



TAS / CAS
TRIBUNAL ARBITRAL DU SPORT
COURT OF ARBITRATION FOR SPORT
TRIBUNAL ARBITRAL DEL DEPORTE

CAS 2025/A/11271 Fédération Royale Marocaine de Football v. FIFA

ARBITRAL AWARD

delivered by the

COURT OF ARBITRATION FOR SPORT

sitting in the following composition:

President: Mr. Rui Botica Santos, Attorney-at-Law, Lisbon, Portugal
Arbitrators: Prof. Dr. Pascal Pichonnaz, Professor and Attorney-at-Law, Fribourg,
Switzerland
Mr. Benoît Pasquier, Attorney-at-Law, Zurich, Switzerland

in the arbitration between

Fédération Royale Marocaine de Football, Rabat, Morocco
Represented by Mr. Jorge Ibarrola and Ms. Monia Karmass, Attorneys-at-Law with Libra Law
SA, Lausanne, Switzerland.

Appellant

v.

Fédération Internationale de Football Association (FIFA), Zurich, Switzerland
Represented by Mr. Miguel Liétard Fernandez-Palacios, Director of Litigation, and Mr. Rodrigo
Morais, Senior Legal Counsel of FIFA Litigation Department, Coral Gables, Florida, USA.

Respondent

I. THE PARTIES

1. The Fédération Royale Marocaine de Football (the “Appellant” or “FRMF”) is the national association governing football in Morocco, with its headquarters in Rabat, Morocco, and is a member of the *Fédération Internationale de Football Association*.
2. The *Fédération Internationale de Football Association* (the “Respondent” or “FIFA”) is the worldwide governing body of international football and exercises regulatory, supervisory and disciplinary functions over continental confederations, national associations, clubs, officials and players. FIFA is an association under Swiss law with its registered office in Zurich, Switzerland, and is the governing body for international football.
3. In this appeal proceedings (the “Appeal”), the FRMF and FIFA are collectively referred to as the “Parties”.

II. FACTUAL BACKGROUND

4. Below is a summary of the main relevant facts and allegations based on the Parties’ written submissions, pleadings and evidence adduced in the course of the present proceedings. Additional facts and allegations may be set out, where relevant, in connection with the legal discussion that follows. This factual background information is given for the sole purpose of providing a synopsis of the matter in dispute. Although the Panel appointed has considered all the facts, allegations, legal arguments and evidence submitted by the Parties in the present proceedings, it is referred in this award (the “Award”) only to the submissions and evidence it is considered necessary to explain its reasoning.

(A) Introduction

5. This Appeal before the Court of Arbitration for Sport (the “CAS”) arises due to the decision issued by the FIFA Appeal Committee (the “Appeal Committee”), namely FDD-20070 against the FRMF, confirming the decision of the FIFA Disciplinary Committee (the “FIFA DC”), which ordered the FRMF to pay FIFA a fine in the amount of CHF 100,000 and serve a one-match closed-door spectator ban, for inappropriate and disruptive behavior of its alleged supporters in connection with the football match between the representative team of Morocco and Argentina, held on 24 July 2024, in Saint-Etienne (the “Match”), during the Men’s Olympic Football Tournament (the “OFT”) at the Paris 2024 Olympics Games (the “Paris Olympics”).

(B) The Relevant Match and the Incidents Under Consideration

6. The Moroccan representative team participated in the Paris Olympics and played six matches against Argentina, Ukraine, Iraq, USA, Spain, and Egypt.
7. After the Match, the match commissioner submitted his report (the “Match Report”), which is as follows:

“(…) There were several pitch invasions by spectator during the match

Minute 68’ – one kid entered from right corner side of team B goal and security chased him, allowing to take a selfie with ARG player number 9 and then leaving the field.

Minute 90+15 After ARG goal, several fans started invading the pitch from different sides. Both – Argentina and Morocco fans were seen entering the [field].

There were water bottles and firecrackers thrown into the field which lead referee suspending the match.

Teams were taken back to the safe area in the tunnel at 17:05 local time and match was suspended. After discussion with local security and once all spectators are cleared from the stadium, the match was resumed. (…)”

(C) The FIFA Integrity Expert Report

8. On 25 July 2024, Mr. Christopher Saad was appointed by the FIFA DC, in accordance with Article 36 of the FIFA Disciplinary Code (the “FDC”), as the FIFA integrity expert to conduct an investigation with regard to the incidents which allegedly occurred at the Match. The key findings of his report (the “FIE Report”) were as follows:

“(…) Relevant timecodes

***55:07** – Bottle thrown towards Morocco player therefore reasonable to attribute this supporter to Argentina. [Article 17(2)(b) violation, AFA]*

***55:15** – Red firework lit behind goal. Fan wearing white shirt. Clearly in celebration and therefore reasonable to attribute this supporter to Morocco. [Article 17(2)(c) violation, [FRMF]]*

***55:53** – Smaller white firework lit behind goal.*

55:40 – Two white fireworks lit. In front of steward towards bottom right of screen.

55:46 – Another firework behind goal. Held by fan wearing red shirt, reasonable to attribute this supporter to Morocco. **[Article 17(2)(c) violation, [FRMF]]**

55:53 – Two white fireworks close together, supporter with red shirt celebrating (see 56:01) therefore reasonable to attribute this supporter to Morocco. **[Article 17(2)(c) violation, [FRMF]]**

56:04 – White fireworks past the far post of the goal. Red firework high up in stands behind goal.

56:10 – Red firework towards top right of the screen.

56:09 – White firework along sideline near corner flag.

56:34 – Red smoke above halfway line.

01:19:16 – Bare-chested supporter with green firework, celebrating Morocco goal. Others close to him with white fireworks also celebrating Morocco goal (01:19:25). **[Article 17(2)(c) violation, [FRMF]]**

01:19:32 – White firework higher up behind goal.

1:37:46 – Bottle thrown onto pitch.

01:41:34 – Red smoke coming into left hand side of shot.

01:42:12 – Young supporter in blue shirt runs onto pitch.

01:42:39 – Young Supporter takes picture with Argentina player therefore reasonable to attribute this supporter to Argentina. **[Article 17(2)(a) violation, AFA]**

02:06:48 – Red smoke seen left of screen.

02:14:0 – 02:14:25 – Approximately 40 bottles thrown at Argentina players. Reasonable to attribute to Morocco fans. **[Article 17(2)(b) violation, [FRMF]]**

02:14:16 – Morocco fans on pitch in/around penalty area. **[Article 17(2)(a) violation, [FRMF]]**

02:14:37 – Morocco fans run from left side of screen across pitch.

02:15:02 – Lit firecracker thrown at Argentina player therefore reasonable to attribute this supporter to Morocco. **[Article 17(2)(b) and (2)(c) violation, [FRMF]]**

02:15:06 – Morocco fan run across pitch.

02:15:10 – Supporter in blue shirt bottom left side of screen. Reasonable to attribute this supporter to Argentina **[Article 17(2)(a) violation, AFA]**

02:15:33 – Fan somersaulting.

02:16:06 – Several fans on pitch, one flying flag behind back.

02:17:42 – Pitch cleared of fans.

(...)

III. Key findings

36. In light of my review of the evidence as set out above, I find that there is evidence to support the contention that Morocco supporters can be seen:

a) entering the field of play, contrary to Article 17(2)(a) of the Code. This was on one lengthy occasion that caused the match to be suspended. This included approximately fifteen Morocco supporters;

b) throwing objects, contrary to Article 17(2)(b) of the Code. I consider there to be two violations of this;

c) lighting fireworks in the stands, contrary to Article 17(2)(c) of the Code. I consider that this is seen on the footage on seven occasions;

37. It should be noted that in relation to the firecracker thrown at an Argentina player, I consider this to be a violation of both Articles 17(2)(b) and 17(2)(c) on the basis that the firework was lit and then thrown.

38. I also find that there is footage that would support the contention that there are two occasions in which an Argentina supporter enters the field of play. This is supported by the evidence of the Match Commissioner, who said that Argentina supporters entered the field

of play on more than one occasion. I have marked this as two violations due to there being a distance in time between each supporter entering the field, and therefore, in my view, these are two separate instances of a supporter entering the field of [play] (as opposed to one instance including multiple supporters as is the case with [FRMF's] violation).

39. There is also one occasion in which I am satisfied that an Argentina supporter threw an object.

IV. Conclusions, recommendations

40. Taking all of the above factors into account I request, pursuant to Article 36(2) of the Code, that disciplinary proceedings are opened against [FRMF] and AFA.

