

IN THE MATTER OF A REGULATORY COMMISSION
BETWEEN
THE FOOTBALL ASSOCIATION

And

MR MARK COOPER

WRITTEN REASONS OF THE REGULATORY COMMISSION

Regulatory Commission: Sally Davenport (Chair) – Independent Legal Panel Member

Faye White – Independent Football Panel Member

Tony Agana – Independent Football Panel Member

Secretary: Michael O'Connor – Lead Judicial Services Officer

Date: 14 February 2022

Venue: Held remotely via Microsoft Teams

Attending: Mark Cooper (MC) – Participant
Craig Harris – Counsel, representing MC
Max Baines – Counsel, representing The FA
Andrew Kitchen – Match Referee, Witness
Helen Edwards – Assistant Referee, Witness
Chris Hall – FA Integrity Investigator, Observer

Introduction

1. These are the written reasons of the Regulatory Commission that considered the charge against Mark Cooper (“MC”)

2. MC is the manager of Barrow AFC (“BAFC”).
3. MC was charged with a breach of FA rule E3 in relation to his conduct in the EFL League Two fixture between BAFC and Exeter City FC that was played on 17 August 2021 (“the Match”).
4. In the 91st minute of the Match MC was dismissed from the technical area for a comment made to the Assistant Referee.
5. On 18 August 2021 the Referee submitted an official report form detailing the incident that led to the dismissal, which stated as follows:

“In the 91st minute of the game, assistant referee Helen Edwards alerted me to a head injury sustained by a Barrow AFC player in close proximity to her. I therefore stopped the game with Barrow in possession of the ball.

Barrow AFC manager, Mark Cooper, perceived that his team were denied an attack by the stopping of the game to allow his player to receive treatment, and remonstrated with assistant referee Helen Edwards.

Helen Edwards asked Mark Cooper to return to his technical area. Mark Cooper continued to question Helen Edwards, who once again asked him to return to his technical area.

Mark Cooper then exclaimed directly to Helen Edwards, 'you just need to realise that it's a man's game.'

Helen Edwards alerted me to this. When he was being dismissed from the technical area, Mark Cooper affirmed to me 'all I said is that it's a man's game'.

I re-started play with a drop ball to Barrow.

Following the conclusion of the game, I informed Barrow AFC secretary Russ Dodd of the accusations made against Mark Cooper, as well as his comments to me following the dismissal. Russ Dodd responded by saying 'oh so he has admitted it to you then?'

After the stipulated 30 minute cooling off period, Mark Cooper asked to be allowed to speak to me. He started by asking to speak to me on a one to one basis, away from the rest of the officiating team. When he was told that this would not be permitted, he came into our changing room and asked, 'so I've been sent off for saying 'it's a man's game'?'

When this was confirmed, he continued by asking 'how is that sexist?'. I told Mark

Cooper that it was not up to me to determine the nature of his comments, only to report them.

He responded by saying, 'can I ask what football is coming to then?' before immediately leaving the changing room."

The Investigation

6. Blake Lewendon, FA Integrity Investigator, was appointed by the FA to investigate the incident. He obtained match footage which he clipped to include the lead up to the incident through to when MC left the pitch side. On 23 August 2021 Mr Lewendon interviewed the Referee and Assistant Referee separately and played them the video clip. He subsequently prepared statements for them which they approved and signed on 11 and 13 October 2021 respectively.
7. BAFC were notified of the investigation and Mr Lewendon arranged to interview MC on 8 September 2021. The interview was conducted via Microsoft Teams and was recorded. MC was accompanied by Lindsay Gordon, LMA Legal Director. Chris Hall, FA Integrity Investigator, was also in attendance. MC was questioned about the incident and the video clip. A transcript of the interview was subsequently produced.

The Charge

8. By letter dated 27 October 2021 MC was charged with a breach of FA rule E3. It was alleged that in or around the 91st minute of the Match he used abusive and/or insulting words towards an Assistant Referee, Helen Edwards, contrary to Rule E3.1 It was further alleged that this breach of FA Rule E3.1 was an "aggravated breach" as defined in Rule E3.2 as it included a reference, whether express or implied, to gender.
9. MC was sent the following documents together with the charge letter:
 - Witness Statement of Blake Lewendon
 - Extract of match footage

- Transcript of his interview with The FA, dated 8 September 2021
- Witness Statement of Helen Edwards
- Witness Statement of Andrew Kitchen
- Green card match notes
- MOAS Incident Report

The Response

10. On 27 October 2021 MC submitted a Disciplinary Proceedings Reply Form, denying the charge. He requested a personal hearing and indicated that he wished to be represented at the hearing by Mr Harris.
11. Along with the Reply Form MC also submitted a four-page signed statement. Although both the Form and statement were dated 11 December 2021, the Commission accepted that there was an error with the dates and that they had been sent to the FA on 27 October 2021.

