

IN THE MATTER OF A REGULATORY COMMISSION

BETWEEN

THE FOOTBALL ASSOCIATION

and

ASTON VILLA FC

and

TOTTENHAM HOTSPUR FC

WRITTEN REASONS OF THE REGULATORY COMMISSION

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

Alan Hardy – Independent Football Panel Member

David Unsworth – Independent Football Panel Member

Secretary: Conrad Gibbons – Judicial Services Assistant Manager

Date: 23 January 2026

Venue: Held remotely via Microsoft Teams

Introduction

1. These are the Written Reasons of the Regulatory Commission (“the Commission”) that considered two charges (collectively “the Charges” and each a “Charge”) against Aston Villa FC (“Villa”) and Tottenham Hotspur FC (“Tottenham”).
2. On 10 January 2026, Tottenham played a match (“the Match”) against Villa in the FA Cup.

The Charges

3. By letters dated 13 January 2026 (“the Charge Letters”), The FA charged Villa and Tottenham with misconduct amounting to a breach of FA Rule E20.1. It was alleged that following completion of the Match, Villa and Tottenham each failed to ensure that their players and/or technical area staff did not behave in a way which was improper and/or provocative (“the Incident”).
4. The FA designated both cases as Non-Standard because the particular facts of the alleged misconduct were of a serious and/or unusual nature.
5. The FA informed Villa and Tottenham that pursuant to Regulation 13 of the Disciplinary Regulations 2025/26 (“the Regulations”), the Charges had been consolidated and would be determined together at a joint hearing.
6. Together with the Charge Letters, The FA sent Villa and Tottenham the following evidence:
 - Report of the Referee, Craig Pawson
 - Extract from Essential Information for Clubs 2025/26
 - Video clips of the Incident

Villa's Response

7. On 16 January 2026, Villa submitted a Disciplinary Proceedings Reply Form to The FA. It accepted the Charge and asked that the case be dealt with at a non-personal hearing. It also submitted a letter of the same date in which it provided mitigation.

Tottenham's Response

8. On 16 January 2026, Tottenham submitted a Disciplinary Proceedings Reply Form to The FA. It accepted the Charge and asked that the case be dealt with at a non-personal hearing. It also submitted a letter of the same date in which it provided mitigation, together with a letter from the Tottenham manager Thomas Frank ("TF"), CCTV footage of the Incident and several screenshots from the CCTV footage.

Relevant Rules

9. FA Rule E20 states:

"E20 Each Affiliated Association, Competition and Club shall be responsible for ensuring that its Directors, players, officials, employees, servants and representatives, attending any Match do not:

E20.1 behave in a way which is improper, offensive, violent, threatening, abusive, indecent, insulting or provocative;"

The Hearing

10. In advance of the hearing the Commission read the documents referred to in paragraphs 6 to 8 above and viewed the video footage and screenshots provided to it.
11. Given that the Charges were accepted, the Commission treated them both as proven and reviewed the evidence and submissions purely in order to determine sanction, as set out below.

12. The following paragraphs summarise the evidence and submissions considered by the Commission. They do not purport to cover all the points made. However, the absence of a point or submission in these Written Reasons should not imply that the Commission did not take that point or submission into account when determining the sanction.

Evidence and submissions

The Referee's evidence

13. In his Extraordinary Incident Report dated 21 10 January 2026, the Referee reported the Incident in the following terms:

“After the final whistle a number of players came together in the home team penalty area. No misconduct was witnessed by the match officials. The incident involved players and technical staff from both teams.”

The video evidence

14. The Commission had three video clips, one being a clip from the tv footage from the Match, another showing an aerial view of the Incident (the CCTV footage provided by Tottenham) and the third being a short recording made by someone in the stand in front of which the Incident took place.

Tottenham's evidence

15. As stated above, Tottenham provided CCTV footage of the Incident and three screenshots from that footage, highlighting Tottenham personnel (said to be a substitute and two members of its security staff).

Villa's submissions

16. In its letter dated 16 January 2026, Villa apologised for the Incident and said that it did not condone the behaviour of its players. They had been told that it was not acceptable. Villa invited the Commission to consider the following points in respect of the Incident:

- Both sets of players were equally at fault.
- The Incident was over relatively quickly and the players all walked off together and went into the tunnel without further issues.
- While some of the Villa technical area staff ran onto the pitch after the final whistle, their sole intention was to disperse the melee and get the Villa players off the pitch as soon as possible.
- The Incident was not a confrontation that was characterised by violent conduct or hostile or aggressive behaviour from the players and nobody was injured.

17. Villa also asked the Commission to take account of a number of further mitigating factors:

- In his Report, the Referee stated that the match officials had not witnessed any misconduct.
- Villa had apologised and had accepted the Charge at the earliest opportunity.
- The disciplinary record of Villa's first team was good, with the Incident being the first mass confrontation involving the first team for over a year.

