

Decision of the FIFA Disciplinary Committee

passed on 12 August 2025

DECISION BY:

Jorge PALACIO (Colombia), Deputy Chairperson

ON THE CASE OF:

Fuad Dapo Sule
(Decision FDD-24911)

Regarding the decisions passed by the Irish Football Association Disciplinary Committee on 27 April 2025 and 2 May 2025

Art. 70 of the FIFA Disciplinary Code (ed. 2023) - *Extending sanctions to have worldwide effect*

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 presiding member of the FIFA Disciplinary Committee (**the Committee**) has thoroughly considered any and all evidence submitted, even if no specific or detailed reference is made to particular elements of the former.
2. On 26 April 2025, Fuad Dapo Sule (**the Respondent**) was sent-off for violent conduct during the match *Larne FC v. Glentoran FC*, played at Inver Park Stadium, in connection with the Irish Sports Direct Premiership (**the Match**).
3. On 27 April 2025, the Irish Football Association (**IFA**) Disciplinary Committee decided to issue a 3-match suspension against the Respondent for Violent Conduct, as per art. 9 (5) of the IFA Disciplinary Code (**the 1st Disciplinary Decision**).
4. On 05 May 2025, the Respondent was issued with a further 6-match suspension for the violation of art. 20.1 of the IFA Disciplinary Code – Participation in a Brawl, in connection with the Match (**the 2nd Disciplinary Decision**).
5. Accordingly, the IFA requested the Committee to extend the 1st and 2nd Disciplinary Decisions as to have worldwide effect on 30 July 2025, on the basis of art. 70 of the FIFA Disciplinary Code (**FDC**) and art. 12 of the FIFA Regulations on the Status and Transfer of Players (**RSTP**).
6. Along with the request, the IFA submitted a copy of the 1st Disciplinary Decision as well as the 2nd Disciplinary Decision (hereinafter jointly referred to as “Decision”) and various supporting documents, including:
 - i. A copy of an IFA’s communication informing that it received an ITC instruction through FIFA TMS for the above-named player from Persis Solo FC of the Football Association of Indonesia, and that the Respondent had outstanding disciplinary sanctions of 8 games yet to be served.
 - ii. A copy of a Notice of Complaint (Ref. MD/DISC/NOC205) sent to Glentoran FC on 02 May 2025, in connection with the art. 20.1 – Participation in a Brawl and a copy of a correspondence informing that the IFA intended to apply for a worldwide extension of the imposed sanctions.
7. On 04 August 2025, the Secretariat of the FIFA Disciplinary Committee (the **Secretariat**) requested further information to the IFA, which has been provided timely.
8. On 12 August 2025, the terms of the Decision issued by the Committee was notified. The Respondent timely requested the grounds of the Decision on 13 August 2025.
9. On 15 August 2025, the Respondent submit a communication informing that intended to appeal against the Decision, arguing the following:

"1. Lack of Proper Notification and Right to be Heard

At no stage did the IFA provide me with direct written notification of the charges, the decision, or the right to appeal, as required under Article 39 of the FIFA Disciplinary Code and the principles of due process. All communications were sent exclusively to my former club, Glentoran FC, who informed me that they would not appeal on my behalf. I was therefore denied any meaningful opportunity to present a defence or lodge an appeal, contrary to Articles 39 and 45 FDC, and contrary to the right to be heard under Article 14(1)(d) FDC.

2. FIFA's Obligation to Verify Procedural Compliance Before Granting Worldwide Effect

Under Article 66(2) of the FIFA Disciplinary Code, FIFA may extend sanctions imposed by a member association only where the proceedings respected the essential principles of law and the FIFA Code. This includes proper notification and the opportunity for the sanctioned party to appeal. As these guarantees were not met, the prerequisite for FIFA to grant worldwide effect was not satisfied. The failure to ensure these procedural safeguards renders the worldwide extension unlawful.

3. Precedent of Reduced or Annulled Sanctions for Other Individuals in the Same Incident

Other individuals involved in the same incident were able to exercise their right of appeal and obtained significant reductions or annulments of their sanctions. The disparity arose solely because I was never informed of my right to appeal, placing me in a materially prejudiced position and violating the principle of equality before the law.