41. In relation to [FRMF], I am satisfied that there is evidence to support the opening of disciplinary proceedings in relation to:

** One violation of Article 17(2)(a);*

** Two violations of Article 17(2)(b);*

** Seven violations of Article 17(2)(c).*

42. I propose that disciplinary measures are imposed on [FRMF] in accordance with Annex 1, Part II, Section B of the Code. In my view, the violation in relation to Article 17(2)(a) involved between 10 and 20 supporters. The Article 17(2)(b) violations related to approximately 40 bottles and one firework respectively. In relation to the Article 17(2)(c), in my view each related to one firework.

(...)”

9. The incidents recorded in the Match Report and the FIE Report – collectively referred to as the “Reports” – are presumed to be accurate unless proven otherwise. While the FRMF did not dispute the occurrence of the incidents captured on video and expressed sincere regret, it contested the attribution of certain incidents to its supporters, noting that the individuals involved could not be ascertained as genuine Moroccan supporters and that it had no control over fan identification in sections reserved for them.
10. Following the Match, and within the framework of the Paris Olympics, the Moroccan representative team played an additional five matches. Within those matches, several incidents occurred which led to the FRMF being sanctioned with a fine of CHF 44,500.

(C) Proceedings before the FIFA Disciplinary Committee

11. On 4 September 2024, disciplinary proceedings before the FIFA DC were initiated against the FRMF (reference FDD-18975) in connection with the incidents recorded in the Reports (see paras. 7 and 8 above) and potential breaches of Article 17 of the FDC.

12. Article 17 of the FDC reads as follows:

“(…)

17. Order and security at matches

1. Host clubs and associations are responsible for order and security both in and around the stadium before, during and after matches. Without prejudice to their responsibility for the inappropriate behaviour of their own supporters, they are liable for incidents of any kind, including but not limited to those listed in paragraph 2 below, and may be subject to disciplinary measures and directives unless they can prove that they have not been negligent in any way in the organization of the match. In particular, associations, clubs and licensed match agents who organize matches shall:

a) assess the degree of risk posed by the match and notify the FIFA bodies of those that are especially high-risk;

b) comply with and implement existing safety rules (FIFA regulations, national laws, international agreements) and take every safety precaution demanded by the circumstances in and around the stadium before, during and after the match and if incidents occur;

c) ensure the safety of the match officials and the players and officials of the visiting team during their stay;

d) keep local authorities informed and collaborate with them actively and effectively;

e) ensure that law and order are maintained in and around the stadiums and that matches are organized properly.

2. All associations and clubs are liable for inappropriate behaviour on the part of one or more of their supporters as stated below and may be subject to disciplinary measures and directives even if they can prove the absence of any negligence in relation to the organization of the match:

- a) the invasion or attempted invasion of the field of play;*
- b) the throwing of objects;*
- c) the lighting of fireworks or any other objects;*
- d) the use of laser pointers or similar electronic devices;*
- e) the use of gestures, words, objects or any other means to transmit a message that is not appropriate for a sports event, particularly messages that are of a political, ideological, religious or offensive nature;*
- f) acts of damage;*
- g) causing a disturbance during national anthems;*
- h) any other lack of order or discipline observed in or around the stadium.”*

13. On 19 September 2024, the FRMF submitted its written position to the FIFA DC. It contested its responsibility and the evidentiary basis, highlighting inconsistencies between reports and the vague attribution of fan identity.
14. On 3 October 2024, the FIFA DC rendered its decision, whose grounds were communicated on 29 October 2024. The decision determined that the FRMF was to be sanctioned under the principle of strict liability, pursuant to Article 17 (2) of the FDC and held it responsible for the conduct of the spectators during the Match. Consequently, it imposed a fine of CHF 100,000 and a one-match closed-door spectator ban on the FRMF (the “DC Decision”):

“1. The Respondent, Moroccan Football Association, is found responsible for the inappropriate behaviour of its supporters (invasion of the field of play, throwing of objects, lighting of fireworks, and lack of order or discipline in or around the stadium) in connection with the match Argentina vs Morocco played on 24 July 2024 in the scope of the Men’s Olympic Football Tournament Paris 2024.

2. The Respondent is ordered to pay a fine to the amount of CHF 100,000. The fine is to be paid within 30 days of notification of the present decision.

3. The Respondent is ordered to play one (1) official match without spectators in line with article 29 of the FIFA Disciplinary Code (FDC).

4. Serving the sanction under point 3 above shall be suspended per art. 27 FDC for a probation period of one (1) year. If the Respondent commits another infringement of a similar nature and gravity during the probationary period, the suspension listed herein shall be revoked and the sanction under point 3 enforced without prejudice to any additional sanction imposed for the new infringement.”

(D) Proceedings before the FIFA Appeal Committee

15. On 31 October 2024, the FRMF informed the Secretariat of the Appeal Committee about its intention to appeal the DC Decision.
16. On 6 November 2024, the FRMF filed its appeal and challenged the applicability of Article 17 of the FDC and claimed that FIFA does not have any legal basis to sanction its members for incidents arising from the Match, which were organized by the International Olympic Committee (the “IOC”).
17. On 12 December 2024, the Appeal Committee issued its decision under reference no. FDD-20070 (the “Appeal Committee Decision” or the “Appealed Decision”) and it is as follows:

“1. The appeal lodged by the Appellant, Moroccan Football Association, against the Decision of the FIFA Disciplinary Committee passed on 03 October 2024 is dismissed. Consequently, said decision is confirmed in its entirety.

2. The costs and expenses of these proceedings in the amount of CHF 1,000 are to be borne by the Appellant. The amount is set off against the appeal fee of CHF 1,000 already paid.”

18. On 26 February 2025, the grounds of the Appealed Decision were notified to the Parties.

III. PROCEEDINGS BEFORE THE CAS

19. On 19 March 2025, pursuant to Article R48 of the Code of Sports-related Arbitration (the “CAS Code”), the FRMF filed its statement of appeal (the “Statement of Appeal”) before the CAS against FIFA in relation to the Appealed Decision and nominated Prof. Dr. Pascal Pichonnaz (Switzerland) as its Arbitrator. The Statement of Appeal was filed in French, with the Appealed Decision (rendered in English), together with other annexures drafted in English and French.
20. On 21 March 2025, the CAS Court Office initiated two appeal arbitration procedures, registered under the references *CAS 2025/A/11271 Fédération Royale Marocaine de*

Football v. FIFA (relating to the Match) and *CAS 2025/A/11270 Fédération Royale Marocaine de Football v. FIFA* (relating to other match incidents), and invited FIFA, *inter alia*, to state its position on the language of the proceedings.

21. On 1 April 2025, the CAS Court Office confirmed that, following consultation with the Parties, the two arbitration proceedings would be submitted to the same Panel.
22. On 7 April 2025, considering the Parties' disagreement on the language of the arbitration, the CAS Court Office informed the Parties that the President of the Appeals Arbitration Division would issue an order on language (the "Order on Language").
23. On 9 April 2025, in accordance with Article R29 of the CAS Code, the President of the Appeals Arbitration Division rendered the Order on Language, determining that English shall be the language of the arbitration proceedings, while allowing the Parties to submit documents in French without English translations and exempting the FRMF from translating the Statement of Appeal in English.
24. On 24 April 2025, within the extended time limit and in accordance with Article R51 of the CAS Code, the FRMF filed its appeal brief (the "Appeal Brief").
25. On 28 April 2025, FIFA nominated Mr. Benoît Pasquier (Switzerland) as its Arbitrator.
26. On 16 June 2025, within the extended time limit and in accordance with Article R55 of the CAS Code, FIFA filed its answer (the "Answer").
27. On 18 June 2025, in accordance with Articles R33, R52, R53 and R54 of the CAS Code, the President of the Arbitration Division appointed the following Panel:

President: Mr. Rui Botica Santos, Attorney-at-Law in Lisbon, Portugal.

Arbitrators: Prof. Dr. Pascal Pichonnaz, Professor and Attorney-at-Law, Fribourg, Switzerland.

Mr. Benoît Pasquier, Attorney-at-Law, Zurich, Switzerland.

28. On 11 July 2025, after consulting the Parties, the Panel decided to hold a hearing in this matter, which was held by videoconference (via Cisco Webex) on 19 September 2025 at 14h00 CET (Swiss time).
29. On 13 August 2025, the President of the Panel issued an Order of Procedure to the Parties, which was subsequently signed by the Parties.

