

IN THE MATTER OF A FOOTBALL ASSOCIATION

INDEPENDENT REGULATORY COMMISSION

13 MARCH 2025

BETWEEN:

THE FOOTBALL ASSOCIATION

And

RYAN BOWMAN

WRITTEN REASONS

Background

1. These are the written reasons for the decisions made by an Independent Regulatory Commission (“**the Commission**”) which sat on Thursday 13 March 2025 in the above-named matter.
2. The members of the Commission were Christopher Stoner KC (Chair), Sally Davenport and Tony Agana. Mr Michael O’Connor, Judicial Services Assistant Manager, acted as the secretary to the Commission. The Commission are grateful to Mr O’Connor for his assistance in ensuring the hearing ran smoothly.

3. As detailed below, the hearing proceeded as a paper only hearing, Mr Ryan Bowman (“**RB**”) having admitted the Misconduct with which he was charged and having elected for the matter to be determined at a paper hearing on the contents of the documents served on him and the documents he had supplied with his Reply Form. Those documents are listed below.

The Charge

4. RB was charged with a significant breach of the rules against Betting. The current rules are found in The FA Handbook at Rule E8. As a Player RB is subject to Rule E8.1 which provides, as relevant:

“A Participant shall not bet, either directly or indirectly, or instruct, cause or enable any person to bet on –

E8.1.1. the result, progress, conduct or any other aspect of, or occurrence in or in connection with a football match of competition ...”

This wording has been constant since season 2018-19, although for seasons 2018-19 and 2019-20 the reference was to paragraph (1)(a)(i) as opposed to E8.1.1, which was a designation introduced in season 2020-2021.

5. Slightly differently worded provisions applied over the earlier period covered by the Charge Letter (as referred to below). For the seasons 2014-15 - 2017-18 the wording was as follows:

“8(1)(a) A Participant shall not bet, either directly or indirectly, or instruct, permit, cause or enable any person to bet on –

(a) the result, progress, conduct or any other aspect of, or occurrence in, a football match or competition ...”

6. Copies of the relevant provisions were extracted from all the relevant FA Handbooks and included within our bundle of papers.

7. In a letter dated 23 October 2024 (“**the Charge Letter**”) breaches of the Rules were identified relating to a very significant total of 6,397 bets placed on football matches between 22 June 2015 and 13 September 2023 (“**the Charges**”).

8. The terms of the Charge Letter (as relevant) were:

“Breach of FA Rules Betting E8

You are hereby charged with Misconduct under FA Rule E1(b) in respect of 6,397 bets placed on football matches between 22 June 2015 to 13 September 2023.

It is alleged that each bet is a separate breach of FA Rule E8 (as applicable) and all references to specific bets are set out in exhibit [REDACTED] 1.

The particulars of the allegation are as follows:

2014/15 Season (see schedule [REDACTED] 2) – Bets placed in breach of FA Rule E8 FA Handbook p115-116

1. *You placed 2 bets on football matches, in breach of FA Rule E8(1)(a)(i), between 22 June 2015 and 27 June 2015 whilst you were a participant at Torquay United FC.*

2015/16 Season (see schedule [REDACTED] 3) – Bets placed in breach of FA Rule E8 FA Handbook p114-116

2. *You placed 191 bets on football matches, in breach of FA Rule E8(1)(a)(i), between 04 September 2015 and 13 December 2015 whilst you were a participant at Gateshead FC.*

2018/19 Season (see schedule [REDACTED] 4) – Bets placed in breach of FA Rule E8 FA Handbook p115-116

3. *You placed or enabled 153 bets on football matches, in breach of FA Rule E8(1)(a)(i), between 02 January 2019 and 07 April 2019 whilst you were a participant at Exeter City FC.*

i. 151 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.

ii. 2 of the bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which your club and/or you were participating.

2019/20 Season (see schedule [REDACTED] 5) – Bets placed in breach of FA Rule E8 FA Handbook p116-117

4. You placed or enabled 65 bets on football matches, in breach of FA Rule E8(1)(a)(i), between 04 August 2019 and 27 October 2019 whilst you were a participant at Exeter City FC.

2020/21 Season (see schedule [REDACTED] 6) – Bets placed in breach of FA Rule E8 FA Handbook p120-121

5. You placed 2,598 bets on football matches, in breach of FA Rule E8.1, between 18 December 2020 and 31 July 2021 whilst you were a participant at Exeter City FC.

iii. 2,492 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.

iv. 106 of the bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which your club and/or you were participating.

2021/22 Season (see schedule [REDACTED] 7) – Bets placed in breach of FA Rule E8 FA Handbook p126-127

6. You placed 1,948 bets on football matches, in breach of FA Rule E8.1, between 01 August 2021 and 31 July 2022 whilst you were a participant at Shrewsbury Town FC.

v. 1,801 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.

vi. 147 of the bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which your club and/or you were participating.

2022/23 Season (see schedule [REDACTED] 8) – Bets placed in breach of FA Rule E8 FA Handbook p142-144

7. You placed 1,259 bets on football matches, in breach of FA Rule E8.1, between 01 August 2022 and 31 July 2023 whilst you were a participant at Shrewsbury Town FC.

vii. 1,167 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.

viii. 92 of the bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which your club and/or you were participating.

2023/24 Season (see schedule [REDACTED] 9) – Bets placed in breach of FA Rule E8 FA Handbook p144-145

8. You placed 181 bets on football matches, in breach of FA Rule E8.1, between 03 August 2023 and 13 September 2023 whilst you were a participant at Shrewsbury Town FC.

ix. 177 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.

x. 4 of the bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which your club and/or you were participating.”

9. As is evident from the Charge Letter, aside from 193 bets placed in seasons 2014-15 and 2015-16, all the Charges relate to bets placed whilst RB was a Player and Participant at Exeter City FC (“**ECFC**”) and Shrewsbury Town FC (“**STFC**”).

10. Together with the Charge Letter, The FA served the following evidence upon which it relied in support of the Charges:

(1) Witness statement of [REDACTED], Betting Integrity Investigator at The Football Association, dated 18 September 2024.

