Decision of the FIFA Disciplinary Committee

passed on 19 May 2026

DECISION BY:

Jorge PALACIO (Colombia), Deputy Chairperson

ON THE CASE OF:

CSA Steaua
(Decision FDD-27761)

REGARDING:

Art. 17.8 of the FIFA Clearing House Regulations – *Second Failure of the Compliance Assessment*

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 and arguments submitted, even if no specific or detailed reference has been made to those arguments in the following outline of its position and in the ensuing discussion on the merits.

2. This case concerns the application of the FIFA Clearing House Regulations (**FCHR**) and the disciplinary proceedings described therein as well as the FIFA Disciplinary Code (**FDC**) in relation a second failure of the compliance assessment by CSA Steaua (the **Respondent**).

3. It is to be noted that the Respondent had already incurred in a first failure of the compliance assessment with the FIFA Clearing House SAS (**FCH**), which let the case to be referred to the FIFA Disciplinary Committee as described in the matter FDD-22705. Contextually, the Respondent was sanctioned for said failure (the **First Disciplinary Decision**).

4. For the sake of completeness, the following transactions are relevant in the context of the First Disciplinary Decision (the **First Transactions**), in that they were the ones that gave rise to the obligation of the Respondent to successfully complete a compliance assessment in line with art. 15 FCHR. It is to be noted that in the First Transactions the role of the Respondent is that of New Club:

    1. On 17 October 2024, a determination was made in respect of the Electronic Player Passport 39112 concerning the player David Andrei LEON (FIFA ID: 1I7SYZ3, Gender: Male, Nationality: ROU) in connection with said player's transfer from ACS Petrolul 52 to CSA Steaua. Consequently, an allocation statement (AS) number 12770-02 was generated and notified on 20 October 2024. The AS included a Payment Order (PO) number 148923 for EUR 9519.86 corresponding to Training compensation.

    2. On 17 October 2024, a determination was made in respect of the Electronic Player Passport 39112 concerning the player David Andrei LEON (FIFA ID: 1I7SYZ3, Gender: Male, Nationality: ROU) in connection with said player's transfer from ACS Petrolul 52 to CSA Steaua. Consequently, an allocation statement (AS) number 12770-02 was generated and notified on 20 October 2024. The AS included a Payment Order (PO) number 148922 for EUR 33361.65 corresponding to Training compensation.

5. Given that the Respondent failed a first compliance assessment as described above, the matter was sent to the FCH for a second compliance assessment on the basis of art. 16 FCHR. To that effect, in addition to the First Transactions, the following ones took place after the First Disciplinary Decision (the **Subsequent Transactions**) and therefore are also relevant in the context of these proceedings. It is to be noted that in the Subsequent Transactions the role of the Respondent is that of Training Club:

    1. On 22 March 2026, a determination was made in respect of the Electronic Player Passport 73587 concerning the player Hussein SHEHAIT (FIFA ID: 1JETJ33, Gender: Male, Nationality: ROU,IRQ) in connection with said player's transfer from CSA Steaua to AL-KARMA SPORTS CLUB. Consequently, an allocation statement (AS) number 46189 was generated and notified on 23 March 2026. The AS included a Payment Order (PO) number 157862 for USD 34657.73 corresponding to Training compensation.

6. The First Transactions and the Subsequent Transactions are hereinafter referred to as the **"Transactions".**

7. However, on 12 April 2026, the FCH sent a notification to the Respondent, in which the latter was informed about another failure of the compliance assessment on the basis of art. 15 FCHR. As a result, the Respondent was advised that the case would be escalated to the FIFA general secretariat in line with art. 16(1)(d) FCHR and that it might be subject to disciplinary proceedings in accordance with article 17 of the FCHR.

8. Subsequently, on 13 May 2026, the FIFA general secretariat formally notified the Respondent that it failed its compliance assessment, thereby constituting a breach of article 16 FCHR. As a result, the case was referred to the Disciplinary Committee. The Respondent was further warned that any previous compliance failures may aggravate the situation and lead to consideration of repeat violations, while emphasizing that all future communications and potential sanctions will be handled through the FIFA Legal Portal.

