

**IN THE MATTER OF A FOOTBALL ASSOCIATION  
INDEPENDENT REGULATORY COMMISSION**

**The FA**

**V**

**LINCOLN CITY FC**

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**DECISION AND WRITTEN REASONS  
OF THE INDEPENDENT REGULATORY COMMISSION**

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**Regulatory Commission** **Dominic Adamson KC (Chairperson)**

**Elahe Youshani**

**Peter Fletcher**

**Secretary to the Commission** **Conrad Gibbons**

**Date** **9 January 2026**

**Hearing Type** **Personal Hearing**

**Introduction**

1. On 17 November 2025, Lincoln City FC ("the Club") was charged with misconduct in respect of two breaches of FA Rule E21 in relation to events at an English Football League Cup match against Chelsea FC ("Chelsea"). The terms of the charges were as follows:-

1. *It is alleged that in or around the 29th minute of the fixture, Lincoln City FC failed to ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) conduct themselves in an orderly fashion whilst attending the Match and do not use words or otherwise behave in a way which is improper, offensive, abusive, indecent, or insulting with either express or implied reference to sexual orientation, contrary to FA Rules E21.1 and E21.4."*
2. *It is alleged that during halftime of the fixture, Lincoln City FC failed to ensure that spectators and/or its supporters (and anyone purporting to be its*

*supporters or followers) conduct themselves in an orderly fashion whilst attending the Match and do not use words or otherwise behave in a way which is improper, offensive, abusive, indecent, or insulting with either express or implied reference to sexual orientation, contrary to FA Rules E21.1 and E21.4.*

2. The conduct underlying the charges is that a section of the Club's supporters chanting the phrase "Chelsea Rent Boy" on each of the occasions referred in the two charges, namely during the 29<sup>th</sup> minute of the game at the half-time interval.
3. On 25 November 2025, the Club admitted the charges and requested that the matter be dealt with at a personal hearing. The Regulatory Commission deliberated at a personal hearing on 9 January 2026.
4. At that hearing The FA were represented by Gabriele Watts, Regulatory Advocate, and the Club was represented by Liam Scully, the Club's Chief Executive Officer. We are grateful to them for their assistance.
5. We have been provided with an 85-page bundle of documents. We have considered it with care and in full. We have also been provided with 6 video clips relating to the charges and a further video of an interview given by Liam Scully to BBC Radio Lincolnshire on matters relevant to a previous breach of E21 by the Club against Wrexham AFC in the final game of the 2024/25 season and events at and subsequent to the game which forms the subject of the charges.
6. If we do not mention within these reasons a specific document or the video materials within these reasons that does not indicate that it has not been given full and proper consideration.

### **The Regulation**

7. Regulation E21 provides, as relevant:

*"A Club must ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) conduct themselves in an orderly fashion whilst attending any Match and do not:*

*E21.1. use words or otherwise behave in a way which is improper, offensive, violent, threatening, abusive, indecent, insulting or provocative.*

*E21.2 ...*

*E21.3....*

*E21.4. conduct themselves in a manner prohibited by paragraph E21.1 in circumstances where that conduct is discriminatory in that it includes a reference,*

*whether express or implied, to one or more of ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation or disability.*

*E21.5. It shall be a defence to a Charge in relation to Rules E21.1 to E21.3 (only) if the Club can show that all events, incidents or occurrences complained of were the result of circumstances over which it had no control, or for reasons of crowd safety, and that its responsible officers or agents had used all due diligence to ensure that its said responsibility was discharged. However, when considering whether this defence is made out a Regulatory Commission will have regard to all relevant factors including:*

- The extent to which the Club has discharged its duty;*
- The severity of the issues involved;*
- The extent to which similar issues have occurred previously in which case whether the Club took sufficient action in preventing further such incidences.*

*E21.6 ..."*

8. Accordingly, there is no due diligence defence available where the conduct complained of is discriminatory.

#### **The Facts & Evidence**

9. On 23 September 2025, the Club played an EFL League Cup match against Chelsea. The basic facts underpinning the charge are described in the Referee's Extraordinary Incident Report which states as follows:-

