise both the betting markets and the in-game action in real time
- Supporting integrity initiatives throughout the year, not just main FIFA competitions
  - Scenario planning/brainstorming
  - Investigation support
  - Risk and threat monitoring
- Introduction of a centralized document file sharing platform to foster cohesive and efficient collaboration

Integrity

## No match manipulation detected at FIFA World Cup™



- No match manipulation cases identified in any of the 64 matches played at the FIFA World Cup 2022™
- FIFA to continue collaborating with the members of the task force

## Integrity Task Force concludes monitoring of FIFA Women's World Cup 023™



English - Other languages (4)

- No suspicious betting or match-manipulation threats identified during the 64 matches
- Second successive edition of FIFA Women's World Cup™ to have been monitored
- Task force composed of members from expert organisations



United Nations  
Office on Drugs and Crime

sportradar



ULiS  
UNITED LOTTERIES FOR  
INTEGRITY IN SPORTS



7

## MATCH FIXING CASES



FIFA®



# SUSPICIOUS DECISIONS TAKEN BY THE REFEREE MR LAMPTEY

■ Preliminary competition for the 2018 FIFA World Cup Russia™: 12 November 2016, South Africa v. Senegal, final score 2-1.

12 NOV 2016 - 15:00 Local time  
GROUP D  
Peter Mokaba Stadium  
Polokwane



SOUTH AFRICA

CANCELLED



SENEGAL



Awarding a penalty (40<sup>th</sup> min)

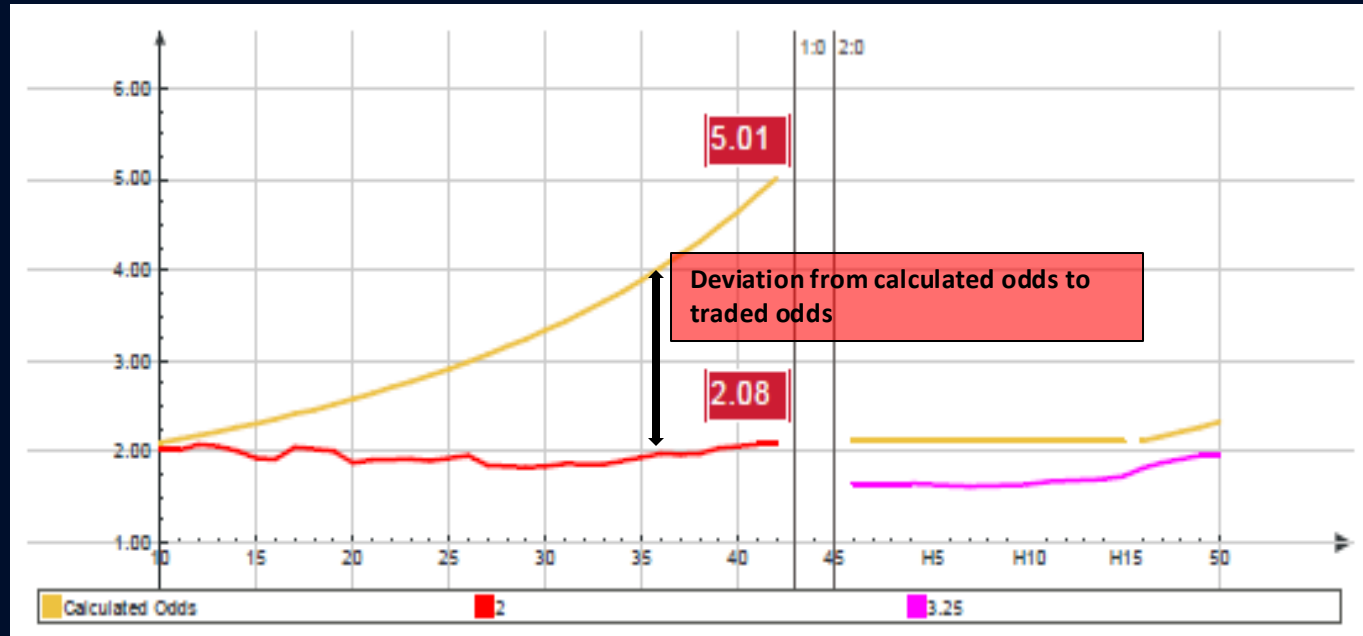


Quick re-start (45<sup>th</sup> min)



FIFA WORLD CUP  
RUSSIA 2018

# BETTING ALERTS



- 5 different betting monitoring companies reported **irregular betting activities**.
- Movements **deviated significantly** from the mathematically calculated market developments
- Highly irregular**
- Concluding that bettors held **prior knowledge of the total number of goals** that would be scored during the match
- At least two goals** to be scored in total
- No explanations that would logically explain the irregular betting patterns

# CONSIDERATIONS

- The wrongful **decisions** of the referee **happened at the same time as the suspicious betting activities** for at least two goals to be scored.
- The penalty decision as well as the quick-restart **created goal scoring opportunities**, which were ultimately converted into goals, which made the **betting successful**.
- The **referee's view of the incident was obstructed** by 5 players. He was not in a position to be sure of the decision without consulting with AR 1.
- The referee admitted that the field decisions were **incorrect refereeing decisions**.
- The refereeing decisions in the FWC qualifier were **not isolated incidents**.