30. On 19 September 2025, a hearing was held by videoconference (via Cisco Webex). In addition to the Panel and Mr. Fabien Cagneux (Managing Counsel), the following persons attended the hearing:
- (i) For the FRMF
 - Mr. Jorge Ibarrola –Counsel
 - Ms. Monia Karmass –Counsel
 - Mr. Flavio Pirrello –Counsel
 - (ii) For FIFA
 - Mr. Rodrigo Morais – Senior Legal Counsel
31. At the opening of the hearing, the Parties confirmed that they had no objections to the constitution of the Panel or to the procedural conduct of the proceeding up to that moment.
32. The Parties were given full opportunity to present their arguments in opening and closing statements and to respond to questions from the Panel.
33. During the hearing, the Appellant introduced two tables not part of the case file. The first was a compilation of FIFA decisions obtained from FIFA's official website. The second, derived from the first, contained summaries, commentary, and analysis on the possible relevance of those cases to the present proceedings.
34. FIFA objected to the admission of both tables, arguing that they were produced for the first time at the hearing without prior notice, in breach of Article R56 of the CAS Code. According to FIFA, their introduction amounted to an impermissible supplementation of the Appellant's case. The Appellant contended that the tables did not constitute new evidence, as they merely compiled publicly available FIFA decision, and that collation of case law does not violate Article R56 of the CAS Code.
35. Having heard the Parties, the Panel admitted the information contained in the first table, as it consisted of an official, publicly available FIFA document that the Appellant had obtained from FIFA's website. With respect to the second table, the Panel decided to consider only the FIFA decisions cited therein, while disregarding the accompanying

interpretations and analytical commentary, which constituted new evidence and arguments impermissible under Article R56 of the CAS Code.

36. Before the conclusion of the hearing, both Parties confirmed that they had been afforded a fair and equal opportunity to present their case and that their right to be heard had been fully respected. The hearing was then declared closed, and the Panel reserved its reasoned decision for the present Award.

IV. THE PARTIES' SUBMISSIONS

37. The following summary of the Parties' positions is illustrative and does not necessarily comprise each contention put forward by the Parties. The Panel, however, has carefully considered all the submissions made by the Parties, even if no explicit reference is made in what immediately follows.

(A) The FRMF's Submissions

38. In its Appeal Brief, the FRMF submitted the following prayers and requests for relief:

“(…)

- I. [The appeal] (...) CAS 2025/A/11271 [is] upheld.*
- II. [The decision] issued by the FIFA Appeal Committee on 12 December 2024 in the case (...) FDD-20070 [is] are set aside.*
- III. No sanction is imposed on the Royal Moroccan Football Federation and the disciplinary procedures (...) FDD-20070 (FDD-18975 before the FIFA Disciplinary Committee) [is] immediately closed.*
- IV. The FRMF shall not be liable for any costs incurred in the FIFA proceedings and FIFA shall therefore reimburse the FRMF the sum of CHF 1,000 in (...) FDD-20070 [case].*

Subsidiarily to III

- V. The penalty imposed by FIFA on the Royal Moroccan Football in the disciplinary procedures (...) FDD-20070 (FDD-18975 before the FIFA Disciplinary Committee) [is] substantially reduced to a warning or reprimand.*

In any event

VI. FIFA shall bear all the arbitration costs, if any, and shall be ordered to reimburse the minimum CAS Court Office fee of CHF 1,000 in each of the CAS proceedings as well as any other advances of costs paid by FRMF.

FIFA shall be ordered to pay FRMF a contribution towards the legal and other costs incurred in the framework of these proceedings.”

39. The FRMF puts forth the following arguments in support of its position, which are summarized hereunder:

A.1 FIFA has no legal basis to sanction member associations for incidents occurred at Olympic matches

40. The FRMF submits that the Appealed Decision must be annulled for lack of any legal basis by FIFA. Under the principle of legality, consistently upheld by the CAS, disciplinary sanctions must have a clear and specific legal basis. They cannot result from an arbitrary extension of a regulatory framework to contexts not foreseen by the applicable rules (CAS 2011/A/2670 and CAS 2023/A/9364).
41. The incidents occurred during the OFT, held as part of the Paris Olympics. The Match was organized by the IOC and the Paris 2024 Organizing Committee (the “Organizing Committee”) and so, they are governed by the Olympic Charter (the “Olympic Charter”).
42. Article 59 (2) of the Olympic Charter provides for specific disciplinary measures applicable in cases of misconduct during the Olympic Games, but the measures only apply to individual athletes, teams, officials and accredited persons. The Olympic Charter contains no provision for disciplinary sanctions against national football associations, particularly not on the basis of strict liability for the behaviour of its supporters.
43. While Article 59 (4) of the Olympic Charter permits international federations (the “IFs”) to impose sanctions under their own regulations, this assumes that such rules are applicable within the context of the Olympic Games.
44. In this regard, the regulations for the OFT, as agreed between the IOC, the Organizing Committee and FIFA, expressly state that FIFA is responsible for enacting and applying its own specific disciplinary rules for the purposes of the Olympic Games.

45. FIFA has not adopted any specific regulations tailored to the Olympic Games context. It has not issued a distinct and specific disciplinary framework, adapted to the particular circumstances and distinctive nature of the Olympic Games.
46. FIFA has merely inserted a general reference to Article 8 of the FDC within the Olympic Football Tournaments – Games of the XXXIII Olympiad Paris 2024 Regulations – Final Competition (the “OFT Regulations”), stating that it shall apply as is, to the Olympic Games. With this general reference, FIFA now seeks to impose sanctions on the FRMF under Article 17 of the FDC.

A.1.1 The concept of strict liability under Article 17 of the FDC:

47. Strict liability has been recognized by CAS as a lawful doctrine under Swiss law, both within the UEFA and FIFA disciplinary frameworks. It acts as a legitimate and necessary tool in the effort to combat violence and disorder in football stadiums and to ensure that supporters’ unlawful conduct does not go unnoticed (CAS 2012/A/2802).
48. Since individual supporters are not subject to FIFA’s direct disciplinary jurisdiction, the only mechanism available to FIFA to address their misconduct is through indirect attribution of responsibility by holding their national federations accountable.
49. Article 17 (2) of the FDC does enshrine the principle of strict liability, holding federations accountable for misconduct by their supporters, even in absence of any fault or any negligence in relation to the organization of the match.
50. This framework ensures that there is always a responsible entity, namely, the organizing or participating federation, who is incentivized to take meaningful preventive measures and, where those measures fail, bears the consequences. This system is fundamentally rooted in deterrence and prevention, operating on the premise that federations possess both the institutional capacity and operational tools to influence and manage their supporter base.
51. For that reason, it must be applied restrictively, and only where its underlying rationale, namely deterrence through accountability, is clearly fulfilled. For the doctrine to be applied legitimately, two essential conditions must be met:
 - The federation must play a direct and active role in organizing or participating in the match; and

- There must be a genuine link between the federation and the individuals involved. In other words, the individuals must be supporters in the disciplinary sense, forming part of a recognizable group over which the federation has at least some degree of influence.
52. Without these conditions, the very foundation of strict liability collapses, and its application becomes punitive rather than preventive. It should be noted that the rule is premised on the assumption that the association concerned is either the host or a directly participating body, with clear responsibilities before, during and after the match.
53. Indeed, Article 17 (1) of the FDC explicitly ties liability to operational duties, such as collaborating with local authorities, implementing safety precautions and ensuring the security of the players, officials and the venue itself. These responsibilities presuppose a meaningful role in the organization and execution of the match and cannot be dissociated from the federation's ability to influence the event.
54. Article 17 (2) of the FDC also presupposes a concrete link between the federation and the individuals concerned, along with a capacity to influence their conduct. It specifically refers to the liability even in case of "*absence of negligence in the organization of the match*", implying its participation in the organization as the invited association.
55. Therefore, Article 17 of the FDC does not, and cannot, extend to passive, non-involved entities that play no role in organizing the event, have no contact with attendees, and exercised no control over ticketing, security, or logistics, whether as host or participation in the Match. In practice, national football federations are not even considered stakeholders in Olympic competitions.
- A.1.2 The FRMF cannot be held liable for the incidents that occurred during the Match:*
56. As confirmed by the Olympic Charter, participation quotas are allocated to National Olympic Committees (the "NOC's"), not to national football federations. The Olympic Charter explicitly states that it is the NOC's who are responsible for entering teams into Olympic competitions.
57. In the Match, the team representing Morocco was not entered by the FRMF, but by the Moroccan NOC.