*"Prior to the game starting, on various occasions in the first half and on one [sic] occasion in the second half, you could audibly hear Lincoln City fans chant "Chelsea rent boy." 4th official David Rock, was made aware of this by the tunnel stewards before the game and told the club were aware of it. At half time, we spoke with safety officer [REDACTED], who informed us Lincoln City were taking proactive measures including stadium announcement and social media post. Post match, we confirmed facts with [REDACTED], who informed us the chanting was coming from the "GBM upper 7" area of the stadium."*

10. As a result of the report of the incident the FA opened an investigation.
11. On 24 September 2025, The FA wrote to the Club enclosing a copy of the Match Official's report and invited its detailed observations. The Club was given until 1 October to respond.
12. On the same date the FA wrote to Chelsea requested their observations. A representative of Chelsea provided the following report setting out the following timeline based on accounts from their Stewards:-

*"The Chelsea Stewards have reported the following*

*20:14 (approx). A large group in the main stand and another large group closest to the Chelsea supporters clearly sang "Chelsea Rent Boys".*

*20:19 (approx). Tannoy announcement made by Lincoln City in relation to the chanting.*

*20:30 (approx). Half Time: The same sets of supporters also clearly sang "Chelsea Rent Boys" and again as the players re-entered the field for the second half."*

13. On 25 September Lincolnshire Police wrote to the Club's Ground Safety Officer noting that there were several incidents that took place inside the stadium during the fixture that required further investigation. Amongst the incidents it was investigating were reports of "*Homophobic Chanting – Predominantly Block 7 Upper and lower*". The Police explained that this had already been recorded as a hate crime. The police requested video footage and a witness statement from the Club staff who witnessed the event including one from the safety officer and the numerous stewards with the area of block 7.
14. On 27 September 2025 the Club's Security Provider "Raw Training & Security" wrote an email to the Club's Safety Officer. It stated:-

*"Yes I had approximately 6fans plus the Chelsea stewards come to me as Supervisor for the Stacey West stand and express their concerns over the chanting. I offered some reassurance that the matter had been raised by myself with control but that control were already aware and it was about to be put over the PA system that it was to stop immediately or face ejection from the stadium.*

*Once that had been done I had the Chelsea Steward say to me "thats great it doesn't normally get acted upon" and then on the bottom of Block 7 , two of the adults that had raised it with me came down approx 3 steps to shake my hand "saying thank-you for acting upon it, this never happens, its usually ignored" that shaking of hands would be able to be witnessed via cctv if we had the camera at the correct angle."*

15. The FA was supplied with the video Club's footage. A witness statement dated 16 October 2025 has been prepared by [REDACTED], the On-Field Football Regulation Officer, at The FA. He analysed video footage of the game. He identified discriminatory chanting during the 29<sup>th</sup> minute of play and during half time. He states:-

*"29th minute analysis – footage/audio: exhibit JG2*

5. The video footage commences with a Lincoln player preparing to take a corner kick. Audible crowd chants of "Come on Lincoln, come on Lincoln" can be heard. As the aerial camera shifts focus to the penalty area, a section of the crowd begins. chanting "Chelsea rent boys, Chelsea rent boys, woah woah." This chant is repeated once more prior to the corner being taken.

*Halftime footage analysis – footage/audio: exhibit JG3*

6. The footage begins with players engaged in warm-up activities during the halftime interval, shortly before the start of the second half. At the 18-second mark, CFC players return to the pitch, which is met with audible jeers and boos from sections of the crowd. At 36 seconds, a chant of "Chelsea rent boys, Chelsea rent boys, woah woah" is heard. The camera then zooms in on [a Chelsea player] during which the chant is repeated once more before fading and becoming inaudible."

16. We have reviewed the footage which is referred to [REDACTED]. In our view, it confirms the accuracy of [REDACTED] statement.