- (2) Witness statement of [REDACTED], Integrity Investigator at The Football Association, dated 18 September 2024.
- (3) Witness statement of [REDACTED], Mobile Device Analyst [REDACTED], dated 19 June 2024.
- (4) Exhibit [REDACTED] 1 – The full list of bets attributed to Mr Ryan Bowman.
- (5) Exhibit [REDACTED] 2 – Bet breaches by Mr Ryan Bowman in 2014/15 season.
- (6) Exhibit [REDACTED] 3 - Bet breaches by Mr Ryan Bowman in 2015/16 season.
- (7) Exhibit [REDACTED] 4 – Bet breaches by Mr Ryan Bowman in 2018/19 season.
- (8) Exhibit [REDACTED] 5 – Bet breaches by Mr Ryan Bowman in 2019/20 season.
- (9) Exhibit [REDACTED] 6 – Bet breaches by Mr Ryan Bowman in 2020/21 season.
- (10) Exhibit [REDACTED] 7 – Bet breaches by Mr Ryan Bowman in 2021/22 season.
- (11) Exhibit [REDACTED] 8 – Bet breaches by Mr Ryan Bowman in 2022/23 season.
- (12) Exhibit [REDACTED] 9 – Bet breaches by Mr Ryan Bowman in 2023/24 season.
- (13) Exhibit [REDACTED] 10 – Bets placed by Mr Ryan Bowman in competitions entered by his club.
- (14) Exhibit [REDACTED] 11 – Bets placed by Mr Ryan Bowman involving his own club.
- (15) Exhibit [REDACTED] 12 – Bets placed by Mr Ryan Bowman against his own club.
- (16) Exhibit [REDACTED] 13 – Spot bets placed by Mr Ryan Bowman involving himself.
- (17) Exhibit [REDACTED] 14 – Spot bets placed by Mr Ryan Bowman not involving himself.
- (18) Exhibit [REDACTED] 15 – Mr Ryan Bowman current account 1, 08/11/18 – 11/02/19.
- (19) Exhibit [REDACTED] 16 – Mr Ryan Bowman current account 1, 12/02/19 – 29/03/19.
- (20) Exhibit [REDACTED] 17 – Mr Ryan Bowman current account 1, 30/03/19 – 17/06/19.
- (21) Exhibit [REDACTED] 18 – Mr Ryan Bowman current account 1, 18/06/19 – 29/08/19.
- (22) Exhibit [REDACTED] 19 - Mr Ryan Bowman current account 1, 30/08/19 – 09/03/20.
- (23) Exhibit [REDACTED] 20 - Mr Ryan Bowman current account 1, 10/03/20 – 27/03/20.
- (24) Exhibit [REDACTED] 21 - Mr Ryan Bowman current account 1, 28/03/20 – 29/12/20.
- (25) Exhibit [REDACTED] 22 - Mr Ryan Bowman current account 1, 30/12/20 – 01/02/21.
- (26) Exhibit [REDACTED] 23 - Mr Ryan Bowman current account 1, 02/02/21 – 23/03/21.
- (27) Exhibit [REDACTED] 24 - Mr Ryan Bowman current account 1, 24/03/21 – 17/05/21.
- (28) Exhibit [REDACTED] 25 - Mr Ryan Bowman current account 1, 18/05/21 – 21/06/21.
- (29) Exhibit [REDACTED] 26 - Mr Ryan Bowman current account 1, 22/06/21 – 22/07/21.
- (30) Exhibit [REDACTED] 27 - Mr Ryan Bowman current account 1, 23/07/21 – 16/08/21.
- (31) Exhibit [REDACTED] 28 - Mr Ryan Bowman current account 1, 17/08/21 – 20/09/21.
- (32) Exhibit [REDACTED] 29 - Mr Ryan Bowman current account 1, 21/09/21 – 29/10/21.
- (33) Exhibit [REDACTED] 30 - Mr Ryan Bowman current account 1, 30/10/21 – 04/01/22.
- (34) Exhibit [REDACTED] 31 - Mr Ryan Bowman current account 1, 05/01/22 – 09/03/22.
- (35) Exhibit [REDACTED] 32 - Mr Ryan Bowman current account 1, 10/03/22 – 19/05/22.

- (36) Exhibit [REDACTED] 33 - Mr Ryan Bowman current account 1, 20/05/22 – 20/07/22.
- (37) Exhibit [REDACTED] 34 - Mr Ryan Bowman current account 1, 21/07/22 – 06/09/22.
- (38) Exhibit [REDACTED] 35 - Mr Ryan Bowman current account 1, 07/09/22 – 03/11/22.
- (39) Exhibit [REDACTED] 36 - Mr Ryan Bowman current account 1, 04/11/22 – 09/01/23.
- (40) Exhibit [REDACTED] 37 - Mr Ryan Bowman current account 1, 10/01/23 – 15/03/23.
- (41) Exhibit [REDACTED] 38 - Mr Ryan Bowman current account 1, 16/03/23 – 10/05/23.
- (42) Exhibit [REDACTED] 39 - Mr Ryan Bowman current account 1, 11/05/23 – 03/07/23.
- (43) Exhibit [REDACTED] 40 - Mr Ryan Bowman current account 1, 04/07/23 – 25/09/23.
- (44) Exhibit [REDACTED] 41 - Mr Ryan Bowman current account 1, 26/09/23 – 02/01/24.
- (45) Exhibit [REDACTED] 42 - Mr Ryan Bowman current account 1, 03/01/24 – 16/04/24.
- (46) Exhibit [REDACTED] 43 - Mr Ryan Bowman current account 2, 18/08/21 – 17/09/21.
- (47) Exhibit [REDACTED] 44 - Mr Ryan Bowman current account 2, 18/09/21 – 18/10/21.
- (48) Exhibit [REDACTED] 45 - Mr Ryan Bowman current account 2, 19/10/21 – 18/11/21.
- (49) Exhibit [REDACTED] 46 - Mr Ryan Bowman current account 2, November 2021.
- (50) Exhibit [REDACTED] 47 - Mr Ryan Bowman current account 2, December 2021.
- (51) Exhibit [REDACTED] 48 - Mr Ryan Bowman current account 2, 18/12/21 – 18/01/22.
- (52) Exhibit [REDACTED] 49 - Mr Ryan Bowman current account 2, 19/01/22 – 07/02/22.
- (53) Exhibit [REDACTED] 50 - Mr Ryan Bowman current account 2, 08/02/22 – 18/02/22.
- (54) Exhibit [REDACTED] 51 - Mr Ryan Bowman current account 2, 19/02/22 – 18/03/22.
- (55) Exhibit [REDACTED] 52 - Mr Ryan Bowman current account 2, 19/03/22 – 14/04/22.
- (56) Exhibit [REDACTED] 53 - Mr Ryan Bowman current account 2, 15/04/22 – 18/05/22.
- (57) Exhibit [REDACTED] 54 - Mr Ryan Bowman current account 2, 19/05/22 – 17/06/22.
- (58) Exhibit [REDACTED] 55 - Mr Ryan Bowman current account 2, 18/06/22 – 18/07/22.
- (59) Exhibit [REDACTED] 56 - Mr Ryan Bowman current account 2, 19/07/22 – 15/08/22.
- (60) Exhibit [REDACTED] 57 - Mr Ryan Bowman current account 2, 16/08/22 – 18/08/22.
- (61) Exhibit [REDACTED] 58 - Mr Ryan Bowman current account 2, 19/08/22 – 16/09/22.
- (62) Exhibit [REDACTED] 59 - Mr Ryan Bowman current account 2, 17/09/22 – 18/10/22.
- (63) Exhibit [REDACTED] 60 - Mr Ryan Bowman current account 2, 19/10/22 – 18/11/22.
- (64) Exhibit [REDACTED] 61 - Mr Ryan Bowman current account 2, 19/11/22 – 16/12/22.
- (65) Exhibit [REDACTED] 62 - Mr Ryan Bowman current account 2, 17/12/22 – 18/01/23.
- (66) Exhibit [REDACTED] 63 - Mr Ryan Bowman current account 2, 19/01/23 – 17/02/23.
- (67) Exhibit [REDACTED] 64 - Mr Ryan Bowman current account 2, 18/02/23 – 17/03/23.
- (68) Exhibit [REDACTED] 65 - Mr Ryan Bowman current account 2, 18/03/23 – 18/04/23.
- (69) Exhibit [REDACTED] 66 - Mr Ryan Bowman current account 2, 19/04/23 – 18/05/23.
- (70) Exhibit [REDACTED] 67 - Mr Ryan Bowman current account 2, 19/05/23 – 16/06/23.
- (71) Exhibit [REDACTED] 68 - Mr Ryan Bowman current account 2, 17/06/23 – 18/07/23.
- (72) Exhibit [REDACTED] 69 - Mr Ryan Bowman current account 2, 19/07/23 – 18/08/23.

