

Disciplinary Committee

Date: 20 August 2021

FIFA[®]

Sent to:
USD Lavagnese 1919
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C.C.:
Italian Football Association (FIGC)

Notification of the grounds of the Decision

Ref FDD-8069

Dear Sirs,

Please find attached the grounds of the decision passed in the aforementioned case by the FIFA Disciplinary Committee on 30 June 2021.

We would appreciate your taking due note of this decision and ensuring its implementation.

Yours faithfully,

FIFA



Carlos Schneider
Director of the FIFA Judicial Bodies

Fédération Internationale de Football Association

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Decision of the FIFA Disciplinary Committee

passed on 30 June 2021

DECISION BY:

Mr. Jorge Palacio, Colombia (Chairman)
Mr. Thomas Hollerer, Austria (Member)
Mr. Leonardo Stagg, Ecuador (Member)

TO DISCUSS THE CASE OF:

USD Lavagnese 1919

(Decision FDD-8069)

REGARDING:

Failure to comply with:

Art. 9 (1) RSTP – International Transfer Certificate

Art. 19 (1), (3) and (4) RSTP – Protection of Minors

Art. 1 (1) Annexe 2 RSTP – Procedure governing applications for first registration
and international transfer of minors

Art. 1 (3) Annexe 3 RSTP – Transfer Matching System

I. FACTS OF THE CASE

1. The following summary of the facts does not purport to include every single contention put forth by the actors at these proceedings. However, the FIFA Disciplinary 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 its position and in the ensuing discussion on the merits.
2. On 26 April 2021, FIFA Regulatory Compliance Department transferred a report (hereinafter to “the Report”) concerning the club USD Lavagnese 1919 (hereinafter also referred to as “the Respondent” or “the Club”), affiliated to the Italian Football Association (hereinafter also referred to as: ‘the FIGC’), containing the following case summary:

“The Nigerian System

Following media allegations and upon request for information from FIFA, the Italian Football Federation (Federazione Italiana Giuoco Calcio, hereinafter: FIGC) provided us with documentation and information concerning an alleged illegal scheme put in place by Spezia Calcio and involving certain clubs and individuals, including Lavagnese, discovered by the Police of La Spezia.

The investigation of the Police of La Spezia allowed discovering such a scheme, also known as the “Nigeria System”. Such investigation would have led to proceedings before FIGC and national courts against Spezia Calcio, Valdivara 5Terre (hereinafter “Valdivara”) and individuals employed by the respective clubs, who all pled guilty in front of the competent body of FIGC as it will be further described in this report.

The information below would be drawn from the police report:

Spezia Calcio adopted the “Nigeria System” as early as 2013, which led to Nigerian minors being illegally brought into Italy. The goal was to facilitate bringing the top talent from Nigerian club Football College Abuja, affiliated to the Nigerian Football Federation (NFF), to play for Spezia Calcio or one of their subsidiary amateur clubs, with the aim of eventually selling them for profit once they were of age. First, the club helped the minors obtain tourist visas to enter Italy. The athletes would be accompanied into Italy with coach/guardian Renzo Gobbo of the Football College Abuja (an individual who received payments from Spezia Calcio). Once the players arrived in Italy, they were assigned a tutor guardian, who enrolled them into the local school and subsequently “parked” with either Spezia Calcio’s youth side (hereinafter Spezia Primavera), amateur club Lavagnese or Valdivara, with the amateur clubs acting in the interest of (and receiving benefits from) Spezia Calcio. Findings of the Police of La Spezia found that the players were not attending school.¹ Except Players 1 and 2 who were registered in FIGC via Limited Minor Exemption (hereinafter: LME), the players would eventually be engaged in a first registration with FIGC when they turned at least 18 years old.

From February 2018, an investigation by the Police of La Spezia commenced, which included technological devices used against individuals employed by the Spezia Calcio and Valdivara to obtain evidence. The motive being that Spezia Calcio violated the provisions of Italian Legislative Decree no. 286/98 on immigration, by engaging in

behaviour aimed at encouraging the illegal stay of young Nigerian football players, who were underage, within national territory.

The outcome of the investigation led the Police of La Spezia to conclude that Spezia Calcio had direct influence in deciding which players from Football College Abuja were selected to be transferred to Italy, facilitation of the tourist visa application process, their entry into Italy, the placement with a guardian who enrolled them in the local school, acquire an Italian residency permit, placement with an amateur club affiliated to FIGC and then the eventual registration with the latter once they were over 18 years old. Spezia Calcio is therefore “identified both as the real beneficiary of the economic benefits and as a central and crucial part of the ‘Nigeria system’, by virtue of the illegal conduct implemented since 2013”.

The investigation by the Police of La Spezia would have led to proceedings before FIGC and national courts against Spezia Calcio, Valdivara and individuals employed by the respective clubs.

Nonetheless, the information and evidence collected by the Police of La Spezia showed a clear involvement of Lavagnese in the transfer of certain minors from Nigeria to Italy”

3. The Report referred to four (4) minor players, which had allegedly been illegally transferred by Spezia Calcio. The situation of each player is summarized hereafter and takes into account information from the case file as well as the finding contained in the case Report from the Regulatory Compliance Department.

Player 1:	Sadiq Umar
Date of birth:	2 February 1997
Nationality:	Nigeria
Previous association:	Nigerian Football Federation (NFF)
Date of the ITC:	N/A
Date of entrance into Italy:	30 September 2013 (16 years old)
Date of first registration with FIGC:	20 February 2014 for Lavagnese (17 years old)
Name of the guardian/tutor:	Giuseppe Addiego Mobilio

Player 2:	Nura Abdullahi
Date of birth:	17 August 1997
Nationality:	Nigeria
Previous association:	Nigerian Football Federation (NFF)
Date of the ITC:	N/A
Date of entrance into Italy:	30 September 2013 (16 years old)
Date of first registration with FIGC:	20 February 2014 for Lavagnese (17 years old)
Name of the guardian/tutor:	Giuseppe Addiego Mobilio

Player 4:	Chidozie David Okereke
Date of birth:	29 August 1997
Nationality:	Nigeria
Previous association:	None
Date of the ITC:	-
Date of entrance into Italy:	26 August 2014 (16 years old)

Date of first registration with FIGC: 3 September 2015 for Lavagnese (18 years old)
Name of the guardian/tutor: Roberto Sannino

Player 5: **Tahir Nasiru Maigini**
Date of birth: 15 May 1997
Nationality: Nigeria
Previous association: None
Date of the ITC: -
Date of entrance into Italy: 26 August 2014 (17 years old)
Date of first registration with FIGC: 31 July 2015 for Lavagnese (18 years old)
Name of the guardian/tutor: Roberto Sannino

“Lavagnese and Spezia Calcio (Players 1, 2, 4, 5)

As part of the Nigerian System, minor Players 1, 2, 4 and 5 entered into Italy via tourist visa between 2013 and 2014 being under 18 years old, and were assigned to either tutor guardian Giuseppe Addiego Mobilio or Roberto Sannino. The guardian registered the players for school at Caboto Institute of Chiavari, although they never attended school. The players, entirely at the discretion of Spezia Calcio, either remained with Spezia Primavera or parked to amateur club Lavagnese. Tutor guardians received payments from Spezia Calcio for their efforts.

