

IN THE MATTER OF A REGULATORY COMMISSION

BETWEEN

THE FOOTBALL ASSOCIATION

And

OSMAN FOYO

WRITTEN REASONS OF THE REGULATORY COMMISSION

Regulatory Commission: John Finlay (Chair) – Independent Legal Panel Member

Tony Agana – Independent Football Panel Member

Andrew Adie – Independent Football Panel Member

Secretary: Michael O'Connor – Judicial Services Assistant Manager

Date: 3 October 2025

Venue: In Person Hearing held remotely via Microsoft Teams

Introduction

1. These are the written reasons for the Regulatory Commission (“the Commission”) that considered the charges against Osman Foyo (“OF”)
2. OF has been, and still is, a player in Step 4 or above of the football pyramid. He is currently a player for AFC Wimbledon. OF was identified as being someone who might possibly have been betting in breach of the Football Association’s (“FA”) betting rules (“the Rules”). Further to investigation, the FA issued charges against OF.
3. The relevant factual background herein is a summary of the submissions provided to the Commission. It does not purport to contain reference to all the points made, or to all the statements and information provided, however the absence in these reasons of any particular point, or submission, should not imply that the Commission did not take such point, or submission, into consideration when it determined the matter. For the avoidance of doubt, the Commission has carefully considered all the evidence and materials furnished in this case.

The Charges

4. By letter dated 8 July 2025 the FA charged OF with Misconduct under FA Rule E1.2 in respect of 252 bets placed on football matches between 29 October 2023 to 28 March 2025.
5. It is alleged that each bet is a separate breach of FA Rule E8. The particulars of the allegations were as follows:

2023/24 Season – Bets placed in breach of FA Rule E8

- a. OF placed 164 bets on football matches in breach of FA Rule 8.1 between 29 October 2023 and 26 July 2024 whilst he was a participant at Ipswich Town FC, Torquay United FC and Welling United FC.
 - i. 111 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.
 - ii. 53 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which his club and/or he was participating in.

2024/25 Season – Bets placed in breach of FA Rule E8

- b. OF placed 88 bets on football matches in breach of FA Rule 8.1 between 04 August 2024 and 28 March 2025 whilst he was a participant at Ipswich Town FC, Chelmsford City FC and AFC Wimbledon.
 - i. 35 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.
 - ii. 53 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which his club and/or he was participating in.

The Response

6. On 28 July 2025 OF submitted a Disciplinary Proceedings Reply Form, admitting the charges and requesting an opportunity to attend the Commission for a personal hearing.
7. OF also submitted the following documents:
 - OF Letter of Response dated 28 July 2025
 - PFA Mitigation and Defence Case Summary dated 25 July 2025
8. [REDACTED]

9. At the hearing, the FA was represented by Mr Andrew Phillips (Regulatory Advocate). OF was present in person and was accompanied by Mr Nick Cusack as his advocate.

The Rules

10. The applicable rule is FA Rule E8.1 which states:

E8.1 *A Participant shall not bet, either directly or indirectly, or instruct, permit, cause or enable any person to bet on –*

E.8.1.1 the result, progress, conduct or any other aspect of, or occurrence in, a football match or competition;”

E.8.1.2 any other matter concerning or related to football anywhere in the world, including, for example and without limitation, the transfer of players, employment of managers, team selection or disciplinary matters.