- (73) Exhibit [REDACTED] 70 - Mr Ryan Bowman current account 2, 19/08/23 – 18/09/23.
- (74) Exhibit [REDACTED] 71 - Mr Ryan Bowman current account 2, 19/09/23 – 17/11/23.
- (75) Exhibit [REDACTED] 72 - Mr Ryan Bowman current account 2, 18/11/23 – 18/12/23.
- (76) Exhibit [REDACTED] 73 - Mr Ryan Bowman current account 2, 19/12/23 – 16/02/24.
- (77) Exhibit [REDACTED] 74 - Mr Ryan Bowman current account 2, 17/02/24 – 18/03/24.
- (78) Exhibit [REDACTED] 75 – Stratford Town FC v STFC line-ups 07/11/21
- (79) Exhibit [REDACTED] 76 – ECFC v Sheffield Wednesday FC line-ups, 09/01/21.
- (80) Exhibit [REDACTED] 77 – ECFC v Morecambe FC line-ups, 26/01/21.
- (81) Exhibit [REDACTED] 78 – ‘Exeter City V Grimsby Town: League Two game postponed because of waterlogged pitch’ (BBC Sport article, dated 20/02/21).
- (82) Exhibit [REDACTED] 79 – ECFC v Leyton Orient FC line-ups, 06/03/21.
- (83) Exhibit [REDACTED] 80 – ECFC v Salford City FC line-ups, 27/03/21.
- (84) Exhibit [REDACTED] 81 – ECFC v Southend United FC line-ups, 17/04/21.
- (85) Exhibit [REDACTED] 82 – ECFC v Newport County AFC line-ups, 24/04/21.
- (86) Exhibit [REDACTED] 83 – STFC v Burton Albion FC line-ups, 07/08/21.
- (87) Exhibit [REDACTED] 84 – STFC v Rochdale FC line-ups, 24/08/21.
- (88) Exhibit [REDACTED] 85 – STFC v Gillingham FC line-ups, 28/08/21.
- (89) Exhibit [REDACTED] 86 – STFC v AFC Wimbledon line-ups, 25/09/21.
- (90) Exhibit [REDACTED] 87 – STFC v Wolverhampton Wanderers FC U21 line-ups, 05/10/21.
- (91) Exhibit [REDACTED] 88 – STFC v MK Dons FC line-ups, 16/10/21.
- (92) Exhibit [REDACTED] 89 – Wigan Athletic FC v STFC line-ups, 10/11/21.
- (93) Exhibit [REDACTED] 90 – Gillingham FC v STFC line-ups, 25/01/22.
- (94) Exhibit [REDACTED] 91 – Sunderland AFC v STFC line-ups, 15/04/22.
- (95) Exhibit [REDACTED] 92 – STFC v Doncaster Rovers FC line-ups, 18/04/22.
- (96) Exhibit [REDACTED] 93 – Morecambe FC v STFC line-ups, 30/07/22.
- (97) Exhibit [REDACTED] 94 – STFC v Carlisle United FC line-ups, 09/08/22.
- (98) Exhibit [REDACTED] 95 – Wycombe Wanderers FC v STFC line-ups, 13/08/22.
- (99) Exhibit [REDACTED] 96 – STFC v Port Vale FV line-ups, 20/09/2022.
- (100) Exhibit [REDACTED] 97 – STFC v Charlton Athletic FC line-ups, 22/10/22.
- (101) Exhibit [REDACTED] 98 – Plymouth Argyle FC v STFC line-ups, 25/10/22.
- (102) Exhibit [REDACTED] 99 – STFC v York City FC line-ups, 05/11/22 962.
- (103) Exhibit [REDACTED] 100 – STFC v Oxford United FC line-ups, 09/11/22.
- (104) Exhibit [REDACTED] 101 – Sheffield Wednesday FC v STFC line-ups, 19/11/22.
- (105) Exhibit [REDACTED] 102 – STFC v Lincoln City FC line-ups, 03/12/22.
- (106) Exhibit [REDACTED] 103 – Cambridge United FC v STFC line-ups, 26/12/22.
- (107) Exhibit [REDACTED] 104 – Burton Albion FC v STFC line-ups, 14/01/23.
- (108) Exhibit [REDACTED] 105 – MK Dons FC v STFC line-ups, 24/01/23.

- (109) Exhibit [REDACTED] 106 – STFC v Forest Green Rovers FC line-ups, 28/01/23.
- (110) Exhibit [REDACTED] 107 – Accrington Stanley FC v STFC line-ups, 18/02/23.
- (111) Exhibit [REDACTED] 108 – STFC v Morecambe FC line-ups, 11/03/23.
- (112) Exhibit [REDACTED] 109 – Barnsley FC v STFC line-ups, 10/04/23.
- (113) Exhibit [REDACTED] 110 – Bolton Wanderers FC v STFC line-ups, 22/04/23.
- (114) Exhibit [REDACTED] 111 – STFC v Bristol Rovers FC line-ups, 02/05/23.
- (115) Exhibit [REDACTED] 112 – Lincoln City FC v STFC line-ups, 07/05/23.
- (116) Exhibit [REDACTED] 113 – STFC v Notts County FC match report, 29/07/23.
- (117) Exhibit [REDACTED] 114 – STFC v Cheltenham Town FC line-ups, 05/08/23.
- (118) Exhibit [REDACTED] 115 – Transcript of first interview with Mr Ryan Bowman, dated 15 May 2024.
- (119) Exhibit [REDACTED] 116 – All football bets placed through SM’s account in 2022.
- (120) Exhibit [REDACTED] 117 – All football bets placed through TB’s betting accounts.
- (121) Exhibit [REDACTED] 118 – Search terms provided to CCL.
- (122) Exhibit [REDACTED] 119 – The FA letter to Mr Ryan Bowman, dated 18/04/24.

11. As is evident from the above list, the documentation presented by The FA was considerable. This documentation was prepared in circumstances where it was by no means clear to what extent RB might admit the allegations against him. The Commission wishes to pay tribute to those responsible at The FA for the meticulous nature in which the evidence followed thousands of transactions through bank accounts and lists of bets, including specific timings as to when bets were placed. It was evident to the Commission that a considerable time investment lay behind the Charges and the investigation leading to the Charges.

12. With his Reply Form, RB served the following documents:

- (a) A witness statement dated 13 November 2024.
- (b) A document entitled ‘Defence Case and Mitigation Summary’ dated 13 November 2024 and prepared by the P.F.A; and

[REDACTED]

[REDACTED]

13. The FA also provided a Response to the Reply and Submissions on Sanction, to which document was appended a copy of a previous Commission decision, namely that in *The FA v Dean Snedker*¹.
14. The Hearing Bundle runs to some 1630 pages. The Commission has considered the Hearing Bundle carefully, including narrative documents, albeit in circumstances where RB has admitted the Charges it was not necessary, for example, for the Commission to consider the bank statements in considerable detail or the lists of all the bets (as distinct from those specifically referred to below). If a particular piece of evidence is not referred to in the following paragraphs that does not mean that it was not taken into consideration by the Commission.

Admission

15. As already recorded, by his Reply Form RB accepted the allegations against him and elected for a paper hearing. In his witness statement dated 13 November 2024 RB says:

“I am taking full responsibility for all the 6397 bets.”

16. The Defence document, prepared by the P.F.A. on RB’s behalf states: *“RB admits all of the charges”*.

Sanction Guidelines

17. In the context of this admission the role of the Commission was to consider sanction. In doing so it had regard to the Sanction Guidelines – Betting Cases Charged under FA Rule E8(b) (**“the Guidelines”**). The reference to Rule E8(b) is not altogether clear, but the Commission were quite satisfied, not least by reference to the Commission decision in *The FA v Snedker* and the contents of the Hearing Bundle, that these were the correct Guidelines.

¹ 16 August 2023, Chair David Phillips KC FCI Arb.

18. The Commission noted that the Guidelines are just that and expressly state: *“The guidelines are not intended to override the discretion of Regulatory Commission to impose such sanctions as they consider appropriate having regard to the particular facts and circumstances of a case. However, in the interests of consistency it is anticipated that the guidelines will be applied unless the applicable case has some particular characteristic(s) which justifies a greater or lesser sanction outside the guidelines.”*
19. A copy of the Guidelines is appended to these Written Reasons for ease of reference.
20. Having noted the Guidelines, the Commission considered them a useful starting point. In doing so, the Commission noted:
- (a) That bets placed by a Participant on their own team to win have a guided sporting sanction of 0-6 months to be determined by the factors set out in the Guidelines.
 - (b) That bets placed by a Participant on a particular occurrence not involving the player, namely a spot bet, have a guided sporting sanction of 0-12 months to be determined by the factors set out in the Guidelines.
 - (c) That bets placed by a Participant on their own team to lose have a guided sanction of a minimum of 6 months suspension, with no maximum, again to be determined by the factors set out in the Guidelines.
 - (d) That bets placed by a Participant on a particular occurrence involving that Participant, namely a spot bet, were guided with a minimum 6-month suspension. Although no reference is made to the factors set out in the guidance, in the Commission’s view there is no logical reason not to apply them to this category of bet as well.
21. In the context of the 6397 bets RB had admitted placing, it also falls to be noted that ‘bets placed on any aspect of a football match anywhere in the world, but not involving Participant’s Club Competitions’ is guided to be an offence sanctioned with a warning or a fine, but not a suspension, whilst bets placed on the Participant’s competition but not involving his Club (including spot bets) are guided to be sanctioned by a fine, with no suspension applicable unless the Participant has a connection with the Club bet on.

