

UEFA Control, Ethics and Disciplinary Body

UNION DES ASSOCIATIONS EUROPÉENNES DE FOOTBALL (UEFA)
(Claimant)

v.

KF SKËNDERBEU
(Respondent)

ETHICS AND DISCIPLINARY INSPECTOR REPORT

Contents

I. THE PARTIES	5
II. FACTUAL BACKGROUND	5
A. The UEFA and CAS Admissions Criteria Proceedings	5
B. The FAA Proceedings	6
C. Investigation carried out by the UEFA Ethics and Disciplinary Inspectors	7
III. APPLICABLE LAW AND REGULATIONS.....	7
IV. INTRODUCTION OF THE CASE. WHAT IS THIS CASE ABOUT?	8
V. SKENDERBEU'S INVOLVEMENT IN MATCH-FIXING ACTIVITIES	10
<i>PART I – THE FIXED MATCHES.....</i>	<i>10</i>
A. The BFDS Reports.....	10
(i) The UEFA Betting Fraud Detection System.....	10
a) Introduction	10
b) Expert Analysis on the BFDS by Prof. David Forrest.....	11
c) Past Success of the BFDS as a means of detecting match-fixing	18
d) CAS approach on the BFDS.....	21
(ii) An analysis on KS Skënderbeu	23
a) UEFA Champions League and UEFA Europa League 15/16	25
<i>i) Introduction.....</i>	<i>25</i>
<i>ii) Crusaders FC vs. Skenderbeu (UCL, 21/06/2015).....</i>	<i>25</i>
<i>iii) NK Dinamo Zagreb vs. Skënderbeu (UCL, 25/08/2015).....</i>	<i>27</i>
<i>iv) Sporting Clube de Portugal vs. Skënderbeu (UEL, 22/10/2015) ..</i>	<i>29</i>
<i>v) Skënderbeu vs. FC Lokomotiv Moskva (UEL, 10/12/2015).....</i>	<i>30</i>
b) Earlier UEFA European matches	32
c) Domestic League and Cup matches at Albanian Superleague (2010-2015)	33
d) Friendly matches	39
B. Further Evaluation of the UEFA Betting Fraud Detection System	40
(i) Additional expert analysis and evaluations of the BFDS	40
(ii) Explanation as to why no Skënderbeu matches have been escalated since mid-2016.....	43
C. Technical Appreciation of the Performance of Skënderbeu Players in UEFA club competition matches.....	45

D. Match-fixing was confirmed by Skënderbeu representatives in front of CAS	51
PART II – THE FIXED MATCHES BY PERSONS CONNECTED TO SKENDERBEU	52
A. Matches were fixed by Skënderbeu.....	52
B. There cannot be a fixed match without the involvement of people within the club.....	52
C. UEFA’s supplementary investigations on KS Skënderbeu	54
(i) Background of recent Skënderbeu history	55
(ii) Suspected individuals involved in Skënderbeu’s manipulation of matches	55
a) Introduction.....	55
b) Ridvan Bode (financial backer).....	56
c) Current and former Skënderbeu presidents: Ardjan Takaj and Agim Zeqo	57
d) Connection between Ardjan Takaj and former Skënderbeu coach Mirel Josa	59
e) Connection between Ardan Takaj and Skënderbeu players.....	60
f) Connection between Ardjan Takaj and betting companies.....	62
i) EuroBest Sh.a.....	62
ii) Star Bet.....	63
iii) Top-Bast.....	64
iv) SBObet.....	65
v) Baste-Live.....	66
vi) Super Bast.....	69
D. The National and International Perception on KS Skënderbeu	70
(i) Opponent players:	70
(ii) Supporters:.....	71
(iii) Betting operators:.....	72
(iv) Media:.....	73
VI. LEGAL EVALUATION OF THE ABOVE-MENTIONED FACTS.....	74
A. Burden of proof	74
B. Standard of proof	75
C. The Case for Disciplinary Measures.....	76
D. The principle of strict liability	78
E. Evaluation of the facts and evidence.....	81
VII. MEASURES TO BE IMPOSED ON KS SKËNDERBEU	83
VIII. CONCLUSIONS	85

IX. EVIDENTIARY REQUEST87
X. REQUEST FOR RELIEF.....88

I. THE PARTIES

1. The claimant in these proceedings is the *Union des Associations Européennes de Football* ("UEFA"), the governing body of European football. The Claimant is represented in these proceedings by two UEFA Ethics and Disciplinary Inspectors, pursuant to Article 34bis of the UEFA Statutes and Article 31.2 of the UEFA Disciplinary Regulations (the "DR").
2. The respondent in these proceedings is **KF Skënderbeu** ("Skënderbeu"), an affiliated member of the Football Association of Albania (the "FAA").

II. FACTUAL BACKGROUND

A. The UEFA and CAS Admissions Criteria Proceedings

3. On 13 May 2016, following an investigation initiated on the basis of UEFA Betting Fraud Detection System (the "BFDS") reports of irregular betting on Skënderbeu matches at both national and international level and the completion by this club of its Admissions Criteria Form for the 2016/2017 UEFA Champions League (the "16/17 UCL"), the UEFA Ethics and Disciplinary Inspectors submitted a detailed and comprehensive report requesting that Skënderbeu be declared ineligible to participate in the 16/17 UCL. This request was made pursuant to Art. 4.02 UCL Regulations (the "UCLR") without prejudice to seeking further disciplinary measures at a later stage in accordance with Art. 4.03 UCLR.
4. On 1 June 2016, the UEFA Appeals Body found to its comfortable satisfaction that Skënderbeu had been in breach of Art. 4.02 UCLR and decided to declare the club ineligible to play the 16/17 UCL.
5. On 6 July 2016, and following an appeal lodged by Skënderbeu with the Court of Arbitration for Sport ("CAS"), a CAS arbitral tribunal decided to dismiss the appeal and to confirm the UEFA Appeals Body's decision. The grounds of such decision (CAS 2016/A/4650) were notified to the parties on 21 November 2016.
6. In its award in case CAS 2016/A/4650, the Panel confirmed the validity of the two-step process conducted by UEFA in relation to match-fixing, consisting first in a possible exclusion from participation in European competitions for one season and, second in a possible disciplinary sanction which may involve a suspension from participating in European competitions for multiple seasons.¹
7. The Panel also acknowledged the CAS jurisprudence endorsing disciplinary proceedings being carried out separately and subsequently from the initial administrative measure of ineligibility from UEFA competitions:

¹ CAS 2016/A/4650 Klubi Sportiv Skënderbeu v. UEFA, paras. 47 *et seq.*

"48. While acknowledging that an administrative measure can still have certain punitive elements, the Panel finds that such hybrid nature does not take away that a distinction between an initial administrative measure, followed by a subsequent disciplinary procedure is perfectly feasible (CAS 2013/A/3256, para 164 of abstract published on CAS website)."

(emphasis added)

B. The FAA Proceedings

8. On 19 January 2017, UEFA shared with the FAA the content of the above-mentioned CAS award. At the same time, UEFA invited the FAA to conduct an investigation to determine whether Skënderbeu was also in breach of the relevant legal framework of the FAA at domestic level.

(Exhibit 1)

9. The FAA, after having noted that the case involves many national-level matches played by the club that were escalated by the BFDS, forwarded the file to its Ethics Committee, that initiated an investigation into the BFDS reports to determine whether Skënderbeu had committed a violation of the FAA Code of Ethics and Sport Discipline.
10. On 23 June 2017, the FAA Ethics Committee, focusing on six of the most recent national-level matches escalated by the BFDS (between 2015 and 2016), found that Skënderbeu had fixed those matches and issued a decision (the "FAA Decision") imposing the following sanctions on the club:
 - Skënderbeu's "Champion" title for the 2015/2016 Albanian Superleague is revoked.
 - Skënderbeu is fined 2.000.000 ALL.
 - Skënderbeu is imposed a 12-point reduction from standings in the 2016/2017 Albanian Superleague.
11. An English translation of the grounds of the FAA Decision was provided to UEFA by the Albanian FA on 1 August 2017.

(Exhibit 2)

12. To the best of UEFA's knowledge, Skënderbeu has appealed the FAA Decision to CAS, and those proceedings are ongoing at the time of submission of this report.
13. Any other facts related to the procedural background and the facts of this investigation shall be addressed further on, insofar as they are relevant.

C. Investigation carried out by the UEFA Ethics and Disciplinary Inspectors

14. Following the notification of the grounds of the award CAS 2016/A/4650, the undersigned UEFA Ethics and Disciplinary Inspectors opened a new investigation concerning Skënderbeu.
15. Pursuant to Article 31(5)(b) DR and in order to guarantee the smooth running of these investigations, Skënderbeu's investigation remained confidential. The club was duly informed about the investigations on 20 June 2017.

(Exhibit 3)

III. APPLICABLE LAW AND REGULATIONS

16. The law applicable to this case are the DR, the UCLR and UELR and subsidiarily, Swiss law.
17. In particular, and considering the relevant procedural background, this case is instigated on the basis of Art. 4.03 UCLR:

In addition to the administrative measure of declaring a club ineligible as provided for in Paragraph 4.02, the UEFA Organs for the Administration of Justice can, if the circumstances so justify, also take disciplinary measures in accordance with the UEFA Disciplinary Regulations

18. Also, it is respectfully submitted that in accordance with the UEFA DR the matter is to be considered directly by the UEFA Appeals Body (the "AB"), as per Article 23(3) DR:

*The Control, Ethics and Disciplinary Body has jurisdiction to rule on disciplinary issues and all other matters which fall within its competence under UEFA's Statutes and regulations. **In particularly urgent cases (especially those relating to admission to, or exclusion from, UEFA competitions), the chairman may refer the case directly to the Appeals Body for a decision.***

19. In view of the foregoing and the qualification of Skënderbeu for the 2017/2018 UEFA club competitions (currently participating in the 2017/2018 Europa League), the club's probable qualification for the 2018/2019 UEFA club competitions, and of the request for exclusion from UEFA competitions made at the end of this report, it is respectfully submitted that the present case requires an urgent decision, and it is therefore requested that it is submitted by the chairman of the Control, Ethics and Disciplinary Body ("CEDB") directly to the Appeals Body for a decision.
20. The most relevant applicable provisions of the DR are:

- Art. 8 DR: *A member association or club that is bound by a rule of conduct laid down in UEFA's Statutes or regulations may be subject to disciplinary measures and directives if such a rule is violated as a result of the conduct of one of its members, players, officials or supporters and any other person exercising a function on behalf of the member association or club concerned, even if the member association or the club concerned can prove the absence of any fault or negligence.*
- Art. 12(2)(a) DR: *The integrity of matches and competitions is violated, for example, by anyone: (a) who acts in a manner that is likely to exert an unlawful or undue influence on the course and/or result of a match or competition with a view to gaining an advantage for himself or a third party.*

IV. INTRODUCTION OF THE CASE. WHAT IS THIS CASE ABOUT?

21. This case relates to Skënderbeu's persistent and recurrent match-fixing over at least the past seven years, carried out in its national club competitions as well as in UEFA club competitions and even in friendly matches.
22. As set out in the above factual and procedural background, Skënderbeu has already been declared non-admissible to the 16/17 UCL pursuant to Art. 4.02 UCLR, for having been directly and/or indirectly involved in activities aimed at arranging or influencing the outcome of a match at both the national and international level since April 2007.
23. UEFA now aims for additional disciplinary measures to be imposed on Skënderbeu, based on the facts contained in this report and in accordance with the applicable legal framework, pursuant to Art. 4.03 UCLR. Such measures are sought not only in light of the overwhelming match-fixing activities carried out by Skënderbeu, but also because UEFA cannot tolerate or allow such a team to continue to tarnish the image of its most important club competitions, as are the UCL and UEL.
24. The evidence submitted with this report, namely the BFDS reports of 53 matches manipulated by Skënderbeu for betting purposes and the results of UEFA's further investigation into the club's activities, officials, players and other personnel, shall prove at least to the standard of comfortable satisfaction that Skënderbeu, as a club, is responsible for numerous and repeated disciplinary violations in relation to match-fixing.
25. Moreover, some of the recommendations made by the Panel in the above-referenced case *CAS 2016/A/4650 KS Skenderbeu v. UEFA* at para. 96 have been implemented to the scope of this investigation. Notably, and as will be explained further below, an anonymized and independent analysis of the betting patterns from several Skënderbeu matches has been

performed by an expert company, and a technical review of the full videos of the club's matches has been carried out by independent coaches.

26. In particular, it shall be demonstrated not only that the referenced matches were fixed, but also that such scheme was carried out by persons connected to Skënderbeu in order to gain a financial advantage for themselves and/or third parties in the betting markets, and for whose violation of the applicable regulations the club is liable.
27. Bearing in mind the above-described shocking situation involving Skënderbeu and considering "the nature and restricted powers of the investigation authorities of the governing bodies of sport as compared to national formal interrogations authorities" (CAS 2009/A/1920, at para. 85), almost four years ago UEFA initiated a cooperation with the police and prosecutors of the highest level in Albania, in order to support them in criminal investigations regarding the illicit behavior of Skënderbeu and its management. With regard to this, it shall be noted that according to the DR, UEFA has a subsidiary competence to intervene at domestic level in the event of a UEFA members association failing to prosecute a serious violation of UEFA's statutory objectives². Unfortunately, this was the case at hand.
28. In order to comply with its regulatory obligations, which came into force in July 2013, UEFA met with representatives of the Albanian General Prosecutor several times between 2013 and 2014. In order to support these investigations, UEFA also held a formative two-day meeting with a delegation of the Albanian General Prosecutor's office in Nyon in 2014. In addition, the UEFA General Secretary and high ranked officials of UEFA met the Albanian Ministry of Education and Sports in Tirana in order to get her support over these investigations..

(Exhibit 4)

29. In this context, a recent example is even more explanatory. Thanks to the excellent collaboration between UEFA and the Austrian Police, UEFA has been informed of the recent struggles of the Austrian police when investigation the alleged manipulation of friendly matches by the Albanian club KS Teuta, where it was found that further investigation in Albania would not be expedient because the suspects were informed of the inquiries by the Albanian police. The Final Report of the Austrian Police on this matter concluded that:

"Further investigations in Albania appear not to be expedient because the accused were told about the initial inquiries by the 'police chief' of Durrës."

(Exhibit 5)

² Cfr. Articles 2.4 and 23.4 4 DR.

30. In view of the evident lack of collaboration by the Albanian authorities with other foreign law enforcement agencies, and even the reported apparent collusion between the Albanian police with match-fixers, UEFA can only conclude that further investigations in Albania will not result in any further evidence, beyond what is set out in this report. Therefore, due to this lack of collaboration from the local authorities, UEFA feels that it has no other alternative than using the only tool it has to stop corrupt clubs from gaining access to its competitions, this being a disciplinary measure.

V. SKENDERBEU'S INVOLVEMENT IN MATCH-FIXING ACTIVITIES

PART I – THE FIXED MATCHES

A. The BFDS Reports

(i) The UEFA Betting Fraud Detection System

a) Introduction

31. The UEFA BFDS was established in 2009 in response to the growing threat of match manipulation in both UEFA and European domestic league competitions.
32. The role of the BFDS is to highlight irregular betting movements, both pre-match and in-game (live), in the core betting markets by monitoring all major European and Asian bookmakers. The core betting markets are: the Asian handicap (AHC), Totals (number of goals in a match) and 1X2 (home win, draw, away win). The monitoring of the betting markets covers all UEFA competition matches (approximately 2.000 per season) and matches of the top two divisions and cup competition of UEFA's member associations (approximately 30.000 matches per season).
33. The monitoring uses sophisticated algorithms and mathematical models to compare calculated odds³ with actual bookmakers' odds to determine whether the odds in a specific minute or time period are irregular and therefore potentially suspicious.

³ Calculated odds are a mathematical representation of the true probability of an occurrence without the external effect of money and opinion. In effect **they show what should be happening to the odds** instead of what is actually happening.

34. If a match displays irregular betting patterns the match is 'escalated' and a report is generated. These reports include detailed information from the monitored betting operators, together with match specific information. For example, the information may relate to the current performance curve of the teams involved, on-field action, player data, and information regarding the match officials as well as motivational factors (promotion/relegation needs or potential qualification for a UEFA competition the following season, etc.). The reports contain a textual analysis and a conclusion of the observations made by the specialists as well as graphical representations of market movements.
35. UEFA's primary BFDS partner and information provider is the Swiss-based company Sportradar. Founded in 2001, this company employs a team of highly trained sports betting analysts dealing exclusively with European football. The company was awarded ISO 9001 certification in 2014⁴.
36. UEFA has two additional partners providing betting-related information, these are Betfair, the UK based betting exchange and the Global Lotteries Monitoring System (GLMS). UEFA has a long standing Memorandum of Understand (MoU) with both organisations.
37. To further enhance the BFDS, UEFA signed a MoU with Europol in 2014 aimed at establishing a mutual framework of cooperation between the two organisations. Information is exchanged via a secure Internet platform, with Europol providing expertise in the areas of match-fixing in football and related organised crime.
38. As the experts will demonstrate at the hearing before the UEFA disciplinary bodies, the statistical and mathematical models of the BFDS are accurate and will confirm, to the comfortable satisfaction of the panel, that the Albanian club Skënderbeu has been continuously involved in match-fixing activities at domestic and at international level over the last seven years. This is totally unacceptable for UEFA and deserves an appropriate and proportionatedecision from the UEFA disciplinary bodies.

b) Expert Analysis on the BFDS by Prof. David Forrest

39. An independent review of the Sportradar FDS system (i.e, the BFDS) was carried out by David Forrest, Professor of Economics at the University of Liverpool and Prof. Ian G. McHale, Reader in Statistics, University of Manchester, in the UK (the "Forrest Report"). This in-depth study, published in 2015, analyzed each component of the system including

⁴ ISO 9001 certification is awarded by authorized independent auditors who have satisfied themselves that quality management procedures in the company or institution inspected comply with best practice standards as set out in an international agreement concluded in 2008. Sportradar's certification was awarded in July 2014 with registration number TIC 15 100 148923.

the quality, scope and reliability of the data used, the mathematical models in place, the alerting process and the expertise of the analysts themselves.

(Exhibit 6)

40. The introductory chapter of the Forrest Report sets out the scope of the study of the BFDS carried out by these experts as well as a summary of its main findings.
41. Notably, in relation to the variations in the betting patterns observed by the BFDS in a given match, the experts explain that these changes often signify the existence of (i) unusually heavy flows of money on a particular bet, or that (ii) bookmakers suspect that match-fixing is taking place and react to such suspicion by lowering the odds, making them uncompetitive:

*"Bursts of activity in the context of a betting market may be captured by observing unusual changes in odds. **Such changes will often signify unusually heavy flows of money which reflect that certain bettors believe that the previous odds were favourable to them**; sometimes this will be because they themselves had arranged for the match to take a certain course. **Changes may also be observed where bookmakers come to form an opinion that a match is being subject to manipulation, for example they may then respond by taking the odds into an untypically uncompetitive range**. Thus odds changes capture both bettor and bookmaker knowledge and behaviour and algorithms to identify anomalous odds changes will therefore present a selection of cases where the behaviour of bettors and bookmakers indicates a need for further investigation."⁵*

[emphasis added]

42. Prior to studying the betting analysis and escalation processes in depth, the experts provide a summary of the two-stage procedure undertaken by the BFDS to detect cases of match-fixing based on the irregular betting patterns. As it will be described hereunder, these stages consist in:
- a. First stage: An automated screening of the betting odds for each observed match which triggers an alert in case an irregularity is detected.
 - b. Second stage: a detailed evaluation carried out by Sportradar's analysts in a systematic way to discard false positives and assure a high specificity of the final conclusions. This second stage is subdivided into two processes: (i) hotlisting and (ii) escalation.