58. Under the conditions of Article 17 (2) of the FDC, namely the genuine link between the federation and the individuals involved, the provision clearly uses the word “*their*” supporters. Yet, despite this, FIFA seeks to hold the FRMF strictly liable for the alleged spectators’ misconduct occurring in an event the FRMF did not organize, did not participate in as a football federation, over which it exercised no control and for a crowd of spectators it is not connected to.
59. The FRMF points out that there are fundamental differences between a FIFA-regulated football competition and the Olympic Games. During FIFA-regulated competitions, the participating federation is deeply involved in every aspect of the event from managing ticket distribution, coordinating supporter travel to collaborating with local law enforcement.
60. The Paris Olympics, by contrast, operated differently; matches were organized by the Organizing Committee, ticketing, security, crowd management were all managed through the Olympic systems and host authorities. The organization and security of the OFT fell exclusively within the remit of the IOC and the Organizing Committee, with no involvement from FIFA or the national football associations.
61. The FRMF were not assigned fan sections, did not liaise with police or stadium staff and had no capacity to instruct, warn or remove individuals. It had no institutional, structural or practical relationship with the Paris Olympics or with those attending it. The FRMF had no access to ticketing data, no information about the identities of the spectators and none of the typical means of engagement.
62. Article 17 of the FDC was never intended to regulate anonymous Olympic crowds. Unlike dedicated support groups typically seen at FIFA events, Olympic spectators are a mixed and unregulated crowd. Some may cheer for a country or wear its colors, but these symbolic acts do not amount to a formal affiliation in the disciplinary sense.
63. To apply the referred provision in this context is to distort its purpose and is to abandon the principle of legality. It turns a rule of deterrence into an instrument of arbitrary blame, punishing a federation for conduct it could neither influence nor prevent. Such an approach departs from both the wording and the spirit of the provision and risks reducing strict liability to a tool of nationality-based attribution.
64. In every relevant case where strict liability was upheld, there was a clear and verifiable link between the federation and the supports in question, namely through ticketing,

formal participation, supporter group coordination or direct match involvement as an opposing federation participating in the match. The rationale was always tied to actual influence and foreseeable responsibility.

65. None of those elements exist here, according to FRMF. The misconduct occurred at an event that the FRMF did not organize, involving spectators it did not know, control or engage with, in a stadium managed by a third-party Olympic authority.
66. If FIFA's interpretation was to be accepted, it would allow federations to be sanctioned for virtually any incident loosely connected to their national identity, regardless of whether they were involved or had any relationship with the individuals concerned.
67. The principle of strict liability presumes accountability, but accountability requires some degree of control. Without it, liability becomes punitive for its own sake. If the principle of strict liability were to be meaningfully applied in the Olympic context, it would need to rest with the entities that actually exercise control over the event, namely the IOC, the NOC and the Organizing Committee. Holding them accountable would be the only way to preserve the logic and legitimacy of the principle of strict liability in this setting.
68. Based on the foregoing, it should be concluded that Article 17 of the FDC is not applicable in the framework of the Olympic Games and in particular to the Paris Olympics, given the complete absence of any direct or indirect involvement of the FRMF.
69. Therefore, the Appealed Decision must be annulled.

A.2 Subsidiarily, no sanctions should be imposed on the FRMF

70. Subsidiarily, even if Article 17 of the FDC and the principle of strict liability were deemed applicable, no sanctions should be imposed on the FRMF.
71. The CAS jurisprudence confirms that strict liability does not entail automatic sanctions (CAS 2014/A/3578 and CAS 2013/A/3090), distinguishing between "*recognition of responsibility*" and the "*imposition of a disciplinary sanction*", with discretion expressly embedded in Article 17 of the FDC.
72. Unlike in previous CAS cases, the FRMF had no role in organizing or participating in the OFT, nor any authority over logistics, ticketing, or security, such that sanctions would serve no preventing or deterrent purpose.

73. Moreover, the alleged link between the FRMF and the supporters involved was not proven, since FIFA relied only on indirect indicators (e.g., shirt colors, chants, seating), which fall short of the required standard of proof.
74. In both cases (see para. 71 above), the federations were either hosts or participating in the matches and thus had a degree of operational control. Even then, CAS accepted that no sanctions were warranted based on the specific facts.
75. That distinction is enshrined in the very structure of Article 17 of the FDC which, by using discretionary language such as “*may be fined*”, grants the FIFA DC the authority to refrain from imposing sanctions altogether where the circumstances so warrant.
76. Even the FIFA DC acknowledged the difficulty of establishing any connection between the supporters and Morocco.
77. In light of these specific circumstances, no sanctions should be imposed on the FRMF.

A.2.1 The sanctions imposed are manifestly disproportionate:

78. In the alternative, if any sanctions under Article 17 of the FDC are deemed warranted, it should be substantially reduced for reasons of proportionality.
79. The CAS jurisprudence requires sanctions to reflect the nature, severity and context of the offence, and to promote “*prevention*” and “*deterrence*” rather than undermine them (CAS 2002/A/493).
80. FIFA imposed two separate sets of sanctions arising from the same tournament context, resulting in cumulative penalties of CHF 144,500, which are manifestly disproportionate.
81. The burden of proof was applied inadequately given the diverse and unaffiliated composition of Olympic crowds, making attribution unreliable.
82. The FRMF had no role in organizing the Match, no control over the venue, security, ticketing, or logistics, and no ability to influence spectators at the Olympic Games.
83. Therefore, the sanctions serve no preventive purpose, and any penalty, if imposed, should be limited to a symbolic warning or reprimand.

(B) FIFA’s Submissions

84. In its Answer, FIFA submitted the following prayers and requests for relief:

“(…)

(a) Rejecting the reliefs sought by the Appellant;

(b) Confirming the Appealed Decision;

(c) In any event, dismissing the appeal in full; and

(d) Ordering the Appellant to bear the full costs of these arbitration proceedings.”

85. FIFA puts forth the following arguments in support of its position:

B.1 The alleged inapplicability of Article 17 of the FDC

86. The FRMF alleges that Article 17 of the FDC is not applicable to the present matter and that there is no legal basis for sanctioning the FRMF. This position is not only legally flawed but is also clearly inconsistent with the stance it adopted during the Appealed Decision proceedings.

B.1.1 General applicability of the FDC to incidents occurred at the OFT:

87. The FDC applies to all FIFA competitions (Article 2 (1) of the FDC).

88. The OFT are expressly defined as FIFA events under the FIFA Statutes (Article 1 (1) of the OFT Regulations) and organized by the Organizing Committee appointed by the FIFA Council (Article 3 (1) of the OFT Regulations).

89. The OFT Regulations confirm that the FIFA Statutes and all FIFA regulations apply in full (Article 1 (6) of the OFT Regulations) and explicitly state that disciplinary matters fall under the FDC and the jurisdiction of the FIFA DC (Article 8 (1) and (4) of the OFT Regulations). These regulations were approved by the FIFA Council in its 26th meeting, held on 17 December 2023 in Jeddah, Saudi Arabia.

90. Accordingly, the FRMF’s claim that FIFA failed to adopt competition-specific disciplinary rules is unfounded. The FDC is of general applicability and governs all FIFA competitions, including the OFT. There is no requirement for a separate code per tournament.

91. This framework is consistent with the Olympic Charter, which affirms the authority of the IFs to establish and apply rules for their sport at the Olympic Games (Rule 46 (1) of the Olympic Charter) and to impose sanctions without prejudice to the rights of the IOC and other bodies (Rule 59 (1) of the Olympic Charter).
92. In sum, both the OFT Regulations and the Olympic Charter recognize FIFA's autonomy to regulate and enforce disciplinary matters at the OFT.

B.1.2 Specific applicability of Article 8 and Article 17 (2) of the FDC:

93. Article 8 of the FDC establishes strict liability: infringements are punishable regardless of intent, and associations and clubs are responsible for the conduct of players, officials, supporters, and others acting on their behalf – even in the absence of fault or negligence. Article 17 (2) of the FDC reinforces this principle by holding all associations, not just hosts, liable for the inappropriate behaviour of their supporters.
94. The CAS jurisprudence consistently upholds this strict liability regime, confirming that associations remain responsible for supporter conduct even at away matches or tournaments they did not organize (CAS 2009/A/1944 and CAS 2014/A/3944). The rationale, as emphasized in CAS 2013/A/3094, is not to sanction fault but to deter misconduct by placing responsibility on the team's association.
95. Against this backdrop, the FRMF claims that the individuals were “not its supporters”, because the Olympic team was not directly affiliated with it is untenable. Not only does this contradict the clear wording of the FDC, but during the Appeal Committee proceedings the FRMF acknowledged the misconduct, accepted responsibility, and apologized for “*mistakes made by some of its attributed fans*”. The FRMF also expressly recognized that Article 17 (2) of the FDC applied, disputing only the severity of the sanctions.
96. FIFA's strict liability framework applies unequivocally, and the FRMF's attempt to disclaim responsibility is inconsistent with both the FDC and its own prior admissions.