Players 1 and 2’s first registration with FIGC and Lavagnese should have been entered in the appropriate LME but were not due to “a technical, material, error in the operations of extraction of data” according to the FIGC, but confirm in the players’ respective player passports that they were indeed registered for Lavagnese. Subsequently, their domestic transfers to Spezia Calcio were declared in the following LME report.

Players 4 and 5’s first registrations with FIGC for Lavagnese happened once they both turned 18 and then subsequent amateur transfers to Spezia Calcio thereafter.”

4. In addition, the Report contained reference to the following remarks and considerations from FIFA Regulatory Compliance Department. Having in mind that the Report was particularly extensive, the following is intended to illustrate the main elements and information contained in such Report and is without prejudice to other sections of it that may be relevant to the present case.

1. *Italian Budget Law, Law no. 205 of 27 December 2017 (hereinafter, Italian Law)*

- *The Italian Law provides that “foreign minors, even if they entered Italian country soil and are residing in Italy in breach of the applicable immigration rules – have to be registered with national Sports Federations, as if they were Italian citizens, (...) provided that they have been registered for at least one year at any level of a school within the Italian school system”.*
 - *Due to the Italian Law, the FIGC has stated that it must strictly comply with the respective law that entitles foreign minor citizens that are enrolled for at least one year in an Italian school to be registered with the FIGC under the same conditions granted to Italian minor citizens if they are in breach of Italian immigration. The FIGC acknowledged that “a significant number of cases that would have normally*

been rejected [by the FIFA sub-committee] were processed”, which ultimately results in the registration of said minor players on the basis of Italian Law and in breach of FIFA’s regulations.

- *According to the police report, it appears that the Nigerian System takes advantage of the compatibility issues between the Italian Law and the provisions of the FIFA regulations on the protection of minors. In fact, important components of the Nigerian System for the successful circumvention of the FIFA rules on minors were the assignment of the players to a tutor guardian (that was eventually economically compensated by Spezia Calcio) and their enrolment at a high school (where the player eventually failed to attend classes). In this way, Spezia Calcio could take advantage of the peculiarities of the Italian law and circumvent art. 19 of the RSTP.*
- *With reference to the compatibility of a national law in connection to the provisions of FIFA, the CAS rendered an award where it had to answer the question to whether national law and the regulations of a national federation have any impact on the club’s duty to comply with the relevant regulations of FIFA. The CAS Panel held if a club voluntarily applies for a minor player to be registered, such is bound by the FIFA RSTP and national law¹.*
- *Regulatory Compliance cannot ignore Lavagnese’s apparent complicity and role in assisting Spezia Calcio with the scheme to circumvent the relevant rules and regulations.*

2. Protection of Minors

- *An aim of art. 19 of the RSTP is to prevent, among others, practices of illicit trafficking and exploitation of young footballers. In this case, it would appear that the Nigerian minors were transferred to Italy by means of abuse of power and vulnerability with the purpose to economically benefit from their eventual sale to other clubs. In this respect, Regulatory Compliance finds that the entire system that would have been put in place by Spezia Calcio could be summarized by quoting Gobbo’s statement “[launch] them and take advantage of them and sell them over”.*
- *CAS has previously emphasized that clubs have the “direct and primary obligation to avoid transferring under-aged players, unless it can demonstrate that one of the statutory exceptions embedded in Art. 19.2 RSTP have been met [...]”². Without demonstrating the effort to comply with the regulations, other sectors of law would deem the behavior “willful ignorance” and “deliberate shutting of eyes”. With no minor application entered in TMS by Spezia Calcio, Lavagnese or Valdivara (for players 3-13), there appears to be no attempt of the club to transfer the minor players on the basis of any of the exceptions.*
 - *Regulatory Compliance cannot ignore the police report which would appear to describe the actions and extent to which Lavagnese collaborated as an*

¹ CAS 2016/A/4805 Club Atletico de Madrid SAD v. FIFA

² CAS 2014/A/3793 Futbol Club Barcelona v. FIFA

intermediary with Spezia Calcio to transfer the minors into Italy to avoid suspicion as an aggravating factor.

- *Furthermore, it is worth recalling that art. 19 of the RSTP came into force to “protect young players from international transfers which could disrupt their lives, particularly, if, as often happens the football career eventually fails or, anyways, is not as successful as expected”.*
 - *In this sense, Regulatory Compliance would like to underline the example of Player 2 and Player 5: both would have eventually suffered medical issues that either prevented them or limited them from pursuing a professional career in football. In fact, Player 2 would have retired in April 2019 (aged 21) for medical reasons whereas Player 5 had to temporarily suspend his activities due to an ischemia, which forced him to restart his career at amateur level.*
- *The foregoing would show how the conduct of Lavagnese, at the request of Spezia Calcio, to facilitate bringing Nigerian minors to Italy, corresponds to a serious infringement of the FIFA rules regarding the protection of minors.*

3. Affiliation

- *The Viareggio Cup is a youth tournament based in Viareggio, Italy that is in collaboration with FIGC. Based on the rosters of the clubs participating in the tournament, it appears that Player 5 participated with Rijeka in 2014. It should be noted that the tournament takes place every year in March and falls within the timeline of the player residing in Italy and participating in the tournament before officially registering with the FIGC. Regulatory Compliance considers that the foregoing shows how the player’s participation in the Viareggio Cup was aimed at taking him to Italy, where he would then remain as part of the “Nigeria System”.*
- *Moreover, it is submitted that the entire Nigeria System would appear to show a clear connection between Lavagnese and Spezia Calcio, since the former would appear to have played a key role in ensuring that some of the minors in question could move to Italy in clear circumvention of all applicable rules (cf. subsection “5. Misuse of LME” below).*

4. Breaches of FIFA RSTP

Misuse of LME – failure to submit a minor application

- *FIGC confirmed that Player 1 and Player 2’s first registrations of minor player for Lavagnese do not appear in the LME due to a technical mistake.*
- *Player 1 and Player 2 were domestically transferred from Lavagnese to Spezia Calcio under the LME with the exception labelled “Tutor”. However, art. 19.2 of the applicable Regulations did not provide for the explicit exception of “Tutor”. Due to Spezia Calcio being a professional club, and considering the entire modus operandi that characterises the Nigeria System, it appears that Lavagnese’s amateur status was used in order to circumvent the rules of the LME and then have the two players transfer to Spezia Calcio once they reached 18 years old. In addition, since the “exception of tutor” does not exist in the RSTP and the decision of the FIFA Sub-Committee granting the LME specified that the latter applied only to specific exceptions provided for in the RSTP, a first*

registration with Lavagnese would have required the prior approval from FIFA through a minor application.