⁵ Forrest Report, page 4.

43. The first stage of analysis is summarized in the Forrest Report, on page 9⁶, in which the experts explain how the initial automated alerts are triggered in a given match:

*"1. **Throughout the betting period for each match, betting odds are obtained at high frequency from many platforms. Algorithms developed by Sportradar trigger e-mail 'alerts' to be considered by one of the duty analysts in the London (or Hong Kong or Sydney) office.** These alerts can be considered as the first-stage screen. In the pre-match betting market, alerts are mostly linked to changes in odds above a threshold (or cut-off) specified for the relevant football league ('odds' in the FDS algorithms are expressed as a statistic termed 'netwin'). For a subset of leagues, alerts may additionally be triggered by deviation (beyond a threshold) of observed odds from 'true' odds where true odds are generated from a Sportradar probabilistic forecasting model based on Elo ratings of teams. In the in-play market, alerts are linked to significant deviation of odds from those predicted ('calculated probabilities') by a statistical forecasting model where outcome probabilities depend on pre-match odds, the current score, the time remaining and whether teams are currently short-handed because of red cards. Additional criteria for alerts to occur include withdrawals of market by bookmakers and unexpectedly high volume on Betfair."*

[emphasis added]

44. Once an alert is triggered in the first stage of the process, the second stage is initiated, starting with the 'hotlisting' of the suspicious match. This process is summarized on page 10 of the Forrest Report⁷:

*"2. Where an alert or multiple alerts on the same event are generated, the analyst sees the 'deviation' in odds in tabular and/or graphical form (also information on whether any bookmakers have withdrawn coverage of a match). At this stage, the system gives him access to any additional information available, for example on latest sporting data, such as team news, and any relevant recent reports from correspondents ('freelancers') engaged to report significant football stories to Sportradar on a routine basis. The analyst may also use online sources to research possible factors triggering the alert. **Then the analyst must use skill, knowledge and experience to judge whether the alert can be dismissed or should remain under active consideration in the FDS. Knowledge of both sport and betting has to be used in decision-taking.** For example: in the in-play market, a deviation from the calculated odds might be explained by a red card having been awarded to an unusually influential member of the team (the statistical model takes account of the award of a red card but not of the identity of the carded player); and whether bookmakers failing to offer in-play betting on a match is significant depends on what is the usual commercial practice for those bookmakers for that League. The*

⁶ The first stage is explained and evaluated in detail in section 4 of the Forrest Report (pages 29-39).

⁷ The 'hotlisting' stage is described in detail in section 5.2 of the Forrest Report (pages 41-45).

*analyst therefore needs to draw on his knowledge of sport and of betting markets. **Having reached a judgement based on such considerations, reasons must be logged in the FDS. If the analyst cannot find adequate legitimate reason for the alert and so still finds the match potentially suspicious, then, subject to agreement by a supervisor, the match is 'hotlisted' for further consideration in the FDS.** This process can be interpreted as the first part of the second-stage screen, *filtering out false positives from the first-stage that can be judged as such by appropriately experienced personnel aided by appropriate collated information.*"*

[emphasis added]

45. Once a match is hotlisted after further analysis, the BFDS moves to the second part of the second stage called 'escalation', in which at least three analysts (usually more) debate the circumstances of a hotlisted match and decide whether this match shall be escalated and a final report containing a warning of a fix is to be prepared. This final step is summarized on pages 10-11 of the Forrest Report⁸:

"3. Details of any match which has been hotlisted are flagged up in the FDS to allow other analysts to consider the case. Meanwhile, the supervisor sends questions seeking further information about the match from the freelancer in the relevant country. The questions broadly follow a set pattern but are modified in each case to be made specific to the match under suspicion. Responses are expected within 24 hours. In some cases, questions are also sent to the 'scout' who attended the game (Sportradar has a scout at many matches, with the primary responsibility of supplying reliable sports data, such as time of kick-off and principal match events). Sports data are validated and further analysis of personnel in the match is conducted.

Once all the relevant documentation has been assembled, normally on the day after the match, analysts and supervisor compare the facts against a 'suspicious betting checklist'. They debate the circumstances of the match and reach a consensus on whether Sportradar should issue a warning to the client sports federation or competition. *The number of personnel involved in this debate varies according to duty periods but **at least three analysts must formally agree for the process to move towards a warning being issued, which would signify that the evidence indicated strongly that the match had been manipulated. Normally many more than three are involved in decision-taking and sometimes opinions are sought from other offices.** In the event that a decision to escalate is taken, the team will allocate one of three warning levels (for use internally) and the analyst responsible for the match will write a full report, which is subject to a checking process. In the alternative case where*

⁸ The 'escalation' stage is explained in detail in section 5.3 of the Forrest Report (pages 45-54).

the judgement reached is that there are insufficiently strong grounds for concluding that the match had been manipulated, the analyst writes a detailed statement to interpret/explain what was observed in the betting data. This statement is checked by the supervisor and then referred to the weekly 'Escalation Review', which has the option to report the match after all."

[emphasis added]

46. The Forrest Report also contains the experts' conclusions regarding the reliability of the data used by the BFDS to analyze the odds of any match. The odds data is obtained from three different sources of information: (i) live feed of odds provided voluntarily to Sportradar by many bookmakers, (ii) the use of automatic web-crawlers⁹ to scrape information off the bookmakers' websites, and (iii) the automated screenshots of the bookmakers' webpages. After analyzing the consistency and reliability of the data obtained by Sportradar, the experts concluded the following on page 16 of the Forrest Report:

"[C]onsistency between the odds on the screenshot and the odds captured by the web crawler was found in all cases.

To get an idea of how likely this is, suppose there is a 1% chance of an error in the webcrawling data. Observing no errors in 444 experiments (or 444 out of 444 correct pieces of information) has a probability of occurring of just 0.0115.

*We view this as strong evidence that the web crawlers have been deployed in the FDS to perform their functions correctly, for example collecting the 'right' odds on the webpage. **We can be confident that the automated capture of odds data using web crawlers works virtually as well as if the relevant operator were supplying odds from its website directly to the FDS.**"*

[emphasis added]

47. Regarding the tracking of the money moved through illegal bets, the Forrest Report explains on pages 13-14:

'[...] From the criminal trials of match fixers, we know that betting associated with large-scale fixing is in practice nearly always channelled through Asia because larger bets are accepted there and lack of meaningful regulation ensures that funds cannot be traced back to source in the event that a match falls under suspicion.

[...]

⁹ According to the Forrest Report, page 15: "Web-crawlers are automated pieces of software that scrape information off websites. During any match being monitored by the FDS, a web-crawler visits each bookmaker's website and scrapes the odds every minute, or immediately following a goal or red card event."

The fixers' money is not observed directly but through odds changes. *These will occur because the major Asian operators hold to a 'book balancing' business model where they seek to equalize liabilities across sporting outcomes. If there is a surge of money on one outcome, they will reduce exposure to that outcome by adjusting odds and may sometimes also hedge with other operators, causing secondary changes in odds which will again be observed in the FDS.*

The set of bookmakers for which odds are monitored by the FDS is therefore large, sufficiently comprehensive to pick up the effects of suspicious money flows in Asia in the markets where they are placed, and comprehensive enough also to detect local fraud in other regions including Europe where unsophisticated offenders may bet with familiar local operators."

[emphasis added]

48. A full summary of the main evaluations performed and the conclusions reached is set out in Section 8 of the Forrest Report (pages 65-66):

"As independent consultants, we have carried out for this Report a detailed review of Sportradar's Fraud Detection System (FDS) which is based on monitoring betting markets for anomalous activity which might indicate that a sports event has been subject to fraudulent manipulation.

We noted that the efficacy of screening for any phenomenon is conventionally judged by the extent to which the classification of cases as positives (here, fixed matches) or negatives (here, non-manipulated matches) exhibits sensitivity and specificity. Sensitivity refers to whether the screen picks up a high proportion of true cases; specificity refers to how confident one can be that cases classified as positives are true positives.

We examined in detail every component of the FDS.

• *In Section 2, we examined the data input into the first, automated stage of the FDS. We found that the breadth of coverage of betting markets was very wide such that betting activity related to significant fraud was very likely to be picked up. We scrutinised the betting data and the sports data to which the algorithms for detecting fraud are applied. The betting data were free of error. **The sports data were gathered from a comprehensive list of sources and were subject to robust checks to ensure accuracy.***

• *In Section 3, we examined **the mathematical and statistical models which drive the algorithms used to identify potentially suspicious matches.** They*

conformed to best practice in their construction and performed well when we subjected them to empirical testing.

• In Section 4, we examined the selection of criteria embedded within the algorithms for evaluating whether there were anomalous patterns of activity in betting markets and the corresponding thresholds used to define which matches needed further consideration. **We found that the criteria employed were conceptually sound and allowed for possible manipulation in all the principal markets offered on football matches.** Thresholds were set quite low such that a significant proportion of matches were flagged as requiring assessment in the second stage of the FDS, when analysts become involved. We presented evidence that setting thresholds any lower would be unlikely to lead to more matches being classified at the end of the FDS process as likely to have been manipulated. We therefore recommended no change in thresholds.

• In Section 5, we examined Stage 2 of the FDS where analysts decide whether the matches with betting anomalies drawn to their attention by Stage 1 are truly likely to have been manipulated. First, analysts filter out cases (a large majority) where they perceive a ready, legitimate explanation for apparent anomalies. Those still then regarded as potentially suspicious are referred on for more detailed scrutiny, which involves group decision-taking on whether to report a match as likely to have been manipulated. Prior to this final scrutiny, all sports and betting data are checked and further relevant information obtained. In reviewing processes in these parts of the FDS, we were satisfied that the procedures for reaching a decision are rigorously set out and followed. **We determined that the qualifications and collective experience of the team of analysts equip them to make reliable assessments of the evidence.** They were informed by data which had been subject to appropriate checks according to systematic procedures and by appropriate additional information obtained from correspondents on the ground. We noted that only a very small proportion of matches flagged as potentially suspicious by the algorithms in Stage 1 were finally classified as likely manipulated by the analysts' team in Stage 2. This we judged to reflect a cautious attitude where **sensitivity was implicitly sacrificed in favour of specificity: only matches where a compelling case could be made were in the end reported as suspicious to the relevant sports organisation.**

• In Section 6, we examined some case studies relating either to matches reported as suspicious by Sportradar and subsequently verified by the legal system as manipulated or to matches independently discovered to have been manipulated. In the case of the FDS it is not possible to assign a precise numerical value to the level of specificity because many reports are not investigated further to establish finally the truth of whether manipulation has been present. However, **this review of**

some known instances of match fixing provides evidence fully consistent with high specificity.

• **Our overall conclusion from the study is that matches reported as suspicious by the FDS are very likely to have indeed been manipulated.**”

[emphasis added]

c) Past Success of the BFDS as a means of detecting match-fixing

49. On several occasions, the BFDS has proven its effectiveness where evidence of suspicious betting activity has been detected and where the fixes were subsequently confirmed by police prosecution, conviction of players in court or by bans of players by sporting bodies. The following case examples confirm the BFDS to be working on high standards.
50. Latvia: Both matches of the UEFA Champions League qualification in 2013 between the Swedish team IF Elfsborg and FC Daugavas Daugavpils from Latvia triggered BFDS reports for Daugavpils to have manipulated the results for betting purposes (matches on 17 and 23 July 2013). Following the alerts, UEFA contacted the Latvian Criminal Police regarding the allegations against the club from Daugavpils. The authorities started a comprehensive criminal investigation against the club and its officials. During the course of their investigation, where the police used resources like phone tapping, observation, monitoring of financial data, etc. the authorities gathered sufficient evidence of systematic match-fixing and proceeded to the arrest of eight members of the club, including the club president, players and other officials¹⁰. According to the head of the criminal police, the investigations have been completed and charges will be pressed by the prosecutor later this year.
51. Romania: During the seasons 2014/2015 over 10 BFDS reports were generated in the Romanian Liga 2 with the implication of FC Gloria Buzau. The Romanian Football Association together with UEFA took up the case with the Romania Anti-corruption directorate, the leading state agency to fight corruption in the country. The police investigation is still ongoing but evidence was discovered that confirmed the manipulations alerted by the BFDS. Several players have admitted to be involved. In parallel to the criminal investigations, the Romanian Football Association has taken up disciplinary proceedings and confirmed the implication of members of the club in manipulations of the matches. Consequently, sanctions have been imposed against three coaches and 14 players recently¹¹.

¹⁰ <http://uk.reuters.com/article/uk-soccer-latvia-matchfixing-idUKKCN0ID24V20141024>

¹¹ <http://www.insideworldfootball.com/2016/05/27/romanian-fa-clamps-bans-17-match-fixing-players-coaches/>

52. Portugal: On 14 May 2016, after the end of the matches Atlético – Oriental and Oliveirense – Leixões of the Portuguese LigaPro (second league), the Judiciary Police of Portugal, with the cooperation of the Department of Investigation and Criminal Action of Lisbon, has detained a total of 11 people including players, sports chiefs and entrepreneurs from Oriental and Oliveirense due to suspicions of match-fixing, in an operation called "Jogo Duplo" (in English, "Double Game")¹². This operation has been carried out since March and started with an official complaint from the Portuguese Football Federation to the Judiciary Police of Portugal; the complaint was based on alerts and reports from BFDS.
53. Armenia: Referee Andranik Arsenyan and assistant Hovhannes Avagyan, who officiated at a UEFA Europa League match on 11 July 2013 between FC Inter Turku and Víkingur, had been suspended for life by the UEFA Control and Disciplinary Body (CDB) for their attempt to manipulate the outcome of that match¹³. These sanctions were imposed after a joint investigation of UEFA, the Armenia Football Federation and the Armenia criminal police. A BFDS report had observed highly suspicious pre-match betting on the monitored European bookmakers for both teams to score at least one goal in the match, leading odds to reach very illogical levels at European bookmakers. There was highly suspicious match action, with referee Andranik Arsenyan awarding a highly questionable penalty to each team within 90 seconds during the final 13 minutes. The BFDS report triggered the prompt investigation of the authorities. Eventually, after being questioned by the criminal police and the Armenia disciplinary bodies, the referees admitted to have received \$30'000 by a group of match-fixers in order to manipulate the game. Criminal sanctions have also been imposed on them by the Armenian authorities.
54. Australia: The fraud detection system was directly involved in the uncovering of fixing in the Victorian Premier League in Australia. The analysts noted that a number of English sixth-tier players had been transferred to the Southern Stars Club and had in common that each had played in English matches which had been declared suspicious by the BFDS. The Southern Stars games were then monitored over a certain period of time and irregular betting patterns associated with at least five Southern Stars games were detected. The results were shared with the Victorian police and initiated the investigation "Operation Starlings", which ultimately led to court hearings in which players admitted their involvement in fixes. Four players of the club and a coach were charged by the Victorian police and convicted in the courts, alongside a Malaysian national who had liaised between the players and the betting syndicate that had paid for the fixes¹⁴.
55. Estonia: In December 2013 the police arrested eight players and three other individuals that have participated in the manipulation of 17 matches during 2011-2012. This concerned mainly matches in the top division in Estonia but included also three matches of the UEFA Europa League qualification. During 2014, the players concerned were banned by

¹² <http://www.lematin.ch/sports/football/soupcons-matches-truques-arrestations/story/23491642>

¹³ <http://www.uefa.org/protecting-the-game/integrity/news/newsid=1984517.html>

¹⁴ <https://www.theguardian.com/football/2013/sep/16/football-match-fixing-southern-stars>

the Estonian Football Association and these bans were later extended to world-wide bans by FIFA¹⁵. The integrity officer of the Estonian Football Association confirmed that the BFDS reports played a key role in its investigation, which led ultimately to 26 players receiving sporting sanctions for involvement in match-fixing. He observed that “the BFDS reports and accompanying analysis were used both to launch the investigation and also retrospectively to confirm intelligence already gathered which were under suspicion of match-fixing. In the vast majority of cases, the criminal intelligence corresponded to highly suspicious betting patterns recorded by the BFDS in matches already escalated independently of our investigation”.

56. Lithuania: In 2015, two matches of Lithuanian club Vsl Pakruojo FK played on 27 May and 16 August, both against FK Sinulai, were found by the BFDS to have suspicious betting patterns for Vsl Pakruojo FK not to win. This club and several of its players were charged by the Lithuanian Football Federation’s (“LFF”) Disciplinary Committee and found guilty of having fixed both matches. CAS ultimately confirmed the LFF’s decisions because, *inter alia*, it found that the anomalies in the betting patterns found by the BFDS were abundant and inexplicable – if not by the reason that the punters knew in advance the result of the matches – and that the experts consulted by the LFF had proven an existing, illicit behaviour by the players involved that allowed to deem them responsible for match-fixing.
57. Cyprus: In November 2016, the Cyprus Football Association introduced integrity regulations at national level which impose sanctions on clubs participating in domestic competitions in Cyprus based exclusively on betting patterns found by the BFDS. Sanctions imposed range from a ‘warning’ for a first escalated match, a fine for the second escalated match, the relegation to a lower division for a third escalated match, and the exclusion from all competitions of the Cyprus FA for five years for the fourth escalated match. The introduction of these regulations in Cyprus shows how national associations are relying even more on the BFDS to take disciplinary measures against clubs. Indeed, would such a system have been in place in Albania, Skenderbeu, with 53 matches being ‘escalated’ by the BFDS, would probably not be participating at domestic level anymore.
58. The above examples have in common that the initial trigger for the inquiry was the receipt of BFDS reports of suspicious matches and that the subsequent investigations confirmed the accuracy of the BFDS reports. They represent success stories of the important fight against match-fixing and they demonstrate the benefit of the monitoring of the betting markets and the consistent prosecution of the suspicions raised by BFDS.

¹⁵ <http://www.sportsintegrityinitiative.com/fifa-extends-27-match-fixing-sanctions-worldwide/>

d) CAS approach on the BFDS

59. It is relevant to note that CAS has very recently had the opportunity to evaluate and approve the reliability of the BFDS to detect match-fixing in two of the cases already mentioned above:

- CAS 2015/A/4351 Vsl Pakruojo FK et al. v. Lithuanian Football Federation

60. In the *Pakruojo* case, the CAS panel fully endorsed the conclusions reached by the LFF Appeals Committee based on the BFDS reports, confirming that these allow to detect abundant anomalies in the betting pattern that are inexplicable, if not for the fact that bidders knew in advance the result of the matches:

"92. In that respect, the Panel agrees with the conclusions of the Appealed Decisions and, contrary to the Appellants' contentions, notes that the conditions for the application of Article 44.3 of the Old Disciplinary Code and of Article 44.5 of the New Disciplinary Code were satisfied. In fact, in the Panel's opinion, it is established that:

*i. the Matches had been manipulated. The evidence adduced by the LFF in fact shows, to the satisfaction of the Panel, that suspicious betting activities took place with regard to the Matches. **For the reasons stated by BFDS in its reports, and most convincingly explained by Mr Peaker in his deposition at the hearing, the anomalies in the betting patterns were abundant and inexplicable - if not by the reason that the punters knew in advance the result of the Matches. In that regard,** the Panel notes that the abnormality of the movements in the betting markets (pre-match and live, with respect to Match 2) is not disputed as such by the Appellants, that only challenge the link between betting anomalies and match manipulation, but offer no alternative plausible explanation of the suspicious betting patterns;"*

[emphasis added]

61. In addition, to validate the reliability of the BFDS' assessment of the matches fixed by FK Pakruojo, the CAS panel also took into account that a behaviour of the club's players had been identified that further reinforced its finding that match-fixing had occurred. This particular consideration shall be addressed further on in relation to Skënderbeu, but it is already worth quoting at this stage the following remarks of the CAS panel:

"92. [...]

ii. a behaviour of the Players during the Matches was identified, which allows the presumption that the Players could be responsible of match-fixing. In that regard, the Panel finds convincing the explanations given by the Experts, which

were not contradicted by the Players beyond their own words. Actually, the Players did not offer any other opinion and/or evidence to disprove the Experts' conclusions. The fact that no player of FK Siauliai was investigated is in that context irrelevant, since it is obvious that in order to fix a match the involvement of the losing team's players is necessary, and the potential liability of the players of FK Siauliai would not exclude anomalies in the behaviour of the Club's players. In any case, the Panel had the opportunity to review the video of the matches and agrees with the Experts conclusions for each of the Players. As a result, the fact that the reports of the Experts were undated and (initially) did not indicate the names of the Experts is irrelevant: indeed, when the identity of the Experts was eventually disclosed, the Appellants did not challenge their qualification and expertise."

