

IN THE MATTER OF A FOOTBALL ASSOCIATION
INDEPENDENT REGULATORY COMMISSION

BETWEEN:

THE FOOTBALL ASSOCIATION

and

(1) WEST HAM UNITED FOOTBALL CLUB; AND
(2) CHELSEA FOOTBALL CLUB.

WRITTEN REASONS AND DECISION OF
THE INDEPENDENT REGULATORY COMMISSION FOLLOWING THE
HEARING
ON 16 FEBRUARY 2026

Background

1. These are the written reasons and decision made by an Independent Regulatory Commission which sat by video conference on 16 February 2026 to consider the consolidated charges against West Ham United FC and Chelsea FC.
2. The Regulatory Commission members were Mr Gareth Farrelly, Chairman and Independent Football Panel Member, Mr Alan Hardy, Independent Football Panel Member and Mr Tony Agana, Independent Football Panel Member.
3. Mr Paddy McCormack, Judicial Services Manager, acted as Secretary to the Regulatory Commission.

West Ham United FC

4. By letter dated 3 February 2026, The Football Association charged West Ham United FC with misconduct for a breach of FA Rule E20.1 in respect of the Premier League fixture between Chelsea FC and West Ham United FC that took place on 31 January 2026.
5. It was alleged that in or around the 95th minute of the fixture, West Ham United FC failed to ensure that its players did not behave in a way which was improper and/or provocative and/or violent.
6. The FA designated this as Non-Standard Case as the particular facts of the alleged Misconduct were of a serious and/or unusual nature and/or due to a proven breach of FA Rule E20.1 in the preceding 12 months:
 - West Ham United FC vs Nottingham Forest FC, 18 May 2025.

Chelsea FC

7. By letter dated 3 February 2026, The Football Association charged Chelsea FC with misconduct for a breach of FA Rule E20.1 in respect of the Premier League fixture between West Ham United FC and Chelsea FC that took place on 31 January 2026.
8. It was alleged that in or around the 95th minute of the fixture, Chelsea FC failed to ensure that its players did not behave in a way which was improper and/or provocative.
9. The FA also designated this as a Non-Standard Case as the particular facts of the alleged Misconduct were of a serious and/or unusual nature and/or due a proven breach of FA Rule E20.1 in the preceding 12 months:

- Chelsea FC vs Aston Villa FC, 27 December 2025; and
- Fulham FC v Chelsea FC, 7 January 2026.

Consolidated Proceedings

10. The above referenced Charges were consolidated pursuant to Regulation 13 of the Disciplinary Regulations of The FA Handbook Season 2025/26. It was stated on each Charge that the proceedings would be conducted together, and the Charges would be determined at a joint hearing.

Rules

11. FA Rule E20 states that –

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.

Evidence

12. The FA included the following evidence with the respective charges:

- Report of the Match Referee, dated 1 February 2026;
- Video clips of the incident; and
- Essential Information for Clubs 2025-26.

13. The Match Referee stated, in his Extraordinary Incident Report Form:-

“In the 90+5th min following Chelsea number 20 (Joao Pedro) and West Ham number 17 (Adama Traore) becoming aggressive towards each other, for which both players were cautioned, a mass confrontation involving most players occurred. As a result of a VAR West ham [sic] number 25 (Jean-Clair Todibo) for an act of violent conduct. No further misconduct was identified on field however you may wish to review the incident due to the number of players involved from both teams”.

14. The following is a summary of the principal submissions provided to the Commission. It does not purport to contain reference to all the points made, however the absence of a point, or submission, in these reasons should not imply that the Commission did not take such point, or submission, into consideration when the members determined the

matter. For the avoidance of doubt, the Commission has carefully considered all the written and video evidence in respect of this case.