The Hearing

12. In advance of the hearing the Commission read the documents referred to in paragraph 9 above, along with the FA's submissions dated 21 December 2021, and viewed the video clip provided.
13. The following paragraphs summarise the evidence and submissions provided to the Commission. They do not purport to cover all the points made. However, the absence of a point or submission in these reasons should not imply that the Commission did not take that point or submission into account when determining the case. For the avoidance of doubt, the Commission carefully considered all the written and video evidence in respect of the case and confirmed at the start of the hearing that we had read all the documents referred to in paragraphs 9, 11 and 12 above and watched the video clip.

The FA's Case

The Assistant Referee's witness statement

14. Describing the incident in her statement, the Assistant Referee stated:

- She has been a qualified referee for 15 years and has worked as an assistant referee in the Football League for the past 7 or 8 seasons.
- She has a good understanding of what discrimination is and has attended workshops and training on equality and discriminatory conduct.
- The weather on the night of the Match was windy, but she had no difficulty communicating with other people, either face-to-face or via the communication device used by the match officials.
- In the 91st minute of the Match a BAFC player was lying on the pitch holding his head following an aerial challenge.
- She informed the Referee that there was a player down with a head injury by shouting “head injury, head injury” into the communication device (at minute 00.06 on the video clip).
- The Referee stopped play in response to her shout and waved on the physio.
- As play stopped she became aware of MC who was standing approximately two yards behind her. At that point she was looking out onto the pitch as she had been trained to do.
- She heard MC ask “why have you stopped the game” (or words to that effect). He was not noticeably aggressive but she could tell that he was unhappy as his team had been attacking. She told MC to return to his technical area. He repeated his question and she repeated her response.
- MC then said to her “you need to realise it’s a man’s game”. She had not been looking at MC at the time but immediately turned to look at him (at minute 00.28 on the video clip).
- She knew immediately that MC had made a sexist comment and didn’t feel great. She was shocked as MC had personalised the comment by saying “you”. She felt that he was saying that she should not be involved in the Match because of her gender.

- She told the Referee via the communication device that MC had made a sexist comment. She beckoned the Referee over (at minute 00.34-00.39 on the video clip).
- She walked away from the technical area to create space so she could tell the Referee what MC had said. MC approached them and interrupted, saying “all I said was, it’s a man’s game”.
- The Referee showed MC a red card and asked him to leave the field of play. MC briefly remonstrated and again said “all I said was, it’s a man’s game”. The Referee returned to the middle of the pitch and MC appeared to accept the situation and walked towards the tunnel.
- The Match continued and finished without further incident.
- After the match the Referee checked she was ok. She gave him her account of what had happened and he recorded it on his match green card.
- MC later came to the Referee’s dressing room. All the match officials were present. MC said “so I’ve been sent off for saying it’s a man’s game”. The Referee replied that it was not up to him to say whether what MC had said was right or wrong, his job was to report what was said. MC then said “is this what the game’s coming to?” before leaving the room.

The Assistant Referee’s oral evidence

15. The Assistant Referee answered questions from Mr Baines. At Mr Baines’ request the video clip was played during the questioning and paused and replayed on a number of occasions at key points. The Assistant Referee’s evidence was consistent with and largely repeated the contents of her statement.
16. The Assistant Referee confirmed that there had been no incidents of note in the game before the 91st minute and that she had had no prior interaction with MC. She identified the various individuals in the video clip, confirming that it was a BAFC player on the ground.
17. Under cross-examination by Mr Harris, the Assistant Referee was asked if she was predisposed to make matters sound worse to MC. She denied this. Asked how she

could know if MC was in or out of his technical area if she was facing the pitch, she said that she could see in her peripheral vision that he was out of his area. She stated that she immediately took MC's comment to be sexist. When it was put to her that due to the wind, the fact that she was wearing an earpiece and the fact that she was not looking at MC when the comment was made, there was a danger that she might have misheard it, she said she was 100% confident that MC had used the words she had reported, including the words "you need to realise". She said that she had immediately alerted the Referee when the comment was made. Asked if she could remember an incident when an opposition player was on the ground and play was stopped, she said she could not.