- CAS 2016/A/4650 Klubi Sportiv Skënderbeu v. UEFA

62. The CAS panel in the admissions criteria proceedings (first stage of the two-stage process in match-fixing cases) involving Skënderbeu also considered that the BFDS constituted a reliable means to detect match-fixing activities.
63. Notably, in support of the explanations provided by Sportradar's representative at the hearing and by Prof. Forrest, who conducted an independent review of the BFDS (see further below), the CAS panel found:

*"96. Although the Panel reckons that, in general, the BFDS system could be improved through an ad hoc UEFA regulation (for example, setting a minimum number of analysts that need to agree in order to flag a match for abnormal betting behaviour, anonymising the name of the club at least during the first stages of the analysis, including some former players and/or coaches in the pool of analysts), with regard to the case at hand **the Panel adheres to the unrebutted findings of Prof. Forrest and Prof. McHale and finds that the conclusion reached by the BFDS in respect of the Club are fully justified as will be set out in more detail below.***

[...]

102. The Panel took note of the study of the BFDS carried out by Prof. Forrest, his explanation of the BFDS and his review of the system during the hearing. Prof. Forrest concluded in his report that "[o]ur overall conclusion from the study is that matches reported as suspicious by the [BFDS] are very likely to have indeed been manipulated". On the basis of such unrebutted expert testimony of Prof. Forrest and his report (written together with Prof. McHale) as well as the explanations of Mr

*Mace, and despite the above Panel's remark that there is still some room for improvement, **the Panel is satisfied that the BFDS is a reliable means of evidence to prove indirect involvement in match-fixing.***"

[emphasis added]

64. It is noted at this stage that the CAS panel in this case refrained from entering into more detail in respect of the more specific accusations made by UEFA with respect to the club's direct involvement, in light of the fact that only the indirect involvement was necessary to exclude Skënderbeu in the admissions criteria process; in other words, the panel did not wish to prejudice the outcome of any future disciplinary proceedings against the club or persons related to it.¹⁶
65. The foregoing confirms both the full validation by CAS of the BFDS as a reliable means to detect match-fixing in football matches as well as the justification and necessity of the present disciplinary proceedings against the club Skënderbeu.

(ii) An analysis on KS Skënderbeu

66. There is overwhelming and outrageous evidence which shows that Skënderbeu has manipulated a very long list of football games in the domestic Albanian club competitions, in UEFA club competitions and in several international friendly matches, with millions of dollars being gained in the process.
67. Based on UEFA's experience in gaming, betting and lotteries, the conclusion has been reached that the statistical evidence from the global betting markets is in the present case simply striking. In fact, the match-fixing activities of Skënderbeu reveal a highly organized structure and system that has resulted in huge financial gains through betting on its matches.
68. As it will be detailed below, there are more than 50 objective, yet suspicious betting reports from the BFDS concerning always the same club: Skënderbeu. All these reports lead to the unbiased conclusion that Skënderbeu has participated in match-fixing activities over the past seven years. In this respect, one must note that more than 99 percent of all football clubs are never mentioned in any betting report. Skënderbeu has been involved more than 50 times. More often than any other club in Europe.
69. It shall be noted that the calculated odds from all betting operators always include the motivation of a team's players on the pitch, as well as other relevant factors such as

¹⁶ CAS 2016/A/4650 Klubi Sportiv Skënderbeu v. UEFA, para 107.

injuries or suspensions of key players, weather conditions, rivalry between the clubs, etc. It is therefore no lack of motivation (such as not being able to qualify to the next round) that causes the drastic odds changes observed by the BFDS. As explained in the Forrest Report, these changes are solely linked to the enormous amounts of money placed on bets at a specific moment during the match, or to bookmakers voluntarily reducing the odds because of strong suspicions that a match has been manipulated.

70. There is also an explanation for the fact that some match-fixing is only partly successful, as it will be explained by the expert Tom Mace at the hearing.
71. The TV footage of some of the matches escalated by the BFDS clearly shows that some of the actions that have occurred on the pitch are a result of severe manipulations, with a strong disrespect for the football community and for the core principles of sport. UEFA will show that the actions on the pitch are always linked to betting activities that cannot be explained by anything other than bettors possessing inside information from within the club.
72. Most of the TV footage shown is proof of some intentionally bad defending. Not all footage results in a goal but it is always obvious how some defenders resolutely refuse to attack their opponents in order to provide them with the greatest amount of opportunities to score.
73. The tendency for all of the games analyzed in this report is always the same: they were all manipulation attempts to obtain criminal betting profits on a stunning global scale. The magnitude of this manipulation has been so alarming that bookmakers over the whole world have removed Skënderbeu games from their betting lists, and some even refused to offer bets on their football matches.
74. It is also important to mention that not only is it possible to bet for huge sums of money on the outcome (Result/1X2/Asian Handicap) of a football game but also on the total amount of goals being scored in that game (Totals market) or on another/next goal being scored. Betting was either being done both before the game (Pre-Game) or live during the game (Live trading/Betting). All those bets have been used in the criminal scheme in relation with Skënderbeu's matches.
75. A last remark about some of the opponents in this long list of fixed games: some of Skënderbeu's rivals in the domestic Albanian matches mentioned in the BFDS reports are also under accusation of match-fixing. The focus of the present investigation, however, is solely on Skënderbeu.

a) UEFA Champions League and UEFA Europa League 15/16

i) Introduction

76. Skënderbeu has manipulated and/or attempted to manipulate several high-profile UEFA competition matches in order to make huge illegal gambling profits on their games. Only in the season 2015/2016, they are known to have fixed at least four UEFA club competition matches, which of course have disrupted these competitions and has brought forward serious integrity issues in the whole world of football.
77. The high profile nature of the UCL and the UEFA Europa League ("UEL") and the associated high betting limits, make it abundantly clear that enormous sums of money must have been wagered on the outcomes of these matches to force odds to behave in such an illogical and suspicious manner.
78. Given the high profile nature of the UCL and UEL, it is generally accepted that one person with one click on a sports betting website can bet up to tens of thousands of euros at a time on a specific match event (winner, total number of goals in the match, which team will score the next goal, etc.). An organized group of people betting on several websites simultaneously can bet up to hundreds of thousands of euros in a few minutes.
79. Odds are supposed to go up when time runs out in a football match, as it becomes more improbable for a team to score or secure a win with less time remaining, but in several of the mentioned matches more and more money was streaming in on those odds despite the logical, statistical, rational, analytical and obvious reasons for the opposite to happen.
80. In these televised games, it is also palpably clear from several actions on the pitch that Skënderbeu has no respect for the integrity of the game at all. The following subsections will explain in detail the mentioned four UEFA club competition matches from the 2015/2016 season, and an additional summary of earlier matches escalated by the BFDS and played in European competitions will also be provided.

ii) Crusaders FC vs. Skenderbeu (UCL, 21/06/2015)

81. In the first fixed European match of the 2015/2016 season, **Skënderbeu manipulated the away match played on 21 June 2015 against Crusaders FC (Northern Ireland) in the 15/16 UCL Qualification**. The UEFA BFDS clearly indicates that there were credible indications that corrupt betting profits were generated from this match. There is an overwhelming conclusion that the attempt for at least four goals to be scored in this game could not be justified by any other reason than a manipulation of the match in order to secure corrupt betting profits:

- The final result was 3-2 for Crusaders (HT 0-0). Skënderbeu played with white shirts. This was the second leg tie in the 15/16 UCL qualifying round. The first leg resulted in a 4-1 home win for Skënderbeu.
- Already after ten minutes, Renato Arapi, playing for Skënderbeu, was sent off following an off the ball incident, a foul committed right in front of the fourth official with the obvious intent of receiving a red card. Bookmakers all over the world changed their odds accordingly, but no suspicious betting was detected yet. An early sending-off is a tactic often used by match-fixers to both weaken their team and have an answer for their pathetic defending at the end of a match. 'We had a man less' always works with a part of the non-critical press and fans.
- To show the correlation between the antics on the pitch and the international betting markets is very interesting to see that when Skënderbeu played in a normal way and scored two goals, the betting markets were also very normal without any suspicious betting pattern whatsoever.
- When the score-line was 1-2 no suspicious betting patterns were detected yet.
- With only 12 minutes to go, Skënderbeu held a commanding 6-2 aggregate score. At this point they executed their brutal scheme without putting their qualification for the next round at risk. They could afford to take goals and link the events on the pitch to betting manoeuvres.
- After 78 minutes of the match, an in depth analysis of over 400 global bookmakers showed some outrageous suspicious live betting. For example, odds which should be statistically 6,00 (ten euro bet, returns sixty euro) were as low as 2,09 (ten euro bet, returns 20,9 euro) with the betting company Maxbet. Large amounts of money, and we talk here of a minimum of several hundreds of thousands of dollars, were being bet at once contradicting all normal betting logic.¹⁷
- In the last ten minutes of the match, Skënderbeu's defending was of serious concern, with erratic decision-making, a lack of effort and questionable positional awareness and effort. It is undoubtedly a very different Skënderbeu who is now playing. Twice a goal was denied to Crusaders because of an offside situation, but it is clear from the dramatic non-defending that some Skënderbeu defenders gave up playing completely.

¹⁷ See BFDS Report page 4, 5 and 9. All these pages provide clear betting evidence that individuals had prior knowledge of the match result.

- All half-hearted, laughable attempts to defend go hand in hand with the simultaneous massive betting of illogical money on the international betting markets by persons who knew what would happen afterwards.¹⁸ The Skënderbeu players on the pitch at the same time were doing everything possible to help the Crusaders' team to more goals.
- UEFA's expert witness, Mr. Tom Mace, will gladly explain these figures in detail at the hearing.

82. It is submitted that Skënderbeu manipulated the closing portion of the match. Once their progress to the next round was already secure, i.e. once they led 1-2 (6-2 on aggregate), they could deliberately concede goals in the closing period without risking their progress in the competition. Such manipulation is very opportunistic but also is clearly premeditated.

83. This outrageous display of match-fixing generated huge corrupt betting profits, as all irregular bets were found to have been successful.

(Exhibit 7)

84. The scandalous defending of Skënderbeu even prompted Crusaders goalkeeper O' Neill to suggest on Twitter that some kind of betting scam took place in the last ten minutes of the game. It is also very obvious to UEFA that Skënderbeu is the only complicit party of the two teams in this manipulation.

(Exhibit 8)

85. It is also worthy of mention that the Hong Kong Jockey Club (one of the members of the GLMS and a very large gaming company in Asia) no longer offers matches involving Skënderbeu since the Crusaders match (21/07/2015), and that the GLMS also recommend that their members exercise extreme caution when offering Skënderbeu matches.

(Exhibit 9)

iii) NK Dinamo Zagreb vs. Skënderbeu (UCL, 25/08/2015)

86. In their second match-fixing event in the **15/16 UCL, Skënderbeu played against GNK Dinamo Zagreb (Croatia) on 25 August 2015**, in the next qualifying round, merely one month after the aforementioned match against Crusaders. There is clear evidence that this match was manipulated for betting purposes in a highly organized manner. The

¹⁸ See UEFA BFDS Report page 29 and further. On page 29 one can see that the calculated odds should be close to 6.00 (the green line) but the odds stay a lot lower (purple line) because of the fact that people keep betting on yet another goal.

evidence to support this conclusion is overwhelming, with highly suspicious betting indicating Skënderbeu deliberately attempted to concede at least two late goals:

- The final result was 4-1 for Dinamo Zagreb (HT 2-1). Skënderbeu played with white shirts.
- This was the second leg match in the 15/16 UCL qualifying round. The first leg resulted in a 1-2 away win for GNK Dinamo Zagreb.
- The highly suspicious betting started abruptly midway through the second half. With the score being 3-1 in favour of GNK Dinamo Zagreb (leaving Skënderbeu without any realistic hope of qualifying to the next UCL round) and Dinamo playing with a numerical disadvantage, enormous amounts of money were suddenly bet midway through the second half for more goals to be scored, this against all sportive and betting logic: again, Dinamo was playing with one man less and had virtually guaranteed its qualification.¹⁹
- Indeed, the sudden amount betting was so severe and so illogical that the BFDS found it clear that bettors were aware that at least one more goal would be scored in the match and were attempting to extract the maximum possible profits from all live betting markets.
- At that point, Skënderbeu decided to make some serious money by attempting to concede one or two more goals and reap the betting benefits instead of the sporting ones that it could no longer achieve.
- With a one-man advantage for his club, Skënderbeu player Renato Arapi, reacted very slowly to a ball that set up the goal and then completely gave up chasing his opponent.²⁰
- Goalkeeper Orges Shehi also behaved very suspiciously in that action of the match, choosing to stay on his line rather than to close his angle.
- UEFA's expert witness, Mr. Tom Mace, will gladly explain these figures in detail at the hearing.

87. Huge profits must definitely have resulted from this setup. There were absolutely no sportive or betting reasons why bettors would place such extraordinary amounts of money on Skënderbeu to concede another goal, when Dinamo was playing with one less player and no pressure whatsoever to score, having already secured qualification, and so little

¹⁹ See BFDS Report page 4, 5, 10 and 11. All these pages provide clear evidence that individuals placing the massive bets had prior knowledge of the match result.

²⁰ See minute 80 of the TV images on file.

time remaining in the match. In this case, Skënderbeu players voluntarily “stopped playing” in order to exploit the match for corrupt betting purposes whenever the opportunity presented itself, indicating an overwhelming evidence for a premeditated and carefully planned scheme. It was very obvious that Skënderbeu is the only complicit party of the two teams in the manipulation of this game.

(Exhibit 10)

iv) Sporting Clube de Portugal vs. Skënderbeu (UEL, 22/10/2015)

88. The third manipulated match, this time in the **15/16 UEL Group Phase played on the 22 October 2015, saw Skënderbeu face Sporting Club de Portugal in Lisbon.** Once again, there is substantial evidence to indicate there was an organized manipulation to generate corrupt betting profits. No justification can be found for the overwhelming betting for Skënderbeu to concede at least one late goal in the match and for at least six goals to be scored in total. This betting returned mixed results but the evidence strongly indicates that Skënderbeu was once again manipulating the game:

- The final result was 5-1 for Sporting de Portugal (HT 2-0). Skënderbeu played in the dark shirts.
- This was the third match for both sides in Group H of the 15/16 UEL. No aggregate scores are taken into account in this stage of the competition.
- In the 24th minute of the match, Skënderbeu player Hamdi Salihi was sent off after being shown a second yellow card following a deliberate handball, having touched the ball with his hand off a cross from his own side’s attacking corner kick. This is yet another blatant example of the disdain Skënderbeu shows for the integrity of the game. It is noteworthy that this action took place on a Skënderbeu attack, and not on a defensive corner kick. He was less than ten meters away and in direct sight from the goal-line referee, further confirming the intentionality of the foul and the dismissal.
- As mentioned earlier, an early sending-off is a tactic often used by match-fixers to both weaken their team and to later justify their pathetic defending at the end of a match.
- Skënderbeu also caused two penalties to be awarded against Skënderbeu²¹ during the match, which ensured they did not have any chance of obtaining a

²¹ The first at the 38th minute, with the Portuguese player being blocked off by another Skënderbeu defender, who had no need to make this mistake. The second in the 41st minute, because of a deliberate, unnecessary foul by a Skënderbeu defender who had three of his teammates in his back to support him, but chose to intentionally foul his opponent.

positive result and could now focus on making huge betting profits on six goals being scored and more corrupt attempts to make money on this game.

- Late in the game, with the score already at 4-0 for Sporting and the game obviously being lost, highly suspicious live betting suddenly emerged for at least six goals to be scored in the match. The final 20 minutes of the match were specifically targeted for generating corrupt betting profits. When Skënderbeu conceded the fifth goal, only five minutes after enormous amounts were being bet on a worldwide scale, more exuberant and illogical betting continued to take place.²²
- The peculiar actions on the pitch by Skënderbeu's players obviously correlate to the sudden, simultaneous and illogical betting of massive amounts of money on the international betting markets.
- UEFA's expert witness, Mr. Tom Mace, will explain these figures in detail at the hearing.

89. And despite not all wagers being maximized in this chaotic and surreal betting of this match, there was once again substantial evidence that this match was targeted for betting-related manipulation. Interestingly, because the betting was mainly directed at the total number of goals that would be scored in the match, it was irrelevant whether Skënderbeu scored a goal themselves or allowed Sporting to score at that stage.

90. UEFA submits that large sums of money were gained by people fully aware of the result of the match before it had even finished.

91. The betting was in fact so unusual, illogical and manipulated that it led one prominent Asian bookmaker to remove the live markets before the match had ended. It is of great concern when manipulations activities by a club and its players lead to situation in which a important gaming company shows no trust in a UEFA competition by removing one or more match from its betting market.

(Exhibit 11)

92. In this match, it was again very obvious that Skënderbeu is the only complicit party of the two teams in its manipulation.

v) *Skënderbeu vs. FC Lokomotiv Moskva (UEL, 10/12/2015)*

²² See BFDS Report page 4, 5, 9, 10, 11 and 12.

93. In their fourth manipulated UEFA competition match in the 2015/2016 season, **Skënderbeu played FC Lokomotiv Moskva at home on 10 December 2015**. This match once again provided substantial evidence of betting-related manipulation. No sporting factors can account for the highly suspicious live betting for Skënderbeu to lose by at least two goals and for at least two (and even three) goals to be scored in total. This is perhaps the simplest manipulation of the four UEFA competition matches fixed by Skënderbeu in last season's UEFA competitions:

- The final result was 0-3 in favour of FC Lokomotiv (HT 0-1). Skënderbeu played in the red shirts.
- This was the sixth and final match for both sides in Group H of the 15/16 UEL. No aggregate scores are taken into account in this stage of the competition.
- After FC Lokomotiv scored the first goal (0-1), and particularly early in the second half of the match, there was a sudden heavy one-sided betting for further two goals to be scored in the match.²³
- Even towards the end of the match, with the score still at 0-1 for FC Lokomotiv and only five minutes of normal time remaining, bettors continue to wager that an additional goal would be scored.
- There was also a highly suspicious betting against Skënderbeu which suddenly appeared in the final ten minutes of the match for two different wagers: first, (i) on a total of three goals being scored in the match, and then (ii), on Skënderbeu losing the match by at least a two-goal margin.²⁴
- Notably, FC Lokomotiv's second goal resulted from a match incident in the 89th minute, when a long hopeful ball was not dealt with by (yet again) Skënderbeu goalkeeper Orges Seshi, who 'hesitated' followed by a 'miscommunication' between himself and a defender, allowing the opposite striker to score in a – to say the least – simple way.
- FC Lokomotiv's third goal in the 90th minute was also characterized by some highly questionable defending from Skënderbeu where not one of the defenders attempted to stop a FC Lokomotiv attacker near the goal, allowing him to score under absolutely no pressure.