Replies to the Charges

15. West Ham United FC admitted the charge by reply on 6 February 2026. They did not request a personal hearing, and their case was dealt with on the papers only. They submitted a detailed statement setting out their account of the incident, a number of stills of the incident, the social media post from Jean-Clair Todibo, and the Premier League's Match Delegate Report, the contents of which were read and noted by the Commission.
16. In summary, it was submitted that the Club regretted its players' involvement in the incident. It fully accepted that the actions of their players, Jean-Clair Todibo and Adama Traoré warranted the on-field sanctions received but did not accept that any of their other players were involved in any conduct beyond being involved in the mass confrontation. The Commission were invited to consider the context of the game itself as well as the Club's current position. The Club contended that save for Mr Todibo's conduct, the conduct of the players was directed at diffusing the incident and avoiding any escalation. The Club would suffer the consequences of the playing suspension and the non-availability of one of its key players. Finally, a Club executive had spoken to the Head Coach and Captain to discuss matters and to impress upon them the importance of the players refraining from any similar incidents moving forward.
17. Chelsea FC provided their response on 6 February 2026. They accepted the charge. They did not request a personal hearing, and their case was dealt with on the papers only. They also submitted a detailed written statement setting out their position.
18. The Club accepted that it failed to ensure that its players conducted themselves in an orderly fashion. It submitted that the incident began due to the aggressive act of the West Ham United player, Mr Traoré on their player. Their players were motivated to enter the confrontation to defend both Mr Cucurella and Mr Pedro from the immediate threat of harm posed by the violent acts of Mr Traoré and Mr Todibo. The level of violence shown by their players was low, no player received a red card for their behaviour and Mr Pedro was the only player to receive a yellow card in relation to the incident. The game resumed and concluded without any further issue. The Club had taken this incident very seriously and the Manager had spoken to the players about handling similar situations in the future.

Sanction

19. These were non-standard cases. Therefore, the Commission has a discretion with regard to sanction. In accordance with the non-Standard Penalty guidelines concerning FA Rule E20, where a breach has been admitted, a Regulatory Commission may disregard

the standard penalty and may impose a sanction as high as those listed in the guidelines. For each successive non-Standard breach of FA Rule E20, including E20.1, within a 12-month period the maximum fine and entry point shall double and then treble (and so on) the amount set out in the guidelines.

20. The guidelines were distributed to clubs in the Essential Information for Clubs booklet at the start of this season. The Clubs were on notice as to the level of fine to be expected in respect of breaches of this nature. The introduction of an 'entry point' of 50% of the maximum fine was an approach supported by The FA's Participant Behaviour Working Group and approved by the Football Regulatory Authority.
21. The Regulatory Commission viewed the video evidence in detail and gave consideration to a number of factors, firstly, the parties' submissions and then the incident itself, these factors being equally applicable to both parties - the number of players involved from both sides, those players running from other areas of the pitch to become involved, the duration of the incident, further break out incidents, the level of aggression involved, the proximity to the crowd, and the fact that this was a live, televised game, watched by millions of people. For completeness, there was no finding as to the level of culpability of both sides. This was a typical case where both sides claim that without the actions of the other, the incident would not have occurred. However, this is quite a simplistic position in relation to this incident, suffice to say that, but for the actions of the other, there would be no breach, charge or subsequent need to determine sanction.
22. The Regulatory Commission considered previous First Team sanctions imposed on Chelsea FC with regard to breaches of Rule E20 which are detailed as follows:
 - (1) The Club was fined £25,000.00 for an incident that occurred in a Premier League fixture v Liverpool FC on 28 August 2021 (non-Standard);
 - (2) The Club was also fined £40,000.00 for an incident that occurred in a Premier League fixture v Nottingham Forest FC on 6 October 2024 (non-Standard);
 - (3) The Club was fined £40,000.00 for an incident that occurred in a Premier League fixture v Ipswich Town FC on 30 December 2024 (non-Standard);
 - (4) The Club was fined £150,000.00 for an incident that occurred in a Premier League fixture v Aston Villa FC on 27 December 2025 (non-Standard);
 - (5) The Club was fined £20,000.00 for an incident that occurred in a Premier League fixture v Fulham FC on 7 January 2026. This was a Standard Case.
23. It was noted by the Regulatory Commission that this is the Club's sixth FA Rule E20 incident in the current season and preceding five full seasons, the most recent of which was 7 January 2026. For completeness, save for the most recent previous incident, this was the fifth Non-Standard case. As set out above, the charge was admitted and there was contrition. The Club had spoken to the players about how to handle similar situation in the future. However, this was a serious incident involving a number of their players. It was not accepted that Mr Cucurella was wholly without fault. He was aware of his actions after conceding the corner kick and returning to his feet. He sought to invite a

reaction from Mr Traoré. That is not to justify Mr Traoré's disproportionate reaction from which the mass confrontation ensued. Furthermore, the Commission noted that three of the Chelsea players were in some way seeking to incite the crowd during and towards the end of the incident. There is no justification for this behaviour, irrespective of what had happened during the course of the game or within the mass confrontation itself. It was accepted that the Club had admitted the charge and was contrite. Equally, as per The FA submissions, given the overwhelming evidence in this case, it would be difficult to reconcile any other response.