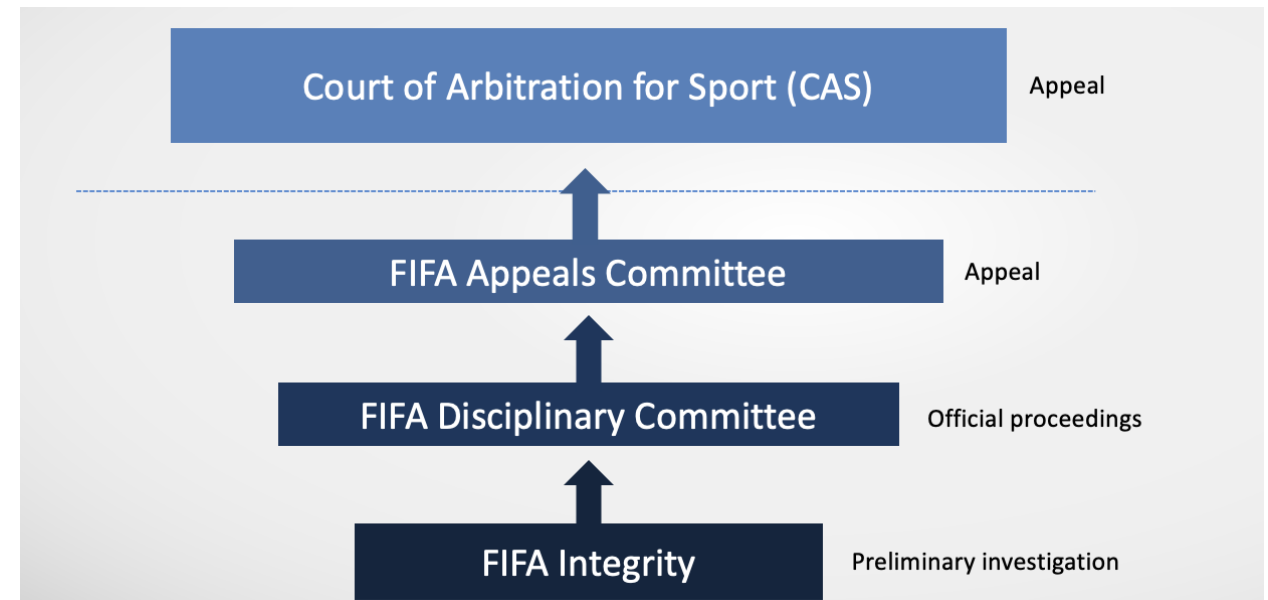


## LIFETIME BAN FOR SERIOUS INFRINGEMENTS

- **Duty to ensure** matches are conducted in full respect of the **Laws of the Game**
- **Credibility** of a match & sport in general depend on the authority of match officials
- **Zero-tolerance** against all kinds of activities intended to influence the result of a match
- Sanctions serve as an **effective deterrent**
- In casu: **Lifetime ban is fair and proportionate.**

### CAS AWARD

- CAS confirmed that Mr Lamprey breached art. 69 par. 1 of the FDC
  - The sanction (lifetime ban) is **fair and proportionate**





# Report received from FIFA Integrity

*Zoo FC's involvement in match manipulation*



1

- **Two matches** of the Kenyan Premier League (KPL):
  - Sofapaka FC vs Zoo FC played on 27 January 2019 – *Final score 3-2*
  - Wazito vs Zoo FC played on 1 March 2020 – *Final score 4-1*

2

- FIFA Integrity received **three (3) reports** from specialized companies concluding that the matches had possibly been manipulated due to **suspicious movements on the betting markets**.

3

- The reports indicated that **the bettors held prior knowledge that Zoo FC would lose the matches**. The reports also identified a number of alleged **incidents of underperformance by players of Zoo FC**.

4

- In addition to further reports concerning a total number of six (6) additional matches played in the KPL between 2018-2019, Integrity obtained an **affidavit from the then coach of Zoo FC describing the involvement of various players of the club in match manipulation practices**.