²³ See the BFDS Report on page 9: the odds on the betting markets where **1,67** (16,7 euro being paid out for every ten euro bet) instead of the totally different, normal, mathematical and calculated odds of **3,21** (32,10 euro being paid for every ten euro bet). The decrease from the logical odds can only be explained by an irrational amount of money being wagered at once on this particular bet.

²⁴ See BFDS Report pages 4, 5, 8, 9, 10 and 11.

- UEFA’s expert witness, Mr. Tom Mace, will comment on these elements in detail at the hearing.
94. The terms used by the BFDS in this particular file are: “overwhelming evidence”, “deeply suspicious”, “inexplicably”, “against all expectations” and “unrealistic betting with just minutes remaining on the clock – in a precise and orchestrated manner”. UEFA submits that countless amounts of money were gained by persons who had prior knowledge of the final outcome of the match (particularly the number of goals that would be scored against Skënderbeu).
 95. Overall, the evidence obtained by more than 400 bookmakers all over the world once again fully proves that Skënderbeu manipulated this match to secure enormous betting profits, within the frame of a criminal scheme that was executed in a highly organized manner.
 96. It was also very obvious that Skënderbeu is the only complicit party of the two teams in the manipulation of this match.

(Exhibit 12)

b) Earlier UEFA European matches

97. Skënderbeu has also manipulated several UEFA competition matches prior to the 2015/2016 season, which have also been escalated by the BFDS. UEFA fully relies on the full reports prepared by the BFDS for each one of these matches, whose main conclusions are summarized below.
98. 30/07/2013, UEFA Champions League Qualification, FC Shakther Karagandy v. Skënderbeu. Conclusion BFDS match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.
99. 06/08/2013, UEFA Champions League Qualification, Skënderbeu vs. FC Shakther Karagandy: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 13)

(Exhibit 14)

c) Domestic League and Cup matches at Albanian Superleague (2010-2015)

100. Skënderbeu has also manipulated an enormous number of matches in its domestic League and in domestic Cup competitions, especially in the Albanian Superleague, from 2011 onwards. These domestic matches have also been escalated by the BFDS. UEFA fully relies on the full reports prepared by the BFDS for each one of these matches, whose main conclusions are summarized below.

101. 13/11/2010: Skënderbeu vs. Dinamo Tirana: Conclusion BFDS Match-report: This match should be considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 15)

102. 08/12/2010: Teuta vs. Skënderbeu: Conclusion BFDS Match-report: This match is considered highly suspicious and most likely to be manipulated.

(Exhibit 16)

103. 12/12/2010: Skënderbeu vs. Shkumbini: Conclusion BFDS Match-report: Given that both the pre-match support for Shkumbini + 1,5 (goals HCP – KD) and the live (betting – KD) support for KS Skënderbeu -0.75 (goal HCP – KD) were both successful (at least partially), with no apparent justification for the switch in betting opinion this match is considered highly suspicious and most likely manipulated.

(Exhibit 17)

104. 03/02/2011: KF Tirana vs. Skënderbeu: Conclusion BFDS Match-report: In conclusion, elements of this match appear suspicious with a possibility of manipulation.

(Exhibit 18)

105. 06/02/2011: KS Kastrioti vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, there is substantial evidence to support the conclusion that this match was targeted for betting-related manipulation. It strongly bears the hallmarks of others highly suspicious matches, and although the betting ultimately proved unsuccessful, this match was clearly targeted for the purpose of generating corrupt betting profits.

(Exhibit 19)

106. 25/02/2011: KS Dinamo Tirana vs. Skënderbeu: Conclusion BFDS Match-report: in conclusion, this match is highly suspicious and is most likely to have been manipulated.

(Exhibit 20)

107.07/03/2011: Skënderbeu vs. Bylis Ballsh: Conclusion BFDS Match-report: To conclude, elements of this match appear suspicious with a chance it was manipulated for betting purposes.

(Exhibit 21)

108.15/04/2011: KS Dinamo Tirana vs. Skënderbeu: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 22)

109.20/04/2011: Skënderbeu vs. KF Laçi: Conclusion BFDS Match-report: To conclude, this match is very likely to have been manipulated for betting purposes.

(Exhibit 23)

110.26/10/2011: Skënderbeu vs. KS Kastrioti: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result and score-line. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 24)

111.05/12/2011: Skënderbeu vs. Bylis Ballsh: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 25)

112.04/02/2012: KF Laçi vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 26)

113. 08/02/2012: Skënderbeu vs. KS Pogradeci: Conclusion BFDS Match-report: Overall, the betting on this match suggests that bettors may have had prior knowledge of the final result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 27)

114. 07/03/2012: Skënderbeu vs. KS Vllaznia: Conclusion BFDS Match-report: To conclude, the betting on this match is considered suspicious and bears all the hallmarks of other suspected manipulated matches, even though the majority of the betting was unsuccessful.

(Exhibit 28)

115. 21/03/2012: Skënderbeu vs. KF Laçi: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 29)

116. 26/03/2012: Dajti Kamza vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting on this match is considered suspicious and bears the hallmarks of other suspected manipulated matches, even though the majority of the betting was unsuccessful.

(Exhibit 30)

117. 25/04/2012: Skënderbeu vs. KS Vllaznia: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 31)

118. 24/08/2012: KS Vllaznia vs. Skënderbeu: Conclusion BFDS Match-report: Overall, the betting on this match suggests that bettors may have had prior knowledge of the final result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 32)

119. 24/09/2012: Skënderbeu vs. KF Laçi: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear

indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 33)

120. 08/12/2012: KS Shkumbini vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 34)

121. 15/12/2012: Skënderbeu vs. KS Kukesi: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 35)

122. 19/12/2012: KS Kastrioti vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 36)

123. 04/02/2013: Skënderbeu vs. KS Kastrioti: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 37)

124. 17/02/2013: Apollonia Fier vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 38)

125. 20/02/2013: KS Shkumbini vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear

indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 39)

126. 01/03/2013: KF Laçi vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting on this match is considered suspicious and bears all the hallmarks of other suspected manipulated matches, even though it was ultimately unsuccessful.

(Exhibit 40)

127. 06/03/2013: KS Kukesi vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 41)

128. 12/03/2014: Skënderbeu vs. KS Kastrioti: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 42)

129. 30/04/2014: Skënderbeu vs. KS Kukesi: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 43)

130. 11/09/2014: FK Partizani vs. Skënderbeu: Conclusion BFDS Match-report: Overall, the betting on this match suggests that bettors may have had prior knowledge of the final result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 44)

131. 29/10/2014: Skënderbeu vs. KF Elbasani: Conclusion BFDS Match-report: Overall, the betting on this match suggests that bettors may have had prior knowledge of the final

result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 45)

132. 21/12/2014: KS Vllaznia vs. Skënderbeu: Conclusion BFDS Match-report: Overall, the betting on this match suggests that bettors may have had prior knowledge of the final result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 46)

133. 25/01/2015: KF Elbasani vs. Skënderbeu: Conclusion BFDS Match-report: Overall, the betting on this match suggests that bettors may have had prior knowledge of the final result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 47)

134. 31/01/2015: Skënderbeu vs. KF Laçi: Conclusion BFDS Match-report: To conclude, the betting on this match is considered highly suspicious and bears all the hallmarks of other suspected manipulated matches. With the betting ultimately proving unsuccessful, this match is almost certainly a failed attempt at manipulation.

(Exhibit 48)

135. 18/02/2015: Skënderbeu vs. KS Flamurtari: Conclusion BFDS Match-report: To conclude, the betting on this match suggest that bettors may have had prior knowledge of the final result. This match should be considered suspicious and possibly manipulated for betting purposes.

(Exhibit 49)

136. 16/05/2015: Skënderbeu vs KS Flamurtari: Conclusion BFDS Match-report: In summary, there is credible evidence to support the conclusion that this match was manipulated for betting purposes. The suspicious betting patters observed exceed the acceptable threshold, and the BFDS are satisfied that corrupt betting profits were generated on this match.

(Exhibit 50)

137. 21/09/2015: Skënderbeu vs. KF Tirana: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 51)

138. 16/10/2015: Skënderbeu vs. KS Teuta: Conclusion BFDS Match-report: To conclude, there is substantial evidence to support the conclusion that this match was targeted for betting related manipulation. It strongly bears the hallmarks of other highly suspicious matches, and although the betting ultimately proved unsuccessful, this match was clearly targeted for the purpose of generating corrupt betting profits.

(Exhibit 52)

139. 22/11/2015: Skënderbeu vs. Terbuni Puke: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 53)

140. 17/02/2016: Skënderbeu vs. Vllaznia: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 54)

141. 20/04/2016: Skënderbeu vs. KF Laçi: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 55)

d) Friendly matches

142. A list of escalated friendly matches is also included, in view of the concerning trend in the conclusions reached by the BFDS. There are also millions of Euros to be gained by betting on friendly matches. In order to make up turnover and profit, bookmakers tend to offer friendly matches during the summer and winter periods, as most important competitions in Europe are on break. As a result, these matches can be used by criminal organizations in order to maximize their betting profits. UEFA fully relies on the full reports prepared by the BFDS for each one of these matches, whose main conclusions are summarized below.

143. 24/01/2013: Skënderbeu vs. Silkeborg IF: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear

indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 56)

144. 31/01/2013: Skënderbeu vs. SV Mattersburg: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 57)

145. 04/07/2013: FC Energie Cottbus vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 58)

146. 25/06/2014: FC Shakhtar Donetsk vs. Skënderbeu: Conclusion BFDS Match-report: To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes.

(Exhibit 59)

147. 11/01/2015: Skënderbeu vs. KV Oostende: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 60)

148. 06/07/2015: FC Dynamo Kyiv vs. Skënderbeu: Conclusion BFDS Match-report: In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.

(Exhibit 61)

B. Further Evaluation of the UEFA Betting Fraud Detection System

(i) Additional expert analysis and evaluations of the BFDS

149. Of course, UEFA has led investigations on Skënderbeu since some time. While some first conclusions were possible and led to the non-admissibility decision and the first CAS case on Skënderbeu, UEFA has now reached the stage in which disciplinary sanctions must be imposed on the club. The CAS Panel in CAS 2016/A/4650, analysing the non-admissibility decision, well aware of the two-steps system of UEFA (administrative decision on admission criteria as first step and disciplinary sanctions as second step) had explicitly left open the door to UEFA to proceed with further disciplinary measures when and so far as appropriate. This is what must be done with the present report.
150. As part of the continued investigation by UEFA on Skënderbeu, following the recommendation made by the Panel in *CAS 2016/A/4650 KS Skenderbeu v. UEFA* at para. 96 to anonymize the name of the club during the first stages of betting analysis, and in order to produce a qualitative analysis of the BFDS, UEFA has commissioned the British company Starlizard to carry out an anonymised analysis of the betting data of ten matches played by the club over the course of four seasons between 2013/14 and 2016/17. Eight of these matches had been 'escalated' (i.e., found to have been manipulated) by the BFDS, whilst two were not.
151. UEFA provided the betting data from these ten matches to Starlizard, and information on the goals scored and red card incidents during each match, in a random order, without the names of the teams taking part in the matches and the names of the players involved in the game. Even the name of goal-scorers and players sent-off were not provided. Of course, Starlizard was not informed of which matches had been previously escalated by the BFDS.

(Exhibit 62)

152. The objective of this exercise was to see whether on the basis of the simple betting data and with just minimal additional information, a company that carries out the analysis of betting patterns would be able to discern whether matches were fixed, or at least suspicious, or not.
153. Starlizard, after analysing the betting data of the ten matches provided, produced ten reports (one for each match) in which it commented on the movement of the betting odds during these matches. Starlizard reached conclusions on whether there are significant, fairly significant or no evidence of the matches being manipulated. Very tellingly, according to the reports produced by Starlizard, there is a significant possibility that seven of the analysed matches (Matches 1, 2, 4, 5, 6, 7 and 9) are fixed, a fairly significant possibility that one (Match 3) was manipulated and no evidence that two of the matches (Matches 8 and 10) are fixed. UEFA's expert witness, Mr. Affy Sheikh, Global Head of Security and Integrity at Starlizard, will explain these reports in detail at the hearing.

(Exhibit 63)

154. An analysis of the report produced by Starlizard, shows that with just the betting data, and very minimal information, Starlizard was able to reach a very similar conclusion to the one reached by the BFDS. Below is a table with the details of the matches, the conclusion of the BFDS and the conclusion of Starlizard:

Match No.	Teams	Date	Score (HT)	Type	BFDS Conclusion	Starlizard Conclusion
Match 1	KS Skënderbeu vs SV Mattersburg	31/01/2013	0:4 (0:2)	Friendly Match	Escalated	Significant possibility of manipulation
Match 2	KS Skënderbeu vs KS Kukesi	30/04/2014	3:3 (1:0)	Albanian League	Escalated	Significant possibility of manipulation
Match 3	FK Partizani vs KS Skënderbeu	11/09/2014	1:0 (0:0)	Albanian League	Escalated	Fairly significant possibility of manipulation
Match 4	Crusaders FC vs KS Skënderbeu	21/07/2015	3:2 (0:0)	UCL Match	Escalated	Significant possibility of manipulation
Match 5	NK Dinamo Zagreb vs KS Skënderbeu	25/08/2015	4:1 (2:1)	UCL Match	Escalated	Significant possibility of manipulation
Match 6	Sporting Clube de Portugal vs KS Skënderbeu	22/10/2015	5:1 (2:0)	UEL Match	Escalated	Significant possibility of manipulation
Match 7	KS Skënderbeu vs Lokomotiv Moskva	10/12/2015	0:3 (0:1)	UEL Match	Escalated	Significant possibility of manipulation
Match 8	KS Skënderbeu vs KS Teuta	12/10/2016	1:0 (0:0)	Albanian League	Not Escalated	Not Fixed
Match 9	KS Skënderbeu vs KS Vllaznia	17/02/2016	2:1 (1:0)	Albanian Cup	Escalated	Significant possibility of manipulation
Match 10	KS Skënderbeu vs FK Partizani	22/12/2016	1:2 (1:1)	Albanian League	Not Escalated	Not Fixed

155. According to Starlizard, the matches that have been marked with 'significant' or 'fairly significant' possibility that the match had been manipulated were marked as such because with only the betting data and such minimal information Starlizard could obviously not reach a definitive conclusion that these matches were fixed. For ease of reference, UEFA has produced a document whereby the conclusions reached by the BFDS and Starlizard are put next to each other and provide a very clear picture of how Sportradar and Starlizard reached their conclusions.

(Exhibit 64)

156. UEFA submits that this anonymised assessment made by Starlizard, clearly confirms the reliability of the BFDS. Starlizard did not know the name of the teams taking part in these matches, the competition, nor the names of the participants in these matches, but still,

with just the betting data, and very minimal information at hand, it reached the conclusion that eight of the matches analysed were either fixed or suspicious, whereas two are not. Interestingly, the two matches that Starlizard found were not fixed are the same two matches that had not been escalated by the BFDS, which further confirms the reliability of the BFDS in correctly screening for suspicious matches by eliminating those that are not manipulated.

157. This analytical exercise, made on an anonymous basis, clearly shows that the BFDS works efficiently and reliably. The exercise also establishes that without any doubt all the matches of KS Skënderbeu that have been escalated for betting-related manipulation were indeed fixed matches, and that for a protracted period of time KS Skënderbeu repeatedly committed match-fixing offences. This is a proven fact that cannot be denied.

(ii) Explanation as to why no Skënderbeu matches have been escalated since mid-2016

158. It is noteworthy that the BFDS has not escalated any Skënderbeu match since 20 April 2016. More remarkably, none of the team's matches have been escalated for betting-related manipulation after the decision in CAS 2016/A/4650 in July 2016 up to this date.
159. The lack of escalated matches from Skënderbeu during the 2016/2017 season is explained by the BFDS in a detailed report of 23 January 2017. Among other factors considered by the BFDS are:

"• The removal of KS Skënderbeu from UEFA European competitions this season could be a contributing factor to the lower number of suspicious matches being recorded. Over the past three seasons, KS Skënderbeu have been involved in seven escalated fixtures in these competitions – representing over a quarter (27%) of their total number of suspicious matches in this timeframe. Therefore, **KS Skënderbeu's eradication has naturally nullified the contribution of these matches to their suspicious activity.**

• None of KS Skënderbeu's club friendlies played in January were offered for betting by Asian bookmakers, thereby removing another opportunity for manipulation. However, analysis of betting coverage does not indicate that in general bookmakers are taking an overly cautious approach to trading KS Skënderbeu matches.

• Albania, as a whole, has also experienced a decline in the number of escalated matches in their domestic competitions over recent years. This is shown by the fact that there have been six escalated matches in the current season,

whilst at the same point in the 2013/14 and 2014/15 season there had been 13 and 14 escalations respectively, so this season illustrates a decrease by more than 50%.”
[emphasis added]

(Exhibit 65)

160. The absence of escalated matches from Skënderbeu and the significant reduction of escalated matches observed in Albanian football in this 2016/2017 season, as described by the BFDS, clearly demonstrates how Skënderbeu was the team responsible for a large majority of domestic match-fixing in Albania over the past seasons. In few words, criminals noticed that UEFA was onto Skënderbeu, and so preferred to avoid using this club, at least for the time being.
161. In the above overview of Skënderbeu’s suspicious activities over the past three seasons, the BFDS also analyses how bookmakers have offered the club’s matches in the 2016/2017 seasons, in comparison to past years, and makes the following considerations:

*“KS Skënderbeu have seen the pre-match bookmaker coverage of their matches remain **largely unchanged** with an average of 33 bookmakers offering at least a pre-match 1X2 market for their 23 competitive matches played so far this season, compared to an average of 34 bookmakers last season over the same period. In addition, **the coverage offered by Asian bookmakers, including in the live markets, has also remained reasonably consistent**, with nine of the 23 competitive matches this season being offered by prominent Asian bookmakers, such as 188bet and SBObet. This compares to the 12 matches offered in the same timeframe in the 2015/16 season.*

*This level of coverage is reflected on a wider scale by the Kategoria Superiore and Kupa e Shqiperise in recent seasons, with a common trend being that **the coverage is often sporadic as some matches are not offered at all and others are afforded a vaster coverage, thus resulting in a low average across the competitions**.*

*Lastly, KS Skënderbeu have participated in six friendly matches since July which have also had mixed bookmaker coverage. In fact, **of the three played in January 2017, two were not offered at all and none were offered by Asian bookmakers**. However, the coverage depends on the stature of the teams involved and for these latest club friendlies (against Bursaspor, Fk Sumqayit and Qarabag FK) the betting coverage observed is not regarded as unusual.*

*To summarise, **from a betting coverage perspective there is no indication that bookmakers in general are adopting a more cautious approach to trading matches of KS Skënderbeu**.”*[emphasis added]

162. The above shows how, despite certain caution displayed by bookmakers (especially in Asia) regarding Skënderbeu friendlies, bookmakers have been offering the club's matches at a similar rate than in past years, which is likely due to Skënderbeu not having any suspicious matches after the CAS decision of July 2016.

C. Technical Appreciation of the Performance of Skënderbeu Players in UEFA club competition matches

163. Following another of the recommendations made by the Panel in *CAS 2016/A/4650 KS Skënderbeu v. UEFA* at para. 96, UEFA has asked an expert panel composed of three experienced international coaches (the "Expert Panel") to evaluate the performance of Skënderbeu and its players on the field of play. The Expert Panel comprises the following well-known international coaches:

- Michael Appleton
- Jacques Crevoisier
- Hans Leiterd

164. The Expert Panel submitted a report (the "Panel Report") with their observations.

(Exhibit 66)

165. To prepare its Panel Report, the Expert Panel has analyzed all twelve matches played by Skënderbeu during the 2015/2016 UEFA club competitions (6 UCL and 6 UEL matches). Also, in order to ensure the highest quality of analysis of the club's performance, the Expert Panel analyzed an additional 25 matches played by the club at the national level during the 2015/2016 and 2016/2017 season.