Request for Relief

In light of the above, I respectfully request that FIFA annul the decision to extend the IFA sanction to have worldwide effect on the grounds that the underlying proceedings did not comply with the procedural requirements mandated by the FIFA Disciplinary Code. This appeal does not seek to relitigate the merits of the case before the IFA, but solely challenges the validity of FIFA's worldwide extension due to the procedural defects described herein"

II. CONSIDERATIONS OF THE DISCIPLINARY COMMITTEE

10. In view of the circumstances of the case at hand, the Committee decided to first address the procedural aspects of the present proceedings, namely, its jurisdiction and the applicable law, before entering into the substance of the matter and assessing whether the request submitted by the IFA for the worldwide extension of the sanction(s) imposed on the Respondent could be granted.

A. Jurisdiction and applicable law

11. First of all, the Committee recalled that, in accordance with art. 45 (2) of the FIFA Statutes, it may pronounce the sanctions described in these Statutes and the FIFA Disciplinary Code (**FDC**) on members associations, clubs, players, officials, football agents and match agents.
12. In this context, the Committee subsequently recounted that in accordance with art. 57 (1) (e) FDC, the Chairperson of the Committee can rule alone, acting as a single judge, and may delegate their functions to another member of the Committee to may take a decision on extending a sanction so as to have worldwide effect, as *in casu*.

13. In view of the above, the Committee stressed that the specific procedure related to the extension of sanctions to have worldwide effect (so-called *worldwide extension*) is foreseen under art. 70 FDC.
14. Furthermore, for serious infringements (in particular but not limited to discrimination, manipulation of football matches and competitions, misconduct against match officials, or forgery and falsification, as well as sexual abuse or harassment) the associations, confederations, and other organising sports bodies shall request the FIFA Disciplinary Committee to extend the sanction(s) which they have imposed so as to have worldwide effect (cf. art. 70 (1) FDC). Put differently, a worldwide extension is applicable to any serious infringement – this, whilst keeping in mind that the list of infringements referred to as “serious” pursuant to the aforementioned provision is not an exhaustive list, as demonstrated by the clear and unequivocal wording used therein (“*in particular but not limited to*”).
15. In continuation and consistently with art. 70 (2) FDC, the art. 12 of the FIFA Regulations on the Status and Transfer of Players states that:

“Any disciplinary sanction of more than four matches or more than three months that has not yet been (entirely) served by a player shall be enforced by the new association that has registered the player only if the FIFA Disciplinary Committee has extended the disciplinary sanction to have worldwide effect. Additionally, when issuing the ITC, the former association shall notify the new association via TMS of any such pending disciplinary sanction.”

16. In addition, the Committee observed that the request (for worldwide extension) shall be submitted in writing and shall enclose a true copy of the decision concerned.
17. With the foregoing in mind, the Committee next proceeded to point out that, in principle, it takes decisions on worldwide extensions without deliberations or orally hearing any of the parties, and using only the file (cf. art. 70 (6) FDC) – this whilst keeping in mind that it would either grant or refuse to grant the relevant request to have the sanction extended (cf. art. 70 (9) FDC).
18. Against such background, the Committee subsequently underlined that, upon deciding on a worldwide extension, it may not review the substance of the decision (to be extended) – *in casu* the IFA Disciplinary Committee – but was restricted to ascertaining whether the conditions of art. 70 FDC had been fulfilled (art. 70 (8) FDC).
19. In this context, the Committee was mindful that, pursuant to arts. 70 (3) and 70 (5) FDC, the worldwide extension would be approved in the event that the following conditions had been cumulatively met:
 - i. the person sanctioned was cited properly (lit. e);
 - ii. the person had the opportunity to state its case (with the exception of provisional measures) – (lit. e);

- iii. the decision was communicated properly (lit. f);
- iv. the person had been informed that the sanction will be submitted for a worldwide extension (lit. g);
- v. the decision complies with the regulations of FIFA (art. 70 (5) FDC);
- vi. extending the sanction would not be in conflict with public order or with accepted standards of behaviour (art. 70 (5) FDC).