9. Based on the above and in accordance with art. 55 FDC as read together with art. 17.8 FCHR, the Secretariat to the FIFA Disciplinary Committee (the **Secretariat**) opened disciplinary proceedings against the Respondent on 15 May 2026 for the breach of the cited provisions of the FCHR in relation to the Respondent's Second Failure of the Compliance Assessment. Accordingly, the Respondent was not only granted a deadline of three days to provide the Secretariat with its position but also informed that the matter would be subsequently submitted to the Committee for consideration upon expiry of the same.

10. No reply was filed by the Respondent within the deadline granted.

11. On 19 May 2026, the Committee decided on the matter. The decision was notified to the Respondent with grounds on the same date.

II. CONSIDERATIONS OF THE DISCIPLINARY COMMITTEE

12. In view of the circumstances of the present matter, the Committee decided to first address the procedural aspects, namely, its jurisdiction and the applicable law, before entering into the substance of the matter and assessing the possible breaches of the FCHR and/or FDC by the Respondent as well as the potential sanctions, if applicable, resulting therefrom.

a. Jurisdiction and applicable law

13. First of all, the Committee noted that at no point during the present proceedings did the Respondent challenge its jurisdiction or the applicability of the FDC. At the same time, the Committee confirmed the matter can be adjudicated by a single judge in line with art. 57(1) FDC.

14. Notwithstanding the above and for the sake of good order, the Committee found it worthwhile to emphasise that, in view of the issue at stake and on the basis of art. 56 FDC as read together with art. 16.1. d) and 17.8 FCHR, it is competent to evaluate the present case and to impose sanctions in case of corresponding violations. The above also stems from art. 23(4) FDC, which states that breaches of the FCHR are sanctioned in accordance with those regulations and the FDC. The Committee equally noted that it can assess the Respondent's failure of the compliance assessment as a first failure in

respect of the Subsequent Transactions, which did not form part of the case file for the First Disciplinary Decision as they had not yet happened.

15. In order to duly assess the matter, the Committee noted that the present case related to a potential violation of the FCHR. In this regard, the Committee deemed it relevant to recall that in accordance with art. 1.3 FCHR read in conjunction with art. 3.1 FCHR, the FCH is a separate entity from FIFA and was established to act as an intermediary in payments deriving from the football transfer system, especially for the payment of training rewards that fall due pursuant to the Regulation on the Status and Transfer of Players (**RSTP**) and performs all required compliance assessments in their execution.

16. In particular, the "Compliance Assessment" is defined under the FCHR as *"procedure required to be performed by the* [FCH] *prior to accepting any potential client in order to satisfy financial regulatory requirements"*. By the same token, the FCHR defines "Second Failure of the Compliance Assessment" as the *"failure by a Non-Compliant Party to pass the Compliance Assessment within the established process and deadline following the First Failure of the Compliance Assessment*".

17. In other words, the FCH assesses the parties involved in the financial transactions with it in order to ensure that they comply with both the national and international laws in relation to, without limitation, international payment sanctions, money laundering, anti-bribery/corruption and countering the financing of terrorism. Such procedure is governed by art. 15.6 FCHR, which provides *inter alia* that *"[a]fter receipt and analysis of the information requested from a party to carry out the Compliance Assessment, the* [FCH] *will make a first assessment and determination on whether a party passes or fails the Compliance Assessment"* and that *"any determination of the* [FCH] *in relation to a Compliance Assessment shall be final and binding and shall not be subject to any appeal"*.

18. Finally, the Committee noted that consequences of a "Compliance Assessment" failure are laid down in art. 16 FCHR, which states in its first paragraph "[w]*here a party is subject to a First Failure of the Compliance Assessment (...) d) the Non-Compliant Party shall be subject to disciplinary proceedings in accordance with article 17*". By the same token, lit. c) of this same provision states that *"the respective Compliance Assessment shall continue, and the Non-Compliant Party shall remain obliged to pass the Compliance Assessment. The Non-Compliant Party may reinitiate the Compliance Assessment at any time through the Client Portal"*.

19. The Committee equally noted that per art. 16.2 FCHR, a party subject to the Second Failure of the Compliance Assessment also triggers the consequences set forth by art. 16.1 (d) FCHR.

20. As a final note, the Committee underlined that in accordance with art. 17.9 FCHR, for all other violations of the FCHR and/or for repeated violations of the provisions identified in paragraphs 17.3 to 17.8 FCHR, the Committee may determine the sanction at its discretion.