166. The objective of this Expert Report was to find team- and player-related patterns in regards of Skënderbeu's on-field performance. In order to achieve this, the following factors were analyzed by the Expert Panel:

- the general level of the team;
- the strengths and weaknesses;
- the general behaviour of the team offensively and defensively;
- the individual analysis of the players;
- the behaviour of the team in specific situations (set pieces, counter attacks, built attacks).

167. Taking the above factors into consideration, the Expert Panel analyzed a number of specific sporting incidents which occurred in the above-mentioned matches. Briefly, it looked into the following factors:

- the disposition of the team offensively and defensively;
- the distribution of the players on the pitch (i.e., who is doing what?);
- the position of the defensive line;
- the attitude when the ball is lost;
- the logic of the game of the team;
- the way Skënderbeu concedes goals;
- the way Skënderbeu scores goals.

168. Briefly, the methodology used by the Expert Panel when performing its evaluation of Skënderbeu can be summarized as follows:

- i. First, the Expert Panel defines the normal, general profile of individual players and the team throughout the analysed matches;
- ii. Second, the Expert Panel addressed individual and team-specific behavior, this being a very powerful and useful source to make the players' and team-specific actions on the pitch more understandable in relation to statistically generated data.

169. From its analysis of Skënderbeu's performance as a team, as well as of the individual performance of its players in the matches analyzed, the Expert Panel was able to find clear outliers when focusing on the UEFA competition matches escalated by the BFDS. As a general analysis of the team, the Expert Panel noted that the tempo of the team changed drastically from one half-time to the other in some matches, as well as on some occasions it seemed that players directly avoided to play²⁵:

However, it was very unusual to see how the tempo (speed of the game) could change from the first half to the second half and more obvious to the last minutes of some games, (e.g. Crusaders vs. Skënderbeu).

Psychologically some signs of resignation are perceptible after conceding a goal. But in some circumstances that we will mention, it was more than that, with the impression that some players were just stop playing.

²⁵ Report page 6.

170. The Expert Panel also noted that an unusual amount of shots on goal was conceded by Skënderbeu in two of those matches (against Crusaders and against Sporting de Portugal)²⁶:

Considering that Skënderbeu normally faces 4.59 shots on target against on average within 90', then facing 10 situations within the last 6 minutes of the game vs. Crusaders is a significant and completely unusual fact.

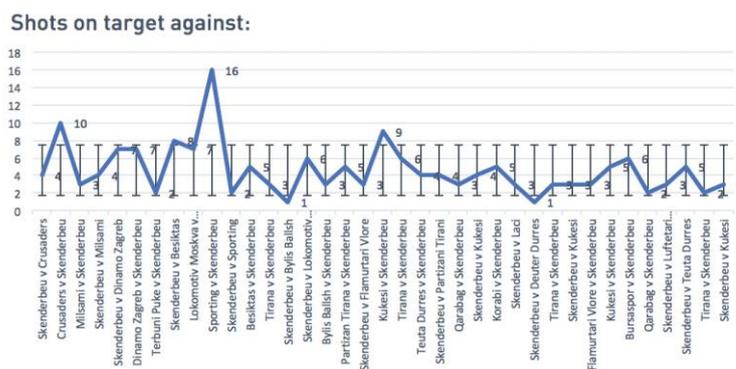
171. The Expert Panel then focused on the performance of individual players, finding that its goalkeeper Orges Shehi's performance was, in the escalated matches, at the very least unusual and clearly a factor in the opposition's increased creation of goal-scoring opportunities:

The Expert Panel can therefore confirm that Shehi's performance in terms of distribution quality was a clear outlier which he neither had shown before nor after and which was also not observed once in a 100 game sample size comparison from other competitions²⁷

172. This resulted in the conclusion by the Expert Panel that in the escalated matches the goalkeeper's low and unreasonable performance had a direct impact on the outcome of the match:

The Expert Panel can therefore confirm that Shehi's performance in terms of distribution quality was a clear outlier which he neither had shown before nor after and which was also not observed once in a 100 game sample size comparison from other competitions²⁸

173. Remarkably, the figures presented by the Expert Panel with regard to the performance of both the team and the goalkeeper are self-explanatory:



²⁶ Two clear outliers were found in the matches played against Crusaders and Sporting de Portugal that had been escalated by the BFDS: Skënderbeu conceded 10 and 16 shots on goal, respectively, well above the average 4,59 shots in other matches.

²⁷ Report, page 11.

²⁸ Report, page 12.

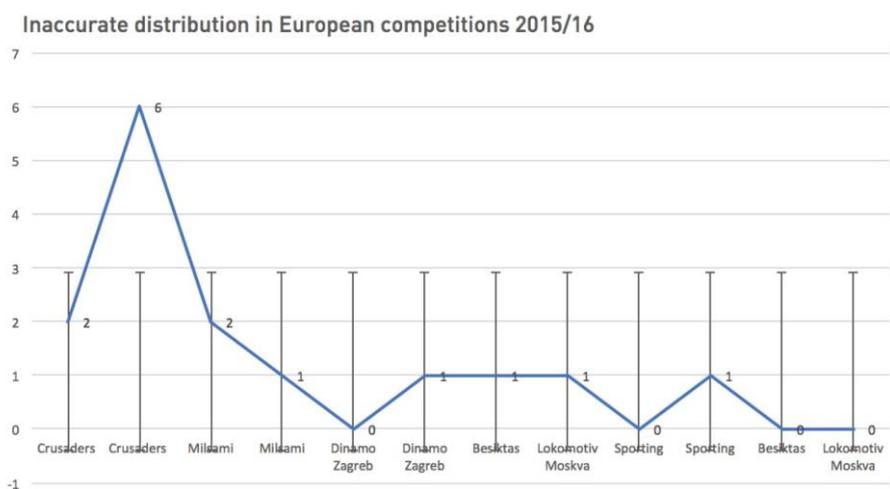


Fig 1 and 2 of the Expert Report

174. Finally, each of the members of the Expert Panel supports the above conclusions (the existence of objective outliers in Skënderbeu's performance) with individual observations. This is reflected, for instance, in the additional observations provided Michael Appleton and Jacques Crevoisier with regard to the Crusaders, Sporting Clube Portugal FC Lokomotiv Moskva and Dinamo matches:

Crusaders vs. Skënderbeu (3-2 FT)

Michael Appleton:

Skënderbeu's play from this point onwards was appalling. This was led by the Keeper who, despite the team having 10 men and being ahead on aggregate, suddenly sped up his distribution and kept kicking the ball short and to the wrong team. His distribution before this point was slower and when going long he had been sending the ball 10 yards into the opposition half. Both CB's (No. 5 and No. 32) were also embarrassing in their play and desire to throw goals.

Jaques Crevoisier:

So the last 10 minutes are just unbelievable, horrible, with so many goal-scoring opportunities and a team who definitely stopped playing with some players having a shameful attitude, absolutely not concerned by the game, not running, not defending, not even sometimes watching the game.

Sporting Clube de Portugal vs. Skënderbeu (5-1 FT)

Michael Appleton:

Although the team played as normal for most the game, they were 2nd best for nearly all of it while playing with 10 men. Skënderbeu had their poorest patch mid-way through the 2nd half which may be suspicious as they then conceded 3 goals in this time. During this period, they played a lot of poor offsides and also gave the ball away with a lot of poor passes in bad areas (however they did look to play out from the back all game). The No. 8 was one of the worst culprits for getting caught in possession but he was subbed off after 65 mins. For the last 10 mins after going 5 down Skënderbeu looked to defend better again and sat back restricting the opposition to long shots and getting chances of their own on the counter.

Jacques Crevoisier:

No fighting spirit, no work, no commitment, goals stupidly conceded, bad positioning of the defenders, no balance in the team, no coordination, that explains the score.

Skënderbeu vs. FC Lokomotiv Moskva (0-3 FT)

Michael Appleton:

The keeper had a few questionable moments in the game and flapped or spilt the ball a few times (see times below). He also seemed to dive out of the way for the 2nd goal of the game. However, for both the No. 5, and the GK, I think they would need to be watched over a large sample of games to guarantee their behaviour was not normal for them as the No. 5 did miss-kick the ball a number of times and get caught deep a few times in this game and the keeper did make a couple of good saves.

Jacques Crevoisier:

It was not a big gap between the two teams, but the goal conceded at the 17' was due to:

- *absence of close down*
- *no aggressiveness on the ball carrier*
- *bad positioning of the defence and midfielders (No. 30).*

GNK Dinamo vs. KF Skënderbeu (4-1 FT)

Michael Appleton:

In the first half Skënderbeu were the 2nd best team in the game and gave the ball away poorly a couple of times as they insisted on playing out from the back. There were not many potentially suspicious events although they conceded 2 poor goals which may be looked at as the left back was poor for both, and other players did not track runners at all. Skënderbeu started the 2nd half poorly as well and it was not until Dinamo had a red card that Skënderbeu started to properly dominate possession of the ball. However, while they had possession in this patch, and managed to create chances for themselves, they also managed to give away a lot of chances to a team with 10 men and managed to concede 2 more goals. The left back was again poor for the goals and the No. 5 and No. 30 had a few suspicious moments. It may be suspicious the times Skënderbeu gave the ball away in poor areas.

Jacques Crevoisier:

It was incredible how Skënderbeu could stupidly give the ball away in a lot of situations:

- *First goal 8': Cross from the left, nobody at the reception*
- *Beginning of the second half: absolutely no pressure at all on the ball carrier*
- *Lot of space in the central defence with a very poor display of all the defenders*
- *Last goal at the end: no reaction from No. 3 just starting to defend after the pass.*

175. In sum, the Expert Panel was able to conclude that both the individual and team performance of Skënderbeu and its players in the escalated UEFA competition matches were clearly an unexpected and unexplainable deviation from their usual level of performance in other matches.

176. The identification by the Expert Panel of inexplicably poor individual performances (particularly of goalkeeper Orges Shehi) also confirms that the manipulation of the matches is always carried out by persons on the field of play.

D. Match-fixing was confirmed by Skënderbeu representatives in front of CAS

177. More interestingly, within the scope of the 2016 CAS proceedings related to Skënderbeu's exclusion from the 16/17 UCL (CAS 2016/A/4650), the club itself has admitted that the BFDS proves that match-fixing was carried out by one or more of its players.
178. This is confirmed by the audio recording of the hearing in CAS 2016/A/4650 held before CAS in Lausanne on 4 July 2016. In the closing statement, Skënderbeu's representative explicitly confirmed that the BFDS indicate that some of the club's players fixed the matches, only contesting Skënderbeu's responsibility for such conduct. In this sense, the following relevant excerpts of Skënderbeu's closing statement in CAS are hereby transcribed:

(Exhibit 67)

As of 4:02:04 of the audio recording of the CAS hearing:

*"Furthermore what is flagged by the system leaves open the most important question when it comes to this particular case. **So, who can exclude or say that the anomaly is due to the fact that single players can be accused of determining the result?***

***In any case the specific responsibility of the club does not mean that they can be banned from taking part in the UEFA championship.** This is based on recent decision by the Appeals Body in the cases of Sampdoria and Lazio. These two Italian clubs had a situation whereby a player had been found guilty in terms of the disciplinary procedures...it was internal, domestic. But in this case the Appeals Body decided that this could not mean that they have been involved in any match-fixing. So much so that Sampdoria and Lazio did take part in UEFA competition.*

So, if from the disciplinary procedure would emerge that it was not the club but rather single players that were involved in match fixing, and in the meantime the club had not taken part in the UEFA competition, this is necessary how it is very important to wait for the disciplinary process to take place before taking a decision of this nature.

[emphasis added]

As of 4:19:42 of the audio recording of the CAS hearing:

Chairman of the Panel: *"Thank very much Mr. Zuccheretti, Just for my perception, You don't deny the observed exceptional betting patterns but you deny the involvement of the club. Is that correct?"*

Skënderbeu lawyer, Mr. Zuccheretti: "**What comes out of the system is something that cannot be denied...** There could be some explanation for it. For instance, **you could say that some of the players were involved but that would not in any way touch upon the responsibilities of the club.** The club would be in the clear."

[emphasis added]

179. It is clear from the above that Skënderbeu has acknowledged the validity and reliability of the BFDS escalation reports, by stating that their content "*cannot be denied*". Moreover, and more importantly, the club has accepted that some of its players were involved in the fixing of the matches escalated by the BFDS, while conveniently (but without any merit) trying to clear the club from any liability for its player's actions.
180. As it will be explained in the legal analysis in the final section of this report, the club's admission that its players were involved in fixing its matches can only lead to sanctions being levied on Skënderbeu, based on the principle of strict liability foreseen in the DR. Skënderbeu's wish that only its players but not Skënderbeu shall be sanctioned is first hopeless and second without any legal justification.

PART II – THE FIXED MATCHES BY PERSONS CONNECTED TO SKENDERBEU

A. Matches were fixed by Skënderbeu

181. While in general there is always a possibility that a match may have been fixed by both clubs involved, this is absolutely unrealistic in the present case of Skënderbeu in view of the evidence available and in particular the enormous amounts of matches that have been escalated in the BFDS with Skënderbeu being one of the teams.
182. It is therefore UEFA's position that Skënderbeu's matches were fixed without the involvement or participation of its opponents.

B. There cannot be a fixed match without the involvement of people within the club

183. As a matter of principle, it is obvious that a football match can only be fixed with the direct involvement of the persons on the football pitch, mainly the players and the referee, and to some extent the coach. This results from the fact that a match whose result has been

prearranged requires the participation of one or several individuals on the field for that result to be reached.

184. This conclusion has been reached in several analyses on match-fixing in sports, notably:

- In an article in the Australian and New Zealand Sports Law Journal published in November 2015, Nathan Deakes stated that:

*"The rules and regimes prohibiting match-fixing must, as the essential requirement, cover the competitors on the field of play, in view of the fact that they can most directly influence the outcome of the competition. They also need to encompass coaching staff and team management, who can direct what those competitors do on the field of play [...]."*²⁹

(Exhibit 68)

- This confirmed the findings of a study conducted by the *Institut de Relations Internationales et Strategiques*, together with the University of Salford, Manchester, Cabinet Praxes-Avocates and the University of Beijing in 2012, which stated that:

*"All cases of corruption in sport involve the falsification of a result or aspect of the game at a given moment. The athlete (or referee) is therefore the first cog in the wheel of corruption. It is their action (or conversely, their inertia) that is likely to falsify the course of an event and be the substance of the fraud."*³⁰

(Exhibit 69)

- A more recent study published in January 2015, by the Asser Institute's International Sports Law Center found *inter alia* the following:

"4.3 Conclusions

[...] Furthermore, the focus of the fraudulent betting activity reveals that for most of the likely manipulated matches the manipulation could realistically only have been achieved through coordinated action by several players and/or the involvement of the referee.

²⁹ Deakes N., Match-fixing in football: The epistemology of the Court of Arbitration for Sport Jurisprudence, Australian and New Zealand Sports Law Journal, 2014 9(1), p67.

³⁰ Boniface et al., Study: Sports betting and corruption, How to preserve the integrity of sport, IRIS et al., 2012, p15.

5.1 Main findings

[...] This manipulation can only be realistically achieved through coordinated action by several players and/or the involvement of the referee."

(Exhibit 70)

185. It is clear from the above literature that the total or partial manipulation of the result of a football match requires the involvement of either the players or the referee. However, in the case of Skënderbeu, match-fixing by the referees is excluded by the following facts:
- Over 50 Skënderbeu matches have been escalated by the BFDS over the past seven years, in domestic, international and friendly competitions involving referees from different backgrounds and nationalities. It is completely unrealistic to believe that all referees involved in those escalated matches would be responsible for the irregular betting patterns.
 - Many of the BFDS escalation reports directly refer to mistakes made by Skënderbeu's players, and none seem to mention any intentional mistake by the referees of those matches.
186. It follows that the match-fixing at Skënderbeu could only have been carried out on the pitch by its players. As it will be explained in the next section, UEFA's investigation into Skënderbeu allows to conclude that the scheme was orchestrated by Skënderbeu officials, mainly its president, and other key employees (coach, etc.) and connected persons, and finally carried out by its players as set out above.

C. UEFA's supplementary investigations on KS Skënderbeu

187. In addition to the above analysis of the matches escalated by the BFDS, UEFA has also investigated the individuals, organizations and entities linked to Skënderbeu and that have been involved with match-fixing operations at the club. Some of the most relevant findings and results of this further investigation are presented in this section.

(i) Background of recent Skënderbeu history

188. Before presenting the nature of Skënderbeu's match-fixing activities over the past seven years, it is important to briefly summarize the history of the club's hierarchy and the internal and external football, political and criminal links associated to it:

- In winter of the 2009/2010 season, Skënderbeu was at the bottom of the Albanian Superleague and very realistically faced the possibility of relegation. At that time, a new president was appointed: **Agim Zeqo**, who was then CEO of Red Bull Albania.
- A new 16-member board was also elected at that time, and several new donors became linked to the club, including some of Albania's most successful businessmen. These donors included journalist Bledi Fevziu, former Minister of Finance, **Ridvan Bode**, and the prefect of Korçë, Niko Peleshi.
- Before the 2010/2011 season, Skënderbeu made many changes to its first team, bringing in several new players were brought in, including many Albanian internationals such as Orges Shehi, Ditmar Bicaj, Endrit Vrapit, Jetmir Sefa and Bledi Shkëmbi, who was appointed captain.
- In 2011, the club hired **Mirel Josa** as head coach, as well as more footballers.
- More relevant for this investigation and what will be set out below, **Ardjan Takaj** became Skënderbeu's president in 2012, and has remained in that position from that moment on.

189. Of note, Skënderbeu has been monitored by the BFDS since the beginning of the 2009/2010 season, with the first escalated match attributing irregular betting to the club appearing in November 2010. All matches escalated by the BFDS have occurred after the significant regime change at the club in the board, coaching staff and squad, as described above.

(ii) Suspected individuals involved in Skënderbeu's manipulation of matches

a) Introduction

190. It is submitted that Skënderbeu is involved in the manipulation of a great amount of matches in European, domestic and friendly competitions since 2010. The investigation carried out by UEFA covering that period suggests that match-fixing has been directed and operated in particular by:

- Ridvan Bode (financial backer, former Minister of Finance),
- Agim Zeqo (former club president), and,
- Ardjan Takaj (club president).

b) Ridvan Bode (financial backer)

191. Ridvan Bode was the former Albanian Minister of Finance, and became a donor to the club after the above-referenced hierarchical changes took place during 2009/10 season.
192. He continued to be an influential person in Skënderbeu and, subsequently, had influence over personnel and match-fixing at the club.
193. While he was the Albanian Minister of Finance, he piloted the privatization of the lucrative Albanian state lottery. In doing so, Mr. Bode has reportedly deliberately attributed a much lower value to the state assets, thus providing the possibility to sell the Albanian state lottery to an Austrian private group. Unsurprisingly, there are very close links between Mr. Bode and such Austrian investors. Mr. Bode was also accused in 2013 of falsely declaring his wealth and of money laundering.³¹
194. After a match between Skënderbeu and Dinamo Tirana in 2011, the latter's coach Luis Manuel Blanco said that he and his club were threatened by Ridvan Bode to lose that match³². Mr. Blanco revealed to have been addressed by Mr. Bode as follows:

"If you ruin the holiday, I will destroy you. He asked me when I returned in the second half, our team had to lose. I could not believe my eyes. It was horrible."