22. The factors the Guidelines state 'will' be taken into account in considering whether any increase or decrease from the entry point should be applied are expressed as including:

- Overall perception of impact of bet(s) on fixture/game integrity.
- Player played or did not play.
- Number of bets.
- Size of bets.
- Facts and circumstances surrounding pattern of betting.
- Actual stake and amount possible to win.
- Personal circumstances.
- Previous record – (any previous breach of betting Rules will be considered as a highly aggravating factor).
- Experience of the participant.
- Assistance to the process and acceptance of the charge.

23. To place the seriousness of the Charges in the context of the Guidelines, as identified in the witness statement of The FA's Betting Integrity Investigator at paragraphs 113-116:

"113. On analysis of the betting accounts, in total there are 351 bets which include games in competitions that RB's clubs participated in during the relevant seasons. These are detailed in exhibit These include bets on ECFC and STFC whilst RB was a Participant there - including bets against STFC – and spot bets involving STFC, including spot bets on RB to score.

114. The 87 bets on RB's own clubs are exhibited ...

115. The 8 bets against RB's own club are exhibited as

116. RB has placed 47 spot bets involving STFC. 6 of these spot bets involved himself, exhibited as The remaining 41 spot bets are exhibited as"

24. As such, at the outset of its consideration of the appropriate and proportionate sanction to apply, the Commission noted a number of admitted bets fall into the highest categories, subject to consideration of all the particular circumstances, including mitigation and aggravating features, where in each instance, if charged separately, the misconduct in question would carry an entry point of a minimum 6-month suspension.
25. In the circumstances, in these Written Reasons, we only detail the admitted bets which fall within the categories of *“Bet placed on own team to lose”* and *“Bet placed on particular occurrence(s) involving the player who spot bet”*.
26. This does not detract, however, from the fact there are 41 spot bets placed by RB which did not involve himself, but where each admitted bet in the context of the Guidelines attracts a sanction of between 0-12 months suspension, as well as multiple bets where RB bet on his own club to win, which in the context of the Guidelines attract a sanction for each admitted bet of 0-6 months suspension.
27. In many of the games referred to in the previous paragraph, RB played in at least a part of the match.
28. An analysis of the 8 bets RB placed against his own club shows all involved STFC:
- 28.1. Bet 3221 was a £10 accumulator bet, including on STFC to lose to Portsmouth FC. The bet was cashed out. RB was not in the squad for the match.
 - 28.2. Bet 3227 was a £10 accumulator bet, including on STFC to lose to Portsmouth FC. This was the same game as Bet 3221, so RB was not in the squad and although Portsmouth FC won 1-0 the bet was lost overall.
 - 28.3. Bet 4722 was a £6 accumulator, including on STFC to lose to Sunderland. Sunderland won 3-2, although the bet was lost overall. RB played the entirety of the match.
 - 28.4. Bet 5897 was a £10 accumulator bet including for STFC to lose to Barnsley FC. The bet was cashed out before the match, which Barnsley won 2-1, with RB playing the entirety of the match before being sent off in the 99th minute.
 - 28.5. Bet 5900 was also a £10 accumulator bet on the same match, including for STFC to lose to Barnsley. This bet was also cashed out before the match.
 - 28.6. Bet 5907 was a £10 accumulator bet including for STFC to lose to Portsmouth FC. This match was the match after the Barnsley game which was the subject matter of bets 5897 and 5900. RB was not in the squad for the match, as he

had been sent off in the previous match and was suspended. The match was a 1-1 draw.

- 28.7. Bet 5910 was the third match in a row in which RB bet on his club, STFC, to lose. The opponents were Plymouth Argyle FC and the bet for STFC to lose was part of a £20 accumulator bet. RB was not in the squad as he was still suspended. STFC lost 2-1, but the bet was lost overall.
- 28.8. Bet 5924 was the fourth match in a row where RB bet on his club, STFC, to lose. The bet was a £20 accumulator and although Bolton Wanderers FC won the match 1-0 the bet overall was lost. RB played the entirety of the match.

29. As to the 6 spot bets placed by RB on himself:

- 29.1. Bet 4164 was a £20 single bet on RB to score at any time in the Stratford Town v STFC match. The bet was cashed out before the game.
- 29.2. Bet 4165 was a £10 single bet on RB to be the 1st goal scorer in the same game. This bet was also cashed out before the game.
- 29.3. Bet 4176 was a £20 single bet on RB to score at any time in the same game. This bet was also cashed out before the game.
- 29.4. Bet 4179 was a £10 single bet on RB to be the first goal scorer in the same game. RB played 86 minutes in the game and scored 2 goals, but he was not the first goal scorer.
- 29.5. Bet 4190 also related to the Stratford Town v STFC match and was a single £20 bet on RB to score at any time. The bet was cashed out before the match.
- 29.6. Bet 4193 also related to the same match and was a £20 single bet on RB to score at any time. As stated above, RB played 86 minutes and scored 2 goals so his bet was won.

Consideration of evidence and issues of aggravation and mitigation

- 30. In turning to the 'factors' identified above in the Guidelines, the Commission noted that the majority of the issues arising were inextricably linked into their consideration of the issues of aggravation and mitigation. Unfortunately, as will be apparent from the following paragraphs, this is a case where the Commission considered there were numerous aggravating features, many of which are properly categorised as 'serious aggravation'.

31. That the Commission's considerations of the factors in the Guidelines was so linked to aggravation and mitigation reflected not only the facts of this case, but also the reality that those factors are described as being "factors to be considered in relation to any increase/decrease from entry point."
32. Firstly, as to the overall perception, the Commission observes that the notes in the Guidelines state:
- "The assessment of the seriousness of the offence will need to take account of the factors set out above. A key aspect is whether the offence creates the perception that the result of any other element of the match may have been affected by the bet, for example because the Participant has bet against himself or his club or on the contrivance of a particular occurrence within the match. Such conduct will be a serious aggravating feature in all cases. A further serious aggravating feature will be where the Participant played or was involved in the match on which the bet was made."*
33. The issue is one of perception, not one of whether any particular participant has actually contrived an occurrence or a result. That would properly be a matter for a charge pursuant to Rule E5. There is no suggestion in this case that RB was involved in activity which would attract such a charge.
34. As is evident from the description of the bets placed by RB on his own side to lose, or on himself as a spot bet, the Charges in this matter include some of the most serious in the context of their perception. As the Guidelines identify, this is a serious aggravating feature, albeit one which is also reflected in the relevant entry point being a sporting sanction of at least 6-month suspension, subject to all other factors and circumstances to be taken into account.
35. Furthermore, it is a serious aggravating feature in this case that RB played in a significant number of the matches upon which he bet on his own side to win and also on a particular occurrence not involving himself.
36. A separate but very notable feature of the Charges relates to the sheer number of bets: namely 6397 bets on football, all of which were admitted by the Reply Form and RB's accompanying documentation. On any view, this is a very significant breach of the Rules indeed. Indeed, these numbers fall to be considered in the context of:

(a) Rule E8.1.1. being one which prevents, essentially, any bets being placed on football by a Participant; and

(b) RB accepting in his witness statement, at paragraph 8: "*I was aware that prior to 2014, as a player, I was not permitted to bet on my own team and that there was a blanket ban imposed for the 2014-15 season.*" Put another way, RB was aware at all material times that none of the 6397 bets should have been placed.