#### **The Club's Preparation, Planning and Response to the Incident**

17. We have been provided with the Club's 'Supervisors and Safety Briefing'. Of note from that document:-

- a. As regards Strategy there is a slide which states. The Key Risks included '*possible antisemitic/homophobic chanting*'.
- b. There is a slide entitled "*Business as Usual*" which states "*EEDI – racism, etc – if in doubt escalate to a supervisor*". It goes on to state "*We can't hear the crowd from control so if in doubt – let us know*".
- c. The Match Specifics Slide identifies the "*Additional Controls*" which include "*Zero tolerance to harassment*".

18. We have second version of this briefing in our bundle which contains various manuscript amendments. The manuscript amendments include

- a. Identifying "*Harassment/Hate speech*" as a key priority. Amongst the matters of that nature which are listed is "*homophobia*".
- b. On the 'Business as Usual' slide there are handwritten entries referring to "*homophobic chanting, rent boy*".

19. We were informed by Mr Scully during the course of his submissions that these amendments were made prior to the safety briefing. We were also informed that this

briefing would have been attended by the Supervisors. It would then be for those Supervisors to cascade information to their teams. However, Mr Scully acknowledged that he could not say how much of this information was cascaded to stewards who were performing stewarding duties in the stands.

20. We have been provided with a copy of the Matchday Safety Team Briefing (p.50). We note the following features:-

- a. The game was identified as a sell out.
- b. It was designated a medium risk.
- c. It specifically identified the following key risk: "*Possible racist/ anti semitic or homophobic (sic) chanting*". In the next line of the document it states, "*Control will monitor and advise accordingly – please CALL in with any issues or any anticipated issues.*"

21. Finally, we have been provided an e-mail sent to ticketholder accounts prior to the game. Confusingly, it refers to a match on Saturday when the fixture we are concerned with took place on Tuesday. The e-mail then states:-

*"Every fan should feel safe and enjoy an inclusive experience when they attend matches at the LNER Stadium and dangerous or anti-social behaviour have no place in our game. No spectator should have their experience of the match disrupted by those who only wish to indulge in anti social behaviour. Investigations continue to identify those involved from previous matches, and take appropriate action, particularly with the throwing of missiles and we welcome the support from fans in this area and across the club to help us in ensuring the LNER is the stadium we all want it to be.*

*In order to best protect those fans who want to watch the action on the pitch and the best interests of the club, fans in these areas should expect additional ticket checks throughout the coming matches as we work to identify anyone who should not be in the area together with anyone related to the incidents of anti social and criminal behaviour.*

....

*We are appealing to all spectators report any antisocial or illegal behaviour using the QR code attached and also located around the stadium. You can also report anything suspicious anti social or safety issues to a steward.*

*We are also reminding all fans that dangerous, illegal and antisocial behaviour, can, will and is being dealt with both by the Club, football authorities and the Police and*

*those who are found to have committed offences face stadium bans and potential criminal prosecution.*

*Enhanced sanctions apply for people identified entering the pitch, using pyros, taking drugs to games, participating in racist, homophobic or other discriminatory language or chanting, throwing objects or for discriminatory abuse...."*

22. We were informed by Mr Scully that the e-mail is automated and that a similarly worded e-mail would have been sent to ticketholders e-mail accounts on the Tuesday and the text of the email would automatically refer to the Tuesday match. It is curious that we have been provided a document which refers to the Saturday but we accept Mr Scully's explanation that a similarly worded message.
23. Within our bundle we have a photograph of a sign a QR code to enable discriminatory conduct to be reported.