21. In sum, the Committee understood that in view of the above provisions, it is not able to review or modify any aspect regarding the Respondent's Second Failure of the Compliance Assessment made by the FCH but has as sole task to apply the sanctions provided for in art. 17 FCHR, in particular those outlined under art. 17.7 and 8 FCHR given the Respondent's status as both new club and training club in the Transactions.

b. Merits of the case

22. Having clarified the above, the Committee observed that according to the information and evidence at its disposal, the Respondent had to pay and was entitled to receive Training Rewards due in

connection with the Transactions described in these proceedings, yet it failed to successfully complete the compliance assessment per art. 15 FCHR – something which stood uncontested in these proceedings.

23. This means that because of this failure, the process outlined by the FCHR cannot be completed and the training clubs could not receive the Training Rewards which they are entitled to for investing in the training and education of the relevant players as cited in these proceedings. At the same time, the Respondent could also not receive the training rewards it is entitled to on account of its failure in connection with the Subsequent Transactions.

24. Therefore, since the violations of the FCHR by the Respondent had been established by the FCH and the Committee is precluded from reviewing the outcome of the compliance assessment carried out by the FCH, the Committee confirmed the Respondent has breached art. 15 FCHR and subsequently turned its attention to art. 17 FCHR and the relevant sanction(s) to be imposed for infringing said provision.

c. Determination of the sanction

25. With regard to the applicable sanctions, the Committee observed in the first place that the Respondent is a legal person, and as such was subject to the sanctions described under art. 6.1 and 6.3 FDC.

26. Notwithstanding the above, the Committee observed that the FCHR provides for specific consequences and sanctions depending on whether the club or member association incurs a First Failure of the Compliance Assessment or a Second Failure of the Compliance Assessment. In particular, art. 17.7 and 8 FCHR reads as follows:

> *"17.7 The sanction for a club or Member Association that is subject to a First Failure of the Compliance Assessment shall be:*
>
> *a) for a new club:*
>
> *i. a reprimand; and/or*
>
> *ii. a levy of 2.5% of the calculated training rewards due, payable to the training club(s) through the FIFA Clearing House instead of interest for late payment; and/or*
>
> *iii. a fine.*
>
> *b) for a training club or Member Association:*
>
> *i. a reprimand; and/or*
>
> *ii. a fine.*
>
> *17.8 The sanction for a club or Member Association that is subject to a Second Failure of the Compliance Assessment shall be:*
>
> *a) for a new club:*

i. a fine: and

ii. a ban on registering any new players, either nationally or internationally. For the avoidance of doubt, the Compliance Assessment shall continue until the FIFA Clearing House determines that it has been successfully passed. The registration ban shall be lifted only after the FIFA Clearing House confirms that the club has passed a subsequent Compliance Assessment.

b) for a training club or Member Association:

i. forfeiture of the training reward due to that party for the specific transaction. The Allocation Statement will be amended to direct the new club to pay the forfeited training rewards to the Member Association of the club through the FIFA Clearing House, to be used by the Member Association for development of football at national level; and

ii. any further sanction deemed proportionate, taking into account that the party has already forfeited its right to receive the relevant training reward."

27. For the sake of good order, the Committee underlined that it is responsible to determine the type and extent of the disciplinary measures to be imposed in accordance with the objective and subjective elements of the offence, taking into account both aggravating and mitigating circumstances (art. 25.1 FDC).
28. As it was established above, the Respondent was found responsible by the FCH of having infringed art. 15 FCHR, which aim at ensuring that the relevant parties comply with both the national and the international laws in relation to, without limitation, international payment sanctions, money laundering, anti-bribery/corruption and countering the financing of terrorism.

29. As to the Subsequent Transactions in which the Respondent appears as training club, the Committee decided that a reprimand was also in order. The Committee underlined that a new failure of the compliance assessment could generate more severe sanctions, including forfeiture of the Training Rewards that the Respondent would be otherwise entitled to receive. To that effect, the Committee noted that while the case at hand deals with the consequences of the second failure of the compliance assessment, this can only concern the First Transactions, as the Subsequent Transactions had not yet happened and therefore were not subject to the Respondent's first failure of the compliance assessment and the First Disciplinary Decision.

30. Furthermore, consistently with art. 17.8 FCHR in respect of the Second Failure of the Compliance Assessment with respect to the First Transactions, the Committee decided to impose the following sanctions on the Respondent:

    a. A fine of USD 3,000.
    b. A ban from registering new players, both nationally and internationally.