B.1.3 The link between the representative team of Morocco in the OFT and the FRMF:

97. The operational link between the FRMF and Morocco's representative team at the OFT is beyond dispute.

98. The qualification pathway for the OFT is regulated in Section D of the “Qualification System – Games of the XXXIII Olympiad – Paris 2024 – Football” (the “OFT Qualification System”), which assigns to the confederations, the organization of qualifying tournaments subject to FIFA’s approval. In Africa, the Confédération Africaine de Football (the “CAF”) designated the 2023 U-23 Africa Cup of Nations as its qualifier, where Morocco’s U-23 national team – affiliated with the FRMF – secured its place at the OFT.
99. The FRMF itself publicly acknowledged this affiliation by consistently referring to the U-23 squad as “our team” in official communications and social media, prominently featuring its logo alongside Olympic branding. Thus, Morocco’s representative team was formally and substantively under FRMF’s responsibility.
100. The CAS jurisprudence confirms that the notion of “supporters” is an open concept, to be assessed from the standpoint of a reasonable and objective observer, taking into factors such as clothing, stadium location, and the use of team symbols (CAS 2015/A/3874). In the present case, the individuals involved were wearing Moroccan jerseys, positioned in sections designated for Moroccan fans, and using red and green flares timed to Moroccan goals and the national anthem, as documented in the Reports.
101. While FRMF did not deny the incidents, it argued that FIFA had not proven a concrete link between the individuals and the FRMF. This position fails for two reasons: (i) under Article 40 of the FDC, match reports are presumed accurate, and the burden of proof lies with the association to rebut them; and (ii) despite being granted access to video and photographic evidence, FRMF submitted no rebuttal.
102. Accordingly, the incidents were clearly committed by Moroccan supporters and under Articles 8 and 17 (2) of the FDC, by application of the principle of strict liability, the FRMF is responsible.

B.2 As to the sanctions imposed

103. FIFA rejects FRMF’s argument that the fine imposed is disproportionate or should be symbolic due to its lack of organizational control over the OFT. Under Article 6 (1) of the FDC, a wide range of sanctions may be imposed on associations, with the nature and degree of misconduct guiding the choice.

104. In this case, the FRMF was sanctioned with a fine of CHF 100,000 and a one-match closed-door spectator ban. No mitigating factors were established by the FRMF, as required under Article 25 of the FDC.
105. The CAS jurisprudence confirms that association's internal judicial bodies enjoy wide discretion in determining sanctions, and CAS panels should intervene only where a sanction is unlawful, arbitrary, discriminatory, or clearly disproportionate (CAS OG 24/09; CAS 2022/A/9053; CAS 2022/A/8731; CAS 2022/A/8651).
106. A mere warning or a reprimand, as sought by the FRMF, would not serve the necessary deterrent effect, especially given the principle of strict liability under Article 17 (2) of the FDC, where absence of fault is irrelevant.
107. Accordingly, the fine imposed was fair, proportionate, and well within FIFA's disciplinary discretion. The Appealed Decision cannot be considered arbitrary or excessive.

V. JURISDICTION

108. In accordance with Article 186 of the Swiss Private International Law Act (the "PILA"), the CAS has the power to decide upon its own jurisdiction.

109. Article R47 of the CAS Code states that:

"An appeal against the decision of a federation, association or sports-related body may be filed with CAS if the statutes or regulations of the said body so provide or if the parties have concluded a specific arbitration agreement and if the Appellant has exhausted the legal remedies available to it prior to the appeal, in accordance with the statutes or regulations of that body."

110. Pursuant to Article 49 (1) of the FIFA Statutes (2024 Edition):

"FIFA recognizes the independent Court of Arbitration for Sport (CAS) with headquarters in Lausanne (Switzerland) to resolve disputes between FIFA, members associations, confederations, leagues, clubs, players, officials, football agents and match agents."

111. Pursuant to Article 52 of the FDC (edition 2023):

“Decisions passed by the Disciplinary and Appeal Committees may be appealed against before CAS, subject to the provisions of this Code and articles 56 and 57 of the FIFA Statutes.”

112. The FRMF also relies on Article 50 (1) of the FIFA Statutes (2024 Edition) as the provision conferring jurisdiction on the CAS to hear this dispute, since it states that “[a]ppeals against final decisions passed by FIFA and its bodies shall be lodged with CAS within 21 days of receipt of the decision in question.” FIFA, in turn, did not contest the jurisdiction of CAS to hear this dispute.
113. The Order of Procedure has been duly signed by the Parties, confirming the jurisdiction of the CAS.
114. Therefore, it expressly follows that the CAS has jurisdiction to hear this dispute.

VI. ADMISSIBILITY

115. Article R49 of the CAS Code provides as follows:

“In the absence of a time limit set in the statutes or regulations of the federation, association or sports-related body concerned, or of a previous agreement, the time limit for appeal shall be twenty-one days from the receipt of the decision appealed against. After having consulted the parties, the Division President may refuse to entertain an appeal if it is manifestly late.”

116. Pursuant to Article 50 (1) of the FIFA Statutes:

“Appeals against final decisions passed by the FIFA’s legal bodies and against decisions passed by confederations, member associations or leagues shall be lodged with CAS within 21 days of receipt of the decision in question.”

117. The Appealed Decision was notified to the FRMF on 26 February 2025, and the Statement of Appeal was filed on 19 March 2025, i.e. within the 21-day deadline. Furthermore, FIFA has not contested the admissibility of the Appeal.
118. In view of the above, the Appeal is admissible.

VII. APPLICABLE LAW

119. Pursuant to Article R58 of the CAS Code, in an appeal arbitration procedure before the CAS:

“The Panel shall decide the dispute according to the applicable regulations and, subsidiarily, to the rules of law chosen by the parties or, in absence of such choice, according to the law of the country in which the federation, association or sports-related body which has issued the challenged decision is domiciled or according to the rules of law that the Panel deems appropriate. In the latter case, the Panel shall give reasons for its decision.”

120. Article 49 (2) of the FIFA Statutes provides as follows:

“The provisions of the CAS Code of Sports related Arbitration shall apply to the proceedings. CAS shall primarily apply the various regulations of FIFA and, additionally, Swiss law.”

121. The Parties do not dispute the applicability of FIFA regulations as the “applicable regulations” within the meaning of Article R58 of the CAS Code, with Swiss law being applied on a subsidiary basis, in the event that it is necessary to fill any gap or omission in the FIFA regulations. The Panel further notes that, since the present case concerns a tournament held within the framework of the Paris Olympics, the applicable regulations under Article R58 of the CAS Code include both the OFT Regulations and the Olympic Charter.

VIII. MERITS OF THE APPEAL

(A) PRELIMINARY ISSUES

(A.1) The Extent of the Powers of the CAS

122. Pursuant to Article R57 (1) of the CAS Code, the Panel has the “*full power to review the facts and the law*”. As repeatedly stated under CAS jurisprudence, with reference to this provision, the CAS appeals arbitration procedure entails a *de novo* review of the merits of the case and is not confined merely to deciding whether the decision appealed was correct or not. Accordingly, it is the function of the Panel to make an independent determination as to the merits.

(A.2) The Applicable Burden and Standard of Proof

123. The Panel notes that the burden of proof lies with the party that relies on a particular fact. This principle is expressly contained under Article 13 of the Procedural Rules Governing the Football Tribunal and is likewise reflected in Article 8 of the Swiss Civil Code (the “SCC”). As to the standard of proof, the Panel applies the test of comfortable satisfaction, which is less demanding than *proof beyond a reasonable doubt* but higher than *a mere balance of probability*.

(B) THE SCOPE OF THE APPEAL

124. The Panel holds that the scope of the Appeal is limited to a review of the FRMF’s liability, and the sanctions imposed in the DC Decision (see para. 14 above) and confirmed in the Appealed Decision (see para. 17 above), namely the fine of CHF 100,000 and a one-match closed-door spectator ban for the misconduct of certain individuals during the Match.
125. As previously noted, the Panel has full authority to review the Appealed Decision *de novo*. However, this review is strictly limited to the issues adjudicated therein. Accordingly, the Panel is not called upon to examine broader matters relating to tournament organization or Olympic governance. Its task is confined to determining whether the sanctions imposed on the FRMF was legally justified and proportionate in light of the circumstances. The Panel further notes that the facts recorded in the Reports are not in dispute.

(C) ISSUES TO BE DETERMINED

126. The Panel must examine and determine the following issues:

(1) The First Issue:

To determine whether FIFA had a valid legal basis to apply the FDC to the OFT, and thus disciplinary jurisdiction over the FRMF.

