

Decision of the FIFA Disciplinary Committee

passed on 28 April 2020

COMPOSITION:

Mr. Anin Yeboah, Ghana (Chairman)
Mr. Alejandro Piera, Paraguay (Deputy Chairman)
Mr. Lord Veehala, Tonga (Member)

TO DISCUSS THE CASE OF:

Hellenic Football Federation

(Decision 200193)

Regarding the failure to comply with
art. 15 of the FDC (2019 ed.)

I. INFERRED FROM THE FILE

1. On 2 October 2019, the Greek club Aris FC (hereinafter also referred to as the Club) was notified, via the Hellenic Football Federation (hereinafter also referred to as the Hellenic FA), of the decision passed by the Deputy Chairman of the FIFA Disciplinary Committee on 25 September 2019 (decision with reference number 131149 PST) against the Club for the violation of article 15 of the FIFA Disciplinary Code (hereinafter, FDC). In particular, the Club was sanctioned with a fine for not respecting the decision passed by the Dispute Resolution Chamber on 23 January 2013, by means of which it was ordered to pay outstanding amounts due to the player Cristian Portilla Rodriguez.
2. In particular, the Club was sanctioned with a fine for not respecting the relevant decision passed by the Dispute Resolution Chamber and warned that, should it not comply with the said decision (i.e. pay the outstanding amounts due to the relevant creditor) within the deadline stipulated (i.e. 30 days as from notification of the relevant decision) a ban from registering new players (hereinafter, “transfer ban”), either nationally or internationally, would be imposed on the Club.
3. In this sense, the Hellenic FA, which is the Member Association to which the Club belongs, was reminded of its duty, should it be the case, to implement the transfer ban on the Club at national level and provide FIFA with evidence that this had been done. Furthermore, the Hellenic FA was warned that failure to comply with this duty would lead to the FIFA Disciplinary Committee deciding on appropriate sanctions on the Hellenic FA.
4. Furthermore, on 7 November 2019, three other decisions were passed by the Deputy Chairman of the FIFA Disciplinary Committee (hereinafter also referred to as “Deputy Chairman”) against the Club for a violation of article 15 of the FDC (decisions with reference 130834 PST, 131086 PST, 150025 PST), and were notified to the Club, via the Hellenic FA, on the same date. In particular, the Club was sanctioned in each of the three decisions with a fine for failing to comply with the decisions passed by the Single Judge of the Players’ Status Committee on 21 January 2013 (related to decision 130834 PST) and by the Dispute Resolution Chamber on 7 June 2013 (related to decisions 131086 PST and 150025 PST), by means of which it was ordered to pay outstanding amounts to the respective creditors.
5. To this respect, and as it had been done in the decision from the Deputy Chairman dated 25 September 2019, the Hellenic FA was reminded that, should the Club not comply, within 30 days as from notification of the decisions from the Deputy Chairman dated 7 November 2019, with the relevant decisions passed by the Single Judge of the Players’ Status Committee and the Dispute Resolution Chamber, it would be in charge of implementing a transfer ban on the Club at national level, and subject to disciplinary sanctions if it failed to do so.
6. On 8 November 2019, following the notification of the decisions from the Deputy Chairman dated 7 November 2019, the Hellenic FA informed the secretariat of the FIFA Disciplinary Committee (hereinafter, the Secretariat) that there are three different Greek sport entities in Greece known as “Aris FC”. These entities are 1) Aris Thessalonikis A.S, which is an amateur sports association with

several sports departments; 2) P.A.E. O Aris Thessalonikis, a “football société anonyme” dissolved on 2014 and disaffiliated from the Hellenic FA since then; and 3) Athlitikos Syllogos Thessalonikis O Aris Podosferiki Anonymi Eteria, a “football société anonyme” competing in the Greek Super League Championship. To this respect, the Hellenic FA requested the Secretariat to clarify to which of these three entities were the decisions taken by the Deputy Chairman on 25 September and 7 November 2019 (hereinafter also referred to as the four Decisions), addressed to.