- *According to the LME Decision of 23 January 2014, the FIGC's LME is strictly limited to the exceptions according to article 19.2 of the Regulations. FIGC failed to record the first registrations of Player 1 and Player 2 in their LME report for the period 01.01.2014 to 30.06.2014 and subsequently recorded the players' domestic transfers to Spezia Calcio in a later LME report, uploaded in TMS on 03.02.2015.*
- *It appears that Lavagnese and Spezia Calcio would have taken advantage of the Italian law and aided in first registrations with FIGC, via LME, for minor Player 1 and Player 2 after they had resided in Italy with a guardian, had been enrolled in an Italian school and had registered with the amateur club acting in the interest of Spezia Calcio. It is worth recalling that the enrolment was a mere façade since Player 1 and Player 2 (as well as all remaining players) never attended school, according to the Investigation Report by La Spezia Police.*
- *In view of the above, Player 1 and 2 were incorrectly included in the LME whereas Lavagnese should have submitted a minor application to FIFA. Consequently, Player 1 and 2 were registered with Lavagnese without approval from FIFA, in breach of art. 19.1.*

First registration of a non-national minor without prior approval (Art. 19.3 and 19.4 RSTP)

- *Pursuant to the FIFA regulations pertaining to the international transfer of minors, clubs are obliged to request prior approval of the Player's Status Sub-Committee for the first registration of a non-national minor.*
- *From the date Players 4 and 5 entered into Italy to the date in which Lavagnese officially registered them with the FIGC at 18 years old, the obligation under the Italian law was satisfied of the minor players having registered in a school for at least one year. Satisfying the obligations of the Italian law would have allowed Lavagnese to take advantage of its conflicting obligations under article 19.3 and 19.4 of the FIFA RSTP and allow the club to officially register the players once they had turned 18 years old.*
- *The NFF confirmed that Players 4 and 5, are Nigerian citizens, and could not provide registration details of a registration with the NFF (Annexe 12). Therefore, Lavagnese should have submitted minor applications in TMS to register the players for the first registration of the above mentioned non-national minors.*
- *Therefore, instead of requesting prior approval of FIFA for the first registration of non-national minor players 4 and 5, Lavagnese would have benefitted on a conflicting national law to circumvent its obligations under articles 19.3 and 19.4 of the FIFA RSTP.*

International transfer of a non-national minor without prior approval (Art. 19.1 and 19.4 RSTP)

- *Pursuant to the FIFA regulations pertaining to the international transfer of minors, professional clubs are obliged to request prior approval of the Player's Status Sub-Committee for the international transfer of a non-national minor.*

- *The NFF confirmed that players 1 and 2 are Nigerian nationals who were registered in Nigeria as amateur players before their entrance into Italy. The NFF also confirms that they did not deliver ITC's for any of the players with the purpose of the players' registration with Spezia Calcio or Lavagnese. With no TMS instruction nor minor application entered, it appears that the two players joined Lavagnese before reaching the age of 18 following an international transfer without the prior approval of FIFA, without an ITC and without valid registration.*

5. Spezia Calcio is the "real beneficiary of the economic benefits"

- *With reference to the players' player passports, Players 1, 2 and 4 eventually signing an employment contracts with Spezia Calcio further illustrate the club's benefits and how the system allowed Spezia Calcio to "park" the players with Lavagnese, circumventing FIFA regulations, and then eventually sign the players.*
- *With reference to their player passports, Player 1 and Player 2 were subsequently domestically transferred to Roma SPA and Player 4 domestically transferred to Cosenza Calcio. Each transfer possibly allowed Spezia Calcio, via Lavagnese, to economically benefit from a system that was in breach of the FIFA Regulations. Section 9 of the La Spezia police report clearly outlines the economic analysis and financial benefits for Spezia Calcio in the player's subsequent transfers.*
- *Player 5 (amateur) was eventually transferred from Lavagnese to Spezia Calcio, which results in a "free" transfer for the latter.*
- *Regulatory Compliance considers that Lavagnese would have played a key role in ensuring that Spezia Calcio could benefit from the implementation of the "Nigeria System".*

6. Conclusions

- *With respect to players 1 and 2, Regulatory Compliance considers that it has been demonstrated that both joined Lavagnese in the context of an international transfer from Nigeria before reaching the age of 18, without complying with any of the exception provided under art. 19 RSTP and without filing a minor application to FIFA.*
- *According to the Swiss Federal Tribunal, "a circumvention of a regulation is given in case someone acts according to the wording of such regulation but does not respect/comply with its purpose". Based on that wording, it would appear that Lavagnese waited until players 4 and 5 turned 18 years old before having their assigned tutor guardian register them with FIGC in order to circumvent FIFA's regulations on internationally transferring or registering minors. Nonetheless, Regulatory Compliance considers having demonstrated that in reality the players joined Lavagnese before turning 18.*
- *The Italian Law has no impact on Lavagnese's duty to comply with its obligations under the FIFA RSTP. Therefore, if the club proceeds to internationally transfer minor players to its club it is bound to article 19 of the FIFA Regulations.*
- *It appears that Lavagnese is in breach of the FIFA Regulations by not requesting prior approval of the Players' Status Sub-Committee for the international transfer or first registration of non-national minor players and submitting a minor application through*

TMS with respect to players 1, 2, 4 and 5. Moreover, Regulatory Compliance wishes to underline that the infringements committed by Lavagnese are aggravated by the fact that they would appear to have taken an active role in the Nigeria System to facilitate Spezia Calcio's scheme aimed at intentionally circumventing the rules.