The FRMF maintains that, as the OFT falls under the IOC’s authority, FIFA lacked competence to sanction incidents arising from its tournaments. FIFA, however, argues that the OFT Regulations expressly incorporate the FIFA Statutes and the FDC, thereby affirming its jurisdiction. The Panel must therefore examine the regulatory framework to determine whether FIFA was legally entitled to impose sanctions on the FRMF.

(2) The Second Issue:

To determine whether the individuals responsible for the misconduct during the Match can be regarded as *supporters* of Morocco's team under Article 17 (2) of the FDC.

The FRMF argues that, given the global nature of the Olympic Games and its lack of control over ticketing and security, the disruptive behavior cannot be specifically attributed to Moroccan supporters. FIFA, relying on the Reports, points to individuals wearing Moroccan colors, chanting during the anthem, and igniting fireworks during Moroccan celebrations as evidence of such affiliation. The Panel must therefore determine, in light of the evidence and CAS jurisprudence, whether the misconduct is attributable to the FRMF through its *supporters*.

(3) The Third Issue:

To determine whether FRMF can be held strictly liable under Article 17 (2) of the FDC.

The FRMF maintains that it should not be sanctioned, as it had no organizational authority or practical ability to prevent incidents at the Match. FIFA, by contrast, invokes the principle of strict liability, which holds associations responsible for the conduct of their supporters regardless of fault or negligence. The Panel must therefore determine whether FRMF's lack of control exempts it from liability, or whether strict liability applies regardless of such circumstances.

(4) The Fourth Issue:

To determine whether the sanctions imposed is proportionate.

The FRMF argues that the fine of CHF 100,000 and the one-match closed-door spectator ban are excessive, given its lack of control over the event and the cumulative effect of multiple disciplinary proceedings. FIFA, by contrast, submits that the sanctions are proportionate, noting it was already reduced from the amount initially proposed and is consistent with precedents. The Panel must therefore assess whether the fine appropriately reflects the seriousness and recurrence of the incidents, in line with the principle of proportionality and CAS jurisprudence.

(C.1) Does FIFA have legal and disciplinary authority over the OFT?

127. The Panel starts by highlighting that the OFT is a competition organized within the sporting context of the Paris Olympics. This was not contested by any of the Parties.
128. With this in mind, it is relevant to also consider what is established in the Olympic Charter, since, *inter alia*, it “(...) governs the organization, action and operation of the Olympic Movement and sets forth the conditions for the celebration of the Olympic Games” (Introduction, Olympic Charter).
129. According to Rule 46 (1) of the Olympic Charter:
- “Each IF is responsible for the control and direction of its sport at the Olympic Games. All elements of the competitions, including the schedule, field of play, training sites and all equipment must comply with its rules. For all such arrangements, the OCOG must consult the relevant IFs.”.*
130. Based on the foregoing, the Panel considers that, notwithstanding the IOC’s overarching role in organizing and coordinating the Paris Olympics, it is the responsibility of each IF to control and direct the conduct of its respective sport. This responsibility encompasses the power to establish and enforce the rules, regulations and technical requirements governing all elements of the competition and to ensure that the integrity and proper organization of the events are preserved.
131. Within this framework, the Panel notes that FIFA, as the IF entrusted with the worldwide governance of football, assumed responsibility for regulating the OFT. In discharge of this mandate, the FIFA Council approved the OFT Regulations at its 26th meeting, held on 17 December 2023 in Jeddah, Saudi Arabia, which are intended to apply in full to both to the final stages of the OFT.
132. In fact, Article 1 (1) of the OFT Regulations expressly recognizes the OFT as official FIFA events under the FIFA Statutes:
- “The Olympic Football Tournaments Paris 2024 (...) are FIFA events embodied in the FIFA Statutes.”*
133. Article 1 (6) of the OFT Regulations follows this understanding, since it expressly determines that FIFA regulations are applicable in the context of the OFT:

“The FIFA Statutes and all FIFA regulations in force shall apply. Any reference in these Regulations to the FIFA Statutes and regulations refers to the FIFA Statutes and regulations valid at the time of application.”

134. Article 3 (1) of the OFT Regulations further confirms that the OFT is organized under the authority of FIFA, through its Organizing Committee appointed by the FIFA Council, in accordance with the FIFA Statutes and Governance Regulations:

“The Organizing Committee for FIFA Competitions (hereinafter the FIFA Organizing Committee), appointed by the FIFA Council, is responsible for organizing the Tournaments in accordance with the FIFA Statutes and the FIFA Governance Regulations.”

135. Additionally, the OFT Regulations expressly link disciplinary matters to the FDC. Articles 8 (1) of the OFT Regulations provides:

*“Disciplinary infringements are dealt with in compliance with the FIFA Disciplinary Code in force as well as with all relevant circulars and directives, with which the Participating Member Associations and Delegation Members **undertake to comply**”.*

(Emphasis added by the Panel)

136. Likewise, Article 8 (4) of the OFT Regulations states:

*“Any violations of these Regulations or any other FIFA regulations, circulars, guidelines, directives and/or decisions that do not come under the jurisdiction of another FIFA body shall be dealt with by the **FIFA Disciplinary Committee in accordance with the FIFA Disciplinary Code**”.*

(Emphasis added by the Panel)

137. Understanding all the above-mentioned provisions together, the Panel finds that (i) the OFT is organized by FIFA (even if under the authority and coordination of the IOC in the context of the Olympic Games) and that (ii) as the responsible IF, FIFA has complied with its duty to regulate and direct the OFT, namely by issuing the OFT Regulations, which expressly determine the applicability of FIFA’s regulatory and organizational

framework, as well as provide that disciplinary matters are to be decided under the FDC and by the FIFA DC.

138. Moreover, even in the absence of the OFT Regulation's reference to FIFA disciplinary framework, the Panel considers that, since FIFA is "responsible for the control and direction of its sport at the Olympic Games", the FDC is applicable, as per the default rule set by Article 2(1):

"This code applies to every match and competition organized by FIFA and to matches and competitions in association football that do not fall under the jurisdiction of the confederations and/or the associations, unless otherwise stipulated in this Code".

(Emphasis added by the Panel)

139. It is true that it is usual for competitors to sign an "entry form" whereby they also confirm acceptance of the applicable regulations. This is also the case with the OFT, as per Article 6 (4) of the OFT Regulations:

"All Participating Member Associations shall confirm their participation in the final competition by submitting the entry form and any other required documentation as communicated by FIFA (...)".

140. In the present case, the Panel notes that the case file does not contain evidence that the FRMF expressly undertook to comply with the OFT Regulations, i.e., the entry form that it presumably signed, was not provided.

141. However, the Panel considers this to be immaterial.

142. Firstly, the Panel notes that, in any event, FIFA's disciplinary authority does not rest solely on the undertaking clause of Article 8 (1) of the OFT Regulations but derives directly from the Olympic Charter's Rule 46 (1) read together with Articles 1 (1) and 3 (1) of the OFT Regulations, which place the OFT under FIFA's authority. This conclusion is further supported by Article 2 (1) of the FDC, which establishes its wide scope of application.

143. Secondly, it is explicit from the OFT Regulations that, by entering its qualified national team in the OFT, the FRMF necessarily participated as a "*Participating Member*

Association” in the sense of the OFT Regulations and thereby accepted the applicable framework, at least by tacit adhesion. In fact, the Panel notes that the OFT Regulations are not dubious in this matter, establishing the following:

Article 6 (1) OFT Regulations:

“The member associations that qualify for the Tournaments (the “Participating Member Associations”) agree, in collaboration with the respective NOC, to comply with and ensure that every player, coach, manager, official, media officer, representative, guest and any other person carrying out duties throughout the final competition, and for the entire stay in the host countries, on behalf of a Participating Member Association (hereinafter “Delegation Member”) complies with these Regulations, the Laws of the Game, the FIFA Statutes and FIFA’s other regulations, in particular the FIFA Disciplinary Code, the FIFA Anti-Doping Regulations, the FIFA Code of Ethics and the FIFA Equipment Regulations, as well as with any other FIFA circular letters, regulations, guidelines, directives and/or decisions. (...)”

Article 6 (2) OFT Regulations:

“On entering the final competition, the Participating Member Associations automatically undertake to:

- a) **observe and comply with these Regulations** and ensure that each of their Delegation Members also observes and complies with these Regulations and the principles of fair play;*
- b) **observe and comply with the FIFA Statutes, as well as with any other FIFA regulations**, directives, circular letters, guidelines and decisions as well as all applicable laws relating to the final competition; (...)*
- c) **observe and comply with all instructions and decisions** taken by the bodies and officials of FIFA under the terms of these Regulations; (...).”*

(Emphasis added by the Panel)

144. The provisions above leave no room for doubts: by entering the final competition (played during the Paris Olympics), the FRMF automatically undertook to observe and comply with the OFT Regulations, which expressly mandate the application of the FDC, and also with “any other FIFA regulations” and all instructions and decisions taken by the bodies and officials of FIFA.