18. In terms of the level of sanction, Villa submitted that the entry point in the sanction guidelines ("the Guidelines") is a suggested starting point only and that a Commission has the discretion to impose any penalty of its choosing within the parameters of the Regulations. It submitted that a fine at the entry point of £125,000 would be "*wholly inappropriate and unreasonable*", as the case was at the lowest level of the spectrum. It highlighted the disparity between the sanction for an admitted Standard Charge, ie

£20,000, and the entry point of £125,000. It requested that the Commission adjust the entry point down to take account of what the fine would have been had a Standard Penalty been imposed.

Tottenham's written submissions

19. In its written submissions, Tottenham apologised for the Incident and referred to the separate letter of apology from TF. It invited the Commission to consider the following points in respect of the Incident:

- The context of the Match. This was a highly competitive FA Cup fixture and emotions were running high.
- Both sets of players were equally at fault.
- There were a limited number of players involved.
- The Incident only lasted a couple of minutes. The confrontation dispersed quickly and without issue.
- Staff from both clubs ran onto the pitch, but only in order to try to diffuse the Incident and separate the players.
- The Incident did not involve any violent conduct or any offensive, threatening, abusive, indecent or insulting behaviour.
- No individual received a red card and the match officials did not witness any misconduct.

20. Tottenham also asked the Commission to take a number of additional mitigating factors into account:

- Tottenham had apologised to The FA and the Commission and had accepted the Charge at the earliest opportunity.
- TF had personally apologised and, as set out in his statement, had spoken to the Tottenham players and reminded them of their responsibilities.

- The Incident was at the lower end of the scale.

21. In terms of the level of sanction, Tottenham asked the Commission to take into account the fact that the disciplinary record of Tottenham's first team was good, with the Incident being the first mass confrontation involving the first team for over 15 months. It invited the Commission to take a "*reasonable approach*" and impose a fine no higher than the Standard Penalty, ie £20,000. It submitted that the entry point was guidance only and not mandatory. A fine of £125,000 would be wholly disproportionate in this case.

The FA's written submissions

22. The FA referred to the Guidelines and highlighted the introduction of an entry point for the 2025-2026 season, indicating that it was intended to be an appropriate starting point. It pointed to the fact that prior to its introduction, Regulatory Commissions had tended to look to the Standard Penalty as the starting point, with the consequence that penalties imposed in Non-Standard cases routinely fell significantly short of the maximum penalty available. It submitted that in order to ensure consistency of sanction, it would be reasonable to expect the Guidelines to be applied. It referred the Commission to the Appeal Board's decision in *The FA v Plymouth Argyle* [2025] and submitted that the correct approach was to apply the "*stark, simple and intelligible*" Guidelines and start from the entry point of £125,000.

23. The FA also submitted that when considering the appropriate level of discount for the admission of the Charges, the Commission must consider whether it would be realistic to deny a mass confrontation charge where there was clear footage of the Incident.

The Commission's deliberations

24. The Commission began by discussing the Incident. It was assisted by the footage filmed by the spectator as this was the only clip that actually showed how the Incident

started. The Commission observed that at the final whistle, Villa 11, Ollie Watkins (“OW”), went over to celebrate with the Villa supporters. It made no criticism of him doing so. Spurs 6, Joao Palhinia (“JP”), pushed OW with his hands and with his head and then pushed him down the slope towards the barrier separating the stand from the pitch. This was the catalyst for what followed. Villa 26, Morgan Rogers (“MR”), reacted with aggression to JP’s actions and two other players rapidly became involved, Villa 26, Lamare Bogarde, and Spurs 37, Micky Van de Ven.

25. Although the tv footage did not capture the initial confrontation, it did show several players on the pitch reacting to what was happening and moving at pace towards the group behind the goal. The CCTV footage also assisted the Commission as it showed numerous individuals heading for the confrontation, many of them sprinting. They included players, among them the Villa goalkeeper who ran from the opposite end of the pitch, and individuals from the technical areas.
26. The Commission was not able to identify all of the individuals involved. It accepted that some of them, indeed the majority of them, may well have had the intention of trying to break up the confrontation. Nevertheless, their involvement was unnecessary and had the potential to further inflame the situation. Within a short space of time a group of around 20 people had gathered in the penalty area. The Commission accepted that although there was some pushing and shoving at that stage, there was no further serious aggression shown. From that point the confrontation died down relatively quickly. However, the Incident made for ugly viewing and did little for the image of the game.
27. The Commission noted that both clubs submitted that they were equally at fault for the Incident. Nonetheless, based on the video evidence it had seen, the Commission did think that slightly more of the blame lay with Tottenham, in the sense that its player, JP, had sparked the whole confrontation due to his pushes on OW. As far as the Commission could see, this action was not provoked by OW, who remained calm. It accepted that the Villa player, MR, should not have reacted in the way that he did and

his actions clearly contributed to what followed. Thereafter the Commission felt that the two teams were equally to blame for the Incident.