5. At the end of the Report, the FIFA Regulatory Enforcement Department considered USD Lavagnese 1919 potentially breached the following provisions:
 - Art. 9 (1) of the RSTP for players 1 and 2 (ed. 2012);
 - Art. 19 (1) of the RSTP for players 1 and 2 (ed. 2012);
 - Art. 19 (3) of the RSTP for players 4 and 5 (ed. 2014);
 - Art. 19 (4) of the RSTP for players 1 and 2 (ed. 2012), 4 and 5 (ed. 2014);
 - Art. 1 (1) of Annex 2 RSTP for players 1 and 2 (ed. 2012), 4 and 5 (ed. 2014);
 - Art. 1 (3) of Annex 3 RSTP for players 1 and 2 (ed. 2012), 4 and 5 (ed. 2014).
6. On 27 April 2021, following the investigations conducted by FIFA Regulatory Compliance Department, disciplinary proceedings were opened against USD Lavagnese 1919 with respect to potential breaches of arts. 9, 19, and Annexes 2 and 3 of the RSTP. The latter was provided with a six-day deadline to provide the Secretariat to the FIFA Disciplinary Committee (hereinafter also referred to as '*the Secretariat*') with its position.

II. RESPONDENT'S POSITION

7. On 09 December 2020, USD Lavagnese 1919 submitted the following responses to the FIFA Regulatory Compliance Department:
 - *"[...] we have specified the amateur dimensions of our club and the procedures for registering young players, carried out on the basis of the instructions received from the FIGC"*
 - *"1. U.S.D. Lavagnese 1919 and/or his legal representative Mr. Stefano Compagnoni, have never been investigated by the La Spezia Public Prosecutor's Office about the issue named "Nigeria System", as can be seen from the investigation documents and confirmed by the filing measure [preliminary investigations of the Court of La Spezia]; our company and its legal representative are not even mentioned in the documents, because any possible involvement was excluded from the beginning (Spezia Police);"*
 - *"2. From a verification carried out in the decisions published on the FIGC website, in relation to the "Nigerian System" case, the Federal Prosecutor of the FIGC launched an investigation which, as happened to the Court of La Spezia, included other clubs and other members, but never included, among those responsible, the company USD Lavagnese 1919 and/or legal representative Mr. Stefano Compagnoni, confirming once again our total extraneousness to the facts; "After having reviewed all the relevant documents, the Federal Soccer Prosecutor did not ascertain (against Spezia Calcio or its employees) any violation of the rules on transfer of minor players, such as Rule 9, Rule 19, Annex 2 and 3 of Fifa Regulations."*

- *“3. a quick search on the FIGC website also revealed the Federal convictions decided by the National Federal Court of the Federation, none of which against the company U.S.D. Lavagnese 1919 and/or its legal representative Mr. Stefano Compagnoni.”*
 - *“We believe that we have properly fulfilled our obligations and have demonstrated that U.S.D. Lavagnese 1919 and his legal representative are completely unrelated to any facts of disciplinary relevance relating to the aforementioned “Nigeria System” that was completely unknown to our Club.”*
8. On 03 May 2021, following the opening of disciplinary proceedings, USD Lavagnese 1919 provided the Secretariat with its position, which can be summarized as follows:
- It has always behaved in good faith;
 - It is an amateur club, which represents a little town of around 13,000 people;
 - As amateur club, it has a simple structure;
 - The Respondent barely survives mostly thanks to the financial resources that the president can address;
 - It has not an ad hoc administrative or dedicated legal office;
 - The players’ registration is managed by the secretary, who is a voluntary worker with no specific competence in sports matter;
 - The secretary always turns to FIGC any request and considers as official and correct what communicated by FIGC;
 - In this regard, they believed that said registration of players was the correct one since FIGC did not mention that the procedure to be followed should be different;
 - The Respondent indicates that it has never been consciously involved in any "system";
 - It apologizes if they committed any breach of the FIFA regulations as it was simply due to inexperience;
 - The outcome of the investigation carried by the Federal Prosecutor of FIGC and Court of La Spezia indicated that the Respondent was not found liable of any involvement in relation to those facts;
 - In any event, the club remains at the disposal of FIFA.
9. On 10 May 2021, Mr Stefano Compagnoni, *“Pro tempore President”* of the Respondent, delivered a correspondence to the Secretariat that may be summarized as follows:
- He indicates that is the president of the Respondent since 1999;
 - In particular, he would like to take over the sanctions instead of the Respondent.
 - He acknowledges that *“due to [his] action or due to the lack of control over the work of [his] collaborators (whom [he] will never stop thanking for all of these yeasers in which they have helped [him], even if they may have been wrong) could penalize the Club”*.

- He is willing to step aside temporarily or permanently.
- He has never been sanctioned by FIFA or FIGC nor the club.
- He didn't know that something that was allowed in Italian law, could be prohibited in FIFA or FIGC's regulations;
- Based on the above, If the Respondent deserves sanctions, he kindly asks for a fine in the amount of CHF 4,000 and if deemed necessary, a suspension against him.

III. CONSIDERATIONS OF THE DISCIPLINARY COMMITTEE

10. In view of the circumstances of the present matter, the Committee decided to first address the procedural aspects, namely, its jurisdiction and the applicable law, before entering into the substance of the matter and assessing the possible breaches of arts. 9 (1) and 19 together with Annexes 2 and 3 RSTP by USD Lavagnese 1919 as well as the potential sanctions, if applicable, resulting therefrom.

A. Jurisdiction of the FIFA Disciplinary Committee

11. First of all, the Committee noted that at no point during the disciplinary proceedings did USD Lavagnese 1919 challenge its jurisdiction or the applicability of the FIFA Disciplinary Code (FDC).
12. Notwithstanding the above and for the sake of good order, the Committee found it worthwhile to emphasise that, on the basis of art. 53 of the FDC as read together with arts. 19 (4) and 25 (3) and art. 9 (2) of Annexe 3 RSTP, it is competent to evaluate the present case and to impose sanctions in case of corresponding violations.

B. Applicable law

a. Applicable edition of the Regulations on the Status and Transfer of Players

13. In order to duly assess the matter, the Committee deemed that it had to determine which edition of the Regulations on the Status and Transfer of Players (RSTP) applied to the substance of the case.
14. In these circumstances, the Committee took note from the Report that the Regulatory Compliance Department considered that different versions of the RSTP were applicable, based on the date at which the minor in question entered Italy. In this regard, the Report referred to the following versions: ed. 2012 and ed. 2014. More particularly, the allegations reported concerned the potential violation by the Respondent of arts. 9 and 19 RSTP headed *International Transfer Certificate* and *Protection of Minors*, respectively.
15. Notwithstanding the above, the Committee decided to refer to the RSTP in a general manner, without specifically mentioning the pertinent edition applicable to each player involved in the present case, as the aforementioned editions of the RSTP were inherently identical, so

that the content and regulatory principles to be respected had not undergone any changes in the different editions, i.e. the 2012 to 2014 editions.