7. In addition, the Hellenic FA explained that the confusion regarding the identity of the addressee of the four Decisions was due to the fact that the entity against which the relevant decisions of the Dispute Resolution Chamber and the relevant decision of the Single Judge of the Players’ Status Committee were passed, was P.A.E. O Aris Thessalonikis (hereinafter, the “old Aris”), while it appeared that the decisions passed by the Deputy Chairman were addressed to Athlitikos Syllogos Thessalonikis O Aris Podosferiki Anonymi Eteria.
8. On 27 November 2019, the Secretariat informed and confirmed to the Hellenic FA, on behalf of the Chairman of the FIFA Disciplinary Committee, that, indeed, the club Aris FC to which the four Decisions were addressed to, is the “football société anonyme” Athlitikos Syllogos Thessalonikis o Aris Podosferiki Anonymi Eteria”. Therefore, the Hellenic FA was requested to forward the decisions passed by the Deputy Chairman to the aforementioned club¹.
9. Since the Club did not comply with the decisions passed by the Deputy Chairman on 25 September 2019 and 7 November 2019 within the deadline granted (i.e. 30 days from the notification to the Club of the relevant decisions, this is, 28 November 2019²), a transfer ban was imposed on the former.
10. On 9 January 2020, the Hellenic FA sent a correspondence to the Secretariat, by means of which it acknowledged that an international transfer ban had been imposed on the Club and requested the Secretariat, amongst others, to clarify the specific reasons and the legal basis of the imposition of the transfer ban on the Club, and to provide the association with guidance on how to address the matter at national level.
11. On 10 January 2020, the Secretariat sent its response to the Hellenic FA. In this sense, and regarding the Hellenic FA requests, the Secretariat informed the latter that the decisions of the Deputy Chairman had become final and binding and that, bearing in mind that after the deadline of 30 days granted to the Club to comply with the relevant decisions from the Dispute Resolution Chamber and the Single Judge of the Players’ Status Committee, the Club had failed to do so, the transfer ban became effective. Furthermore, the Hellenic FA was reminded that the transfer ban had to be automatically implemented at national level by the concerned association and that failure to do so, could lead to sanctions on the said association. In this sense, the Hellenic FA was advised that, in case any transfer had been made by

¹ For the avoidance of doubt, the Disciplinary Committee stresses that for the calculation of the deadline given to the Club to comply with its obligations, the former considered the 27th of November 2019 as the date of notification of the decisions passed by the Deputy Chairman, since on this date it was clarified to the Hellenic FA, which was responsible for forwarding the decisions passed by the Deputy Chairman to the concerned club, who was the addressee of the mentioned decisions.

² Article 34 par. 3 of the FDC establishes the following: “Time limits to which persons other than the associations shall adhere commence on the day after receipt of the documents by the association responsible for forwarding it [...]”

the Club at national level after the transfer ban became effective, this transfer should be reverted in order to avoid the imposition of disciplinary measures.

12. On 21 January 2020, and following the information received by the Secretariat, the latter informed the Hellenic FA that it had become aware that, apparently, the Club had registered a player at the beginning of the year 2020, this is, after the transfer ban had become effective. As a result, the Hellenic FA was asked to provide its position regarding this situation.
13. To this respect, the Hellenic FA confirmed, on 24 January 2020, that the Club had acquired the player Fiorin Durmishaj (hereinafter, the “Player”) on loan, on 3 January 2020. In addition, the Hellenic FA also provided the Secretariat with its position in relation to this acquisition from the Club. The position of the Hellenic FA can be summarized as follows³:
 - i. After the recommendation made by FIFA on 10 January 2020 (cf. point I/11 ut supra) to revert any possible transfer made by the Club, the Hellenic FA submitted the case to the Hellenic FA Players’ Status Committee (hereinafter, “the Hellenic FA PSC), which, on 17 January 2020, withdrew the registration of the Player with the Club.
 - ii. However, the Club appealed the decision of the Hellenic FA PSC, on 20 January 2020, before the Hellenic FA Court of Arbitration of Football (hereinafter, the “Hellenic FA CAF”). The Hellenic FA partially admitted the appeal made by the Club and hence, annulled the withdrawal of the Player’s registration.
14. Following the above, the Secretariat opened disciplinary proceedings against the Hellenic FA, on 6 February 2020, for a potential violation of article 15 of the FDC, and invited the latter to provide its position in this respect.
15. On 19 February 2020, the Hellenic FA provided the Secretariat with its position, which can be summarized as follows⁴:
 - i. The Hellenic FA did not have the intention to fail to respect the relevant decisions taken by the Deputy Chairman of the Disciplinary Committee.
 - ii. The Hellenic FA was not in a position to know which of the three entities known as “Aris” in Greek football, was the addressee of the relevant decisions, specially taking into account that FIFA never specified the reasons why those decisions had been taken against the Club.

³ The summary does not purport to include every single contention put forth by the Debtor. 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.