195. The BFDS has escalated three Skënderbeu matches, on 13/11/2010, 25/02/2011 and 15/04/2011, played against Dinamo Tirana. As already explained in the above description of these matches the BFDS concluded that the first two were *"highly suspicious and most likely manipulated for betting purposes"*, while in the third match there was *"overwhelming evidence that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result."*

(Exhibits 15, 22 and 22)

196. Ridvan Bode reportedly also has a close relationship to other clubs in Albania. He is a good friend of the main donor of KS Shkumbini, Dashnor Sula. Both of them are members of

³¹ <http://www.sofoot.com/mais-qui-es-tu-skenderbeu-korce-205412.html>

³² <http://www.peshkupauje.com/node/35007>

(English translation: <https://translate.google.com/translate?sl=sq&tl=en&js=y&prev=t&hl=en&ie=UTF-8&u=http%3A%2F%2Fwww.peshkupauje.com%2Fnode%2F35007&edit-text=>)

Albanian Parliament and of the Democratic Party³³. As a matter of fact, and unsurprisingly, the BFDS escalated two matches between Skënderbeu and KS Shkumbini, played on 12/12/2010 and 08/12/2012, as fixed for betting purposes and won by Skënderbeu. The BFDS concluded that both of these matches were *"highly suspicious and most likely manipulated for betting purposes"*.

(Exhibits 17 and 34)

197. Finally, during a session in the Albanian Parliament held on 21 December 2015, socialist party MP Erjon Brace publicly accused Mr. Bode of placing bets and manipulating matches. He stated:³⁴

"In this parliament is a person [referring to Ridvan Bode] that knows to place bets very well, even he knows how to manage a match, but I'm not going further to this history."

198. It can only be concluded from the above that Mr. Bode possesses the power, the connections and the knowledge to influence the results of Skënderbeu's matches, and that he has done so over the years. It is indeed shocking to see a person in a position of public power attempt to exert undue influence on the result of a match by pressuring an opponent's coach. It comes as no surprise that the BFDS has escalated several Skënderbeu with a high degree of likelihood of manipulation involving clubs that have been either under pressure from Mr. Bode (Dinamo Tirana) or controlled by his friends and colleagues (KS Shkumbini). This, along with his now notorious public perception as a match-fixer simply proves that he is an integral part of Skënderbeu scheme.

c) Current and former Skënderbeu presidents: Ardjan Takaj and Agim Zeqo

199. UEFA's further investigation into Skënderbeu and its current president has shown the influential role of Ardjan Takaj in Skënderbeu's illegal activities, as he has connections with all levels of match-fixing including betting companies and agents, as well as wider government and society.
200. As has been explained above, Ardjan Takaj officially succeeded Agim Zeqo as President of Skënderbeu in 2012.
201. It is noteworthy that both before and after the change in power, Ardjan Takaj and Agim Zeqo have maintained close ties. Ardjan Takaj has publicly confirmed that they have been longtime friends, and they even have common business interests, such as the company

³³ See <http://www.pd.al/keshilli-kombetar/> for the members of the Democratic Party in the Albanian National Council.

³⁴ Quotation translated from original article available at: <http://www.gazetatema.net/web/2015/12/21/debatet-ne-kuvend-behen-akuza-edhe-per-shitje-ndeshjesh/>

Media 99, in which they are both shareholders/partners³⁵. Since Agim Zeqo remained as Skënderbeu's vice-president in 2012, he clearly maintained at least awareness of the figures and mechanisms involved Skënderbeu's match-fixing activities.

202. As it has been described earlier, part of Skënderbeu's match-fixing activity over the past few years has included friendly matches played abroad. These matches were organized by the club and, mainly, its president Mr. Takaj. For instance, in January 2013, Skënderbeu travelled to Portugal for a mid-season training camp, playing two friendly matches that were escalated by the BFDS, whose conclusions are recalled below:

- Against Danish team Silkeborg IF (24/01/2013): very suspicious live betting was found for a Skënderbeu defeat by at least two goals (Skënderbeu lost the match by two goals, 2-4). This match was played in the Atlantic Cup, a mid-season friendly tournament organized by Sporting Events Limited³⁶. The BFDS's conclusion is recalled: *"To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes."*

(Exhibit 56)

- Against Austrian team SV Mattersburg (31/01/2013): very suspicious live betting was found for a minimum four-goal KS Skënderbeu defeat (they lost the match by exactly four goals, 0-4), in a performance which was described as 'theatrical' by Albanian newspapers. The BFDS's conclusion is recalled: *"To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes."*

(Exhibit 57)

203. Also, before the start of the 2013/14 season, president Ardjan Takaj arranged a pre-season training camp for Skënderbeu that took place in Austria, where they played five friendly matches. One of these matches, played against FC Energie Cottbus (04/07/2013), was escalated by the BFDS following highly suspicious live betting for a Skënderbeu defeat by at least four goals (they lost by exactly four goals, 4-0). The BFDS's conclusion is recalled: *"To conclude, the betting patterns combined with the other elements described in this report show clear indications that bettors had prior knowledge of the result. This match is considered highly suspicious and most likely manipulated for betting purposes."*

(Exhibit 58)

³⁵ <http://open.data.al/en/corporates/view/id/K21817006K>

³⁶ <http://livinginthesun.info/portugal/international-football-teams-return-to-algarve-for-atlantic-cu/>

204. There are therefore no doubts that Skënderbeu has deliberately targeted friendly matches organized by its president Ardjan Takaj to manipulate matches and generate illegal betting profits.
205. Mr. Takaj's influence is also evidenced by his personal connections to several other clubs in Albania, especially with his hometown and childhood favorite KF Tirana. It has been reported that Ardjan Takaj will invest in KF Tirana after he leaves Skënderbeu, and he has even publically expressed a desire to lead that club.³⁷
206. It is recalled that the match between KF Tirana and Skënderbeu of 21 September 2015, was escalated as manipulated for betting purposes by the BFDS, who concluded: "*In summary, there is **overwhelming evidence** that this match was manipulated for betting purposes in a precise, orchestrated manner, with corrupt betting profits generated as a result.*" [emphasis added]

(Exhibit 51)

d) Connection between Ardjan Takaj and former Skënderbeu coach Mirel Josa

207. Another relevant aspect of Skënderbeu's match-fixing scheme, is the close personal relation between its president and the former head coach³⁸, Mirel Josa, who have known each other since their youth.
208. Notably, prior to his appointment as Skënderbeu's head coach, Mirel Josa had already been involved in suspicious activity related to match-fixing when he was the coach of KS Vllaznia. Indeed, according to Panorama Sport, he was interrogated by the Prosecutor of Krujë for fixing the match between KS Kastrioti Krujë and KS Vllaznia played on 02/10/2011, which finished at 2-1. The BFDS submitted a report for that particular match, concluding that it had been manipulated for betting purposes.

(Exhibit 71)

³⁷ <http://www.panorama.com.al/sport/takaj-josen-e-kam-shok-femijerie-ja-flirti-me-tiranen/>

English translation:

<https://translate.google.com/translate?hl=en&sl=sq&tl=en&u=http%3A%2F%2Fwww.panorama.com.al%2Fsport%2Ftakaj-josen-e-kam-shok-femijerie-ja-flirti-me-tiranen%2F>

³⁸ Mr. Josa was head coach of Skënderbeu until the end of the 2015/2016 season.

209. Then, when he was coach of Skënderbeu, the BFDS escalated the match played against his former club, KS Vllaznia, on 24 August 2012, concluding that the match was suspicious and possibly manipulated for betting purposes.³⁹

(Exhibit 32)

210. Mirel Josa has also been the target of criticism related to match-fixing from Skënderbeu fans, who have complained of his tactical actions which often brought negative effects to the team. For example, in the friendly match against Silkeborg IF on 24/01/2013, Mirel Josa made eight changes in the second half while they were leading by 2-1 at halftime, and defender Marko Radas was one of the players that was brought in. Skënderbeu conceded three goals in the second half and the match finished 2-4, as was expected by the persons who bet large sums of money as detected in the BFDS.

211. Also, Skënderbeu fans on some social networks have accused its executives of having manipulated this match, saying that they purposefully allowed Silkeborg IF to score in the second half. In view of the significant impact that the substitutions made by Mr. Josa in the second half of the match, it is highly likely, if not certain, that he was at the very least aware of the prearranged match result consisting in a Skënderbeu defeat by at least two goals. It is also highly likely that the senior management, probably president Ardjan Takaj, directed the coach to make changes to lose this match. Significantly, the strong betting support for Skënderbeu to lose and for more than six goals to be scored was ultimately successful.

(Exhibit 56)

212. These reactions and comments from Skënderbeu supporters have been reported by the BFDS, for example in the referenced report of the Silkeborg IF (Exhibit 56) played on 24/01/2013.

e) Connection between Ardjan Takaj and Skënderbeu players

213. Ardjan Takaj has reportedly known Skënderbeu goalkeeper Orges Shehi since he was 14 years-old. Orges Shehi is reportedly the most trusted player of the president and spends a lot of time with him.

³⁹ This is not the first time that a Skënderbeu coach is involved in suspicious matches played against a former team. Previous Skënderbeu Coach Shkelqim Muca has been involved in seven suspicious matches highlighted by the BFDS:

- As manager of KS Dinamo Tirana, he oversaw two highly suspicious matches against KF Laçi on 30/04/2010 and KF Tirana on 14/05/2010.
- Then, the match between Skënderbeu and his former club, KS Dinamo Tirana on 13/11/2010 is also regarded as highly suspicious and most likely manipulated.

214. A number of BFDS reports mention Mr. Shehi, including the one for the match played against NK Dinamo Zagreb (25/08/2015) in the 15/16 UEL.
215. Ardjan Takaj has also known former Skënderbeu defender Renato Arapi⁴⁰ as a youth player with the team FC Tropikal U17⁴¹. Mr. Arapi is also mentioned in several BFDS reports, notably in the one for the Crusaders FC match (21/06/2015) in the 15/16 UCL, in which he was sent off with a direct red card for an off-the-ball incident.
216. Ardjan Takaj has reportedly known former Skënderbeu player and captain Bledi Shkëmbi⁴² since he was ten years old, as they have very close family ties. It is reported that it was Shkëmbi's idea for Takaj to become a donor of Skënderbeu. It is notable that Mr. Shkëmbi likes the Facebook page 'Sure Match Predictions'. He also has very close ties to Illir Vrenozhi, an employee of the betting company Baste-Live, as shall be explained further on.
217. Moreover, Ardjan Takaj also has very close ties with Skënderbeu defender Tefik Osmani, who is reportedly known for his close links with many club leaders and players in Albania.
218. Ardjan Takaj used his personal and often long-standing relationships with the players and coach to control and direct the sporting element of the match-fixing fraud mechanism. From this and the BFDS reports of Skënderbeu matches, it is established that all of the above players have been directly responsible for and personally profited from the Skënderbeu match-fixing. Of note, it is also highly likely other players currently at Skënderbeu also have knowledge and were involved in match-fixing.
219. A summary of Skënderbeu players' and coaches' suspicious match information is provided in the table below:

⁴⁰ Mr. Arapi played for Skënderbeu from 2010 until 2016.

⁴¹ Ardjan Takaj has confirmed

⁴² Mr. Shkëmbi retired as a player at the end of the 2015/2016 season.

Name	Position	DOB	# of suspicious matches	Nationality	Prior Fraud History	Suspicious Match Activity
Renato Arapi	Defender	28/08/86	38	Albania	KS Besa (09-10), KS Shkumbini (10-11)	Poor performance against NK Dinamo Zagreb (25/08/15) Red Card against Crusaders FC (21/07/15) Poor performance against FC Shakhtar Donetsk (25/06/14)
Orges Shehi	Goalkeeper	25/09/77	46	Albania	KS Besa (09-10)	Poor performance against Silkeborg IF (24/01/13) Poor performance against Apoel FC (20/07/11)
Tefik Osmani	Defender	08/06/85	26	Albania	KS Teuta (11-12, 13-14) KS Vllaznia (12-13) KF Tirana (08-11)	Conceded a late penalty against FK Partizani (11/09/14) Poor performance against FC Shakhtar Donetsk (25/06/14) Poor performance for first goal conceded against FC Dynamo Kiev (06/07/15)
Bledi Shkembri	Forward	13/08/79	37	Albania	KS Besa (09-10)	Missed penalty against FC Shakhtar Donetsk (25/06/14) Poor defending against SV Mattersburg (31/03/13) Missed Penalty against KS Vllaznia (07/03/11) Suspicious performance against KS Dinamo Tirana (25/02/11)
Sabien Lilaj	Midfielder	18/02/89	25	Albania	KF Tirana (08-11)	N/A
Marko Radas	Defender	26/10/83	32	Croatia	N/A	N/A
Mirel Josa	Coach	01/06/63	32	Albania	KS Vllaznia (10-11)	N/A

f) Connection between Ardjan Takaj and betting companies

220. Ardjan Takaj has a substantial background and current links to betting companies. This is clearly a factor and that has allowed him to acquire the knowledge and contacts to profit from match-fixing through his club.
221. The summary of the Albanian betting and Skënderbeu sponsorship landscape provided in the following paragraphs highlights the links between Skënderbeu and companies that are involved in betting.

i) EuroBest Sh.a

222. Ardjan Takaj was the founder of EuroBest Sh.a (with registered domain www.eurobest.net), an Albanian betting company started in 2000, which has now declared bankruptcy. A number of tax issues surrounded the company which operated under

registration number K31511116I.⁴³ An Elmaz Takaj is listed as far back as at least May 2010 as principle name according to tax liability documents.

(Exhibit 72)

223. Ardjan Takaj is still to this date a shareholder in Eurobest, as well as in another betting company, Star Bet.⁴⁴ In fact, on 10 February 2015, Eurobest's web registration was updated for one year, with the registrant being Mr. Ardian Takaj.⁴⁵

(Exhibits 73 and 74)

ii) *Star Bet*

224. In 2009, Ardjan Takaj also became a shareholder of Star Bet. This company was created as a merger of several companies. The main shareholder continues to be Gazmend Demi, with 51,33% of the shares. Of note, Gazmend Demi is the president of Albanian Superleague club Partizani.

(Exhibit 75)

225. A further search of phone number selector + 355 692022576, identified in setting up Eurobest Sh.a, reveals that the same telephone number is also associated to several other companies such as:

- **2AT Construction Sh.p.k**

Rruga Deshmoret e 4 Shkurtit - Rruga Deshmoret e 4 Shkurtit, Sky Tower - 1000 Tirane, + 355 692022576.

Of note, "Ardjan Petrit Takaj" was listed as Administrator for 2AT Construction Sh.pk under VAT ID number K72326029Q until at least 22/07/2016.

Mr. Takaj is in fact still a shareholder of this company, owning 50%.

(Exhibit 72)

⁴³ <https://es.scribd.com/doc/244892490/Lista-e-subjekteve-te-borxhit-tatimor-18-pdf#scribd> (#433 on the list)

⁴⁴ Ownership of companies by an individual can easily be searched on the Albanian National Registration Center's website: <http://www.qkr.gov.al/search/search-in-trade-register/search-for-subject/>.

⁴⁵ The same registration e-mail was used in the original registration of Eurobest in 2000 and in the extension of the registration in 2015: Ardjan Takaj's. However, the domain was transferred to a Chinese company in the second half of 2015.

- **Tropikal Resort 'Durrës'**

This company is listed as an official sponsor of Skënderbeu and is owned by Ardjan Takaj. The ownership and status of the land at the resort has been investigated, as well as the falsification of documents and non-payment of loans.⁴⁶

Mr. Takaj is currently listed as administrator of Tropikal for the period 27/07/2011-27/07/2021, and owns 80% of Tropikal through another company that he owns called ROGER.

The registered online domain of www.tropikalresort.com was registered by ilir.dokle@trinissoft.com in 2007. This relates to Ilir Dokle, an individual involved in betting organisation I.T.S.G.A (a.k.a, "Baste-Live"), who sponsor Skënderbeu and are almost certainly protagonists in betting in Skënderbeu match-fixing operations. More details on these companies are provided further below. Mr. Dokle is also known to use the e-mail idokle@yahoo.com.

(Exhibit 76)

iii) Top-Bast

226. Top-Bast is an Albanian betting company and a sponsor of Skënderbeu. It is fully owned by Ermal Barjami, and has VAT ID K72009007H and 1117 licensed shops in Albania.⁴⁷

227. Website address analysis shows that there are at least 41 betting website domains registered in the same IP address as Top-Bast sites. It is almost certain that these sites are associated with Top-Bast.

(Exhibit 77)

228. Open Source analysis of a sample of these websites indicates traffic numbers to some of these sites are very low such as <http://live4.bastbast.com/> and <http://live4.maxlloto.com/>. It is likely that some of these sites listed in Exhibit 77 have been set up as sites where only invited users can bet and are only used by those who are given the website address and login details.

⁴⁶ <http://www.corrierepl.it/2015/08/26/scandalo-intesa-s-paolo-truffa-da-2-mln-e/>

English translation: <https://translate.google.com/translate?sl=it&tl=en&js=y&prev=t&hl=en&ie=UTF-8&u=http%3A%2F%2Fwww.corrierepl.it%2F2015%2F08%2F26%2Fscandalo-intesa-s-paolo-truffa-da-2-mln-e%2F&edit-text=>

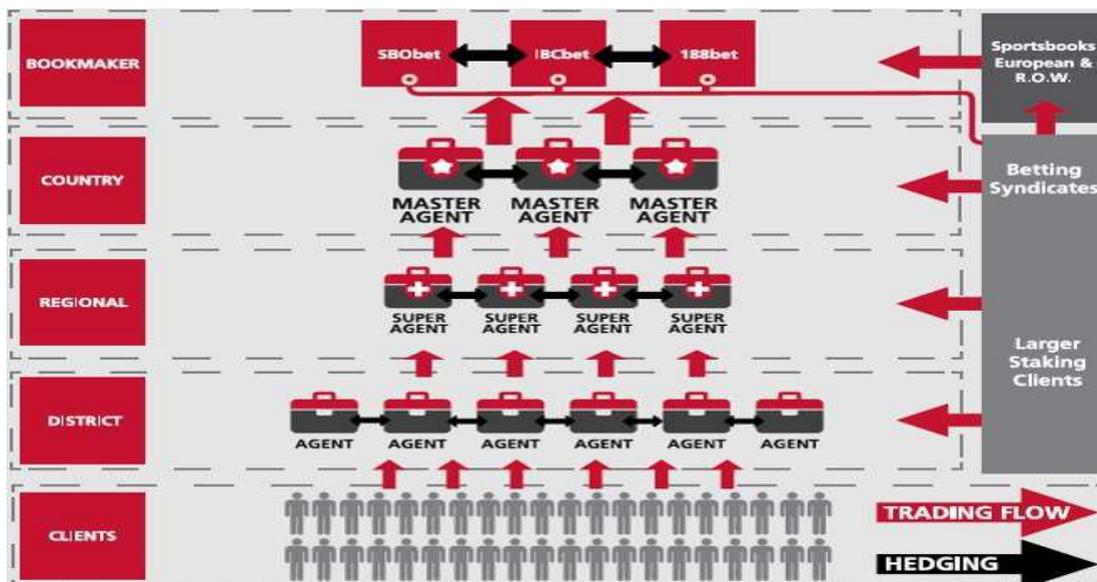
⁴⁷ <http://amlf.gov.al/index.php/en/component/content/article/14-sample-data-articles/102-top-bast>

229. The company has three accounts on Facebook⁴⁸. One of these is classified as a sports page and offers match predictions, stating that *"this site has an obligation to provide 3 match winning and safe, 100%"*.

iv) *SBObet*

230. Top-Bast is most likely i a "front" for the Asian bookmaker SBObet. Bets placed online with Top-Bast can be channeled into the Asian betting market through SBObet, thus providing larger turnovers.