The FA’s Evidence and Case

11. The following documentary evidence was relied upon by the FA in support of its case along with the charge letter:

- Witness statement of [REDACTED], Betting Integrity Investigator at The Football Association, dated 19 May 2025
- **Exhibit** [REDACTED] /1 – The full list of bets attributed to OF
- **Exhibit** [REDACTED] /2 – Bet breaches by OF in 2023/24 season
- **Exhibit** [REDACTED] /3 – Bet breaches by OF in 2024/25 season
- **Exhibit** [REDACTED] /4 – Bets placed by OF in competitions entered by his club
- **Exhibit** [REDACTED] /5 – Bets placed by OF involving his own club
- **Exhibit** [REDACTED] /6 – Bets placed by OF against his own club
- **Exhibit** [REDACTED] /7 – Spot bets placed by OF involving his own club
- **Exhibit** [REDACTED] /8 – ITFC U21’s v Colchester United FC U21’s match report
- **Exhibit** [REDACTED] /9 – Overview of ITFC U21’s v Colchester United U21’s match
- **Exhibit** [REDACTED] /10 – Peterborough United U21’s v ITFC U21’s team news
- **Exhibit** [REDACTED] /11 – Overview of Peterborough United U21’s v ITFC U21’s match
- **Exhibit** [REDACTED] /12 – Chelmsford City FC v Boreham Wood FC match report
- **Exhibit** [REDACTED] /13 – Transcript of interview with OF

12. In his witness statement [REDACTED] highlighted the fact that under the Rules a Participant at Step 4 or above is prohibited from betting on the result, progress, conduct or any other aspect of, or occurrence in, a football match or competition; or any other matter concerning or related to football anywhere in the world.
13. [REDACTED] sets out that during the 2023-24 season OF was contracted/registered to Ipswich Town FC (“ITFC”) (Championship), Torquay United FC (National League South) and Welling United FC (National League South) and in the 2024-25 season OF was

contracted/registered to ITFC (Premier League) Chelmsford City FC (National League South) and AFC Wimbledon (League Two).

14. [REDACTED] witness statement confirms that the FA were initially contacted by a betting operator on the grounds that OF had potentially breached the Rules. The FA contacted UK-licensed betting operators asking them to share any accounts in the name of OF that showed breaches of the Rules. One further account was notified. As a result, three betting accounts in total were identified which showed a total of 252 football related bets made by OF.
15. [REDACTED] witness statement sets out the details of the bets involved. The total amount staked across the two relevant seasons and the 252 bets was £6,522.10. The return on those bets was £6,158.62 resulting in a net loss of £363.48.
16. In terms of the breakdown of those bets, the witness statement shows that in the 2023/24 season £3,649.92 was staked with returns of £5,162.14 and a net profit of £1,512.22. In the 2024/25 season £2,872.18 was staked with returns of £996.48 and a net loss of £1,875.70.

Bets Placed on Competitions entered into by his Clubs

17. The witness statement shows that 106 bets were made which involved League and Cup competitions in which OF's Clubs were entered into during the respective seasons.
18. These bets had a total stake of £2,455.90 with returns of £2,020.88 with a net loss of £435.02.

Bets Placed Involving his own Club

19. The witness statement goes on to show that OF placed 33 bets on his own club and these relate to the following:
 - ITFC first team to Win 14 times
 - ITFC first team to Lose 7 times
 - Chelmsford City FC to Lose 4 times
 - Both Teams to Score in an ITFC first team match 3 times
 - ITFC Under 21s to Win 2 times
 - Chelmsford City FC to Win 2 times
 - ITFC Under 21's to Lose 1 time
20. These bets had a total stake of £1,182.15 with returns of £988.62 and net loss of £193.53.

ITFC

21. 24 of those bets were made on 17 matches involving the ITFC first team. OF did not make any appearances or make any match day squads for ITFC and was not involved in any of those matches. 14 of those bets were made whilst OF was at ITFC prior to 16 August 2024 after which OF went on loan to Chelmsford City FC until 2 January 2025.

22. OF placed 3 bets on ITFC Under 21s, these 3 bets covered 3 separate matches and OF played in 2 of those matches. The first of those was on 31 October 2023 where OF bet that ITFC Under 21s would beat Colchester United U21s. He played 82 minutes of the match. ITFC U21s won the match and OF profited by £500.01.
23. The second bet was made on 26 March 2024 where OF bet on ITFC U21s to beat Peterborough United U21s. He played 45 minutes of that match which ITFC U21s lost. OF lost £394.43.
24. The third bet was a 42p accumulator which included Charlton Athletic U21s to beat ITFC U21s. OF was not in the squad for this match.