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- iii. Following Greek law and the Hellenic FA regulations, the Club and the old Aris are to be considered as different legal entities.
- iv. According to labor decisions rendered by Hellenic civil courts and several decisions from the FIFA judicial bodies, Greek clubs established by the same amateur association have no legal connection.
- v. For this reason, it was more than obvious that the mere indication of club Aris FC as the addressee of the decisions passed by the Deputy Chairman was not sufficient reason for the Hellenic FA to conclude, without any doubt, that the Club should also be the club to be sanctioned with a transfer ban.
- vi. As soon as the Hellenic FA was aware that a transfer ban was imposed by FIFA on Aris FC, it contacted FIFA for clarification and, following FIFA's advice to revert the transfer of the Player, submitted the case to the Hellenic FA Players' Status Committee. The Hellenic FA Players' Status Committee annulled the registration of the Player. However, the decision was overturned by the Hellenic Court of Arbitration of Football (Decision nr 4/2020).
- vii. In this sense, article 62 of the Hellenic FA statutes foresees that the Hellenic Court of Arbitration for Football, which is independent from the Hellenic FA and impartial, acts as last instance in relation to national disputes between the Hellenic FA and its members (i.e. clubs, players, etc). In addition, article 64 of the said statutes establish that the decisions of the Hellenic FA Court of Arbitration of Football are irrevocable and no further appeal is possible.
- viii. The Hellenic FA Court of Arbitration of Football held that there is no legal connection between Aris FC and the old Aris as they constitute two separate legal entities.
- ix. The Hellenic FA is, therefore, obliged to fully comply with the decision of the Hellenic FA Court of Arbitration of Football, otherwise it could face penal and civil consequences.

II. AND CONSIDERED

1. In view of the circumstances of the present matter, the FIFA Disciplinary Committee (hereinafter also referred to as *the Committee*) decides to first address the procedural aspects, namely, the applicable law as well as its jurisdiction, before entering into the substance of the matter and assessing the potential failure to comply with the decision (s) of the Deputy Chairman of the FIFA Disciplinary Committee, as well as the potential sanctions resulting therefrom.

A. Jurisdiction of the FIFA Disciplinary Committee

2. First of all, the Committee wishes to highlight that the Hellenic Football Federation is a member association of FIFA and as such, it is bounded by the rules and regulations of FIFA. In particular, by the FIFA Statutes and the FIFA Disciplinary Code (hereinafter also referred to as the “FDC”).
3. In this sense, it must be noted that, according to article 53 of the FIFA Statutes, the function of the Disciplinary Committee shall be governed by the FIFA Disciplinary Code and the latter may pronounce sanctions described in said code and in the FIFA Statutes on member associations, clubs, officials, players, intermediaries and licensed match agents.
4. Finally, the Committee remarks that at no point during the present proceedings did the Hellenic FA challenge the former’s jurisdiction to assess the present matter.

B. Applicable law

5. Once having confirmed the Committee’s jurisdiction, and following the provision laid down in article 53 of the FIFA Statutes, the Committee moves on to define what version of the FIFA Disciplinary Code applies to the present case.
6. In this sense, the Committee underlines that the 2019 edition of the FDC entered into force on 15 July 2019 (art. 72 par. 1 of the 2019 FDC) and applies to all disciplinary offenses committed following said date (art. 4 par. 1 of the 2019 FDC).
7. With regard to the matter at hand, the Committee observes that the disciplinary offense (*i.e.* the potential failure to comply with the decision (s) of the Deputy Chairman), was committed after the 2019 FDC entered into force. As a result, the Committee deems that the merits of the present case as well as the procedural aspects fall under the 2019 edition of the FDC.
8. Before moving on to the analysis of the substance of the case, the Committee believes it is relevant to recall the content and the scope of the provision at stake, this is, article 15 of the FDC.
9. According to article 15 of the FDC, anyone who fails to comply with a final decision (non-financial decision), even though instructed to do so by a body, a committee or an instance of FIFA or a subsequent CAS appeal decision:
 - a) will be fined for failing to comply with a decision;
 - b) will be granted a final deadline by the judicial bodies of FIFA in which to pay the amount due or to comply with the non-financial decision;
 - [...]
 - d) in the case of associations, upon expiry of the aforementioned final deadline and in the event of persistent default or failure to comply in full with the decision within the period stipulated, additional disciplinary measures may be imposed.