The Referee's witness statement

18. The Referee's witness statement was consistent with, and expanded upon, his account on the Official Report Form. He confirmed that he has been a match official for 10 years and that this is his first season as a Level 1 National Group Referee. In his view he has a thorough understanding of what constitutes discrimination and has attended anti-discrimination workshops. The Match had not had any contentious issues and MC had not come to his attention before the injury. He was alerted to a head injury to the BAFC number 6 and captain by the Assistant Referee via his headset and stopped play. He explained that he was then called over by the Assistant Referee but did not speak to her via the headset as he was communicating with the fourth official at the time. He described his interactions with the Assistant Referee and MC, both at that point and subsequently when MC visited the referees' changing room. He also detailed his conversation with the BAFC Club Secretary. He stated that his initial thoughts regarding the words reported by the Assistant Referee were that they were condescending and patronising and would not have been said to a male assistant referee in the same scenario.

The Referee's oral evidence

19. The Referee answered questions from Mr Baines and again the video clip was played. His evidence was consistent with and largely repeated the contents of his statement. He confirmed that he had decided to issue the red card because the

Assistant Referee had reported a comment which she felt was of an offensive nature. He confirmed that he made his handwritten notes on the green card immediately after the Match. He confirmed that MC had asked to speak to him alone after the Match and that he had told MC that he needed to make any comments in front of all the match officials.

20. When cross-examined by Mr Harris, the Referee confirmed that he had not heard MC's comment about it being a man's game personally and was relying on what the Assistant Referee had reported to him. He stated that he was told that the comment made did include the words "you need to realise". He confirmed that when MC said in the changing room "all I said was it's a man's game" the Assistant Referee did not interject to dispute the words that he had used and that nobody else in the changing room had said anything.

21. In response to questions from the Commission, the Referee confirmed that the Assistant Referee had not deviated at any time from her account of the specific words used. He clarified that the words reported to him were "you need to realise it's a man's game".

MC's Case

MC's interview

22. In his interview on 8 September 2021 MC stated:

- He considers himself experienced in football and understands sexism.
- Towards the end of the Match BAFC were pushing to try and get a goal. His recollection was that his captain jumped for a ball and went down. He felt that the player was making a meal of it, bearing in mind they were pushing for the winning goal. As far as he could remember, he shouted onto the pitch "come on, get on with it, it's a man's game". He had just wanted his captain to get up and get on with the game. He thought the player had just laughed at him.
- The incident was quite close to him, in front of the dugout.

- There was frustration on his part, but only because BAFC were trying to get the winning goal.
- Other than a controversial call when the ball went out of play, there was no incident with the Assistant Referee.
- After he had called out to his player to get on with the game he heard the Assistant Referee saying she was reporting him for a sexist comment.
- The Referee came over and gave him a straight red card without asking what had been said.
- When he went in to the referees' room after the match he asked if he had been sent off for saying "it's a man's game" and the Assistant Referee said yes.

23. After the initial questioning MC was played the video clip and asked further questions. He identified the various people shown in the video clip. In response to questions he stated that his comment to his player had been made before the start of the video footage, when the incident first happened, and that the video clip showed that he was really incredulous that he was being shown a red card.

24. When told the words that he was alleged to have said, namely "you just need to realise that it's a man's game", his response was that it was not something he would say and the only person to whom he made the comment about it being a man's game was his captain. Asked about his dialogue with the Assistant Referee he said that he would just have been saying "we need to get on with the game". He said that at no time did he "label" his comment at the Assistant Referee. When asked what he had said immediately before the Assistant Referee turned her head sharply towards him (at minute 00.30 on the video clip), he said that he did not think he had said anything and she was just telling him to go back to his technical area.

25. MC stated that when he shouted "it's a man's game" he basically meant "toughen up. Get on with it". He said that it was a term a lot of people would use and he had heard it numerous times from managers. Nothing was meant by it, he was not being disrespectful. He said he felt terrible as he would not have wanted to offend the Assistant Referee.