#### **The Club's Response to the Charges**

24. As noted above, the Club responded to the Charges by admitting them. Mr Scully, the Club CEO, provided a letter setting out matters which the Club wished to have taken into account. In that letter the Club sets out details of matters which the Club considered to be relevant. We do not repeat the content of the letter in full but note the following:-

*"We would like to highlight the efforts made by ourselves as the Club to try to ensure that an incident such as this did not take place. Following the Wrexham fixture on the final day of last season, which at the time of the Chelsea fixture taking place was an ongoing investigation, Lincoln City Football Club have looked in detail at how best to manage situations such as these prior to, during and after the event. Social media is a powerful tool for Football Clubs to engage their respective fanbases, something which the Club utilised in the lead up to the fixture, sharing the Love Football, Protect the Game messaging across website and X in the week preceding this fixture*

*<https://www.weareimps.com/news/love-football-protect-game-0>*

*[https://x.com/LincolnCity\\_FC/status/1968329094195449873](https://x.com/LincolnCity_FC/status/1968329094195449873)*

*Internal Pre-match communications and messaging is vital for a clear picture to build ahead of each event taking place at the Stadium, and the potential for derogatory chanting was raised in the pre-match performance meeting, which took place the day prior to the fixture. The accompanying document for this meeting has been provided (#1 in the submissions list).*

*A key learning from our prior incident of a similar nature was to be as proactive as possible with any potential issues arising in real time. This is evident from the match official's report which you have supplied in accompaniment of the charges, as it details that the Club's safety officer kept an open and transparent line of dialogue with the match officials throughout the evening – so much so that she raised the ongoing matter with the fourth official as the teams and match officials emerged from the tunnel to kick the game off for its first half. This dialogue continued, leading to half time and full-time briefings between the safety officer and match officials around the incident, to ensure that they were all fully informed and confident that we were taking a strong and proactive stance with the ongoing matter. In addition to this, I myself went round to Block 7 (the area of the stadium in which this incident started) and spoke to a number of individuals in the area in order to get them to stop, which did have a positive effect following this.*

*Our stadium PA was also clear in messaging, highlighting unacceptable behaviour on numerous occasions including pre-match, at half time and whilst the match was ongoing. We feel that we did everything in our power to proactively manage the situation as it unfolded. The head of an external stewarding company, working with ourselves, provided us with feedback following the fixture which detailed the thanks of Chelsea stewards and supporters alike – this has been provided as evidence #2."*

**[Emphasis added].**

25. Mr Scully further highlighted:

- a. The Club is not afraid to speak out. Fan behaviour was raised at the October Fan Advisory Board where representatives of Chelsea Pride and Chelsea were present.
- b. It championed the work of the Club Captain in promoting equality.
- c. An open letter he sent to fans following an incident at Wrexham.
- d. His own appearance on BBC Radio Lincolnshire in which he discussed the issues openly and candidly.
- e. The fact that they now have in place detailed discrimination response plans.

26. Mr Scully ended his letter stating as follows:-

*"In closing, we are dismayed that we find ourselves in this position again, with a very small minority acting in such a way that has severe consequences for the Club and the many match-going fans who attend to enjoy the sport and create memories with friends and family alike. The Club has come a long way since our promotion into the Football League in 2017 and our record on matters such as this has largely been excellent, but sadly the odd 'fan' (and I use the term advisedly) has been unable to*

*conduct themselves properly during highly charged fixtures. It is not an excuse at all (far from it), but it is notable that both the Wrexham and Chelsea fixtures carried additional emotion and adrenalin for our fans and it is within that sphere that some appalling behaviour has let the Club down."*

### **The Prior Breach**

27. It will be apparent from what has been set out above that this is not the first occasion when the Club has been charged with a breach of E21.
28. The Club was charged for two breaches of rule E21 following incidents in a match against Wrexham FC on 3 May 2025. It admitted the Charges. The Regulatory Commission sat on 7 October 2025 (i.e. after the match which forms the subject of these proceedings). In their written reasons the Commission stated

*"It is accepted that around the 64th and 69th minutes of the fixture LCFC supporters engaged in chanting directed at the Wrexham player, James McClean ("JM"). This particular player is frequently the subject of discriminatory chanting based on his nationality, his religion and the political views that he holds. It is best described as sectarian chanting. The video evidence available to us confirms that the chant was the same on both occasions - "fuck the Pope and the IRA". It is an overtly discriminatory chant. The chant was short-lived on each occasion but, of course, was repeated only 5 minutes after the first. It is impossible to conclude how many people were involved in the chant on each occasion, but it does not come into the category of mass chanting."*

29. The Club was fined £8,500. It was also given a 13 point Action Plan which was put in place until the end of the 2025/26 season.
30. The Club's has provided a copy of the Discrimination Response Plan which it has prepared and which is dated 18 November 2025. This includes a 10 point action plan.