37. In the Commission's view, even acknowledging that bets placed on any football match in the world which did not involve RB's own Club's competitions do not of themselves attract a sporting sanction, the sheer scale of the breach of the Rules, can only be considered as a further aggravating feature. The sheer number of bets placed in the category of "Bet placed on any aspect of any football match anywhere in the world, but not involving Participant's Club competitions" plainly take the Charges in this instance beyond a warning. Whether or not a fine is appropriate, given a sporting sanction of at least 6 months suspension is the entry point when considering the Charges as a whole, is a matter the Commission shall return to below.

38. The importance of the number of bets is exacerbated from the perspective of sanctioning, in the Commission's view, given RB is an experienced Participant, who is now 32 years old. Whilst the Commission recognises that when the first bets which were the subject of the Charges were placed, RB would have been much younger, the reality is that as the details of the Charge Letter reveal (as recited above), RB's breach of the Rules becomes worse as he becomes more experienced. We shall return below to a particularly egregious point of evidence relating to RB's knowledge of the Rules through education by The FA and his blatant disregard for them.

39. As to the size of the bets, The FA's witness evidence informed the Commission that the total stakes placed by RB over the 6397 bets amounted to £203,758.57, which resulted in returns of £182,189.85 and a net loss of £21,548.72.

40. The Commission did not have an overall figure for the total amount that was possible to win. Whilst the Commission noted that many of the stakes were £20 or below, there were many which the Commission would classify as 'significant stakes.' Thus, for example, bets in the 2015/16 season included a number of stakes in excess of £1000: Bet 21 involved a stake of £1054.98; Bet 22 a stake of £1635.22; Bet 23 a stake of £2135.79 and Bet 24 a stake of £1888 by way of example.

41. The Commission also noted that, although cashed out, RB placed a bet of £295 on his own team, STFC, to win in Bet 4152.

42. The Commission considered the overall sums involved to also be an aggravating feature.

43. A further seriously aggravating feature, in the Commission's view, relates to RB's treatment of mobile phone data. When RB was initially contacted by The FA it was by a letter dated 18 April 2024. That letter, as relevant, provided details of The FA's requirement for RB to surrender his mobile phone/s for a data download when he attended for interview.

44. The letter clearly stated:

"Please do not delete any data from your phone/s prior to the download taking place. This includes, but is not limited to text messages, iMessages, Whatsapp messages, Facebook or other social media messages, emails and other forms of communication. Also, in order not to compromise any existing data, we would ask that you do not carry out any software updates between now and the date of the download."

45. The Commission were provided with a statement from an individual at [REDACTED] who undertook the download. This revealed a number of deletions from RB's phone after the above letter was sent and prior to his being interviewed and handing over his phone for download. In particular, it was said that 3 'threads' had been deleted and 599 individual messages.

46. When he was challenged about this in his second interview, the following exchange took place:

"Interviewer: So, is it safe to say, and correct me if I'm wrong, but you deleting those messages was a clear attempt on your part to conceal your betting activity?"

RB: I just panicked. I just, yes, I thought, I knew conversations, we had conversations in the past. I couldn't remember what they were about, well, I knew what they were about, obviously football, but I don't remember exactly what was said. So I just panicked and got scared. Yes, I deleted both of those messages.

Interviewer: I can see that you understand the seriousness of the position that you're in, but it's more evidence that you appear to have been trying to conceal what you've been doing. That letter is explicit in telling you to not delete anything and I know that when I went and delivered the club visit to Shrewsbury last November - [REDACTED] [REDACTED] so I know it was then - I made, I always make the point of saying, 'Just because you delete the messages doesn't mean we can't find out they've been deleted or identify what's in them,' and you still deleted data after being contacted

RB: I know, I panicked. I didn't think straight, I panicked. I thought I'd try and hide it and then it would not come out. Obviously, I know the severity of it and football's what I love doing and I thought, 'If these messages show up to you guys, then obviously I'd been in big trouble and it could jeopardise my career,' but I just wasn't thinking straight."

47. In his interview RB then proceeds to admit that he has deleted messages from [REDACTED] [REDACTED] and [REDACTED], including during the course of the evening before his initial interview.

48. Whilst it is not known what was in those messages, it is plain that RB believed that they related to football and, in the Commission's view, to betting on football. Unfortunately, as will become apparent the deletion of the messages was just one element of the concerted efforts of RB to conceal his extensive betting activity on football.

49. In his witness statement provided with his Reply to Charges, RB says:

"I was in a state of panic when I was contacted by the FA. I realise I was not helping my situation when I deleted messages from my phone and was less than forthcoming with the information, but I was not thinking straight when doing so."

50. Notwithstanding any panic, given the clear statement in the letter requiring RB to attend for interview not to delete data, as recited above, allied to the fact of the deletions, including during the evening before the first interview of messages the Commission considers this to be a serious aggravating feature.

51. The relevance of the fact that the messages involved [REDACTED] will become apparent below, it being a sad feature of these Charges that RB has consistently sought to hide his betting, in the Commission's view knowing at all times that it was wrong, by using the accounts of third parties.

52. A further serious aggravating feature, in the Commission's view, was RB's obfuscation and lack of honesty in his interviews with The FA. In the submissions on sanction the FA stated:

"RB was not forthcoming at FA interview until confronted with irrefutable evidence."

53. The Commission considers this is overly polite. By way of example:

53.1. In his first interview RB was asked about 193 bets across three accounts in his own name. RB said he had no recollection of those bets. He said *"I'm not saying I didn't place them. I'm not saying [REDACTED] placed them. I know he had my account details, but, like I say, after the six-month period-, £71,000. £95,000.*

[REDACTED]
Yes, if I did place them, I thought I'd put a stop to it, because it was getting ridiculous. Yes, like I say, I have no recollection of these bets".

53.2. The relevant period of the 193 bets was between June and December 2015. Having been referred to the relevant accounts in that period, when asked *"When was the last time you can recall using any of these accounts to bet on anything?"* RB responded: *"[REDACTED] but the last time I used an account, I think it was [REDACTED] but that was just, like I say, on horses, definitely no football. I think it's just been [REDACTED] that I've used over the years but that's just been on, I think, horses, never football. Like, these accounts I've got, like I say, I don't even remember opening them, never mind using them or when I last used them."*

53.3. Subsequently reference was made to RB's use of [REDACTED] account. Initially RB said this was the odd bet on horses *"but not on football."* Later, the interviewer asks: *"... When was the last time then that you can recall placing a football bet yourself, whether it was through [REDACTED] account if you think you've done it, in a shop or online?"* RB responded to this *"I've not once went into a shop and done it. I wouldn't have been stupid enough*

to place the bet on his account. I don't remember placing a football bet on his account, even with the £5 free bets it would have been used for horses. So, the last football bet was-, I don't even remember them ones on the screen, so it would have been then.” This was clarified as being in December 2015.

53.4. RB was also asked whether he had used anyone else's account in this period, to which he responds 'No'.

53.5. The interviewers then gave RB some disclosure and allowed him to have a period of approximately 50 minutes to consider the documents. Those documents, presented to the Commission as exhibit [REDACTED], comprised a number of screenshots of messages between RB and [REDACTED] relating to betting on football. He said when the interview resumed that he had had sufficient time and then also said: *“Yes, I mean, obviously I've read through it, yes, there's no excuse here whatsoever. I mentioned using [REDACTED] [REDACTED] betting account, because I knew I'd placed a bet on there, but obviously it's the football bets. If I didn't have this information, I wouldn't remember what bets I put on, what teams, anything like that, but I did know there were football bets that were placed on his account, but I couldn't remember when they were, or what teams, what leagues they were, or when it was. But, like I say, there's no excuse, I knew the rules, and I've messed up big time.”*

53.6. The following exchange then took place: Interviewer: *“When you say you've messed up big time, Ryan, just expand on that.*

RB: Like, I knew the rules, and I've gone against them. So, yes, I messed up, I knew what the rules were, you weren't allowed to bet on football, and I was using his account for the bets on horses and football, and it's not acceptable.