16. The above clarified, the Committee decided to begin by recalling the content and the scope of the relevant provisions of the RSTP applicable to the present case, this without prejudice that other rules may also be at stake.

b. Relevant applicable FIFA provisions

Article 9 (1) of the RSTP – International transfer Certificate

17. This article stipulates as a prerequisite for the registration of a player who has been the subject of an international transfer the need to request, and receive, an International Transfer Certificate (ITC):

“Players registered at one association may only be registered at a new association once the latter has received an International Transfer Certificate (hereinafter: ITC) from the former association. The ITC shall be issued free of charge without any conditions or time limit. Any provisions to the contrary shall be null and void. The association issuing the ITC shall lodge a copy with FIFA. The administrative procedures for issuing the ITC are contained in Annexe 3, article 8, and Annexe 3a of these regulations.”

18. Specifically, art. 9 (1) RSTP provides that players registered at one association may only be registered at a new association (and for the new club) after the latter has received an ITC from the former association.

Article 19 of the RSTP – Protection of minors

19. This article governs the international transfer of minor players as well as the first registration of foreign minor players. This provision was implemented with the aim of protecting minor players in the context of international transfers, as young football players are generally extremely vulnerable to exploitation, abuse and mistreatment in a foreign country. Furthermore, although international transfers may benefit the sporting career of a young player in specific cases, it is far more likely that they will harm the overriding interests of the minor in question. Put differently, the adequate and healthy development of a minor as a whole must always prevail over mere sporting interests.
20. In light of the above, it is therefore essential that member associations and clubs comply with this provision to safeguard the interests of minor players. Moreover, it is only through the consistent and strict application of this provision that football authorities, such as FIFA, can ensure effective control of international transfers and guarantee the protection of minor players.

21. Bearing the foregoing in mind, it is worth recalling that the international transfer of a player is only permitted if the player is over the age of 18. The same principle applies to the first registration of a foreign player. These two bans are reflected in paragraphs 1 and 3, respectively:

“International transfers of players are only permitted if the player is over the age of 18.”

“The conditions of this article shall also apply to any player who has never previously been registered with a club, is not a national of the country in which he wishes to be registered for the first time and has not lived continuously for at least the last five years in said country.”

22. Notwithstanding the above, art. 19 (2) RSTP provides for three exceptions to the aforementioned general ban, whereby an international transfer of a minor player or the first registration of a foreign minor player is possible:

“The following three exceptions to this rule apply:

- a) The player’s parents move to the country in which the new club is located for reasons not linked to football.*
- b) The transfer takes place within the territory of the European Union (EU) or European Economic Area (EEA) and the player is aged between 16 and 18. In this case, the new club must fulfil the following minimum obligations:
(...)*
- c) The player lives no further than 50km from a national border and the club with which the player wishes to be registered in the neighbouring association is also within 50km of that border. The maximum distance between the player’s domicile and the club’s headquarters shall be 100km. In such cases, the player must continue to live at home and the two associations concerned must give their explicit consent.”*

23. Consequently, when a minor player complies with one of the exceptions set out in art. 19 (2) RSTP, the association concerned is required, upon request of its affiliated club, to request and obtain the approval of the Sub-Committee appointed by the Players’ Status Committee (hereinafter, “*the Sub-Committee*”) as established under art. 19 (4) RSTP, provision which reads as follows:

“Every international transfer according to paragraph 2 and every first registration according to paragraph 3, as well as every first registration of a foreign minor player who has lived continuously for at least the last five years in the country in which he wishes to be registered, is subject to the approval of the subcommittee appointed by the Players’ Status Committee for that purpose. The application for approval shall be submitted by the association that wishes to register the player. The former association shall be given the opportunity to submit its position. The sub-committee’s approval

shall be obtained prior to any request from an association for an International Transfer Certificate and/ or a first registration. (...).”

24. Such approval will be given only if it can be demonstrated that the minor player complies with one of the exceptions of art. 19 (2) RSTP. In addition, this approval must be obtained before any further steps are taken in relation to the registration of the player, such as the ITC request (art. 9 (1) RSTP) and the registration of the player with the association concerned (art. 5 (1) RSTP).
25. In a nutshell, the aforementioned procedure can be summarised as follows:
- a) For a minor player who was previously registered with a foreign association and is therefore subject to an international transfer:
- i. One of the exceptions of art. 19 (2) RSTP must be applicable to the player’s situation;
 - ii. The association concerned, upon request of its affiliated club, submits an application for the approval of the Sub-Committee via TMS (art. 19 (4) RSTP along with Annexe 2 and art. 1 (3) of Annexe 3 RSTP);
 - iii. Once the approval is granted by the Sub-Committee, the association requests the player’s ITC from the former association (cf. art. 9 (1) RSTP);
 - iv. Once the former association has issued the ITC, the new association receives the ITC and proceeds to the player’s registration (art. 9 together with art. 5 RSTP).
- b) For a foreign minor player who wishes to be registered for the first time³:
- i. One of the exceptions of art. 19 (2) RSTP must be applicable to the player’s situation;
 - ii. The association concerned submits, upon request of its affiliated club, an application for the approval of the Sub-Committee via TMS (art. 19 (4) RSTP along with Annexe 2 and art. 1 (3) of Annexe 3 RSTP);
 - iii. Once the approval is granted by the Sub-Committee, the association proceeds to the player’s registration (art. 5 RSTP).
26. The contours of the provisions at stake being outlined, the Committee then referred to the jurisprudence of the Court of Arbitration for Sport (CAS), which has shed some light on this matter.
27. First, it should be recalled that art. 19 (1) of the RSTP is the backbone of the RSTP on the protection of minor players and is a provision that must be observed by clubs and associations alike⁴.

³ To be considered as a foreign minor player wishing to register for the first time, the prerequisites are as follows:

- a. The player is not a national of the country in which he wishes to be registered for the first time and has not lived continuously for at least the last five years in said country and;
- b. The player has never previously been registered for a club or his last match played for his previous club occurred more than 30 months ago.

⁴ CAS 2014/A/3813.