### **Further Matters Raised during the Course of the Commission Hearing**

31. We are grateful to Mr Scully for seeking to answer our questions. He was at pains to point out how seriously the Club is taking this matter and how disappointed the Club is that they face a second Regulatory Commission hearing so soon after the last one. He emphasised the importance of the Club to the Lincoln community and the good work to promote inclusion: these include providing free English lessons, a Community World Cup and its successful approach to 'Fan Engagement'.
32. Mr Scully asserted that the number of fans involved was probably in the region of 20 to 25. He suggested that because the microphones in the stands were close to where

the chanting occurred that is likely to have given the impression that there were more people chanting than there were. Mr Scully prayed in aid the fact that the fourth official had not heard the chanting and challenged the account given by the Referee which suggested that the chanting occurred on more than two occasions.

33. Mr Scully referred to the fact that when he heard about the incident he moved from his position in the Directors box and went to the stand to speak to known fans in the stand.
34. We were also informed, for the first time, that the Club had now identified 3 individuals engaged in the chanting and was in the process of taking action against them. That had not been completed.

### **Findings**

35. In our view, the Club was correct to admit the Charges. The “Chelsea rent boy” chanting can be heard on each of the occasions to which the charges relate. The chanting plainly amounts to misconduct and it is offensive. Moreover, it is plainly discriminatory in that it included a reference to sexual orientation.
36. We are satisfied that the chanting involved a significant number of home fans. We cannot reach a conclusion on the exact number of supporters involved but we are entirely satisfied that it was clearly not an odd few or 20 to 25. We note that the Chelsea representatives referred to not one, but two ‘large’ groups. We also note that the Stadium Security Provider referred to 6 fans and the Chelsea Stewards raising complaints about the behaviour. We have heard the audio for ourselves. The chanting can clearly be heard. The referee specifically refers to hearing the audible chanting before and during the game. Taking all of these factors together, we are satisfied that significantly more fans were involved than has been suggested to us by the Club. We cannot say for certain but in our view there was likely to have been in excess of a hundred fans involved.
37. We do not consider that the Club was adequately prepared for chanting of this nature. Whilst there was one or two lines about homophobic chanting in the pre-match safety materials in our view the events of the night suggest that the Club did not really have a clear plan about what to do in the event of such chanting.
38. We note that we have not seen:-
  - a. A match-specific risk assessment identifying homophobic chanting as a risk with a clear plan about what to do in the event it occurred. In our view, it was foreseeable that such chanting could take place. It is all too familiar for Chelsea fans to be

subjected to this and we would have expected the Club to have been prepared for it.

- b. Post-match reports from the stewards identifying what they had been told before the game and what they observed and heard during the game and their response to it.
- c. A match day and/or CCTV log which identified in real time when the homophobic chanting reports were received and the response to them.
- d. The Sanctions Policy.

39. Mr Scully explained that the Club was not experienced in dealing with charges of this nature. We do not consider that adequately explains the absence of this material.

40. We have seen footage of the relevant stand. There is no sense from the footage that we have seen that the stewards were actively seeking to identify the perpetrators. In our view, with the volume of information available to the Club and the camera footage available to it we were surprised that more was not done to successfully identify perpetrators on the night.

41. We acknowledge that there is evidence that a stadium announcement was made. In our view, that seems to be the only significant intervention.