Chelmsford City FC

25. OF placed 6 bets involving Chelmsford City FC covering 2 separate matches. He played for Chelmsford City FC in the first of those 2 matches, and the bet was that Chelmsford City FC would beat Boreham Wood FC. Chelmsford City FC lost that match and the bet was unsuccessful.
26. The second match took place some 25 days after OF's loan with Chelmsford City FC had come to an end and he had returned to ITFC. There were 4 bets by OF on that match and he bet that Chelmsford City FC would lose. All 4 bets were unsuccessful.
27. [REDACTED] witness statement also confirms that he interviewed OF on 14 May 2025 and OF admitted placing all the football bets through the accounts in question. OF also stated that he was aware of the Rules and was aware of them during the duration of the bets.
- [REDACTED]

OF Response to the Allegations

28. OF's response to the allegations is set out in the documents he submitted along with his interview with the FA and finally his oral submissions as part of the hearing. His response can be summarised as follows:
- a. He accepts the charges of breaching the Rules.
 - b. At the time the bets were placed he never stopped to properly understand the seriousness of the rules or the consequences.
 - c. He was aware of the Rules.
 - d. He deeply regrets his actions.
 - e. Betting was a common activity when he was at [REDACTED] although it was not football related. He started to gamble on games such as roulette, and he often lost more than he won. He turned to gambling on football as it was a game he knew, [REDACTED]
 - f. [REDACTED]
 - g. [REDACTED]

- h. He never used betting on football as a way to try and get rich or exploit his position in the game. He didn't use any information that only a footballer would be privy to.
- i. He made the bets without considering how serious they would appear. They were based on instinct not with the intention of affecting results. He now understands the seriousness of the bets.
- j. [REDACTED]

29. At the hearing Mr Cusack provided further submissions on behalf of OF in relation to mitigation and on sanction. Those submissions can be summarised as follows:

- a. OF is a lower league player and not a household name and so is unlikely to get any publicity. As a result, the overall perception of the case is low.
- b. He is still young. He started gambling when he was in his teens and stopped when he was twenty. His youth should be taken into account.
- c. It is important to consider that whilst OF made a limited number of bets on his team to lose he never played in any of those games.
- d. The sums of money involved are relatively modest and overall, he made a loss.
- e. [REDACTED]
- f. [REDACTED]
- g. [REDACTED] It should depart from the sanction guidelines and exercise discretion. Any sporting sanction should be fully suspended.

30. OF also made short oral submissions to the Commission. As part of those he apologised for what he described as his reckless and impulsive actions. He also reiterated the difficult personal background he had come from.

31. [REDACTED]

The FA Submissions on Sanction

32. The FA provided submissions on sanction both in writing and also in Mr Phillips' oral submissions.

33. Within those submissions the FA highlighted the serious and aggravating nature of the 33 bets that OF placed on his own clubs and the fact that perception of those bets is a significant consideration. Going further, they made clear that the fact that OF played in some of those matches is an extremely serious matter which has a hugely detrimental impact on the perception of fixture integrity.

34. A further significant aggravating factor is the fact that OF made bets against his own clubs. These consisted of 12 bets with 7 involving ITFC to lose, 4 bets involving

Chelmsford City to lose and 1 bet on ITFC U21s to lose. Although OF did not play in any of those games he is understood to have trained with the first team squad. This has significant perception issues in relation to those bets and those fixtures.

35. The FA also highlighted the fact that OF had admitted in their interview with him, and this was repeated by him in his oral submissions, that he was aware of the Rules and he had been present during PFA sessions on the Rules.
36. The FA did acknowledge that OF had been fully transparent and open in his admittance of the betting and his involvement with the FA. [REDACTED]
37. It was the FA's submission that any consideration of suspending a sporting sanction should only apply to a portion of the sanction period. This was on the basis that the number of bets OF has placed on his own clubs, against his own clubs and, significantly, the fact he participated in some of these matches, means that an immediate sporting sanction is appropriate and proportionate.