C. Merits of the case

10. The Committee would like to begin the analysis of the substance of the present matter by referring to article 7 of the FDC. This article establishes that the FIFA Judicial Bodies may issue directives stipulating the manner in which a disciplinary measure must be carried out and foresees as well, that these directives require those affected by them to behave in a certain manner.

11. In this sense, the Committee draws the attention of the Hellenic FA to paragraph 4 and paragraph 5 of the four Decisions (i.e. Decisions 131149 PST, 130834 PST, 131086 PST and 150025 PST) taken against the Club. These paragraphs stipulate the following:

4. If payment is not made to the Creditor and proof of such a payment is not provided to the secretariat to the FIFA Disciplinary Committee and to the Hellenic Football Federation by this deadline, a ban from registering new players, either nationally or internationally, will be imposed on the Debtor. Once the deadline has expired, the transfer ban will be implemented automatically at national and international level by the Hellenic Football Federation and FIFA, respectively, without a further formal decision having to be taken nor any order to be issued by the FIFA Disciplinary Committee or its secretariat. The transfer ban shall cover all men eleven-a-side teams of the Debtor – first team and youth categories –. The Debtor shall be able to register new players, either nationally or internationally, only upon the payment to the Creditor of the total outstanding amount. In particular, the Debtor may not make use of the exception and the provisional measures stipulated in article 6 of the Regulations on the Status and Transfer of Players in order to register players at an earlier stage.

5. As a member of FIFA, the Hellenic Football Federation is reminded of its duty to implement this decision and provide FIFA with proof that the transfer ban has been implemented at national level. If the Hellenic Football Federation does not comply with this decision, the FIFA Disciplinary Committee will decide on appropriate sanctions on the member. This can lead to an expulsion from FIFA competitions.

12. Following the above, the Committee is of the opinion that the directive given to the Hellenic FA was very clear. In this respect, it had to impose a transfer ban on the Club if the latter did not comply with its financial obligations, as stipulated in each of the relevant decisions of the Deputy Chairman, within 30 days of the notification of the said decisions⁵.

13. As a consequence, and since the Club did not comply with its obligations within the given deadline (i.e. 30 days as from 28 November 2019), or at least no information or evidence has been provided to

⁵ According to article 44. Par. 4 of the FDC, decisions are considered to have been communicated properly to the ultimate addressee (in the present case, the club Aris FC) the day after receipt of the decision by the respective association (in the present case, the Hellenic FA).

the contrary, the Hellenic FA had to impose a transfer on the Club upon expiration of the 30 days deadline.

14. In these circumstances, the Committee notes that the Hellenic FA claims that it was not in a position to know which of the three entities known as Aris FC in Greece, was the addressee of the relevant decisions.
15. In this respect, the Committee points out that it was made clear to the Hellenic FA on the correspondence sent by the Secretariat (cf. point I/8 *ut supra*), on 27 November 2019, that all four decisions passed by the Deputy Chairman, which are the subject of the present proceedings, were addressed to the club “Athlitikos Syllogos Thessalonikis o Aris Podosferiki Anonymi Eteria”. This football club, following the explanation and description given by the Hellenic FA (cf. point I/6 *ut supra*), was the entity known as Aris FC that was competing in the Greek Super League and thus, affiliated to the Hellenic FA.
16. In fact, the Committee believes that the Hellenic FA was well aware that the Club was, indeed, the addressee of the four Decisions as in its correspondence from 19 February 2020, the Hellenic FA stressed that “*the mere (so far unexplained) indication of ARIS [the Club] being the addressee of the decisions [...] was not a secure and sufficient reason for HFF to conclude, without any doubt, that ARIS [the Club] should also be the club to be sanctioned*”.
17. Therefore, In view of the clarification made by the Secretariat and of the Hellenic FA statement, the Committee is convinced that the former perfectly knew that the Club, or “Athlitikos Syllogos Thessalonikis o Aris Podosferiki Anonymi Eteria”, was the addressee of the decisions passed by the Deputy Chairman.
18. Once having clarified the above, the Committee remarks that, despite of what the Hellenic FA affirms, there can be no doubts that the person addressee of a decision, in this case a club, is also the person subject to the potential sanctions contemplated in the said decision. In this sense, and in the Committee’s opinion, any other conclusion would be implausible.
19. In addition, the Committee observes that the Hellenic FA claimed it did not have enough reasons to conclude that the Club, which was the addressee of the decisions taken by the Deputy Chairman, was the club to be sanctioned. From this statement it comes clear to the Committee that neither had the Hellenic FA enough reasons to conclude the contrary, this is, that the Club did not have to be sanctioned.
20. In these circumstances, and considering the (unfounded) doubts from the Hellenic FA, the Committee deems that it was the Hellenic FA’s responsibility to clarify this uncertainty, as it had done with regard to the questions over the identity of the addressee of the decisions.
21. In light of all the above, the Committee considers that the Hellenic FA had all the information and means at its disposal to know, accurately, that the Club was the addressee of the decisions and, consequently, subject to the potential sanctions.