28. Secondly, the rules contained in the aforementioned provision are divided into substantive and procedural rules as follows⁵:
- a. Pars. 1 to 3 are regarded as substantive rules establishing a general ban on the international transfer (par. 1) of a minor player and on the first registration of a foreign minor player (par. 3), unless one of the exceptions set out in par. 2 of that article applies to the minor concerned.
 - b. Par. 4 is a procedural provision requiring the national association to seek and obtain approval of the Sub-Committee before taking any further step in the registration of the minor player.
29. This distinction implies that an association or a club would, on the one hand, be in breach of art. 19 (1) or (3) RSTP, and therefore subject to sanctions, if it has registered a minor player for whom none of the exceptions of art. 19 (2) RSTP applied at the time of registration⁶.
30. On the other hand, an association or a club would be facing sanctions in the event that it failed to submit an application for approval to the Sub-Committee, and obtain that approval, before registering the minor player. In particular, the RSTP contains no exception to art. 19 (4) RSTP and to the strict and mandatory obligation to seek for the Sub-Committee's approval, even if such approval was subsequently granted (once the player has already been registered with the association)⁷.
31. It follows that, when determining whether the provisions governing the protection of minor players have been infringed by an association or a club, FIFA's Judicial Bodies are required to analyse distinctly and separately if the association has infringed the substantive and/or the procedural rules of art. 19 RSTP.
32. Finally, it is worth recalling that CAS has confirmed on repeated occasions that the protection of minor players constitutes a key element in FIFA's overall regulatory framework⁸. Moreover, the legality of these provisions was validated by CAS, which in addition, concluded that these regulations do not contravene any rule of public policy or European law⁹.

Article 1 (1) of Annexe 2 and Article 1 (3) of Annexe 3 of the RSTP

33. Finally, as for as the procedure to obtain the approval of the Sub-Committee is concerned, the following provisions specify that the process should take place in the Transfer Match System (TMS) as per art. 1 (1) Annexe 2 and art. 1 (3) Annexe 3 RSTP, respectively:

⁵ CAS 2019/A/6301.

⁶ CAS 2019/A/6301.

⁷ CAS 2016/A/4805.

⁸ CAS 2005/A/955 & 956; CAS 2008/A/1485; CAS 2011/A/2354; CAS 2011/A/2494; CAS 2012/A/2787; CAS 2014/A/3611; CAS 2014/A/3793; CAS 2014/A/3813; CAS 2015/A/4312; CAS 2016/A/4785; CAS 2016/A/4805; CAS 2017/A/5244.

⁹ CAS 2008/A/1485.

“All applications for a first registration of a minor according to article 19 paragraph 3, or an international transfer involving a minor according to article 19 paragraph 2, must be submitted and managed through TMS.”

“TMS helps safeguard the protection of minors. If a minor is being registered as a non-national for the first time or is involved in an international transfer, an approval must be given by a sub-committee appointed by the Players’ Status Committee for that purpose (cf. article 19 paragraph 4). The request for approval by the association that wishes to register the minor on the basis of article 19 paragraphs 2 and 3 and the subsequent decision-making workflow must be conducted through TMS (cf. Annexe 2).”

C. Standard of proof

34. Firstly, the Committee recalled that the burden of proof lies with FIFA, which is required to prove the infringement under art. 36 (1) FDC.
35. Secondly, the Committee pointed out that, according to art. 35 (3) FDC, the standard of "comfortable satisfaction" is applicable in disciplinary proceedings. According to this standard of proof, the onus is on the sanctioning authority to establish the disciplinary violation to the comfortable satisfaction of the judging body, taking into account the seriousness of the allegation.
36. In particular, CAS, which also applies this standard in disciplinary proceedings, defined this standard of proof as higher than the civil standard of *“balance of probability”* but lower than the criminal standard of *“proof beyond a reasonable doubt”*¹⁰.
37. In addition, the Committee underlined that CAS has recently confirmed that the standard of proof to be applied in disciplinary proceedings involving a potential violation of art. 19 RSTP is "comfortable satisfaction"¹¹.
38. Having clarified the foregoing, the Committee proceeded to consider the merits of the case.

D. Merits of the dispute

a. Issues of review

(1) The “Nigerian System”

39. The Committee started to analyze the evidence at its disposal, in particular the documentation and information provided in the scope of the proceedings before the FIFA Regulatory Compliance Department as well as the present disciplinary proceedings, to determine the potential violations of the RSTP committed by USD Lavagnese 1919.

¹⁰ See amongst other CAS 2009/A/1920; CAS 2010/A/2172; CAS 2013/A/3323; CAS 2017/A/5006.

¹¹ CAS 2019/A/6301.

40. For the sake of good order, the Committee noted that it was undisputed that all four (4) players involved in the present case had Nigerian citizenship and entered Italy when they were under 18 years old.
41. Then, the Committee observed that, in the light of the investigation carried out by *La Spezia police* and referred to in the Report, Spezia Calcio, the instigator of this system, appeared to be deeply involved in the "Nigerian System", as the Italian club:
- had direct influence in deciding which players from the Football College Abuja were selected to be transferred to Italy;
 - facilitated the tourist visa application process, the entry of the minors into Italy, the placement with a guardian who enrolled them in the local school;
 - remunerated those guardians/tutors;
 - acquired an Italian residency permit for those players;
 - placed them with different clubs affiliated to the FIGC or parked them directly in its own youth teams.
42. In particular, the Committee noted that under this system, the players were placed with different clubs, amongst them USD Lavagnese 1919.
43. Moreover, the Committee noticed that players 4 and 5 were not immediately registered with the FIGC, but the general practice was to wait until the player in question reached the age of 18 to register him with the FIGC - or even while still a minor (players 1-2) - and then to transfer some of them to Spezia Calcio by way of a domestic transfer (players 1-2; 4-5).

(2) Purposes of the "Nigerian System"

44. In view of the aforementioned observation and the information contained in the case file, it was apparent to the Committee that Spezia Calcio and USD Lavagnese 1919 put in place the "Nigerian System" by taking advantage of the compatibility issues between the Italian Law and the provisions of the FIFA regulations on the protection of minors. As set out in the Report, the assignment of the players to a tutor and their enrolment at a high school, the *Caboto Institute of Chiavari*, were key components of that system to successfully circumvent the regulations put in place by FIFA to protect minor players.
45. The Committee also noted that USD Lavagnese 1919 did not contest the allegations and conclusions contained in the Report of the Regulatory Compliance Department. Additionally, the Committee observed that Mr Stefano Compagnoni, "*Pro tempore President*" of the Respondent, acknowledged his actions and proposed a sanction to be applied on to the Respondent.
46. In light of the above, the Committee was comfortably satisfied that USD Lavagnese 1919 was involved in the conduct described in the Report. In this context and after examining the evidence on file, the Committee concluded that the Respondent took an active role in the "Nigerian System" to facilitate Spezia Calcio's scheme aimed at intentionally

circumventing the prohibition on international transfers of minor players or on first registration of foreign minor players enshrined in art. 19 RSTP, since none of the four players parked with the Respondent were eligible for any of the exceptions listed in art. 19 (2) RSTP.