26. MC said that he could not recall saying “is this what the game’s coming to?” in the referees’ dressing room but could have done so. Asked what he would have meant by such a comment he said that he felt he could not speak freely on the sidelines.
27. MC said that he felt that in the heat of a game people mishear things all the time and construe things differently.

MC’s written statement

28. In his statement dated 27 October 2021 MC stated that he maintained the generality of his account in the interview. He said that he accepted that he had said words to the effect of “it’s a man’s game” and that they were said in the context of an opposition player reacting to what he perceived to be minor contact that took him to ground. The context was that he was encouraging the player and officials “to get on with it” as the game was being delayed at a key moment for his side.
29. MC pointed to his positive efforts to support women in the game, including appointing a female academy manager (the only one in the country) at his previous club.
30. MC repeated his denials that his comment was addressed to the Assistant Referee and stated that it was neither intentionally nor objectively discriminatory. He used the words “it’s a man’s game” because there were two teams comprising 22 athletic, fit men and he was trying to make the point that the injured player should show those attributes and character.

MC’s oral evidence

31. In response to questions from Mr Harris, MC stated that he stood by the contents of his statement of 27 October 2021. He said that he had no prejudice against women in the game. Asked about the video relating to his own captain and the reference in paragraph 4 of his statement to an opposition player, he said that he thought that there had been a similar issue with a an opposition player going down with the clock

running down. He said it was difficult to recall events of six months ago. Someone went down with a minute to go and the game was stopped. He said to whoever was on the floor “it’s a man’s game, get on with it”. He denied that he had used the term because the Assistant Referee was a woman and said that he would have made the same comment to a man. He said that he did not recall using the words “you need to realise”, but even if he had he was not trying to be sexist, it was just the terminology used in the game.

32. When cross-examined by Mr Baines, MC stated:

- Six months was a long time and he could not recall what he had said to the Assistant Referee. It was possible that he might have asked her why the match had been stopped, but it was a long time ago.
- He could not recall being asked to go back to the technical area and said that the video clip showed him in the area.
- If the Assistant Referee had not been looking at him she could not have known whether he was in the area.
- Although it was a long time ago he believed he would have heard the Assistant Referee communicating with the Referee and saying that he had made a sexist comment.
- As soon as he heard the Assistant Referee communicating with the Referee he knew what comment he was getting into trouble for. It was the only comment that she could be referring to.
- His comment was not sexist as it was in the context of a man’s game.
- In response to the suggestion that it made no sense for his captain to time waste when his team had the ball, he said that he had not thought the injury was that bad and had thought that the player should get on with it and toughen up.
- He thought there was an incident prior to the one with his captain that involved an opposition player, but could not say when it occurred. He did not know which opposition player had been injured. He conceded that the only player down was his own captain and that the video clip did not show any opposition players in that half of the pitch. He said that if the remark had been made to an opposition

player it would have happened some time before the video clip and that all he could recall was shouting with a minute to go.

- Asked why he thought the Assistant Referee would have delayed before calling over the Referee, he said that he was not sure what he had said and when he had said it, but it was not discriminatory.
- “It’s a man’s game” is football terminology and has been said for years.

33. In response to questions from the Commission, MC stated that there had been no dramas in the game and that he had just been frustrated because he wanted his team to get the winning goal.

Submissions on behalf of the FA:

34. Mr Baines relied on and referred to the FA’s Note of Issues dated 21 December 2021, which the Commission had read. In his oral submissions Mr Baines highlighted the fact that the Assistant Referee’s evidence was categorical, clear and consistent. In contrast, MC gave an account of events in his interview which made no sense, and from which he subsequently resiled, and was now saying before the Commission that he could not really remember what happened. He submitted that it was clear from the video clip what had happened, namely that the Assistant Referee had turned to MC because he had said something unacceptable and directly afterwards she had summoned the Referee over. Most tellingly, MC had not said on the day that there had been a misunderstanding. He submitted that it was not arguable that if the words were used they did not amount to misconduct. The comment that all MC meant was that there were 22 men on the pitch was almost laughable. Clearly the comment was made to a female and the inference was that, as a female, the Assistant Referee could not understand what the game was about. He submitted that intention was irrelevant, drawing the parallel with the use of a racial word, and on any objective reasoning the remark must be discriminatory.