Interviewer: Okay. Were you using his account to try and conceal your betting on football?

RB: As I said, I mean, I would never bet on football on my account, apart from the ones-, 14, 15, but I genuinely can't remember them. But yes, I was obviously using his account to bet on football matches, in a period of 3 months at the back end of 2022.”

- 53.7. The use of [REDACTED] account having been discussed in detail, RB was asked about the period between February 2020, when the messages between the two stopped and October 2022 when they restarted. He was asked how he placed bets on football in that period, to which his answer was “*I wasn’t*”. He was also asked if he was using anyone else’s account, to which the answer was “no” and then again, “... *have you used anyone’s account since the end of 2022, to place any football bets*” to which RB responded “no”.
- 53.8. RB was asked “*When we examine your bank statements, Ryan, will it show you transferring money on a regular basis to anyone?*” RB responded “*No, I don’t think so*” [REDACTED]. RB also indicated there would be nothing on his mobile data download to indicate involvement with betting.
- 53.9. Having been pressed as to whether there was anyone else whose accounts may have been used, after some hesitation RB said there was one other person, namely someone called [REDACTED] (“[REDACTED]”). RB said: “[REDACTED]. *I sent him over money because I had his details but I can’t remember what the betting account was. It was horses, but I think it was [REDACTED], off the top of my head.*” When asked, on more than one occasion, if he used the account to bet on football RB responded “*No, horses.*” RB confirmed he would send money to [REDACTED] to finance the bets, which transfers would appear on his bank statements.
54. In the Commission’s view, in his first interview RB was less than straightforward with the investigators from The FA. He initially denied betting on football after 2015 and only when he was confronted with evidence did he admit to using [REDACTED] account to place bets on football. Toward the end of interview he also admitted using the account of [REDACTED], but only, he said, to bet on horses.
55. RB was not straightforward and adopted a stance, in the Commission’s view, of seeking to deny matters until such time as it was obvious that he could be shown to be lying. As will become apparent when the second interview is referred to below, although RB referred to betting through a second person’s account, namely [REDACTED] he insisted this was only for bets on horses. This, in the Commission’s view, was outright dishonesty: the level of the use of [REDACTED]’s accounts for football bets identified by The FA before the second interview cannot have been forgotten by RB.

56. Ultimately, as referred to by The FA's Betting Integrity Officer, at paragraph 42 of his statement, some 5,832 of the bets on football that are now admitted by RB were placed through [REDACTED] account. In the Commission's view there is no other conclusion than that in the 1st interview, before The FA had evidence to present to RB to establish the betting, rather than admit he used [REDACTED] account to bet on football, RB chose to lie about it.

57. The first interview took place on 15 May 2024. The second interview was on 17 July 2024 after The FA had obtained access to bank statements as well as the data download from RB's mobile.

57.1. Early in the interview, the following exchange takes place: *"Interviewer: You confirmed that you'd used the betting account in the name of a friend called [REDACTED] but you said that was to place horse-racing bets and never to place football bets. Is that correct?"*

RB: No, I've placed bets on his account, as well as horses, football as well.

Interviewer: Okay. Just in terms of the first interview, the position you took in that was that, whilst you gave us his name, you said that you'd not placed any football bets through his account. Is that right?"

RB: Yes, I panicked at the time, yes."

57.2. When asked how often he used [REDACTED] account, RB responded *"Probably three or four days out of the week ..."*. RB also confirmed that [REDACTED] when he first met him. He had his details to access his account directly.

57.3. It having been pointed out that it appeared there were approximately 5700 bets in [REDACTED] accounts attributable to RB, he was asked: *"So, from the FA's perspective, it does look like you've tried to conceal what you're doing because you know you're not allowed to bet on football. Would that be why you've done this, to try and hide the bets?"* to which RB responded *"Well, yes, yes."*

57.4. It was then pointed out to RB that additional work by The FA suggested that RB had also been using [REDACTED] (" [REDACTED] ") accounts. It was then put to RB: *"So, in terms of the bets that we've attributed to you on that schedule, was there*

an arrangement between yourself and [REDACTED], where you were able to place bets through his betting account?”. In response RB said: “No, they’ve all been [REDACTED] bets. I’ve always given him money, lent him money to use on whatever he wants. I knew he was betting but I didn’t realise he was betting considerable amounts, and he’d give me the money back but he still owes me money to this day for all that money he’s borrowed in the past.”

57.5. After RB was given a schedule showing activity, it was suggested that “... *its more likely than not that you have been placing accounts through [REDACTED] account*” to which RB responded: “No, I confirm that’s not the case.” Indeed, despite detailed reference to monies being transferred by RB to [REDACTED], RB maintained that he had not bet through [REDACTED] account.

57.6. RB was then given a list of 87 bets on his own clubs and given time to consider that disclosure before being questioned about the bets, many of which RB said he had no recollection about.

58. Consistently with the first interview, in the Commission’s view the second interview showed that when confronted with evidence RB accepted that his previous position, especially in respect of the use of [REDACTED] account, was false. However, he maintained that he had no recollection about the 87 bets put to him relating to his own clubs and he also maintained that he had not used [REDACTED] accounts.

59. As to [REDACTED] accounts, The FA’s Integrity Officer says in his statement:

“I have conducted a full analysis of RB’s bank statements in conjunction with the football bets detailed on the schedule relating to accounts held in [REDACTED] name. The purpose of this analysis was to establish whether any transfers of monies from RB to [REDACTED] was subsequently used to place football specific bets on betting accounts in [REDACTED] name, along with any further bets placed with any subsequent winnings.

It is through this analysis that I have identified 193 football specific bets on betting accounts in [REDACTED] name which I have attributed to RB. The attributions to RB were made due to the amount of money he transferred to [REDACTED] being consistent with the amount of money placed as a stake, and the time the transfer of money was made, being consistent with the time the bet was placed on an account in [REDACTED] name, allowing for some time either before or after the money transfer.”

60. The Commission notes that despite the denial in the second interview these bets were included within the Charges and those Charges have now been admitted by RB.
61. As to the 87 bets RB placed on his own clubs, the Commission refers to some of these in more detail below, but finds itself unable to accept, in all the circumstances and on the balance of probabilities, that RB was unable to remember them.
62. Overall, the Commission considered that RB's approach in the interviews was consistent with his approach overall namely to seek to conceal his Misconduct unless he was essentially confronted with a 'fait accompli'. Only once this happened did RB seem to be able to accept any wrongdoing. The Commission considered this approach to also be a serious aggravating feature of this case.
63. Part of the concealment, which has become evident from the above extracts from his interviews, was the use of other people's accounts which the Commission is quite satisfied was in a misguided attempt to conceal RB's betting on football, which he knew was against the Rules.
64. The level of the use of [REDACTED] account, for example, is evidenced without reciting the detail provided to the Commission, by reference to the fact that The FA's evidence reveals that as well as the 5832 bets placed by RB through [REDACTED] account, the analysis of RB's bank statements shows "*there were 2151 bank transfers between RB and [REDACTED] between December 2020 and October 2023 in addition to 131 bank transfers between [REDACTED] during the entirety of 2022.*"
65. In the Commission's view, the extensive (indeed, principal) use of other persons' accounts to bet on football is yet another serious aggravating feature. The Commission has no doubt this was a further attempt by RB to hide his extensive football betting activity, which he knew at all material times, was against the rules.
66. A more granular consideration of the evidence revealed yet further serious aggravating features to the Commission, especially:
- 66.1. Bets being placed proximate to educational visits to RB's clubs, at which RB was reminded of the Rules against betting; and
- 66.2. A bet being placed during a game when RB was a member of the match day squad.