231. The use of fronts and betting agents to place bets on larger betting markets is described in the figure below:



232. In 33 of the 53⁴⁹ matches UEFA has identified that SBObet has been the first bookmaker to move their odds on the escalated match. This indicates that those who have access to knowledge of the fix and are able to place bets are doing so primarily through SBObet. Of note, another company called 188bet was the one to 'move first' in 18 of the remaining 21 escalated matches, though in 9 of these matches SBObet were not offering live betting.

⁴⁸ <https://www.facebook.com/TOP-BAST-463440443800584/>, <https://www.facebook.com/topbast.sha/about>, <https://www.facebook.com/topbast13>

⁴⁹ As of 20/04/2016.

233. A Google Trends search of SBObet shows how this company has a very large presence in Albania⁵⁰ even when being an Asian bookmaker. In fact, Albania seems to be the only European state in the Top-10 list of countries that searched for SBObet (the remaining countries on the list are Asian). A search of the countries where users have accessed the SBObet website (www.sbobet.com) also places Albania as the first non-Asian country.⁵¹
234. A more specific study of the cities within Albania that searched for SBObet on Google shows that Korça (a.k.a Korçë, where Skënderbeu is based) is by far the place where most of these searches originate.⁵²
235. It is significant that an Asian bookmaker is so frequently searched for online in Albania, and in the city of Skënderbeu in particular. The only logical explanation for this is that persons in Albania can easily channel their bets to SBObet, which allows for greater amounts to be wagered and won.

v) *Baste-Live*

236. Aside from Top-Bast, the company I.T.S.G.A is also identified as being a sponsor of Skënderbeu, through the name **Baste-Live**.⁵³
237. I.T.S.G.A registration details indicate it has been registered since 2003. The company (VAT number K51313001H) mainly trades under the name of **Eccobet** www.eccobet.com since 2005. This website was registered by Ilir Dokle with e-mail idokle@yahoo.com.
- (Exhibit 78)
238. Shareholders as of 2015 listed for the company indicate Arben Goshi 25%, **Ilir Dokle** 25%, **Gramos Murataj** 20%, **Besnik Murataj** 15% and Kujtim Llupa 15%.
- (Exhibit 79)
239. The now-retired website Bast-live.com was registered by Ilir Dokle in October 2013 under registered phone +355 692085712, e-mail idokle@yahoo.com and IP 46.183.120.26.
- (Exhibit 80)

⁵⁰ <https://www.google.com/trends/explore#q=sbobet>

⁵¹ <http://urlm.co/www.sbobet.com#visitors>

⁵² <https://www.google.com/trends/explore#q=sbobet&geo=AL>

⁵³ https://en.wikipedia.org/wiki/KF_Sk%C3%ABnderbeu_Kor%C3%A7%C3%AB#Sponsorship

240. A search of connected domains to bast-live.com also confirms that the email addresses of Ilir Dokle (idokle@yahoo.com and ilir.dokle@trinissoft.com) were also used to register the domain www.tropikalresort.com. This is the domain associated with the resort owned by Ardjan Takaj as described earlier. Ilir Dokle very likely also has interests in Tropikal Resort. It is also almost certain that Ilir Dokle is very well known to Ardjan Takaj and a business associate of him.

(Exhibit 81)

241. A further analysis of the e-mail and domains registered by I.T.S.G.A and Ilir Dokle (through his several mentioned e-mails) indicate that at least 27 associated betting website domains were listed as far as 5 August 2016. New betting related domains were regularly being set up as recently as August 2016 on several different IP addresses.

(Exhibit 82)

242. Similarly to Top-Bast, Open Source analysis of a sample of I.T.S.G.A websites indicate visitor numbers to some of these sites are very low, e.g. <http://superbetal.com/login.aspx> and <http://tiranabet.org/login.aspx>. It is likely these sites are only used by those who are given the website address. The start screen in some cases is a login with language options of English, Albanian and Italian.

243. As mentioned earlier, it is noteworthy that brothers Gramos and Besnik Murataj are shareholders of Skënderbeu's sponsor I.T.S.G.A. (i.e., Baste-Live) and own 35% of this company. Their combined ownership gives them great influence over the company and proves that they are at least associates of Ardjan Takaj.

244. In 2004, Gramos Murataj was found guilty by a court in Lecce, Italy, of narcotics trafficking and association in organized crime, and he was sentenced to four years and six months of imprisonment. He fled detention in 2013 when extradition to Italy was granted.⁵⁴ His brother Besnik has also been investigated, in 2011, for among other things financial fraud in relation to the creation of a 'shell' company exporting from Albania.⁵⁵

245. The proven links between Gramos Murataj and Italian organized crime, along with the presence of Italian login options on the Baste-Live subsites, indicate that it is highly likely that the Murataj brothers are actively involved in Skënderbeu's match-fixing scheme, and it is realistic that Italian organized crime too.

⁵⁴ <http://www.balkaninsight.com/en/article/crime-bosses-find-albania-a-safe-haven>

⁵⁵ <http://www.24ore.com/tag/besnik-murataj/>

English translation: <https://translate.google.com/translate?sl=sq&tl=en&js=y&prev=t&hl=en&ie=UTF-8&u=http%3A%2F%2Fwww.24ore.com%2Ftag%2Fbesnik-murataj%2F&edit-text=>

246. Another person of interest who used to work for Baste-Live is Ilir Vrenozi. Up to June 2016, his Facebook profile⁵⁶ stated that he had been employed by Baste Live since 1 March 2011. He is connected on Facebook with a number of Skënderbeu personnel including president **Ardjan Takaj** and players Bledi Shkembii, Sabien Lilaj, and Gerhard Progni among others on. He also has photos with Ardjan Takaj and several Skënderbeu players on other social networks such as https://instagram.com/ilir_vrenozi/⁵⁷.

(Exhibit 83)

247. It is submitted that Ilir Vrenozi has longstanding, current and direct access to Ardjan Takaj and the Skënderbeu players and staff, often posting photos of himself with them as recently as 27/04/2016 with former team player and captain Bledi Shkembii.

248. Mr. Vrenozi is no stranger to betting on football, and he often posts photos online of betting slips, and pre-match and live odds for Skënderbeu and other matches.⁵⁸

(Exhibit 84)

249. Ilir Vrenozi is also connected to other persons linked to sports betting, such as Fatjon Greva, a manager at Top-Bast⁵⁹ with whom he was Facebook 'friends'.

250. Another person of interest is Armando Mando Janko⁶⁰, who is a Facebook connection ('friend') of Baste-Live employee Ilir Vrenozi and Skënderbeu players Orges Shehi and Bledi Shkembii. This individual's Facebook profile states that he is/was employed at Skënderbeu. It also indicates that he likes the Facebook community 'Match-fixing Germany Mafia'.⁶¹

251. Ilir Vrenozi is very likely to at least have knowledge of Skënderbeu's match-fixing arrangements. He has been employed by the betting company Baste-Live for many years, has direct access to the club's players, president and administration, as well as additional links to other betting companies such as Top-Bast, and experience in betting on football matches. All of this indicates that he is most likely involved as a link between the sporting fix and the betting fraud.

⁵⁶ <https://www.facebook.com/ub3rc04st> (formerly: <https://www.facebook.com/ilir.vrenozi>)

⁵⁷ Formerly: https://instagram.com/ilir_vrenozi/

⁵⁸ See the following Instagram posts by Mr. Vrenozi as an example:

- <https://www.instagram.com/p/BPihPZchAZF/>
- <https://www.instagram.com/p/BOKCND3haLF/>
- <https://www.instagram.com/p/BOKaklxh-cS/>
- <https://www.instagram.com/p/BNRtkg2h3zg/>

⁵⁹ <https://www.facebook.com/fatjongrev/friends>

⁶⁰ <https://www.facebook.com/armandomando.janko.9>

⁶¹ https://www.facebook.com/pages/Match-Fixing-Germany-Mafia/438922959542984?sk=info&tab=page_info

252. It is also submitted that Armando Mando Janko has at least knowledge of match-fixing due to his employment at Skënderbeu and links to the players Orges Shehi and Bledi Shkëmbi and Mr. Vrenozi.

vi) Super Bast

253. In addition to Top-Bast and Baste-Live, the betting company Super Bast became a sponsor of Skënderbeu during the 2015/2016 season and advertised its brand at the club's venue. This betting company entered into the market in recent years and has a wide activity all over Albania.

254. In fact, Super-Bast, has constantly appeared in the club's grounds and in its coach's press conferences during Skënderbeu matches in the 2015/2016 and 2016/2017 seasons.⁶²

(Exhibit 85)

255. Super Bast SH.A is owned by a Gasper Kacinari⁶³ and is registered since December 2012 as a Kosovan company that also operates in Albania.

256. The company's website <http://www.superbast.com/> was registered by a Renis Cerga for the first time in 2011 and updated in 2016.

257. The site's IP address is 46.183.121.82, and is therefore closely associated with that of Baste-Live (46.183.120.26) that had been registered by Baste-Live shareholder Ilir Dokle. These domains both register their IP at MC Networking in Tirana.

258. The close association of prime site IP addresses of Superbast.com and Baste-Live.com shows that there are shared associations between Super Bast and Baste-Live, possibly through Ilir Dokle. Super Bast sites are most likely also being used to conduct betting related to Skënderbeu's match-fixing.

259. A combination of Top-Bast, Baste-Live and Super Bast is used as a front to channel betting through Asian bookmakers, particularly SBObet. These bets are often associated to the irregular patterns found by the BFDS before and during Skënderbeu's fixed matches. The close relationships between the club, its betting partners and the evidence of how the betting manipulation takes place, confirms how Skënderbeu's president, coaching and other staff, players and betting partners profit from match-fixing.

⁶² For example, last season, at the Skënderbeu vs. Milsami match during the 15/16 UCL:

<https://www.youtube.com/watch?v=Y5-5ZiM6Etk> and https://www.youtube.com/watch?v=JKnm_I8BFEM

⁶³ <https://www.linkedin.com/pub/gasper-kacinari/81/b0a/688>, <https://instagram.com/gasperkacinari/>

260. The further investigation carried out by UEFA has allowed to establish strong and direct individual links of Skënderbeu's officials to the club's personnel, as well as to several betting companies, including some whose shareholders have been involved in criminal organizations. When considered with the already overwhelming evidence in the more than 50 BFDS escalation reports over the past seven years, the club's match-fixing activities are more than evident.

D. The National and International Perception on KS Skënderbeu

261. All of the actions carried out by Skënderbeu over the years have not gone unnoticed by the national and international football community, and the public outcry over the club's match-fixing has intensified in the last years. Indeed, opponent players, Skënderbeu and rival supporters, betting operators and journalists, all have publicly complained of the irregularities in Skënderbeu's performance on and off the field.

262. It is notorious that Skënderbeu has been fixing football matches in Albania and in Europe since at least 2010.

263. The following examples are self-explanatory:

(i) Opponent players:

264. As already mentioned, Sean O'Neill, the goalkeeper of Crusaders FC, Skënderbeu's first opponent in the 15/16 UCL, stated his conviction on Twitter that the match had been fixed:

"if there is not a UEFA investigation into our game tonight, then there is something wrong [...] 3.5 goals, was a joke. Last ten minutes, I have never seen football like it".

(Exhibit 8)

265. The above tweet from Crusaders FC's goalkeeper, made on the same evening of that match, clearly refers to Skënderbeu's fixing of the result of that game. It is remarkable to see a rival player publicly denounce that a match he had just played in had been fixed for betting purposes, even when his team had won the match in question

266. It is remarkable to see a footballer publicly assert that a match he had just played, and that his team had won, had been fixed for betting purposes by his opponent (Skënderbeu).

267. It was even obvious to Crusaders FC supporters that there was something wrong with Skënderbeu's actions on the pitch during that match. Stuart Briers, a fan of Crusaders FC, doubted the regularity of the game. He noted that:

*"the suspense was finished. But Skenderbeu stopped playing. In the last five minutes Crusaders had a goal disallowed for off-side, hit two times the post and once the crossbar and scored two goals!"*⁶⁴

268. That Crusaders FC supporter even commented on the match result on Twitter on 22 July 2015, stating:

*"@Albanian_Soccer Some match fixing at the end of the game to give Crusaders the win, not a team with fair play"*⁶⁵

(Exhibit 86)

269. Another example of rival players expressing their concern over the integrity of a match played against Skënderbeu is the one reported by the BFDS for friendly match played against Silkeborg IF on 24 January 2013:

"We have received information from the Danish Football Association that Silkeborg IF's coaching staff and players reported to them their own concerns regarding the integrity of this match. Silkeborg IF stated that whilst they were impressed by the quality and performance of KS Skënderbeu in the first half, there was a drastic change in their performance during the second half, whereby KS Skënderbeu players exhibited a clear lack of effort, in the opinion of the Silkeborg IF team".

(Exhibit 56)

(ii) Supporters:

270. During a match between Skënderbeu and Partizani on 19 December 2015, rival supporters taunted Skënderbeu's president Ardjan Takaj with banners reading *"take take fixed match 100%"*⁶⁶, thus proving how the club's match-fixing activities were common knowledge. This particular banner reportedly referred to the match against FC Lokomotiv Moskva in the 15/16 UEL, analyzed above.

(Exhibit 87)

⁶⁴ The link to this quotation no longer works due to the time elapsed since 2016 (<http://www.hat-trick.fr/crusaders-skenderbeu-match-truque-sans-aucune-discretion/>). However, it did work at the time the Appeals Body dealt with Skënderbeu's admissions criteria case, and it is even mentioned and accepted in para. 114 of the AB's decision of 1 June 2016 on that matter, which is published in the Case Law January-June 2016 available on UEFA's website.

⁶⁵ <https://twitter.com/StuartBriers/status/623598338424852485>

⁶⁶ "Take support fixed match 100%".

271. Also, as mentioned earlier, following the friendly match against Silkeborg IF on 24 January 2013, Skënderbeu supporters accused the club's executives on social media of having manipulated it, saying that Skënderbeu allowed Silkeborg IF to score goals in the second half.

(Exhibit 56)

272. When Skënderbeu's own supporters publicly accuse the club of fixing matches, it cannot be more clearly asserted that the club is perceived as a cheat by fans everywhere.

(iii) Betting operators:

273. As explained before, the Hong Kong Jockey Club no longer offers matches involving Skënderbeu since the Crusaders FC match of 21 July 2015, and the GLMS also recommends that their members exercise extreme caution if they offer Skënderbeu matches.

(Exhibit 9)

274. There have also been a number of Skënderbeu matches in which betting companies stopped offering live bets after noticing the irregular betting patterns.

(e.g. Exhibits 36, 51, 52 and 55)

275. Other betting companies have followed suit in other Skënderbeu matches, by removing their live markets either before or during those matches, suspecting their possible manipulation. For example:

- i. In the Live Betting Summary of the match played against Sporting Clube de Portugal on 22 October 2015, the BFDS report states on page 10:

"Of further concern is that leading Asian bookmaker 188bet removed this market from their live betting schedule in the 86th minute, during the highly suspicious period of betting. Normally, bookmakers would trade this market right up until the end of the match to give bettors the opportunity to bet for the whole 90 minutes; however the decision by such a prominent bookmaker to remove this market prematurely strongly suggests that they had their own concerns regarding the betting patterns that developed late in the game".

(Exhibit 11)

- ii. In the Live Betting Summary of the match played against FC Lokomotiv Moskva on 10 December 2015, the BFDS escalation report states on page 9:

"Finally, it is important to note that leading Asian bookmakers SBObet, MaxBet and 188bet all removed this market from their live betting schedule in the 87th minute, during the highly suspicious period of betting. Normally, bookmakers would opt to trade this market right up until the end of the match to give bettors the opportunity to bet for the whole 90 minutes; however, the decision by such prominent bookmakers to remove this market prematurely strongly suggests that they each had their own integrity concerns regarding the betting patterns that developed late in the game".

(Exhibit 12)

276. When several of the world's most prominent bookmakers decide to remove betting from Skënderbeu matches, it's clearly because the integrity of those matches is considered to have been compromised. The examples mentioned above unequivocally prove that bookmakers and betting operators were so convinced that Skënderbeu was fixing matches that they were willing to lose possible income from bets in order to avoid taking larger financial hit of paying persons who bet on those games with inside knowledge of their outcome.
277. There can therefore be no doubt that the widespread perception from bookmakers on Skënderbeu is that the club has manipulated football matches at both national and international level to a shocking extent.
278. Unsurprisingly, in the current season (2016/2017), immediately following Skënderbeu being declared ineligible by CAS to participate in UEFA competitions for one season, the club has not had any matches escalated by the BFDS. As explained in Section V, Part I, B(ii) above, the lack of irregularities in the betting patterns in its matches this season has led bookmakers to offer Skënderbeu domestic matches at a similar rate as in the past, with some caution still being taken on the Asian market, particularly in the club's friendly matches.

(iv) Media:

279. Suspicions about possible match-fixing by Skënderbeu have been publicized in the media as early as in February 2013, when journalist Brett Forrest from ESPN.com published an article about EUROPOL's findings on match-fixing and mentioning the club as a "prime offender" in the context of match manipulation.⁶⁷

⁶⁷ <http://www.espnfc.co.uk/blog/espn-fc-united-blog/68/post/1840249/match-fixing-scandalshouldnt-surprise-you-brett-forrest>

280. More recently, Spanish daily El País published an article commenting on the betting irregularities and suspicions against Skënderbeu arising from the 15/16 UCL matches against Crusaders FC and Dinamo Zagreb. The article stated that the main concern was that Skënderbeu would still compete in the 15/16 UEL, implying that this would allow the club to manipulate more matches, by stating: "*The problem for European football is that Skënderbeu ... has now passed to the Europa League.*"⁶⁸

281. Finally, it is recalled that the media have also reported how, during a session of the Albanian Parliament on 21 December 2015, a member of the socialist party accused Skënderbeu's financial backer Mr. Bode of placing bets and manipulating matches, stating:

*"In this parliament is a person [referring to Ridvan Bode] that knows to place bets very well, even he knows how to manage a match, but I'm not going further to this history."*⁶⁹

VI. LEGAL EVALUATION OF THE ABOVE-MENTIONED FACTS

A. Burden of proof

282. Under Swiss law, the 'burden of proof' is regulated by Article 8 of the Swiss Civil Code (hereinafter referred to as "CC"), which, by stipulating which party carries such burden, determines the consequences of the lack of evidence, i.e. the consequences of a relevant fact remaining unproven (non liquet, cf. BSK-ZGB/SCHMID/LARDELLI, 4th ed., 2010, Art. 8 no 4; KUKO-ZGB/MARRO, 2012, Art. 8 no 1).

283. Indeed, Article 8 CC stipulates that, unless the law provides otherwise, each party must prove the facts upon which it is relying to invoke a right, thereby implying that the case must be decided against the party that fails to adduce such evidence. Furthermore, the burden of proof not only allocates the risk among the parties of a given fact not being ascertained but also allocates the duty to submit the relevant facts before the court/tribunal.

⁶⁸ http://deportes.elpais.com/deportes/2015/08/26/actualidad/1440610501_394359.html

⁶⁹ Quotation translated from original article available at: <http://www.gazetatema.net/web/2015/12/21/debatetne-kuvend-behen-akuza-edhe-per-shitje-ndeshjesh/>

284. It is the obligation of the party that bears the burden of proof in relation to certain facts to also submit them to the court/tribunal (CAS 2011/A/2384 & 2386; ATF 97 II 216, 218 E. 1; BSK-ZGB/Schmid/Lardelli, 4th ed 2010, Art 8 no 31; DIKE-ZPO/Glasl, 2011, Art 55 no 15).
285. The burden of proof to primarily demonstrate that the club is responsible for match-fixing activities, e.g. directly and/or indirectly involved in activities aimed at arranging or influencing the outcome of a match and any other violation of Art. 12 DR, lies on UEFA's side in the case at hand.