#### **Sanction Guidance**

42. As we note above, and the point is repeated The FA's Policy and Guidance on the Regulation of Discriminatory Conduct by Spectators, there is no due diligence defence under the rules in relation to breaches. However, the Policy and Guidance does provide that a club is entitled to raise as a mitigating factor in relation to the determination of sanction only the extent to which it used all due diligence to ensure that it discharged the responsibility set out at FA Rule E20.1.

43. The FA Policy states:-

*"The sanction guidelines provide that, in relation to a first offence, the imposition of a dedicated action plan on the relevant Club (at the Club's cost) is to be the primary focus. The terms of an action plan are determined by the Regulatory Commission and in view of the particular facts of each case."*

44. However it goes on to state:-

*"Repeat offences will be treated with the utmost seriousness, and there will be a presumption that a further action plan will not be appropriate. Whilst a Regulatory Commission may impose any penalty as provided by paragraph 40 of Part A to the*

*Disciplinary Regulations, in such circumstances a Regulatory Commission shall consider imposing a financial penalty and/or a stadium closure (whether partial or full)."*

45. The FA Sanction Guidance identifies 7 factors for the Court to consider when determining sanction. They are as follows:-

1. *The number of supporters involved;*
2. *The nature of the behaviour of those involved;*
3. *The duration of the incident(s);*
4. *Whether the Club (and/or its officers):*
  - *took all reasonable steps in its preparation and planning for the fixture in which the Relevant Breach occurred;*
  - *took all reasonable steps in dealing effectively with the incident, when it arose;*
  - *took all reasonable steps in identifying the supporter(s) involved;*
  - *took sufficient action against those supporters responsible where those individuals were identified.*
5. *Whether the Club cooperated in full with The FA;*
6. *The previous disciplinary record of the Club or its Participants in relation to Aggravated Breaches or Relevant Breaches;*
7. *In cases where an Action Plan has previously been imposed on a Club, whether the Club has complied in full with that Action Plan.*

46. It goes on to state that second or further offences will be treated with the utmost seriousness. There will be a presumption that the imposition of a further Action Plan shall not be appropriate (if the offence has occurred either during the period of the previously imposed Action Plan or within a year of the expiration of said Plan).

47. The Guidance states that Commission shall consider imposing any combination of:

- a financial penalty in accordance with Table 1 above; [NB the relevant bracket for an EFL League One Club is £2,500 to £37,500.]
- the closure of a stand (or part thereof) of a Club's stadium for a specified number of Matches ("Partial Stadium Closure"); or
- the closure of a Club's stadium for a specified number of Matches (i.e. the playing of a Match or Matches without spectators being present) ("Full Stadium Closure")

#### **Applying the Factors to which we must have regard**

48. The first factor which we have regard to is the number of spectators involved. As noted above, we are unable to determine with any precision the number of supporters

involved. We do not think that it is likely that there were thousands or even many hundreds of spectators involved, but we are satisfied that it was likely to have been at least a hundred fans. It was not an 'odd' few or 20 to 25.

49. The second factor we must consider is the nature of the behaviour. The '*Chelsea rent boy*' chant was plainly homophobic. It is a chant with which Chelsea fans are regrettably all too familiar. It is offensive. Indeed, we have little doubt that it was offensive to a majority of the Club's fans too. This was a high-profile fixture particularly for the Club.
50. The third feature is the duration of the incident. On both occasions the chanting was relatively brief lasting several seconds at a time. But it was clearly audible. We note that the referee in this Extraordinary Incident report suggests that the chanting was not confined to these two occasions. We are inclined to accept the referee's account. In our view this aggravates the seriousness.
51. The fourth factor is whether the Club and/or its officers took all reasonable steps in its preparation and planning for the fixture in which the relevant breach occurred; whether the Club and/or its officers took all reasonable steps in dealing effectively with the incident when it arose; and whether the Club and/or its officers took reasonable steps in identifying the supporters involved.
52. In our judgment, the preparation and planning for this fixture did not go far enough. It is not clear to us that the Club had given enough attention to the risk of homophobic chanting of the sort which occurred as a particular risk at this fixture. That is surprising in our view. Chelsea have many experiences of this sort of chanting. It was depressingly predictable. We would have expected a clear plan for this type of chanting at this match. If necessary a specific warning against that specific type of chanting. That warning might well have drawn upon the fact that the Club was awaiting the outcome of a previous breach of rule E21 for discriminatory chanting. We would have expected to see this addressed in a risk assessment. We would also have expected to see clear evidence of the real time response in the form of the match log. Finally we would have expected to see evidence of rigorous efforts to identify perpetrators on the night.
53. We were pleased to hear that the Club has now identified 3 people and is taking action against them. We were surprised that this fact that this was not drawn to our attention prior to the Commission hearing.