31. In particular, the Committee considered the amount of the fine proportionate to the offence committed as well as to the amount at stake and recalled that art. 6.4 FDC establishes that in general fines shall not be less than USD 100 or more than USD 1,000,000.

32. With regards to the registration ban, it will be implemented automatically and immediately at national and international level by the Respondent's member association and FIFA respectively, without a further formal decision having to be taken nor any order to be issued by the FIFA Disciplinary Committee or its Secretariat. In this respect, the Committee reminded the Respondent's member

association of its duty to implement this decision and provide FIFA with proof that the registration ban has been implemented at national level.

33. By the same token, the Committee confirmed in line with 17.8 FCHR that the registration ban shall remain in place until the Respondent has both (a) passed the compliance assessment as determined by the FCH and (b) paid the fine to FIFA. The Committee underlined in this respect that since under the said provision of the FCHR both sanctions are cumulative, it was necessary that they were effectively applied in order to produce the necessary deterrent effect, whilst serving as a reminder to the Respondent to undertake all appropriate measures in order to guarantee that the FIFA regulations are strictly complied with. The Committee deemed that it was empowered to do so considering the provisions of art. 6 paragraphs 3(a) and 6 FDC as well as art. 25.1 FDC combined with the discretion set forth under art. 17.9 FCHR in respect of repeated or persistent failure by the Respondent to comply.

34. The Committee was satisfied that such sanctions would produce the necessary deterrent effect, whilst serving as a reminder to the Respondent to undertake all appropriate measures in order to guarantee that the FIFA regulations are strictly complied with.

III. DECISION

1. **The club CSA Steaua (the Respondent) is found responsible for failing to pass both a first and a second compliance assessment with the FIFA Clearing House SAS (FCH).**

2. **The Respondent is issued with a reprimand and ordered to pay a fine to FIFA to the amount of USD 3,000. Payment of the fine shall be made to FIFA's bank account indicated in the note enclosed hereto.**

3. **The Respondent is further imposed with a ban on registering new players, both nationally and internationally.**

4. **The registration ban listed above will not be lifted until both (a) the FCH confirms that the Respondent has passed a subsequent compliance assessment and (b) the fine due to FIFA is paid.**

FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION



Jorge Iván PALACIO (Colombia)
Deputy Chairperson of the FIFA Disciplinary Committee

NOTE RELATING TO THE LEGAL ACTION:

This decision can be contested directly before the Court of Arbitration for Sport (CAS) in line with art. 58 (1) of the FIFA Statutes read together with arts. 52 and 61 of the FIFA Disciplinary Code. The statement of appeal must be sent to the CAS directly within 21 days of receipt of notification of this decision. Within another 10 days following the expiry of the time limit for filing the statement of appeal, the appellant shall file a brief stating the facts and legal arguments giving rise to the appeal with the CAS.

NOTE RELATING TO THE COMPLIANCE ASSESSMENT:

The subsequent compliance assessment following the decision is to be made by the Respondent directly with the FIFA Clearing House SAS.

NOTE RELATING TO THE PAYMENT OF THE FINE:

Payment can be made to the FEDERATION INTERNATIONALE DE FOOTBALL ASSOCIATION (FIFA) either in Swiss francs (CHF) to account no. 0230-325519.70J, Bank UBS AG, SWIFT: UBSWCHZH80A, IBAN: CH85 0023 0230 3255 1970 J or in US dollars (USD) to account no. 0230-325519.71U, Bank UBS AG, SWIFT: UBSWCHZH80A, IBAN: CH95 0023 0230 3255 1971 U, with reference to the abovementioned case number. FIFA's address is: FIFA-Strasse 20, 8044, Zurich, Switzerland. Bank UBS AG's address is: Bahnhofstrasse 45, 8098 Zurich, Switzerland.

NOTE RELATING TO THE REGISTRATION BAN:

The registration ban mentioned in the present decision must be implemented automatically and immediately at national and international level by the Romanian Football Federation and FIFA respectively, without a further formal decision having to be taken nor any order to be issued by the FIFA Disciplinary Committee or its secretariat. On this note, the Romanian Football Federation is reminded of its duty to implement this decision and provide FIFA with proof that the registration ban has been implemented at national level, any failure to do so being subject to potential sanctions (which can lead to an expulsion from FIFA competitions) being imposed by the FIFA Disciplinary Committee.

For more information on the registration ban as well as on the scope of said disciplinary measure, reference is made to FIFA circular no. 1843.