22. Furthermore, the Committee observes that, as confirmed by the Hellenic FA (cf. point I/13 *ut supra*), the Club acquired the Player on loan, on 3 January 2020, this is, after the transfer ban had become effective.
23. Notwithstanding the above, the Committee notes that according to the Hellenic FA, the Player's registration was withdrawn by the Hellenic FA Players' Status Committee (hereinafter, the Hellenic FA PSC) on 17 January 2020. However, the Hellenic FA also informed that, following an appeal lodged by the Club, the Hellenic FA Court of Arbitration of Football overturned the decision passed by the Hellenic FA PSC and, consequently, annulled the withdrawal of the Player's registration.
24. To this respect, the Committee wishes to recall that the directive given to the Hellenic FA was to impose a transfer ban on the Club, once the 30 days deadline given to the latter to fulfill its obligations expired, so that, after this deadline, the Club could not be able to register new players. However, the Hellenic FA failed to implement the transfer ban on the Club and thus, allowed the latter to acquire the Player.
25. In addition, and as confirmed by the Hellenic FA itself, the Committee acknowledges that the latter only submitted the case to the HFF PSC, and therefore, took actions to try to revert the registration of the Player, after the Secretariat advised it to do so. To this respect, the Committee firmly believes that the Hellenic FA only reacted following the Secretariat recommendation to do so and after being warned that not reverting any possible transfer made by the Club after the transfer ban became effective, could imply sanctions against the Hellenic FA.
26. Furthermore, the Committee stresses that, although the actions taken by the Hellenic FA after the transfer of the Player to the Club to revert the said transfer, would not have exonerated the Hellenic FA from its responsibility of implementing the relevant transfer ban, in any event, the Player remained registered with the Club.
27. As a result, taking into consideration that i) the identity of the addressee of the decisions of the Deputy Chairman and of the sanctions contemplated in the said decisions was clear and had been clarified to the Hellenic FA, that ii) the Club did not comply with its financial obligations within the deadline granted and iii) the Club registered a Player after the transfer ban became effective, the Committee concludes that the Hellenic FA failed to implement the transfer ban on the Club.
28. In this regard, the Committee finds it relevant to refer to paragraphs 3, 4 and 5 of the decisions passed by the Deputy Chairman on 25 September 2019 and 7 November 2019. In these paragraphs, the Club was informed that it had 30 days as from notification of the present decision in which to settle its debt to the respective creditors. In addition, the Club was warned that if it did not pay the debt and provide FIFA and the Hellenic FA with the relevant proof of payment, a ban from registering new players, either nationally or internationally, would be imposed on the Club.
29. To this respect, it must be noted that paragraph 4 expressly mentioned that the transfer ban at national level would be implemented, automatically, upon the expiry of the 30 days deadline, by the

Hellenic FA. Furthermore, it was also made clear in paragraph 4 of the relevant decisions that, once the transfer ban becomes effective, the Club shall only be able to register new players, either nationally or internationally, upon payment to the relevant creditor of the total outstanding amount due.

30. Therefore, and since there is no evidence that the Club paid the outstanding amounts due to the relevant creditors within the 30 days granted, and provided the Hellenic FA with a proof of such payments, the transfer ban automatically became effective and, consequently, the Club could not register any new players from then on.
31. Notwithstanding the above, and as confirmed by the Hellenic FA, the Committee notes that despite serving a transfer ban, the Club registered the Player on loan.
32. In light of the above, and since it was the responsibility of the Hellenic FA to implement the transfer ban on the Club accordingly and to make sure that the Club did not register any new players after the transfer ban had become effective, the Committee concludes that the Hellenic FA did not comply with the decisions from the Deputy Chairman. Consequently, the Committee declares that the Hellenic FA has violated article 15 of the FDC.