54. That said, we do take account of the fact that the Club has demonstrated that it is taking trying to tackle discriminatory chanting. We consider that the interview given by Mr Scully to the BBC was particularly laudable.
55. The fifth factor is co-operation with the FA. In our view, the Club has co-operated with the FA.
56. The sixth factor is the Club's previous record. As noted above, it has been subject to recent disciplinary proceedings for discriminatory chanting. At the time of this match, the Club was awaiting a Commission hearing to determine the sanction which ought to be imposed for events at the Wrexham game. The Commission imposed an £8,500 fine and imposed an Action Plan.
57. The seventh factor – where a club is subject to an action plan – is the extent to which it has complied with it. Importantly, in our view, the Club was not subject to an Action Plan at the time of this fixture.

#### **Decision on Sanction**

58. We have no doubt that a financial penalty is merited. The sanction guidelines suggest a band of between £2,500 to £37,500 for an EFL League One club. In our judgement, given the nature of the chanting, the fact that it occurred more than once during the game and the fact that this was a second occasion in recent times that the Club's fans have engaged in discriminatory chanting which has resulted in disciplinary action, the high-profile nature of this fixture we would have considered a fine of £20,000 was appropriate. We have regard to the mitigation which has been advanced including the admission of the charges (although we think the Club had little choice in that regard) and the positive measures the Club has taken to address this conduct including its attempt to publicise the unacceptable nature of the conduct, and have reduced the fine to £16,000.
59. We note presumption that for a second offence that an Action Plan will not be appropriate. We consider that applies here because one has already been imposed. We see little point in imposing a further plan. The FA encouraged us to extend the period of time during which the Action Plan shall be in force. We consider that a second occurrence within a short period of time after the first justifies extending the period amply justifies extending the period of the action plan. In our view, it should be extended until the end of the 2026/27 season.

60. Finally, we are required to consider whether the addition to a financial sanction a ground closure or the closure of a stand (or part thereof) for a specified number of matches is merited.
61. We have given this very serious thought. The FA submitted that because the offending conduct with which we are concerned occurred before the Regulatory Commission had deliberated over the and imposed an Action Plan in respect of the previous breach a ground or stand closure was not merited.
62. Ultimately, in our judgement The FA was correct not to pursue a sanction of this nature. We have concluded that it would not be proportionate to impose a ground or stand closure based on the unique facts of this case. If this breach had occurred after the imposition of the Action Plan we might well have taken a different view.
63. The Club – and its fans – should be under no illusion. Whilst we cannot and do not seek to tie the hands of any future Regulatory Commission, in our view, the Club is – for want of a better expression – drinking in the last-chance saloon. In our view it is vitally important that the Club communicate through their various media channels the outcome of this case including the financial penalty imposed. We also consider that the Club should be required to publicise the fact that it is now subject to an Action Plan for an extended period until the conclusion of the 2026/27 season and that the fact that we (that is to say this Regulatory Commission) indicated in its Written Reasons that it had given very serious thought to imposing a partial ground closure but had ultimately decided against it.
64. We make no order as to costs.
65. There is a right of appeal from this decision as provided for by the Disciplinary Regulations.

**Dominic Adamson KC**  
**Elahe Youshani**  
**Peter Fletcher**  
**9 January 2026**