145. Finally, the Panel also rejects the FRMF's contention that FIFA lacked jurisdiction because it did not adopt competition-specific disciplinary regulations for the OFT. No separate code is required where, as here, the FDC already applies by explicit reference in the OFT Regulations. The FDC is, in a way, integrated into the OFT Regulations by this clear (cross) reference.
146. For all these reasons, the Panel finds that FIFA possessed a valid legal basis to assert disciplinary jurisdiction over the OFT and to apply the FDC to the incidents at issue.

(C.2) *Can the Moroccan representative team and its supporters be linked to the FRMF?*

147. In assessing whether the individuals involved in the incidents can properly be considered as *supporters* of Morocco's representative team, the Panel refers to CAS 2007/A/1217, which held that "(...) *the only way to ensure that responsibility is to leave the word "supporters" undefined so that clubs know that the Disciplinary Regulations apply to, and they are responsible for, any individual whose behaviour would lead a reasonable and objective observer to conclude that he or she was a supporter of that club.*" Similarly, in CAS 2015/A/3874 the panel clarified that the definition of *supporter* is not limited to persons with a formal or contractual link to club or federation, but extends to any individual whose conduct, appearance, or behavior objectively demonstrates support for a particular team.
148. CAS 2014/A/3944 further emphasized that the assessment must be made from the standpoint of an *objective observer*. Indicators such as wearing national colors, chanting during the anthem, or celebrating a team's goals are sufficient to establish the requisite affiliation with the relevant team.
149. The Panel notes that this consistent line of CAS jurisprudence confirms that the notion of *supporter* is intentionally broad and functional. Its purpose is to ensure accountability for the conduct of individuals who visibly identify with, and lend their support to, a team in the context of a match, regardless of formal membership of legal ties.
150. Applying these principles to the present case, the undisputed Reports, leave little doubt as to the identity of the individuals concerned and their connection to the Moroccan team. The FIE Report described persons dressed in red and green entering the field, displaying Moroccan flags, igniting flares in Moroccan colors, and setting fireworks during Moroccan celebrations.

151. The Panel has also considered the FRMF’s argument that the Moroccan Olympic football team was formally entered by the Moroccan NOC, rather than the FRMF, and that no genuine link therefore exists between the FRMF and either the team or its supporters. This argument cannot be upheld.
152. According to Article 5 of the OFT Regulations, which establishes the eligibility for the OFT in the final competition, it is explicitly stated that “[t]he ***associations affiliated to FIFA may participate in the final competition provided there is a National Olympic Committee (NOC) in their respective country, which is already recognized or about to be recognized by the IOC.***”

(Emphasis added by the Panel)

153. In addition, Article 6 of the OFT Regulations, which sets out the responsibilities of the participating national associations in the OFT, leaves no doubts that it is the FRMF – not the Moroccan NOC – that qualifies and enters a team into the OFT, since the expression “member associations” relates, without a doubt, to FIFA member associations in light of the context. Article 6 (1) of the OFT Regulations further stipulates that such associations undertake and agree to comply with the OFT Regulations “*in collaboration with*” their respective NOC’s, thereby recognizing a cooperative role for the NOC but not displacing the primacy of the association’s responsibility.
154. Furthermore, the FRMF actively promoted the team on its official platforms and social media channels, particularly during its progression to the semi-finals, consistently presenting it as Morocco’s national football team under its auspices. It would now be a clear case of “*venire contra factum proprium*” to ostensibly deny being involved with the team and state that the same was the Moroccan NOC’s sole responsibility.
155. In light of these facts, and consistent with established CAS jurisprudence, the Panel is comfortably satisfied that the individuals responsible for the misconduct must be regarded as supporters of the Moroccan team within the meaning of Article 17 (2) of the FDC.

(C.3) Can the FRMF be sanctioned under Article 17 (2) of the FDC?

156. Article 17 (2) of the FDC provides that all associations (not only host associations) are liable for the inappropriate behavior of their supporters “*even if they can prove the absence of any negligence.*” This establishes a rule of strict liability, applicable equally

to home, away, and neutral-site matches, as well as to events not organized by the association concerned.

157. The CAS jurisprudence has consistently confirmed the validity and purpose of such strict liability provisions. In CAS 2013/A/3094 para. 90, the panel emphasized that Article 17 of the FDC “*was clear and expressly removed any consideration of fault*” from the inquiry. Likewise, in CAS 2002/A/493, the panel described the rule as having “*a preventive and deterrent effect*”, designed to ensure that associations remain responsible for the actions of their supporters.
158. The absence of negligence or organizational control does not exempt an association from liability. On the contrary, the rule exists precisely to guarantee responsibility for misconduct that may occur beyond an association’s direct control, thereby reinforcing deterrence and ensuring accountability.
159. Against this background, the Panel considers that FRMF’s submission that FIFA had “*no involvement whatsoever*” in the organization of the OFT is also misplaced. As established above, the OFT is an official FIFA event, governed and administered by FIFA through its Organizing Committee and regulations.
160. While the FRMF did not deny that incidents occurred, it disputes their attribution, challenging the attire, seating location, and reliability of the Reports. This contention cannot prevail. Pursuant to Article 40 of the FDC, the Reports are presumed accurate, and the burden rests on the FRMF to rebut them with specific evidence. Despite access to photographs and video footage, the FRMF failed to submit any such rebuttal. The Panel therefore accepts that the incidents described were committed by the Moroccan supporters.
161. The FRMF further submits that it cannot be sanctioned because it was not the host of the Paris Olympics and had no role in ticketing, security, or logistics. However, strict liability applies equally to misconduct at away or neutral-site matches. Without this principle, FIFA would have no effective means to address supporter misconduct, as individual fans cannot themselves be subjected to disciplinary proceedings.
162. The CAS jurisprudence has consistently confirmed that liability under Article 17 (2) of the FDC arises automatically once improper conduct by supporters is established. The rule is preventive rather than punitive, designated to influence fan behavior indirectly by

incentivizing associations to deter misconduct through education, awareness and cooperation with event organizers (CAS 2009/A/1944; CAS 2014/A/3944).

163. The fact that the Match was organized by the Organizing Committee, and that the FRMF lacked direct operational control, does not alter this conclusion. By entering its qualified national team in the OFT, the FRMF accepted the applicable regulatory framework, including the FDC. Under the principle of strict liability, it must therefore answer for the behavior of its supporters.
164. The Panel thus concludes that FIFA was entitled to sanction the FRMF for the misconduct of its supporters. Having established that the individuals responsible were Moroccan supporters (see paras. 147–155 above) and given that Article 17 (2) of the FDC imposes liability irrespective of negligence, the Panel confirms that the FRMF is in breach of Article 17 (2) of the FDC.

(C.4) Are the sanctions imposed proportionate to the violations committed?

165. In assessing proportionality, the Panel notes that the CAS jurisprudence has identified several guiding factors: (i) consistency of the sanction with prior comparable cases; (ii) whether the sanction exceeds what is reasonably necessary to achieve a legitimate disciplinary objective; and (iii) the presence of aggravating or mitigating circumstances (CAS 2022/A/8692). Ultimately, the sanction must correspond to the gravity of the offence and serve the objective of preventing re-offending (CAS 2014/A/3813).
166. The Panel further recalls that disciplinary sanctions serve both retributive and preventive purposes. It is not the Panel's role to substitute its own assessment to the one of the deciding authority where the sanctions are reasoned and proportionate. Sanctions will only be modified where there appear to be arbitrary or manifestly and grossly disproportionate to the offence committed. The Panel will therefore examine the specific circumstances of this case against the above principles.

(C.4.1) Preliminary considerations:

167. The Panel begins by reaffirming a fundamental position. Violence, hooliganism and the aggressive behaviors described in the record have no place in football. They endanger players, officials and spectators alike, disrupt the conduct of the competition and undermine the sport's integrity. Such conduct must be condemned without reservation and sanctioned with the determination necessary to deter repetition and to safeguard safety and order at matches.