24. In determining the fines issued to clubs at this level, the Commission considered the Essential Information for Clubs in relation to such incidents. This was not a Standard Case. It is stated, inter alia, that the maximum fine for Non-Standard E20 breaches is £250,000, the Entry Point being £125,000.00 Furthermore, the Guidance states: - *“for each successive non-standard breach of Rule E20, including E20.1 and E20.2, within a 12 month period the maximum fine shall double and then treble (and so on) as set out”*.
25. There remains no exact formula for determining sanction. The Commission is aware that any sanction must be fair and proportionate. Given the increased scrutiny of all Regulatory Commissions, and its importance to the respective parties, it is a responsibility not taken lightly.
26. Having taken into account the relevant entry point, the aggravating and mitigating factors in this case, and the analysis set out in paragraphs 21 and 23, the Regulatory Commission would have imposed a fine in excess of £400,000.00 on Chelsea FC. However, given the Club's early admittance to the charge, a fine of £325,000.00 was imposed on Chelsea FC. The Essential Information for Clubs has in many ways tempered the discretion of the Commission. This was the second breach within the prescribed 12-month period. The most recent breach on 7 January 2026 was a standard case, and the club were fined £20,000.00. On 27 December 2025, the Club had been fined £150,000 for a Non-Standard breach of FA Rule E20.1. Therefore, the entry point for a second breach within a twelve-month period is £250,000.00 with a maximum fine of £500,000.00.
27. The same approach was taken with West Ham United FC. The Commission considered previous sanctions imposed on West Ham United FC with regard to First Team breaches of Rule E20 which are detailed as follows:
 - (1) The Club was fined £20,000.00 for an incident that occurred in a Premier League fixture v Southampton FC on 16 October 2022 (Standard);
 - (2) The Club was fined £30,000.00 for an incident that occurred in a Premier League fixture v Tottenham Hotspur FC on 19 October 2024 (non-Standard);
 - (3) The Club was fined £60,000.00 for a incident that occurred in a Premier League fixture v Nottingham Forest on 18 May 2025 (non-Standard).

28. The Commission has addressed the issue of culpability above in relation to both clubs, suffice to say that both clubs contributed to the incident. Mr Traoré's disproportionate reaction to Mr Cucurella's movement as he returned to his feet, was the catalyst for what occurred. It was accepted that there was no violent conduct from any other West Ham United players beyond the behaviour of Mr Todibo. However, a large number of West Ham United players did behave in an improper and provocative manner and contributed to what was a serious, unsightly incident. Again, it was accepted and mitigation applied for the early admittance and contrition. In applying the criteria set out in the *Essential Information for Clubs 2025-2026* it is clear that this is a second non-standard breach of Rule E20 for West Ham United FC within 12 months, the previous fine being £60,000.00. Therefore, the Entry Point for the Commission is a £250,000.00 financial sanction with a maximum fine of £500,000.00. It is also the club's fourth First Team breach within the previous five seasons. As above, and considering the entry point, the aggravating factors and mitigation put forward, the Commission would have imposed a fine of £375,000.00. However, given the Club's early admittance to the charge, a fine of £300,000.00 was imposed on the Club.

Conclusion

29. The Regulatory Commission, having carefully considered the Regulations, have imposed the following sanctions:

West Ham United FC

- (i) West Ham United Football Club is fined the sum of £300,000.00.

Chelsea FC

- (ii) Chelsea FC is fined the sum of £325,000.00.

Appeal

30. These decisions are subject to the relevant Appeal Regulations.

Mr Gareth Farrelly, Chairman and Independent Panel Member

Mr Alan Hardy, Independent Football Panel Member

Mr Tony Agana, Independent Football Panel Member

19 February 2026