The Commission's Decision

38. OF admitted all the charges brought by the FA and as such it fell to the Commission to consider the appropriate sanction. The Commission referred to the sanction guidelines for betting cases charged under FA Rule E8 (the "Guidelines").
39. It is clear from the Guidelines that in many instances the suggested sanction range is very wide and therefore the appropriate sanction is left to the discretion of the Commission and will depend on the facts of the case. This is addressed specifically in the Guidelines which state:

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

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

40. The Commission noted that for those bets placed on any aspect of any football match anywhere in the world, but not involving the participant's club competitions the sanction available is a Warning/Fine. For those bets placed on the participant's competition but not involving his club the sanction available is a fine.

41. It is in the next categories where a sporting sanction also becomes relevant and those categories, in column three and four of the Guidelines relate to:

- a. "Bet placed on own team to win – 0-6 months to be determined by the factors below"
- b. Bet placed on own team to lose – 6 months – life to be determined by the factors below."

42. Those factors referred to, and which are to be considered are the following:

- Overall perception of impact of bet(s) on fixture/game integrity
- Player played or did not play
- Number of bets
- Size of bets
- Fact and circumstances surrounding pattern of betting
- Actual stake and amount possible to win
- Personal Circumstances
- Previous Record
- Experience of participant
- Assistance to the process and acceptance of the charge.

43. The Commission considered that as OF had bets that fell within both column three, where he had bet on his own team to win and which carries up to 6 months suspension, and column four, where he had bet on his own team to lose and which carries a starting point of at least a 6 month suspension, an appropriate starting point would be a suspension of 6 months.

44. The Commission then went on to consider the aggravating factors in line with the Guidelines.

45. The Commission considered that the bets were widely placed and the fact that bets had been placed not only on football matches generally but in particular on matches involving OF's clubs was a significant consideration. This was aggravated by the fact that he had placed bets on his clubs to win in matches in which he himself was playing. It was also of concern that the evidence seemed to suggest that bets were being made in the period shortly before kick-off and in one case during the game itself after he had been substituted.

46. The final, and most serious consideration when it came to perception was the fact that OF had placed bets on his clubs to lose. Whilst it was noted that he did not play in those games himself it was of significant concern that he was involved with those clubs at that time. The Commission were of the view that the perception of such actions could have a significant impact on the integrity of the game.

47. The Commission also considered the number and size of the bets involved. The number of bets was not insignificant given the relatively short time period in which they were placed. It was though noted that on the whole the size of the bets was not considerable. There were however two marked exceptions to this which involved two single bets that

[REDACTED] Further, the Commission were of the view that there is power in there being at least some form of suspension which can operate as a reminder of the implications if OF breaches the Rules again. There is a positive incentive behind suspending at least part of the suspension.

57. That being said, the Commission were in agreement with the FA's submission that the seriousness of the offences, and in particular the aggravated elements of betting on matches in which he played, and betting on his club to lose do require at least some sanction that is not suspended. The Commission reminded itself of the Guidelines and in particular the following:

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

58. In light of the facts the Commission felt that a suspension had to be appropriate to reflect the seriousness of the aggravating factors. It therefore felt that the appropriate sanction should be a five (5) month suspension with one (1) month of that suspension to be served with immediate effect and the remaining four (4) months to be suspended for a period of eighteen (18) months.
59. In relation to a fine the Commission were of the view that there should be a financial penalty in light of the aggravating factors. The Commission considered OF's football income and applied a fine of £1000.
60. The Commission determined that there should be no order as to costs.

Appeal

61. The decision of the Commission may be appealed in accordance with the Regulations.

John Finlay
Tony Agana
Andrew Adie

3 October 2025