B. Analysis of the request submitted by the IFA in light of art. 70 FDC

20. As a starting point, upon its reading of the Decision, the Committee *inter alia* noted that it relates to the misconduct of players and that it could therefore be extended to have worldwide effect.
21. In continuation and upon its analysis of the documentation submitted by the IFA and the Respondent, in light of art. 70 (5) FDC, the Committee wished to emphasise that:
- i. the Respondent has been cited properly and had the opportunity to state its case, in so far that he had the opportunity to challenge the Notices of Complaint (cf. par. I.3.i and iii *supra*);
 - ii. The Respondent was notified of the Decisions in accordance with the IFA Disciplinary Code, as per art. 1 (5) and 10 (7) (cf. par. I.3.ii *supra*);
 - iii. The Decision was compatible with the regulations of FIFA in so far that it “*can coexist with these regulations [of FIFA] and does not result in regulatory conflicts*”¹.
 - iv. The Decision did not conflict with public order or with accepted standards of behaviour, keeping in mind that said assessment shall be limited to the question as to whether said decision is consistent with public order, *i.e.* whether it violates fundamental principles of law², including but not limited to the principles of legality and typicality, the principles of proportionality, liability and culpability, the principles of independence, impartiality and good faith or the basic rules of conduct or morality³. In fact, upon analysing the Decision, the Committee was settled in its opinion that none of those fundamental principles or basic rules had been breached.
22. In view of the foregoing, the Committee was comfortably satisfied that the (cumulative) conditions for a worldwide extension, as stipulated under art. 70 (5) FDC, had been met.

¹ CAS 2021/A/7650 Club Atlético de Madrid S.A.D. v. FIFA - free translation from Spanish

² CAS 2015/A/4184 Jobson Leandro Pereira de Oliveira v. FIFA and SFT 4A_18/2008.

³ CAS 2021/A/7650 *op. cit.* – free translation from Spanish.

23. Furthermore, while the Respondent has informed his intention to appeal of this Decision, only the motivated decision can be appealed against pursuant to art. 61 (2) FDC. Therefore, said request for relief is hereby disregarded and the Respondent is granted the opportunity to lodge an appeal in accordance with the provisions of the art. 60 FDC.

C. Conclusion

24. Summarising its above considerations, the Committee found that all the conditions foreseen under art. 70 FDC for a worldwide extension of the Decision were fulfilled.
25. Consequently, the Committee decided to extend the sanction imposed on the Respondent by the Irish FA Disciplinary Committee issued on 27 April 2025 and 2 May 2025 so as to have worldwide effect. This means that the Respondent is sanctioned worldwide with a 9-match suspension as from 05 May 2025. Matches already served prior to the notification of this Decision may be counted towards the fulfilment of the suspension.
26. Finally, for the sake of completeness, the Committee recalled that, pursuant to art. 70 (11) FDC, should the Decision not yet be final in a legal sense, the present decision shall follow the (final) outcome of the Decision.

Decision

- 1. The request to extend the decision passed by the Irish FA Disciplinary Committee issued on 27 April 2025 and 2 May 2025 to have worldwide effect is granted.**
- 2. The player Fuad Dapo Sule is sanctioned worldwide with a 9-match suspension as from 27 April 2025, which may include matches already served prior to the notification of this decision, in connection with the match Larne FC v Glentoran FC played on 26 April 2025.**

FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION

Jorge PALACIO (Colombia)

Deputy Chairperson of the FIFA Disciplinary Committee

NOTE RELATING TO THE EXTENSION WORLDWIDE OF THE DECISION:

A sanction imposed by an association or a confederation has the same effect in each association of FIFA, in each confederation and in FIFA itself as if the sanction had been imposed by any one of them (art. 70.10 FDC).

If a decision that is not yet final in a legal sense is extended to have worldwide effect, any decision regarding extension shall follow the outcome of the association's or confederation's current decision (art. 70.11 FDC).

NOTE RELATING TO LEGAL ACTION:

This decision can be contested before the FIFA Appeal Committee (art. 60 FDC). Any party intending to appeal must announce its intention to do so in writing via the FIFA Legal Portal 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. 60 (4) FDC). The appeal fee of CHF 1,000 is payable on the submission of the appeal brief at the latest (art. 60 (6) FDC).