Submissions on behalf of MC

35. In his oral submissions Mr Harris suggested that the timing of the incident and whether it was the captain or an opposition player on the pitch was a red herring. It was not strongly disputed that the words could be as the Assistant Referee had said, albeit that MC still maintained that the words “you have to realise” were not used. Even if the whole phrase had been used, it was not discriminatory. He drew the Commission’s attention to paragraphs 3.2 and 3.4 of MC’s statement. He conceded that if the FA’s case was found proven on the facts it was not necessary for it to prove that MC intended the remark to be discriminatory, but it did need to be objectively discriminatory. It was not necessarily discriminatory to say “you need to realise” and a remark, if made innocently, does not become discriminatory merely because the person to whom it is addressed is a female or it is heard by a female. He referred the Commission to paragraphs 12 and 14 of MC’s statement, stating that the remark was not about the difference between male and female but simply highlighting the physicality on the pitch. He asked the Commission to be wary of subjectivising the test by reference to the Assistant Referee’s reaction.

Relevant Rules

36. FA Rule E3.1 states:

“A Participant shall at all times act in the best interests of the game and shall not act in any manner which is improper or brings the game into disrepute or use any one, or a combination of, violent conduct, serious foul play, threatening, abusive, indecent or insulting words or behaviour.”

37. FA Rule E3.2 states:

“A breach of Rule E3.1 is an “Aggravated Breach” where it includes a reference, whether express or implied, to any one or more of the following :- ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation or disability.”

The Commission's Decision

38. The Commission reminded ourselves that at all times the burden was on the FA to prove the case and that the applicable standard of proof for this case was the balance of probabilities.
39. The Commission had the benefit of video footage of the incident, albeit that the words spoken by MC, the Assistant Referee and the Referee were not audible.
40. The Commission found the Assistant Referee and the Referee to be credible witnesses. The Assistant Referee was clear and consistent about what she had heard MC say. She was adamant that he had used the words “you need to realise that it’s a man’s game” (rather than just “it’s a man’s game”) and that the words had been addressed personally to her. She told the Referee what had been said to her and the Referee recorded it in a contemporaneous note.
41. The Commission also considered that the Assistant Referee’s account of the sequence of events was borne out by the video footage. It was clear from her demeanour that something had been said to her in order for her to turn sharply towards MC and she then immediately waved for the Referee to come over.
42. The Commission considered that the accounts given by the Assistant Referee and the Referee in their witness statements as to what happened subsequently, namely the repetition of the words “it’s a man’s game” by MC on the pitch and in the referees’ room after the match, were consistent and not challenged in the course of the proceedings.
43. The Commission found MC less credible as a witness. We acknowledged that MC was being asked to recollect events that had occurred six months previously, but noted that he was interviewed within three weeks of the match and provided his written statement around seven weeks later. We noted the inconsistencies between his interview, when he stated that he had made the comment when his captain had gone down injured, and his statement, when he said it had been an opposition player

who had gone down injured and the comment had been directed at him. Under questioning he suggested that the confusion arose because the interviewer had referred to footage of his captain being injured, whereas in fact it was MC who referred at the start of the interview to his captain.

44. The Commission also found it telling that MC knew before he was told what comment he was being sent off for, and that he did not say to the Referee or the Assistant Referee on the day that his comment had been directed at a player, rather than the Assistant Referee.
45. The Commission found on the balance of probabilities that MC did use the words “you need to realise that it’s a man’s game” and that those words were directed towards the Assistant Referee personally and spoken at the time indicated by the Assistant Referee.
46. The Commission then went on to consider whether the words said by MC to the Assistant Referee constituted a breach of FA Rule E3.1 and/or Rule E3.2. We considered that the words “it’s a man’s game” were not necessarily offensive or abusive in and of themselves. However, we reminded ourselves that we must not look at the words used in isolation, but rather in the context in which they were said. The words were directed personally at the Assistant Referee, who had alerted the Referee to the fact that the game needed to be stopped because of a head injury. This was in stoppage time when BAFC were on the attack and pressing for a winning goal. By his own admission MC was frustrated at the stoppage in play.
47. The Commission accepted that the test to be applied was an objective test, as set out in previous FA Regulatory Commission and Appeal Board decisions, including *The FA v Luis Suarez* (30/12/11), *The FA v Nicolas Anelka* (03/03/14), *The FA v Tom Pope* (17/07/20) and *the FA v Edinson Cavani* (31/12/2020). We accepted that the FA was not required to prove any intent on MC’s part in order for us to find that a breach of the Rules had been committed. We rejected the suggestion that we ran the risk of subjectivising the test. We took note of the Assistant Referee’s comments on how the words made her feel, but they were not determinative in our decision.