47. Under the scheme, and in order to successfully assist Spezia Calcio in circumventing art. 19 RSTP, USD Lavagnese 1919 not only facilitated the subsequent transfer of the players to Spezia Calcio, but first took these minor players to the Club without registering them with FIGC and only applied for registration with FIGC when the players turned 18, so that the prohibitions set out in art. 19 RSTP could no longer apply.

b. Infringements committed by USD Lavagnese 1919 in connection with the “Nigerian System”

48. As explained above, the Committee found that USD Lavagnese 1919 was an accomplice in the "Nigerian system", a system implemented to circumvent the provisions governing the protection of minor players. Therefore, it was necessary for the Committee to assess whether the Club had breached the rules contained in art. 19 RSTP as well as art. 9 RSTP, as implied in the Report.
49. To this end, the Committee decided to begin with the procedural aspects of art. 19 RSTP and then to focus on the possible violation of the substantive rules contained therein, and finally to analyze whether further provisions had been infringed by USD Lavagnese 1919.

(1) Failure to request the approval of the Sub-Committee – art. 19 (4) RSTP and Annexes 2 and 3 RSTP

50. As far as the procedural rule of art. 19 is concerned, the Committee had not doubt that, by introducing this system, Spezia Calcio, with the active support of USD Lavagnese 1919, sought to evade the control mechanism established by FIFA in art. 19 (4), which was set up to verify that the situation of the player to be transferred/registered for the first time corresponded to one of the exceptions laid down in art. 19 (2) RSTP.
51. In particular, the Committee noticed that the Respondent did not submit a request for to the Sub-Committee in the Transfer Matching System (TMS) for any of the four (4) players involved in the present case. This led the Committee to conclude that USD Lavagnese 1919 failed to comply with art. 19 (4) RSTP with regard to these players and therefore breach the provisional rule contained in art. 19 RSTP.
52. Furthermore, the Committee recalled that the procedure for obtaining the approval of the Sub-Committee must be carried out in TMS. Therefore, by not submitting a request for approval to the Sub-Committee in the said system, USD Lavagnese 1919 breached art. 1 (1) of Annex 2 and art. 1 (3) of Annex 3 RSTP in respect of all players implicated in the present case.

(2) Breach of the ban on international transfer of minor players and on first registration of foreign minor players – art. 19 (1) and (3) RSTP

53. The Committee then turned its attention to the substantive rules contained in art. 19 RSTP and noticed that USD Lavagnese 1919 contravened the general prohibition on international transfer of minor players and first registration of foreign minor players.
54. Indeed, after examining the evidence available to it, the Committee had no doubt that none of the four players qualified for any of the exceptions listed in art. 19 (2) RSTP at the time of their respective entry into Italy.
55. In particular, the Committee observed from the case file that players 1 and 2 were registered with the Nigerian Football Federation before entering Italy. Given that none of the situations of the five players could fall under one of the exceptions of art. 19 (2) RSTP, the Committee came to the conclusion that these two minor players could not have been internationally transferred without violating the general prohibition embodied in art. 19 (1) RSTP. However, Spezia Calcio circumvented this general prohibition by using the "Nigerian System" described above, and thus moved these two minor players to Lavagnese 1919. In other words, by participating in the "Nigerian System", the Respondent hosted/took these minors at the Club in contravention of art. 19 (1) RSTP in light of the above explanations.
56. The same applies to players 4-5 who, according to the case file, had never been registered with any association before moving to Italy. Consequently, any registration with the FIGC would constitute a first registration within the meaning of art. 19 (3) RSTP. However, as already outlined, these Nigerian minor players did not satisfy one of the exceptions of art. 19 (2) RSTP and did not live continuously for at least five years in Italy, thus excluding any first registration with FIGC. Nevertheless, Spezia Calcio moved these minor players from Nigeria to Italy as part of the "Nigerian system" and parked them with Lavagnese 1919, which waited until they reached the age of 18 before registering them, thereby breaching art. 19 (3) RSTP in respect of these two players.

(3) Failure to request the International Transfer Certificate – art. 9 (1) RSTP

57. Finally, the Committee stressed that players 1 and 2 were registered with the Nigerian Football Federation before moving to Italy. However, there was no evidence in the case file establishing that an International Transfer Certificate (ITC) had been issued by the Nigerian Football Federation and received by the FIGC for these two players.
58. In this regard, the Committee recalled that for any international transfer, an ITC has to be requested and obtained by the new association before registering the player in question. With this in mind, the Committee considered that USD Lavagnese 1919, through its complicity with Spezia Calcio in the international movement of these two players from Nigeria to Italy through the "Nigerian System", not only infringed art. 19 RSTP as explained above, but also failed to request and obtain the relevant ITC for these players, and therefore infringed art. 9 (1) RSTP.

(4) Conclusion

59. All in all, the Committee was firmly convinced that USD Lavagnese 1919 collaborated with Spezia Calcio and participated in the "Nigerian System" with the intention of moving or more appropriately, "bringing" these Nigerian minor players from their home country to Italy, in total disregard of the rules put in place by FIFA to protect the integrity and health of minor players.
60. Indeed, the four minor players brought to Italy by Spezia Calcio could not benefit from any of the exceptions to the general prohibition laid down in art. 19 RSTP, so that with the help and collaboration of USD Lavagnese 1919, the four aforementioned players were parked with the Respondent for as long as their registration with FIGC was impossible. Only once they turned 18 years old did USD Lavagnese 1919 proceed with their official registration and then transfer them to Spezia Calcio. In other words, the abovementioned system was meant to escape not only FIFA's radar, but also that of FIGC.
61. Having determined all of the above, in particular that USD Lavagnese 1919 infringed arts. 9 (1) and 19 (1), (3) and (4) RSTP together with art. 1 (1) of Annex 2 and art. 1 (3) of Annex 3 RSTP, the Committee held that USD Lavagnese 1919 had to be sanctioned for the aforementioned violations.