168. The Panel considers that certain aspects of the present case, as assessed by the FIFA DC, present a certain level of ambiguity. The incidents that occurred were serious and were provoked by supporters of both teams during the Match. The Panel's understanding of the broader factual picture – reflected within the FIE Report (see para. 8 above) – is that individuals from both teams' contingents were involved, with an initial act of aggression originating from an Argentine supporter.
169. The Panel further notes that the Argentine Football Association (the "AFA") was, in a separate proceeding – reference no. 18974, as published in FIFA's public archive (the "AFA Decision") – sanctioned with a fine of CHF 50,000 by the FIFA DC for conduct arising from the same Match. The grounds of this decision were not requested and for this reason remain unknown.
170. Considering the above-mentioned circumstances, the Panel has difficulties to identify the reasons why the FRMF was sanctioned, for that same Match, by a global monetary fine of CHF 100,000 together with a one-match closed-door spectator ban, whereas the AFA's sanction for identical conduct during the same fixture was reportedly limited to a CHF 50,000 fine.
171. Furthermore, the Panel notes another inconsistency. The FRMF played a total of six matches within the OFT and this Match was its first game. As a matter of sequence, therefore, the FRMF had no prior record of OFT-related crowd disturbances before that fixture. Yet, after the Match, the FIFA DC imposed the above-mentioned CHF 100,000 fine and a stadium closure (suspended for a probation period of one year), while, for the subsequent five matches which were also subject to FIFA DC proceedings (reference no. FDD-19662, that resulted in the CAS proceedings with the reference 2025/A/11270), the Appeal Committee proceeded on a per-incident basis – applying the sanctioning criteria provided in Annex 1 of the FDC – and ultimately imposed a global fine of CHF 44,500 with a detailed breakdown per infringement. These events were, however, posterior to those subject to the present proceedings, and cannot therefore be taken into account in the assessment of the penalties for the incidents in this Match.
172. The Panel observes that no factual elements or analytical reasoning were set out in any of the relevant decisions, i.e. neither in the DC Decision, the Appealed Decision, the AFA Decision and the FIFA DC proceedings (reference no. FDD-19662), that could comfortably justify these inconsistencies. No indication was given as to the criteria relied upon by the FIFA DC to conclude that the FRMF's fine should be twice as severe and accompanied by a stadium-closure ban.

173. The Panel does not understand why a structured assessment was not undertaken for the Match, similar to what was done in the other cases; nor has FIFA explained why the Match was isolated into a separate proceeding rather than consolidated with the remaining OFT fixtures involving the same team during the same tournament.
174. These unexplained inconsistencies have created a justifiable doubt within the Panel about the assessment undertaken by the FIFAC DC, which may be qualified as arbitrary (para. 166) or at least which may generate serious doubts about whether the sanction is manifestly and grossly disproportionate to the offence committed. They do not, standing alone, negate the FRMF's strict liability, but they do oblige the Panel to engage in a careful, independent review of proportionality.

(C.4.2) The appropriate assessment of the sanctions:

175. After carefully reviewing the FIE Report (see para. 8 above), the Panel, acknowledges that the Match was marred by multiple incidents of serious misconduct, including two pitch invasions, bottle throwing and the lighting of fireworks. The FIE Report's time-coded analysis records disturbances attributable both to Moroccan supporters (e.g., fireworks at 55:15, 55:46 and 55:53 minutes; mass bottle throwing around 02:14; a large pitch invasion leading to the suspension of the Match at 02:14:16) and to Argentine supporters (e.g., objects thrown at Moroccan players at 55:07; pitch invasions at 01:42:12 and 02:15:10; bottles thrown at 01:37:46). These repeated infractions underline the gravity of the misconduct. The incidents recorded clearly implicate both sets of supporters, and that the initiation of the disruptions was provoked by an Argentine supporter (see para. 8 above, timecode: 55:07).
176. With the above facts in mind, the Panel shall now proceed to reassess the sanctions imposed, considering the seriousness of the incidents that occurred during the Match, as well as the reasoning and approach adopted within the DC Decision, the Appealed Decision and specifically, the AFA Decision. The Panel shall also consider the FIFA DC proceedings (reference no. 19662) concerning the remaining OFT matches involving the FRMF. Upon comparison with these other decisions, the Panel notes that the sanctions imposed in the present case lack sufficient justification to explain the discrepancies identified and therefore appear grossly disproportionate, both in their extent, quantum and structure.
177. The Panel notes that the circumstances within the AFA Decision and the present proceedings are closely aligned. In that matter, as previously established, the AFA was

sanctioned with a fine of CHF 50,000 and no stadium-closure for its involvement in the same Match. The Panel further observes that no factual elements or reasoning were provided that could justify why the FRMF was subjected to significantly higher sanctions. There is no equality in illegality, but it remains that a different sanction between two similar situations needs to be carefully justified to avoid being arbitrary.

178. In light of the foregoing, and in applying the principle of proportionality, the Panel considers that this Appeal should be assessed, at least as a starting point, on the basis of a reference amount of CHF 50,000. This reference value is grounded on two principal considerations. First, it corresponds to the sanction imposed in the AFA Decision, which concerned the same Match and involved a comparable set of incidents. In the Panel's view, maintaining consistency in the treatment of analogous conduct is fundamental to ensuring fairness and coherence within FIFA's disciplinary framework. Second, the Panel takes note of FIFA's own submissions asserting that the sanctions in the present matter should exceed those imposed in the FIFA DC proceedings (reference no. 19662), given that all infractions were committed within a single game, rather than dispersed across multiple fixtures.
179. Before confirming the proportionality of the reference amount of CHF 50,000, the Panel must assess whether any aggravating or mitigating factors arise from the record or surrounding circumstances that would justify an adjustment – either an increase or a reduction – of the proposed fine, or whether the suggested sanction of CHF 50,000 remains appropriate considering all relevant considerations.

(C.4.3) Aggravating and Mitigating factors:

180. The Panel recalls that the incidents which occurred during the Match were of a grave and unacceptable nature, involving behaviour that endangered the safety of players, officials, and spectators. Such actions undermine the spirit of fair play and the integrity of the competition and therefore warrant an effective disciplinary response. The principle of strict liability remains fully applicable, ensuring that associations bear responsibility for the conduct of their supporters irrespective of fault. These considerations have already been reflected in the determination of the proposed fine of CHF 50,000.
181. The Panel also considered whether any additional aggravating factors might justify an increase to the proposed fine. Potential aggravations could include a pattern of prior disciplinary offences, recurrent supporter misconduct, or any evidence suggesting that

the FRMF had previously failed to control its fans in comparable circumstances. However, after a thorough review of the record, no such elements were identified. The FRMF does not appear to have any history of similar infractions, its behavior after the occurrence of the incidents have been sincere and apologetic, nor is there evidence of structural indiscipline or repeated breaches of supporter-related obligations. Accordingly, the Panel finds no aggravating factors that would justify an increase in the proposed fine of CHF 50,000.

182. Turning to the mitigating circumstances, the Panel likewise finds no basis for a reduction of the proposed fine. While certain mitigating elements have been raised by the FRMF – such as the limited organizational control inherent in the Olympic context and the alleged underestimation of risks by the Organizing Committee – the Panel is satisfied that these factors, whether or not they can be considered given the strict liability approach of the sanction, have in any case already been fully taken into account within the proposed fine of CHF 50,000. No further evidence has been produced that would justify additional leniency.
183. Accordingly, taking into account the comparative AFA Decision and the broader proportionality analysis developed above, the Panel concludes that there are neither aggravating nor mitigating circumstances warranting any adjustment to the benchmark fine of CHF 50,000. Moreover, there is no reason to impose a one-match closed-door spectator ban, as this would again mean treating more harshly FRMF than what was retained in the AFA Decision, without any explainable justification.

(C.5) Conclusion

184. Having weighed all the circumstances, the Panel partially upholds the Appeal. The sanctions imposed to FRMF shall be amended to a fine of CHF 50,000 and the one-match closed-door spectator ban is hereby annulled. This revised sanction preserves the deterrent function of Article 17 (2) of the FDC, recognizes the seriousness of the incidents, but avoids a manifestly excessive outcome inconsistent with proportionality and equal treatment.

IX. COSTS

(...)

ON THESE GROUNDS

The Court of Arbitration for Sport rules that:

1. The appeal filed by Fédération Royale Marocaine de Football on 19 March 2025 with respect to the decision issued by the FIFA Appeal Committee on 12 December 2024, is partially upheld.
2. The decision issued by FIFA Appeal Committee on 12 December 2024 is set aside and item n. 2 of the decision issued by the FIFA Disciplinary Committee on 3 October 2024 is amended as follows:
 2. *The Respondent [Fédération Royale Marocaine de Football] is ordered to pay a fine of CHF 50,000. The fine is to be paid within 30 days of notification of the present decision.*
3. (...).
4. (...).
5. All other and further motions or prayers for relief are dismissed.

Seat of arbitration: Lausanne, Switzerland

Date: 19 January 2026

THE COURT OF ARBITRATION FOR SPORT

Rui Botica Santos
President of the Panel

Pascal Pichonnaz
Arbitrator

Benoît Pasquier
Arbitrator