# Decision of the Disciplinary Committee



FIFA



Tickets Login

COMPETITIONS ABOUT FIFA WOMEN'S FOOTBALL SOCIAL IMPACT FOOTBALL DEVELOPMENT TECHNICAL LEGAL WORLD RANKING



Tuesday, 4 May 2021, 15:15 (local time)

The FIFA Disciplinary Committee has found Kenyan club Zoo FC guilty of having been involved in match manipulation in violation of the FIFA Disciplinary Code (2019 edition).

The decision to sanction Zoo FC is related to a series of matches in the Kenyan Premier League deemed to have been manipulated between 2018 and 2020 by individuals belonging to the club, as a consequence of which the club has been held responsible for the behaviour of its members.

By means of this decision, for the first time since the amendments applied to the FIFA Disciplinary Code in 2019, a legal person has been held liable by a FIFA judicial body for the conduct of its members with regard to match manipulation.

In particular, the FIFA Disciplinary Committee determined that Zoo FC had breached article 8 (Responsibility) and article 18 (Manipulation of football matches and competitions) of the FIFA Disciplinary Code.

In light of the above, the FIFA Disciplinary Committee decided to expel Zoo FC from the Kenyan Premier League (2020/2021 season) as of the date of notification of this decision and to assign it to FKF Division One for the next season.

Finally, the FIFA Disciplinary Committee ordered Zoo FC to contact FIFA in the next 30 days from the notification of this decision and implement a prevention plan as an educational directive designed to prevent and combat the manipulation of football matches and competitions.

The formal disciplinary proceedings against the aforementioned club stemmed from an investigation conducted by FIFA through its Integrity Department, in cooperation with the relevant stakeholders and authorities and in accordance with the mandate conferred upon it by the Football Kenya Federation and the Confederation of African Football.

The decision was notified to the club Zoo FC on 4 May 2021. The club has ten days to request the grounds of the decision, after which it will be published on [legal.fifa.com](https://www.legal.fifa.com). This decision may be appealed before the FIFA Appeal Committee, pursuant to article 56 of the FIFA Disciplinary Code.

# Decision of the Disciplinary Committee

*Can a club be held liable for the behaviour of its players?*

## 8 Responsibility

1.

Unless otherwise specified in this Code, infringements are punishable regardless of whether they have been committed deliberately or negligently. In particular, associations and clubs may be responsible for the behaviour of their members, players, officials or supporters or any other person carrying out a function on their behalf even if the association or club concerned can prove the absence of any fault or negligence.

## 18 Manipulation of football matches and competitions

2.

If a player or official engages in behaviour described in paragraph 1, the club or association to which the player or official belongs may be sanctioned with the forfeiting of the match in question or may be declared ineligible to participate in a different competition, provided the integrity of the competition is protected. Additional disciplinary measures may be imposed.

The Disciplinary Committee referred to the Skenderbeu CAS Award in its conclusion that **Zoo FC could be held liable for the conduct of its players for contrary to art. 18 (1) FDC.**

### CAS 2018/A/5734 – KS Skenderbeu vs. UEFA

1. KS Skenderbeu – the club – **was held responsible for the behaviour of individuals belonging to the club for being involved in match-fixing.**
2. CAS decided that the **strict liability of a club can be established without the need to identify a specific perpetrator**, as long as **the offence was committed by an individual under the umbrella of the club** in question.
3. It is sufficient that individuals belonging to a club, such as its official supporters or **players**, were **involved in match-fixing activities in order for the club to incur liability.**

The above approach was confirmed by the Swiss Federal Tribunal.

*Note: the award concerned the UEFA Disciplinary Regulations.*

# Decision of the Disciplinary Committee

## Determination of the sanction

### 18 Manipulation of football matches and competitions

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- *“**A fine would be an insufficient sanction** in view of the long period of time over which Zoo FC's matches had been manipulated and the seriousness of the offence”*
- *“ (...) the Committee considered that **an expulsion from the competition in which the match manipulation scheme took place was necessary to ensure the integrity of that competition**”*
- *“ (...) the Committee decided **that the Club should be relegated to the next division**, namely the Division One. While **the expulsion from the Kenyan Super League is a measure to safeguard the integrity of that championship, the relegation of the Club should be regarded as a disciplinary measure sanctioning the Respondent for having been involved, through its players, in match-fixing schemes and malpractice over a long period of time**”*



# CAS 2018/A/5886 Ramón Enrique Maradiaga v. FIFA

## BACKGROUND

- Final stage of the Concacaf qualifying round for the 2018 FIFA World Cup Russia™:

**El Salvador v. Canada** in Vancouver on 06.09.2016

- **DAY BEFORE THE MATCH:** players of El Salvador held a press conference: they had been approached by a “businessman” who offered them financial compensation in exchange for achieving specific results in the match
- The players were offered money in exchange for a **win, draw or avoiding a heavy loss** against Canada so that Honduras could progress to the next stage instead of Canada
- The players refused the offer and played a recording of their conversation with the businessman

### El Salvador players allege bribe over Canada World Cup qualifier

- Tape reveals businessman offered money depending on the result
- El Salvador score crucial for Honduras' hopes of reaching Russia



**EL SALVADOR PLAYERS  
REPORTEDLY PROMISED:**

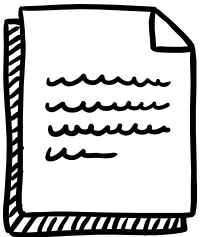
|  |
|--|
| \$30 / minute in win                       |
| \$20 / minute in draw                      |
| \$15 / minute in 1-0 loss                  |
| \$0 if the team loses by two goals or more |

# CAS 2018/A/5886 Ramón Enrique Maradiaga v. FIFA



## MEANS OF EVIDENCE

- Interviews with the players present during the approach
- Interview with Mr Maradiaga (head coach)
- Official report from Mr Maradiaga



## FACTS ESTABLISHED BY EVIDENCE

- Mr Maradiaga met the businessman and knew his intentions to offer an undue advantage to the team
- He told the businessman he was free to meet the players
- He admitted that he was in a position to prevent the meeting
- Mr Maradiaga admitted that his actions were against FIFA regulations
- Mr Maradiaga never prevented the businessman from proceeding, nor did he report the approach to FIFA

# CAS 2018/A/5886 Ramón Enrique Maradiaga v. FIFA

## DELIBERATION: key aspects

*“By breaching articles 18 and 21 of the FIFA Code of Ethics, the appellant, (...), **conspired to undermine the integrity of football**, in sharp contrast to one of FIFA’s core objectives (...).”*

*“He **knew or ought to have known** that the agent’s acts contravened the FIFA regulations and would bring the game into disrepute.”*

*“The appellant was at all material times **free to report the agent to the relevant authorities but failed to do so**. Instead, he remained silent and directed the agent to address his financial incentives to the players. In doing so, he facilitated the agent’s match-fixing attempts.”*



**TAS / CAS**

TRIBUNAL ARBITRAL DU SPORT  
COURT OF ARBITRATION FOR SPORT

# CAS 2018/A/5886 Ramón Enrique Maradiaga v. FIFA

## SANCTION (FIFA level)

- Mr Maradiaga breached **article 21** (Bribery and corruption) and **article 18** (Duty of disclosure, cooperation and reporting) of the FCE
- Ban for **2 years from all football-related activities** and a fine of CHF 20,000

## CAS AWARD

- CAS **confirmed** that Mr Maradiaga had breached both **article 21** and **article 18** of the FCE
- The sanction (2-year ban) and fine **were fair and proportionate**

Adjudicatory Chamber

FIFA Ethics Committee

*MEDIA Advisory*

02.05.2018

English

**Adjudicatory chamber of the independent Ethics Committee bans former El Salvador coach Ramón Maradiaga**

The adjudicatory chamber of the independent Ethics Committee has banned Ramón Maradiaga, the former national team coach of El Salvador, for a period of two years from all football-related activities (administrative, sports and any other) at both national and international level.





# MR WILSON RAJ PERUMAL



The disciplinary proceedings into the stemmed from an extensive investigation into various international matches that Mr Wilson Raj Perumal attempted to manipulate for betting purposes. This large-scale investigation was conducted by FIFA over several years through its Integrity Department and in cooperation with the relevant stakeholders and authorities.

The FIFA Disciplinary Committee has found nine individuals – eight players/former players as well as one players' agent – guilty of having been involved in match manipulation in violation of art. 69 par. 1 of the FIFA Disciplinary Code (Unlawfully influencing match results).

The following individuals have been banned from taking part in any kind of football-related activity at both national and international level (administrative, sports or any other) for life:

- Mr Karlon Murray, Trinidad and Tobago
- Mr Keyeno Thomas, Trinidad and Tobago
- Mr Hellings Mwakasungula, Malawi
- Mr Ibrahim Kargbo, Sierra Leone
- Mr Kudzanai Shaba, Zimbabwe
- Mr Séïdath Tchomogo, Benin
- Mr Leonel Duarte, Cuba
- Mr Mohammad Salim Israfeel Kohistani, Afghanistan

Moreover, the Kenyan player Mr George Owino Audi has been banned from taking part in any kind of football-related activity at both national and international level (administrative, sports or any other) for a period of ten (10) years. In addition, a fine in the amount of CHF 15,000 has been imposed upon him.







**Thank you**