We found that, viewed objectively in the context in which they were spoken, MC's words were objectively insulting and a breach of Rule E3.1. Having found that the words were insulting, we did not also need to consider if it was abusive.

48. The Commission further found that the breach was aggravated by the express reference to gender with the use of the word "men's" and the implied reference to the Assistant Referee's own gender. In our view MC used the words "you have to realise it's a man's game" because he was addressing a female assistant referee and intended to draw a distinction between men and women in football. In our view he would not have addressed the same words to a male assistant referee. We therefore found the charge proven under Rule E3.1 and E3.2.

Sanction

49. The parties were invited to address the Commission on sanction and aggravation/mitigation.

50. The Secretary read out MC's disciplinary record:

- No previous aggravated charges.
- A misconduct charge for abusive/insulting language in a game between Forest Green Rovers and Port Vale FC in 2018 for which he received a 3 match touchline ban and a £1,000 fine.
- A misconduct charge for abusive/insulting language/behaviour in 2018 in a game between Forest Green Rovers and Wycombe Wanderers FC for which he received a 2 match touchline ban and a £750 fine.
- A standard charge in a game between Forest Green Rovers and Accrington Stanley FC for which he received a 1 match touchline ban and a £500 fine.

51. Mr Baines conceded that while MC did have previous charges, none of them related to discrimination and he did not seek to argue that they constituted an aggravating factor. He highlighted MC's continued lack of understanding. He did not consider that any mitigating factors were present.

52. Mr Harris accepted that MC could not argue that he had shown remorse or should be given credit for an early admission. The fact that he was the manager spoke for itself. However, managers frequently use industrial language and the comment was made by MC in ignorance rather than with intent. He submitted that a six match ban was significant and lengthy for someone who had not been the subject of an aggravated charge before and that in light of the fact that MC would be required to undertake compulsory education, the Commission might be inclined to be lenient.

53. Appendix 1 of the Disciplinary Regulations, Standard Sanctions and Guidelines for Aggravated Breaches, states:

A finding of an Aggravated Breach against a Player, Manager or Technical Area Occupant will attract an immediate suspension of between 6 Matches and 12 Matches ("Sanction Range").

A Commission shall take all aggravating and mitigating factors into account, including but not limited to those listed in these guidelines when determining the level of sanction within the Sanction Range.

The lowest end of the Sanction Range (i.e. 6 Matches) shall operate as a standard minimum punishment (the "Standard Minimum").

54. None of the exceptions to the Standard Minimum applied in this case.

55. The Commission noted that it was required to have due regard to the circumstances and seriousness of the incident when determining the appropriate sanction and whether (and to what extent) to depart from the Sanction Range, and that in so doing it must give consideration to any aggravating and mitigating factors.

56. The Commission discounted all the aggravating factors other than profile and relative ages of MC and the Assistant Referee. We considered the offence a serious one. While we did not attach great weight to the difference in age, we were troubled by the fact that, despite having many years of experience in football, both as a player and manager, MC demonstrated a lack of awareness of his conduct and its consequences. We found the fact that MC held a position of responsibility within

BAFC to be an aggravating factor. We were also concerned by his failure to express remorse during the hearing and the fact that he continued to maintain his position that on any analysis his words were not capable of amounting to discrimination. We did not consider that any of the mitigating factors applied in this case.

57. In all the circumstances the Commission felt it appropriate to impose a sanction in excess of the Standard Minimum but towards the lower end of the Sanction Range.

58. The Commission made the following order:

- MC must serve a touchline ban until such time as the Club has completed 8 (eight) first team matches in an approved competition.
- MC must attend a mandatory education programme, the details of which will be provided to him by The FA. That programme is to be completed within a four month period commencing with the date of these Written Reasons.
- MC must pay a fine of £3,000.
- MC must pay a contribution of £500 towards the costs of the Commission.

Sally Davenport

Faye White

Tony Agana

17 February 2022