D. The determination of the sanction

33. Before entering into the determination of the sanction, the Committee would like to provide some context on the functioning of FIFA, the FIFA Disciplinary Committee and the mechanism for the implementation of the disciplinary measures, as it is important to understand the position of clubs within the organization of association football and, specially, the role that member associations play in the execution of disciplinary decisions and implementation of sanctions imposed by the FIFA judicial bodies on their affiliated members.
34. Association football follows a so-called “pyramidal” model: individual athletes (the football players) are registered with clubs, the clubs, in turn, are affiliated to (regional and/or national) football associations, and the national football associations are members of FIFA (an association under Swiss law). As a consequence, football clubs are not direct members of FIFA.
35. However, within the framework of Swiss association law, as well as in sports law in general, an approach has been established according to which football clubs are, under the aforementioned circumstances, considered as “indirect members” of FIFA.
36. Due to such indirect membership, the individual clubs that are affiliated to a member association, are subject to and bound by the FIFA Statutes and all other FIFA rules and regulations as well as all relevant decisions of the FIFA judicial bodies. In the current context, this specific indirect membership enables the FIFA Disciplinary Committee to pass decisions against clubs in line with the provisions of the FDC.

37. The aforementioned principle is embedded in article 14 par. 1 lit d) of the FIFA Statutes, according to which, the member associations have the obligation *“to cause their own members to comply with the Statutes, regulations, directives and decisions of FIFA bodies”* and in article 60 par. 2 of the FIFA Statutes, which stipulates that member associations *“shall take every precaution necessary to ensure that their own members, players and officials comply with these decisions”*.
38. Of course, and as stipulated in article 14 par. 1 of the FIFA Statutes, the member associations also have to comply fully with the Statutes, regulations, directives and decisions of the FIFA bodies and the CAS. In fact, this provision is of utmost importance as the whole football pyramidal model is underpinned by this principle, which has become even more relevant in the past decades due to the professionalization, commercialization and globalization of sport.
39. In this regard, the Committee is of the firm opinion that the only way to enhance and protect competitive balance in the national leagues, which are affiliated to their respective member association, and to ensure that the rights of all football stakeholders (clubs, players, coaches, player agents, etc) are guaranteed and respected, is if FIFA and its member associations maintain a transparent relationship based on mutual trust.
40. In order for this relationship to work, it is crucial that member associations respect and comply with the FIFA regulations, as well as with the directives and decisions adopted by the FIFA bodies.
41. As a result, any failure to respect a FIFA rule, directive or decision is considered to be a very serious infringement as it jeopardizes the football game and the trust of all stakeholders in the system.
42. Once having clarified the above, the Committee moves on to determine the applicable sanction in the present case and observes, in the first place, that the Hellenic FA is a legal person, and as such, it can be subject to the sanctions described under article 6 par. 1 and 3 of the FDC.
43. For the sake of good order, the Committee underlines 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 (article 24 par. 1 of the FDC).
44. In these circumstances, and although the Committee is aware that the Hellenic FA does not have any precedents related to violations of article 15 of the FDC, it wishes to point out that, on five occasions, at least (the notification of each of the four decisions of the Deputy Chairman and the correspondence from the Secretariat dated 27 November 2019), the Hellenic FA was requested and advised that it had to implement a transfer ban on the Club if the latter did not comply with the relevant decisions of the Dispute Resolution Chamber and the Single Judge of the Players’ Status Committee. Despite this, the Hellenic FA failed to do so.
45. In light of all the above, the Committee considers a fine to be the appropriate sanction.

46. The fine to be imposed under the above-referenced article 15 par. 1 a) of the FDC, in combination with article 6 par. 4 of the FDC, shall range between CHF 100 and CHF 1,000,000.
47. In view of all the circumstances pertaining to the present case and particularly taking into account the severity of the infringement, the Committee deems a fine amounting to CHF 500,000 to be adequate and proportionate to the offence.

III. THEREFORE DECIDED

1. The FIFA Disciplinary Committee found the Hellenic Football Federation guilty of failing to comply with the decisions rendered by the Deputy Chairman of the FIFA Disciplinary Committee on 25 September 2019 (Decision 131149) and on 7 November 2019 (Decisions 130834;131086 and 150025), in particular, points 4 and 5 of the mentioned decisions in relation to the implementation of a transfer ban on the relevant club.
2. The FIFA Disciplinary Committee orders the Hellenic Football Federation to pay a fine to the amount of CHF 500,000.
3. The above fine is to be paid within thirty (30) days of notification of the present decision.

FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION



YEBOAH Anin
Chairman of the 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:

According to article 49 together with article 57 par. 1e) of the FDC and article 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.

The contact details of the CAS are the following:

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