28. The Commission did not agree with the clubs that the Incident should be regarded as at the low end of the spectrum. The number of individuals who became involved and the fact that this was a high-profile fixture, televised around the world, were aggravating factors. In addition, the proximity of the Incident to the crowd was a serious aggravating factor in the view of the Commission. The fact that the Villa fans witnessed at close hand one of their players being pushed repeatedly by a Tottenham player had the potential to create crowd unrest and could easily have sparked a much more serious incident.
29. The Commission also considered that the previous misconduct record of both Villa and Tottenham, as detailed below, was a further aggravating factor.
30. In terms of sanction, the Commission was satisfied that The FA was right to designate the Charges as Non-Standard. It agreed that its starting point should be the entry point of £125,000. The Commission accepted that the Referee had not identified any misconduct by either team, albeit that it noted from the footage that the Referee did not appear to witness the initial confrontation involving the five players as he could be seen talking to a player on the pitch. The Commission also accepted that the Incident had not gone beyond pushing and shoving and should not therefore be sanctioned at the upper end of the sanction range. Nonetheless, it concluded that the aggravating factors identified above took the sanction above the entry point in both cases.
31. Both clubs had admitted their respective Charges at the earliest opportunity and had apologised for the Incident, which were mitigating factors. The Commission agreed with The FA that only limited credit should be given for an admission in circumstances where there was clear video evidence in support of a charge. It was also concerned that neither club had identified any specific measures put in place to try to prevent a repetition of the Incident, beyond saying that it had spoken to the people involved. This

was particularly disappointing given that both clubs had previous proven E20 charges involving their first teams.

Villa Sanction

32. As stated above, the Commission considered that Villa's misconduct history was an aggravating factor. It took account purely of Villa's previous proven E20 charges in the current and previous five seasons:

- E20 (surrounding a match official) First Team v Crystal Palace FC. Premier League. November 2021. Standard Charge. £20,000 fine.
- E20 (surrounding a match official) First Team v Southampton FC. Premier League. January 2023. Standard Charge. £20,000 fine.
- E20 (mass confrontation) U23 Team v Leeds United FC U23. Premier League 2 – Division 2. February 2023. Non-Standard Charge. £5,000 fine.
- E20 (mass confrontation) First Team v Brentford FC. Premier League. December 2023. Non-Standard Charge. £180,000 fine.
- E20 (mass confrontation) U18 Team v Southampton FC U18. U18 Premier League - South. August 2024. Non-Standard Charge. £6,000 fine.
- E20 (mass confrontation) U23 Team v Arsenal FC U23. Premier League 2 – Division 1. August 2024. Non-Standard Charge. £5,000 fine.
- E20 (mass confrontation) First Team v Newcastle United FC. Premier League. December 2024. Non-Standard Charge. £30,000 fine.

33. The Commission noted that four of the previous proven E20 breaches related to the first team, with two of them being for mass confrontations. The charge in December 2023 had attracted a very substantial fine. A further misconduct charge against the first team for a mass confrontation was found proven a year later. The Charge was therefore the third in three years. This record, coupled with the other two charges against the first team and the three charges against other Villa teams, all of them for mass confrontations, was a serious aggravating factor.

34. Having considered all of the aggravating factors, the Commission decided to increase the sanction to £150,000. It then gave credit for the mitigating factors identified in paragraph 31 above and concluded that a fine of £125,000 was appropriate.

Tottenham Sanction

35. As with Villa, the Commission considered that Tottenham's misconduct history was an aggravating factor. It took account purely of Tottenham's previous proven E20 charges in the current and previous five seasons:

- E20 (mass confrontation) U23 Team v Arsenal FC U23. Premier League 2 – Division 1. October 2022. Standard Charge. £13,000 fine.
- E20 (surrounding a match official) First Team v Newcastle United FC. Premier League. October 2022. Standard Charge. £20,000 fine.
- E20 (mass confrontation) First Team v Brighton & Hove Albion FC. Premier League. April 2023. Non-Standard Charge. £40,000 fine.
- E20 (mass confrontation) U18 Team v Chelsea FC U18. U18 Premier League Cup. October 2023. Non-Standard Charge. £3,500 fine.
- E20 (mass confrontation) First Team v West Ham United FC. Premier League. October 2024. Standard Charge. £20,000 fine.

36. The Commission noted that three of the previous proven E20 breaches related to the first team, two of them being for mass confrontations. There were also two proven mass confrontation charges against more junior teams.

37. While Tottenham's misconduct record was an aggravating factor, it was not as poor as that of Villa. However, for the reasons cited above, the Commission was of the view that Tottenham was more culpable for the Incident, albeit only marginally more so. The Commission concluded that these two factors balanced each other out. The Commission adopted the same approach to the aggravating and mitigating factors as

it did with Villa. It concluded that a fine of £125,000, the same as Villa's fine, was appropriate.

Conclusion

38. The Commission ordered Villa to pay a fine of £125,000.

39. The Commission ordered Tottenham to pay a fine of £125,000.

40. The FA did not seek an order for costs against either party and the Commission made no order as to costs.

41. The decision of the Commission may be appealed in accordance with the appropriate Appeal Regulations.

Sally Davenport

Alan Hardy

David Unsworth

26 January 2026