67. The FA regularly undertake educational visits to clubs, which includes education on the FA Rules against betting. In this case, as has been stated, RB accepts in paragraph 8 of his witness statement: *“I was aware that prior to 2014, as a player, I was not permitted to bet on my own team and that there was a blanket ban imposed for the 2014-15 season.”* Furthermore, paragraph 4 of his Defence document states: *“RB accepts that he was aware that post the Rule change in 2014/15 he was not permitted to bet on any football anywhere in the World and that all 6397 bets are therefore breaches of the FA Rules.”*

68. The FA's evidence contains the following passage:

Each season, The FA delivers a Club Visit programme, where members of the Integrity Team deliver presentations to squads of Premier League and Football League teams. These sessions cover a variety of integrity related topics, which players need to be aware of in that season. Whilst the content of the sessions vary each season, a reminder of the betting rules is present every year.

Over and above the fact that RB accepted knowing The FA's betting Rules from, at the very least, him joining ECFC on 01 January 2019, I have identified two Club Visit presentations that RB was very likely present at during his time at STFC.

On 21 September 2021, FA Integrity Investigator [REDACTED] delivered STFC's Club Visit presentation via Microsoft Teams. This was held remotely due to some clubs taking up the option of an online session due to COVID...

Whilst no register was taken on this day, I contacted The FA's Anti-Doping Team to obtain STFC's Whereabouts for 21 September 2021. [REDACTED], The FA's Anti-Doping Officer, confirmed RB was listed as being present at the training ground on this day ... Therefore RB was very likely present for this Club Visit.

A copy of The FA's Club Visit presentation delivered at the start of the 2021/22 season is exhibited ... This presentation includes information in relation to The FA's betting Rules.

On 01 November 2022, The FA's Education Officer [REDACTED] attended STFC's training ground to deliver the Club Visit presentation at 9.30am.

Whilst no register was taken on this day, I contacted The FA's Anti-Doping Team to obtain STFC's Whereabouts for 01 November 2022. [REDACTED], The FA's Anti-Doping Coordinator, confirmed RB was listed as being present at the training ground on this day, exhibited as Therefore RB was very likely present for this Club Visit.

A copy of The FA's Club Visit presentation delivered during the 2022/23 season is exhibited as [REDACTED] 125. This presentation includes information in relation to The FA's betting Rules. Analysis of RB's football bets."

69. The relevance of this information is that on 21 September 2021, the first of the educational visits referred to, RB placed a total of 12 bets between 6:22 pm and 10:55pm, all through the account of [REDACTED], whilst on the date of the second visit, on 1 November 2022, RB placed a total of 8 bets through the accounts of [REDACTED] and [REDACTED]. Four of those bets were placed in the 15-minute period before The FA's presentation, whilst the other 4 bets were placed in a period starting just over 6 hours after the session ended.
70. The Commission considered that these betting patterns showed a total disregard for The FA's Betting Rules and, in the Commission's view were an additional serious aggravating feature. To attend, as the Commission considers on the balance of probabilities must have been the case with RB, an educational session which reminded players of the betting rules, only for RB to then place bets on football through the accounts of others within hours of the session ending, is difficult to understand or fathom.
71. A further specific and serious aggravating feature relates to bet 5609. This involved the match between Milton Keynes Dons and STFC on 24 January 2023, in which RB was a substitute who came on in the 80th minute. The match had a 7:45 kick off time and at 8:11pm, namely once the game was underway, RB placed a single bet of £5 on a goal in both halves. Thus, in the Commission's view the bet could only have been placed by RB whilst he was on substitute duty, or, alternatively, he had someone place the bet on his behalf.
72. In interview RB denied that he placed the bet from the substitutes bench, but the Commission notes that the bet is one of those charged for the 2022-2023 season. In the words of the Charge Letter, it was said "*You placed 1259 bets on football matches,*

in breach of FA Rule E8.1.” during that season and the Commission notes this is admitted.

73. Whether the bet was placed by RB from the substitutes bench or was placed by someone on his behalf and at his direction is not a matter we can determine. Nor do we need to do so, given the terms of Rule E8 (as recited above) and the fact the bet is now admitted. Whichever of the options, to be betting on a match, during the match in which RB was actually part of the matchday squad is, in the Commission’s view, a further and serious aggravating feature. Given the purpose of the Rules against betting is to protect integrity and avoid the perception of wrongdoing, it is difficult to conceive of a more serious occurrence than a player betting on a match he is participating in during the match itself.

74. Before turning to mitigation, the Commission noted that aside from (a) the pattern of betting surrounding the educational visits referred to above; and (b) the persistence of betting over a prolonged period of time, which was overwhelmingly through the accounts of others, there was no particular pattern to the betting which required particular attention.

75. The Commission also considered what mitigation was available to RB. In its submissions on sanction, The FA said the following mitigation was available to RB:

(1) RB has co-operated with The FA and admitted all charges. However, it must be acknowledged that the level of co-operation provided is significantly tempered by his position at interview and deletion of data.

(2) RB made an overall loss across all the bets he placed.

(3) [REDACTED]

(4) RB has expressed remorse and apologised to The FA.

(5) RB has no previous record.

76. In addition to this the Commission also considered RB’s personal circumstances [REDACTED]

77. Turning to the mitigation in more detail, the Commission considered that RB's co-operation and admission of the Charges was seriously tempered by his approach in interview and his deletion of data as highlighted in the paragraphs above.
78. In reality, the Commission considers there to be very little mitigation in terms of co-operation other than by way of the ultimate admission of the Charges, which the Commission has no doubt obviated the need for what could have been a complicated and time-consuming Commission hearing such that there is no doubt that RB is entitled to credit by way of mitigation for that admission.
79. As regards the investigatory stage of the proceedings, however, the Commission considers any mitigation to be marginal. We have already detailed how RB sought, in the Commission's view, to obfuscate and mislead in the interviews and was exposed to have outright lied at the end of the first interview regarding the use of [REDACTED] account for football bets.
80. Further, the co-operation, namely handing over the mobile phone and attending for interview has to be considered in the context of RB's obligations pursuant to Rules F2 and F3 in any event: put another way, he did what he was required to do as a Participant, save of course in so far as he was not straightforward and honest once he attended for interview.
81. As to the fact RB made an overall loss on the bets he placed, over a considerable period of time, any mitigation this affords is, in the view of the Commission, very limited. The loss was an outcome of the prohibited activity (betting on football) as opposed to being mitigation in respect of that activity. Whilst it may be, from a perception perspective, that if a profit is made this may be an aggravating feature, not being very good or successful at a prohibited activity is, in the Commission's view, only of marginal relevance.
82. That RB has no previous record also offers some, but only limited mitigation in this case in the Commission's view, given the serious aggravation of RB's attempts to conceal his betting not only by the deletion of mobile phone data, but also by reason of his betting through other people's accounts for a prolonged period, thereby minimizing his chances of being discovered.

83. That RB has offered an apology and expressed his remorse is noted and accepted by the Commission. It is also accepted as mitigation. Although it does not, in the Commission's view affect the mitigation applied, the Commission does express its surprise that RB did not attend before it and express his remorse personally and, most importantly, update the Commission on what steps he had taken, especially in respect of the possible gambling addition referred to below.

84. On this last point, and having regard to RB's personal circumstances, the Commission noted:

(a) [REDACTED]

(b) [REDACTED]

(c) [REDACTED]

(d) [REDACTED]

(e) [REDACTED]

(f) [REDACTED]

85. Two points emerged from the Commission's detailed consideration of RB's personal circumstances when considering mitigation:

85.1. Firstly, having regard to RB's financial circumstances, especially the impact a ban will have on his ability to earn a living, allied to the responsibilities he has, [REDACTED] the Commission considered that having regard to the totality of the Charges, this was not a case in which a fine would be appropriate, notwithstanding the number of offences within that category identified in the Guidelines that suggest a fine is the appropriate sanction.