c. The determination of the sanction

62. The violations of the RSTP by the Respondent having been established, the Committee subsequently considered the sanction(s) to be imposed.
63. The Committee observed in the first place that the Respondent is a legal person, and as such can be subject to the sanctions described under art. 6 (1) and (3) FDC.
64. For the sake of good order, the Committee underlined that it is responsible to determine the type and extent of the disciplinary measures to be imposed in accordance with the objective and subjective elements of the offence, taking into account both aggravating and mitigating circumstances (art. 24 (1) FDC).
65. As it was established above, the Respondent was found guilty of violating arts. 9 (1) and 19 (1), (3) and (4), and art. 1 (1) of Annex 2 and art. 1 (3) of Annex 3 RSTP for the illegal international transfer of two minor players from Nigeria to Italy and the first registration of two Nigerian players.
66. However, the Committee was far more concerned about the system – the so-called "Nigerian System" – put in place by Spezia Calcio in total cooperation with USD Lavagnese 1919 to circumvent the provisions governing the protection of minor players than about the number of players actually involved in the present case. Indeed, in the Committee's view, it is inconceivable and unacceptable that a club uses and manipulates underage players by playing with their health and education in order to generate profits on their back. Such a lack

of respect and moral behaviour should be condemned in the strongest possible terms, but also with sanctions that reflect the seriousness of the offence.

67. In this respect, the Committee recognised that since the occurrence of the prohibited conducts, the Respondent has fully cooperated with FIFA and has even assumed its responsibility with regard to the allegations made in the Report.
68. Furthermore, the Committee was aware that the likely main beneficiary was probably not the Respondent, but Spezia Calcio. In this respect, the Committee strongly recommended that the persons behind the “Nigerian system”, the former administration from Spezia Calcio, be further investigated by the competent bodies.
69. Notwithstanding the above, the Committee, while welcoming the fact that the Respondent has acknowledged the allegations and accepted its responsibility, considered that the seriousness of the offences committed could not be left unpunished and considered the sanctions proposed by the latter to be insufficient.
70. In addition, the Committee recalled that when assessing the degree of fault of the Respondent, it was necessary to take into account the severity of the infringements with respect to the legal interest protected by that provision, namely the integrity of the minor's development. As stated above, the protection of minor players is one of the main pillar of the RSTP and art. 19 was implemented with the aim of protecting minor players in the context of international transfers, as young football players are generally extremely vulnerable to exploitation, abuse, and mistreatment in a foreign country.
71. In the light of the above clarification and the various precedents where clubs have been sanctioned for breaching the rules governing the protection of minors as well as those relating to international transfers of players, the Committee noted that the gravity of the infringement in the present case was unprecedented and considered that a fine and a transfer ban were the minimum sanctions to be imposed in view of the Committee's and CAS's jurisprudence. Indeed, the Committee recalled that the Club had not inadvertently disregarded the rules governing the protection of minors but helped to set up a systematic and organized system for the movement of foreign minors with the main purpose of making financial gain.
72. Against this background, the Committee decided to start with the fine by determining its amount, which according to art. 6 (4) FDC, may not be lower than CHF 100 and greater than CHF 1,000,000.
73. As already explained, the Committee found that the Respondent deliberately disregarded the provisions at stake by collaborating in the "Nigerian system", which, according to the Committee, amounted to child trafficking. In other cases where the essence and purpose of

the provision was blatantly and flagrantly disregarded, the severest possible sanctions were imposed on the offenders¹².

74. In considering the amount of the fine to be imposed in the present case, the Committee took into account the Respondent's willingness to cooperate, its amateur status, and the acceptance of responsibility. However, it could not ignore the seriousness of the facts and the violations committed, and therefore imposed a fine of CHF 4,000, an amount qualified as appropriate and proportionate in view of the whole case.
75. With regard to the transfer ban, the Committee noted that neither the FDC nor any other FIFA regulation provides for a maximum or minimum duration for such a ban. However, when determining the duration of such a ban, the Committee is obliged to bear in mind the proportionality of the sanction as a guiding principle. The Committee would like to stress, in view of the elements highlighted above, that the degree of culpability of the Club is of the highest degree. In this context, it should be recalled once again that FIFA takes the protection of minors in football very seriously. Therefore, the Committee considered that a ban on national and international registration of players for four (4) full and consecutive registration periods was appropriate based on the violations committed by the Respondent.
76. The Committee clarified that this sanction involves a strict ban on the Club registering new players at national and international level for four (4) complete and consecutive registration periods. In particular, the Respondent will only be able to register new players at national and international level from the registration period following the full implementation of the transfer ban and will not be able to make use of the exception and provisional measures specified in article 6 of the RSTP in order to register new players at an earlier stage. The Committee also pointed out that the sanction applies to all categories and sections of men's eleven-a-side football of the Respondent, with the exception of women's football, beach soccer and futsal.

¹² Cf. decisions of the FIFA Adjudicatory Chamber in cases involving Mr Yves Jean-Bart (adj. ref. no 3/2020) or Mr Keramuddin Karim (adj.ref. no 12/2019).

IV. DECISION OF THE DISCIPLINARY COMMITTEE

- 1. The club USD Lavagnese 1919 is banned from registering new players, both nationally and international level, for four (4) entire and consecutive registration periods following the notification of this decision for failing to comply with the relevant provisions of the RSTP related to the protection and transfer of minors.**
- 2. The club USD Lavagnese 1919 is ordered to pay a fine to the amount of CHF 4,000.**
- 3. The above fine is to be paid within thirty (30) days of notification of the present decision.**

FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION



Mr. Jorge Palacio

Chairman of the FIFA Disciplinary Committee

NOTE RELATING TO THE PAYMENT OF THE FINE:

Payment can be made either in Swiss francs (CHF) to 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 account no. 0230-325519.71U, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH95 0023 0230 3255 1971 U, with reference to case number above mentioned.

NOTE RELATING TO THE LEGAL ACTION:

This decision can be contested before the FIFA Appeal Committee (art. 57 of the FDC, 2019 edition). Any party intending to appeal must announce its intention to do so in writing within three (3) days of notification of the grounds of the decision. Reasons for the appeal must then be given in writing within a further time limit of five (5) days, commencing upon expiry of the first-time limit of three (3) days (art. 56 (4) of the FDC, 2019 edition). The appeal fee of CHF 1,000 shall be transferred to the aforementioned bank account on the date of the expiry of the time limit of five days for submitting the reasons for appeal at the latest (art. 56 (6) of the FDC, 2019 edition).