85.2. [REDACTED]

85.3. [REDACTED]

86. The Commission also notes that it was referred by The FA to the decision of the Regulatory Commission in *The FA v Snedeker*. Whilst the Commission noted this decision, and others available on the FA disciplinary website, ultimately it considered them of very little assistance. Each case turns on its own facts and the facts of this case are particular and, the Commission considered, extreme both in terms of the sheer number of bets but also having regard to the aggravating features that are present, a number of which are seriously aggravating features.

87. Furthermore, and in any event, the Guidelines offered greater assistance in identifying a useful entry point and factors for discussion for the Commission's considerations.

Sanction

88. This is a most serious case which includes a number of egregious examples of breaches of The FA Rules against betting, which are important rules which protect the integrity of the game.

89. A number of the admitted breaches could have resulted, of themselves, in a minimum 6-month ban having regard to the Guidelines.

90. However, the Commission considers that the appropriate approach to applying a proportionate sanction to these admitted charges, is to consider them in the round and as a whole. That has to be done, for the reasons identified above, having regard to the considerable and notable aggravating features present in the case.

91. Having carefully considered the Guidelines and all the aggravating features in this case we consider that the appropriate sanction is one of a ban from all football and football related football activity for a period of 4 years, which is reduced by application of the mitigation we have identified above to 3 years and 6 months, which ban shall take immediate effect from the date of these Written Reasons.

92. We considered whether to suspend a part of this ban. However, having regard to Regulation 44 of The FA's Disciplinary Regulations as they appear in The FA Handbook, we can find no 'clear and compelling' reason to do so.

93. Furthermore, as stated above, in mitigation and having regard to RB's personal circumstances, we do not consider it appropriate to impose a fine in addition to the sporting sanction imposed.

94. Accordingly, we order:

(1) That RB is suspended from all football and football related activity from the date of these Written Reasons for a period of 3 years and 6 months.

(2) There is no order as to costs of these proceedings.

.....

Chris Stoner K.C.

As Chair and on behalf of the

Regulatory Commission

.....

Dated 24 March 2025

SANCTION GUIDELINES – BETTING CASES CHARGED UNDER FA RULE E8 (b)

	Bet placed on any aspect of any football match anywhere in the world, but not involving Participant's Club competitions.	Bet placed on Participant's competition but not involving his Club (including spot bet).	Bet placed on own team to win.	Bet placed on own team to lose.	Bet placed on particular occurrence(s) not involving the player who bet (spot bet).	Bet placed on particular occurrence(s) involving the player who bet (spot bet).
Financial Entry Point – Any fine to include, as a minimum, any financial gain made from the bet(s)	Warning / Fine	Fine	Fine	Fine	Fine	Fine
Sports sanction range	Suspension n/a	Suspension n/a where Participant has no connection with the Club bet on*	0-6 months to be determined by factors below	6 months - life to be determined by factors below	0 – 12 months	6 months - life
Factors to be considered in relation to any increase/decrease from entry point	<p>Factors to be considered when determining appropriate sanctions will include the following:</p> <ul style="list-style-type: none"> • Overall perception of impact of bet(s) on fixture/game integrity; • Player played or did not play; • Number of Bets; • Size of Bets; • Fact and circumstances surrounding pattern of betting; • Actual stake and amount possible to win; • Personal Circumstances; • Previous record – (any previous breach of betting Rules will be considered as a highly aggravating factor); • Experience of the participant; • Assistance to the process and acceptance of the charge. 					

*A suspension equivalent to betting on own team may be appropriate where a Participant has recently been on loan at the Club bet on.

The guidelines are not intended to override the discretion of Regulatory Commissions to impose such sanctions as they consider appropriate having regard to the particular facts and circumstances of a case. However, in the interests of consistency it is anticipated that the guidelines will be applied unless the applicable case has some particular characteristic(s) which justifies a greater or lesser sanction outside the guidelines.

The assessment of the seriousness of the offence will need to take account of the factors set out above. A key aspect is whether the offence creates the perception that the result or any other element of the match may have been affected by the bet, for example because the Participant has bet against himself or his club or on the contrivance of a particular occurrence within the match. Such conduct will be a serious aggravating factor in all cases. A further serious aggravating factor will be where the Participant played or was involved in the match on which the bet was made.

Betting offences are separate and distinct from charges under FA Rule E5 which concerns match fixing. It should be noted that save in exceptional circumstances a Participant found to have engaged in fixing the outcome or conduct of a match would be subject to a lifetime ban from the game. Where it can be proved that a bet has actually affected a result or occurrence within the match then such conduct will be specifically charged rather than treating the incident as a betting offence.

SANCTION GUIDELINES – INSIDE INFORMATION CHARGED UNDER FA RULE E8 (d) OR (e)

	Providing inside information where Participant could not reasonably have known it was likely to be used for betting.	Providing inside information where Participant should reasonably have known it was likely to be used for betting.	Providing inside information knowing it was likely to be used for betting.	Using or providing inside information for the purpose of betting.
Financial Entry Point – Any fine to include, as a minimum, any financial gain made from any bet(s)	NFA / Warning	Fine	Fine	Fine
Sport sanction range	Suspension n/a	0 – 3 months	3 months - life	6 months - life
Factors to be considered in relation to any increase/decrease from entry point	<p>Factors to be considered when determining appropriate sanction will include the following:</p> <ul style="list-style-type: none"> • Overall perception of conduct on fixture/game integrity; • Player played or did not play in fixture(s) concerned; • Number of Bets; • Size of Bets; • Fact and circumstances surrounding pattern of betting; • Actual stake and amount possible to win; • Personal Circumstances; • Previous record – (any previous breach of betting Rules will be considered as a highly aggravating factor); • Experience of the participant; • Assistance to the process and acceptance of the charge. 			

The guidelines are not intended to override the discretion of Regulatory Commissions to impose such sanctions as they consider appropriate having regard to the particular facts and circumstances of a case. However, in the interests of consistency it is anticipated that the guidelines will be applied unless the applicable case has some particular characteristic(s) which justifies a greater or lesser sanction outside the guidelines.

SANCTION GUIDELINES – FAILURE TO REPORT AN OFFENCE UNDER FA RULE E14

	Failure to Report an Offence Under E14 made to the Participant themselves.	Failure to Report an Offence Under E14 made to a third party which a Participant becomes aware of.
Financial Entry Point	Fine - to be not less than any financial benefit the Participant accrued in relation to the matter.	Fine - to be not less than any financial benefit the Participant accrued in relation to the matter.
Sports sanction range	[6 months - 5 years]	[0 months - 2 years]
Other sanction considerations	Consideration must be given as to whether a mandatory education order be made.	Consideration must be given as to whether a mandatory education order be made.
Factors to be considered in determining appropriate sanctions	<p>Factors to be considered when determining appropriate sanctions will include, but not necessarily be limited to, the following:</p> <ul style="list-style-type: none"> • The involvement of the Participant in any actual or potential corrupt activity relating to the offence; • The credibility of the approach made to the Participant; • Assessment of any threats made to personal safety of Participant or any other person should a report be made; • The Participant’s personal circumstances; • Participants previous record – (any previous breach of reporting/betting/integrity Rules will be considered as a highly aggravating factor); • Age and/or experience of the Participant; • Assistance to the process and acceptance of the charge; • Overall impact on reputation and integrity of game. 	<p>Factors to be considered when determining appropriate sanctions will include, but not necessarily be limited to, the following:</p> <ul style="list-style-type: none"> • The involvement of the Participant in any actual or potential corrupt activity relating to the offence; • The credibility of the approach made to the third party; • Assessment of any threats made to personal safety of Participant or any other person should a report be made; • The Participant’s personal circumstances; • Participants previous record – (any previous breach of reporting/betting/integrity Rules will be considered as a highly aggravating factor); • Age and/or experience of the Participant; • Assistance to the process and acceptance of the charge; • Overall impact on reputation and integrity of game.