B. Standard of proof

286. The standard of proof applicable to cases as the present one is "comfortable satisfaction" pursuant to the applicable UEFA Regulations (see for example Art. 4.02 UCLR/UELR). By signing the Admissions Criteria Form for the UEFA Club Competitions, Skënderbeu has expressly agreed to the application of the UCLR/UELR and UEFA Disciplinary Regulations⁷⁰ and the standard of proof of comfortable satisfaction.
287. This standard has been confirmed in other cases both by the UEFA disciplinary bodies and by CAS (recently, CAS 2013/A/3258 Besiktas JK v. UEFA, at paragraph 116 *et seq* and CAS 2014/A/3628, at paragraph 122 *et seq*), and has been described as being greater than a mere balance of probability but less than proof beyond a reasonable doubt, bearing in mind the seriousness of the offence committed.
288. From 2015 and in line with the well-established CAS Jurisprudence, UEFA contemplates in already in its UEFA Disciplinary Regulations that the appropriate standard of proof must be the one of comfortable satisfaction. In this regard, Article 18 (2) DR reads as follows:

"The standard of proof to be applied in UEFA disciplinary proceedings is the comfortable satisfaction of the competent disciplinary body".

289. The Panel in CAS 2015/A/4059 has more recently further clarified the weight that shall be given to evidence in order to reach its comfortable satisfaction, by citing the reasoning of Lord Hoffman at paragraphs 107-108:

"107. In Attorney General for Jersey v Edmond-O'Brien, in a decision of the Privy Council (2006 1 WLR 1485), Lord Hoffman, said in his criticism of the Jersey Court of Appeal's judgment, which the Board overturned (para. 25):

⁷⁰ At the time of submission of this report, it is clear that Skënderbeu has the sporting merit to qualify for UEFA Club Competitions. It is however not yet clear whether the club will qualify for the UCL or the UEL 16/17. Any reference from here on to the UCL and the UCLR shall also be understood as a reference to the UEL and UELR, unless otherwise stated.

*Although they said that they had reviewed the evidence "separately and together", there is little indication that they had regard to the cumulative weight of the various items of evidence, to each of which they had, sometimes not altogether plausibly, assigned a possible innocent explanation. **It is in the nature of circumstantial evidence that single items of evidence may each be capable of an innocent explanation but, taken together, establish guilt beyond reasonable doubt.*** (emphasis added)

108. Although that statement was articulated in the context of a criminal case, in the Panel's view, Lord Hoffman's reasoning applies, *mutatis mutandis*, to the situation where a Tribunal is mandated to have 'comfortable satisfaction' before it can inculcate a sportsperson of a disciplinary offence, *a fortiori* where certain pieces of evidence are themselves suspicious.!

290. That CAS Panel further concluded at paragraph 113 of the referenced award that:

*"However metaphor is ultimately no substitute, in the Panel's view, for evaluating all relevant and credible items of evidence and asking itself whether, **considered cumulatively**, they satisfied the test of comfortable satisfaction".* (emphasis added)

291. In view of the above, the standard of proof in the present matter shall be comfortable satisfaction, bearing in mind the seriousness of the offence committed and after evaluating all of the evidence cumulatively.

C. The Case for Disciplinary Measures

292. UEFA created competence for itself to interfere in national match-fixing cases through a two-stage process (through article 50(3) UEFA Statutes in conjunction with Article 4.02 and 4.03 UCLR).

293. In respect of the alleged "two stage process", the following provisions are of particular importance:

Article 50(3) UEFA Statutes (2016):

"The admission to a UEFA competition of a Member Association or club directly or indirectly involved in any activity aimed at arranging or influencing the outcome of a match at national or international level can be rejected with immediate effect, without prejudice to any possible disciplinary measures."

Article 4.02 UCLR (2016/2017):

"If, on the basis of all the factual circumstances and information available to UEFA, UEFA concludes to its comfortable satisfaction that a club has been directly and/or indirectly involved, since the entry into force of Article 50(3) of the UEFA Statutes, i.e. 27 April 2007, in any activity aimed at arranging or influencing the outcome of a match at national or international level, UEFA will declare such club ineligible to participate in the competition. Such ineligibility is effective only for one football season. When taking its decision, UEFA can rely on, but is not bound by, a decision of a national or international sporting body, arbitral tribunal or state court. UEFA can refrain from declaring a club ineligible to participate in the competition if UEFA is comfortably satisfied that the impact of a decision taken in connection with the same factual circumstances by a national or international sporting body, arbitral tribunal or state court has already had the effect to prevent that club from participating in a UEFA club competition. "

Article 4.03 UCLR (2016/2017):

"In addition to the administrative measure of declaring a club ineligible, as provided for in paragraph 2.05, the UEFA Organs for the Administration of Justice can, if the circumstances so justify, also take disciplinary measures in accordance with the UEFA Disciplinary Regulations. "

294. With the introduction of article 50(3) in the UEFA Statutes and Article 4.02 and 4.03 in the UCLR, UEFA created a "two-stage process". The first stage (Article 4.02) being an "administrative measure", pursuant to which a minimum measure would have to be imposed on the offender, by not admitting it from European competitions for one season. The second stage (Article 4.03) being a "disciplinary measure", whose sanction would have to be imposed subsequent to the "administrative measure" and is not restricted by a maximum length. This "two-stage process" can be understood from Article 50(3) UEFA Statutes in conjunction with Article 4.03 UCLR, particularly because in the latter provision reference is made to "administrative measure" and "disciplinary measure", which one can only understand as to reveal UEFA's intention to differentiate between these two types of measures. Also the words "in addition to" create a distinction between the two types of measures. Nevertheless, and for the avoidance of doubt, irrespective of the wording used, proceedings initiated by UEFA on the basis of Article 4.02 UCLR are disciplinary in nature, because the subject matter in such proceedings is the imposition of a sanction.
295. Although indeed a first measure was imposed on Skënderbeu based on Article 4.02 UCLR, this measure was only a minimum sanction of one season exclusion from European competitions. Therefore, based on the wording of Article 4.03 UCLR (and subject to the conditions contained therein), an additional appropriate sanction can, and shall, be imposed on Skënderbeu in a second stage.

296. Finally, Skënderbeu, at least indirectly by filling in the UEFA Admission Criteria Form in order to participate in the UEFA club competitions (UCL and UEL), agreed to be bound by UEFA's Statutes and regulations, including the UCLR and UELR (2016/2017), and, in particular, articles 4.02 and 4.03 UCLR and the "two-stage process" enshrined therein.
297. Disciplinary proceedings initiated by UEFA on the basis of Article 4.02 UCLR are based on the internal regulations of UEFA, and a possible sanction deriving from such proceedings only has consequences at the European level. As such, the "circles" of rights and duties are not identical. In this respect a comparison can be made with the *Valverde* case (*CAS 2007/A/1396 & 1402*), because the panel in that case considered that the domestic suspension imposed on the athlete by CONI was of a different scope and nature as the worldwide suspension sought by WADA and the UCI, which led the panel to the conclusion that the principle of *ne bis in idem* was not violated. Also in the case of Skënderbeu, the scope and nature of the suspensions sought in the different disciplinary proceedings is different. For this reason, the CAS Panel judging the admission case, i.e. the first measure case, left explicitly open the possibility for UEFA to issue further disciplinary sanctions at a later stage.

D. The principle of strict liability

298. The principle of strict liability is enshrined in the current Article 8 DR. According to this provision:

A member association or club that is bound by a rule of conduct laid down in UEFA's Statutes or regulations may be subject to disciplinary measures and directives if such a rule is violated as a result of the conduct of one of its members, players, officials or supporters and any other person exercising a function on behalf of the member association or club concerned, even if the member association or the club concerned can prove the absence of any fault or negligence.

299. In this regard, member associations and clubs are responsible for the conduct of their players, officials, members, supporters and any other persons exercising a function at a match at the request of the association of club. According to this provision, UEFA members and clubs are responsible for any breach of the UEFA regulations committed by any of those persons. Therefore, under this rule, member associations and clubs bear strict liability for the actions of third parties, who are nonetheless specifically identified.
300. This rule leaves absolutely no room for maneuver as far as its application is concerned. UEFA member associations and football clubs are responsible, even if they are not at fault, for the improper conduct of any of those persons acting on their behalf. It includes match-fixing activities, which is expressly a breach the Disciplinary Regulations. Thus, clubs are automatically held responsible once such an act has been established.

301. In a recent CAS award the arbitral tribunal again endorsed the above mentioned approach and the compliance of this principle to fairness and public policy. In this regard, it refers to the well-established CAS jurisprudence quoting some other awards dealing, notably, also with match fixing cases:

An argument that the imposition on the club of strict liability in such situation is contrary to basic fairness or public policy is foreclosed by the decision in the Fenerbahçe case itself in which the Panel, in considering an argument to like effect determined that strict liability for the behaviour of a club's supporters is neither inconsistent with Article 6 of the European Convention on Human Rights or Swiss Procedural Public Policy (see para. 103 of that decision), nor violative of the legal principle of Nulla Poena Sine Lege. (Ditto) see further CAS 2013/A/3094 Hungarian Football Federation v. FIFA paras 85-90. Moreover, the compatibility of strict liability of club's for their supporters' behaviour with public policy, is supported by the decision of the Permanent Court of Arbitration for Clubs and Corporations of the German Professional Leagues in Football ("Srtindiges Schiedsgericht for Vereine und Kapitalgesellschaften der Lizenzligen") dated 14 May 2013 in SG Dynamo Dresden e.V. v. Deutscher Fussball-Bund e.V., published in Zeitschrift für Sport und Recht, 5/2013, p. 200 seq. See also CAS 2013/A/3258 Besiktas Jimnastik Kullibii v. UEFA, para. 133.

(CAS 2013/A/3324 and 3369, at para 9.24)

302. The object of this rule is to ensure that clubs shoulder the responsibility for individuals under their umbrella, which must also comply with UEFA's objectives. If clubs were able to extricate themselves from any responsibility by claiming that they had taken all measures they could reasonably be expected to take to prevent any breach of the UEFA rules, and if persons under the umbrella of clubs and associations manage to commit such acts, there would be no way of penalizing that behavior, even though it constituted a fault in itself. UEFA's rules of conduct would therefore be nothing more than vague obligations, since they would be devoid of any sanctions. By penalizing a club for the behavior of these individuals, it is in fact the latter who are targeted and who will be liable to pay the penalty imposed on their club. This is the only way in which UEFA has any chance of achieving its objectives and protect the integrity of its competitions, and so defending the interests of all clubs and players that participate in the competitions complying with the principle of fairness and honesty. Without such an indirect sanction, UEFA would be literally powerless to deal with these kinds of misconducts if a club refused to take responsibility for such behaviour.
303. It is worth noting that CAS has already supported the above approach on applied to match fixing incidents:

"First of all, the Panel notes that in accordance with Article 6 of the 2008 Edition of the UEFA Disciplinary Regulations ("2008 DR"), applicable at the time of the events, member associations and clubs are responsible for the conduct of their players, officials, members, supporters and any other persons exercising a function at a match on behalf of the association or club. This strict liability principle -confirmed in CAS 2002/A/423 as well as in CAS 2007/A/1217 and by a recent decision of the Permanent Court of Arbitration for Clubs and Corporations of the German Professional Leagues in Football (Standiges Schiedsgericht für Vereine und Kapitalgesellschaften der Lizenzligen) published in Zeitschrift für Sport und Recht, 5/2013, p. 200 seq.- put in parallel with Article 2.08 UELR means that the actions of these people are attributable to the clubs in the context of the eligibility of such club to take part in the 2013/2014 UEL."

(CAS 2013/A/3258, at para. 133)

304. Article 8 DR, under which clubs assume strict liability for individuals also has a preventive and deterrent effect. Its objective is to make clubs responsible for attitudes of those indeed playing an essential role in the sporting and structural development of the club. In substance, the idea connected to the application of this principle is that it's not possible to discern between players, coaches and other individuals acting on behalf of the club, and the club itself. It has full sense that if clubs profit, for instance, from the success of their players and coaches on the field of play, they must also bear the negative consequences of their illicit misbehaviors.
305. The fact that, for example, players and coaches trigger the disciplinary responsibilities of their clubs is not new and has even been used by CAS in another recent award in a match-fixing case. In this regard, CAS deemed that the responsibility of the club was at stake after confirming the involvement of a goalkeeper in match fixing activated the consequences of Article 2.05 UCL Regulations (current 4.02 UCL Regulations) for the involvement in match fixing activities:

"Consequently, taking into account the content of the above-referenced conversations, the secret code used by the involved individuals ("Number 1 ", "the Emperor", "he is our brother now", "think about the operation", etc.), and the secrecy that surrounded the meetings held by those individuals ("Number I will meet with you ... but none should know about this"), in light of all this the Panel finds that it has been established to its comfortable satisfaction that the Goalkeeper, the Agent, and the Intermediary, Mr. Bapk, fixed the Match."

(CAS 2014/ A/3625, at para. 138 letter iii.)

306. Consequently, there is no doubt that players and coaches, as well as other persons acting on behalf of the club, activate the strict responsibility of clubs for their illicit conduct, including match fixing activities which could have taken place.

E. Evaluation of the facts and evidence

307. UEFA submits that the facts and evidence of this case can lead only to one conclusion: Skënderbeu fixed a large number of matches and needs to be punished accordingly.
308. Prior to addressing the facts related to this investigation, UEFA notes that while the BFDS has escalated over 50 Skënderbeu matches at both the national and international level, the FFA has already sanctioned the club in relation to the matches fixed in Albanian competitions. It is therefore not necessary to directly address these particular matches, aside from the fact that they allow to assess the large scope of Skënderbeu's illicit activities.
309. Therefore, the evaluation of the facts and evidence submitted hereby focuses specifically on those matches found to have been fixed in UEFA's club competitions, i.e., the UCL and UEL, particularly on the four escalated matches from the 2015/2016 season.
310. As a reminder, CAS already established that Skënderbeu was involved in match fixing activities, mainly on the basis of a high number of BFDS reports, in the award *CAS 2016/A/4650*, para. 97:
- "The Panel particularly considers the emergence of a betting pattern, which remained essentially unchallenged by the Club, to be convincing evidence that the Club **is at least indirectly involved in match-fixing activities.** [...]"*
311. It follows that the starting point isn't whether there were match-fixing activities; as this is not put into doubt by the CAS in its awards. The keystone of this case is Skënderbeu's level of involvement in such activities and the deriving disciplinary responsibilities.
312. Both the facts and evidence contained in the case file have demonstrated that there is no other possible explanation than players, under the orchestration of Skënderbeu officials, coaches and other individuals, systematically fixed a large number of matches during several years in the domestic Albanian club competitions, in UEFA club competitions and in several international friendlies.
313. This conclusion is based on undisputed facts and evidence that show a plot created in the aim of fixing matches and, more concerning, to obtain illegal profits through betting. All the elements of a criminal organization are present and well documented. There is no doubt that the case of Skënderbeu is a tragic one.
314. In substance, the legal assessment pivots around two main questions:

- i. Are Skënderbeu's match-fixing activities in the sense of the DR proven to a standard of comfortable satisfaction (i.e. "second stage")? And,
 - ii. Does Skënderbeu's responsibility derive from the application of the principle of strict liability?
315. Regarding the first question, this report comprehensively and extensively demonstrates that the answer is "YES". This, combined with the other facts and evidence submitted in this case, certainly lead to the following three conclusions:

First, the standard of proof is already reached by only taking into account the evidence provided by the BFDS reports. CAS already came to this conclusion in its analysis of Skënderbeu's case, considering "*the betting patterns to be convincing evidence (...) that the Club is at least indirectly involved in match-fixing activities*". Briefly, a high number of BFDS reports combined with a very recent CAS award demonstrate that Skënderbeu is in the center of an organization created to fix matches for betting purposes; In fact, Skënderbeu itself recognized the manipulating activities of its players, at the occasion of the CAS hearing in the first CAS case.

Second, the key elements of the plot include both the presence of individuals with strong links to the public authorities, to betting companies as well as to criminals, i.e. the Ridvan Bode (financial backer, former Minister of Finance), Agim Zeqo (former club president), and, mainly Ardjan Takaj (club president);

Third, the general public perception of Skënderbeu leads to the objective and reasonable conclusion that the club is responsible for having fixed matches. In summary, there have been opposing players, away and own supporters, different media releases and betting companies not offering this club's matches who publicly have denounce match-fixing activities undergone by the club.
316. Regarding the second question about the existence of the club's level of disciplinary responsibility, the latter derives from the application of the principle of strict liability enshrined in Article 8 DR. Briefly and as exposed in previous paragraphs the responsibility of the club is caused by the misbehavior of those persons acting under the club's umbrella, including its President, players and coaches.
317. As explained in previous sections of this report, only referees and players, who are the ones acting on the field of play, have the capacity to directly influence the outcome of matches. Consequently, if the referees' involvement is discarded, only the players can have, in practical terms, fixed the matches.
318. The referees' involvement must completely be discarded because of the following two reasons, which were already explained in full detail above:

- It is completely unrealistic to find that referees with different backgrounds and nationalities involved in over 50 matches in different competitions would be responsible for the irregular betting patterns detected in Skënderbeu's matches.
- The BFDS escalation reports directly refer to mistakes made by Skënderbeu's players, and none seem to mention any intentional mistake by the referees of those matches. In fact, some BFDS reports mention the opposite: Skënderbeu players deliberately committing penalties and receiving red cards (i.e, forcing the referee to make correct decisions against them).

319. In particular, as explained in previous paragraphs, once the participation of the referee is discarded from the formula, there simply can't be any doubt that in cases of match-fixing only players have the power to influence and/or arrange the outcome of a match.

320. On the other hand, the players had perfect connections to the plot orchestrated by the club's officials in which direct links to betting companies, individuals with criminal and match fixing backgrounds existed. All of it is well proven. Consequently, either by means of the players or by means of the individuals, who succeeded in fixing a large number of matches of Skënderbeu, the conditions contemplated in the DR are completely fulfilled.

321. Bearing all the above in mind, the responsibility of the club is irremediably triggered in accordance with the principle of strict liability contemplated in Article 8 of the DR.

VII. MEASURES TO BE IMPOSED ON KS SKËNDERBEU

322. After having established that Skënderbeu is responsible for having fixed matches both nationally and internationally, it is necessary to determine the applicable sanction to be imposed on the club. In this sense, one must first turn to Art. 6(1) DR, which establishes the list of disciplinary measures that may be imposed on clubs:

1 The following disciplinary measures may be imposed on member associations and clubs:

- a. warning;*
- b. reprimand;*
- c. fine;*
- d. ban from selling tickets to supporters for away matches;*
- e. annulment of the result of a match;*
- f. order that a match be replayed;*
- g. deduction of points (for the current and/or a future competition);*

- h. order that a match be forfeited;*
- i. playing of a match behind closed doors;*
- j. full or partial stadium closure;*
- k. playing of a match in a third country;*
- l. withholding of revenues from a UEFA competition;*
- m. prohibition on registering new players in UEFA competitions;*
- n. restriction on the number of players that a club may register for participation in UEFA competitions;*
- o. disqualification from competitions in progress and/or exclusion from future competitions;*
- p. withdrawal of a title or award;*
- q. withdrawal of a licence;*
- r. community football service.*

323. Pursuant to Art 17(1) DR, the competent disciplinary body determines the type and extent of the disciplinary measures to be imposed in accordance with the objective and subjective elements of the offence, taking account of both aggravating and mitigating circumstances.
324. Since the DR do not offer guidance as to the objective and subjective elements to consider when determining the disciplinary measures to impose in match-fixing cases, it is helpful to turn to the range of sanctions pronounced in past cases of match-fixing relating to UEFA competitions matches (*CAS 2009/A/1920, FK Pobeda v. UEFA*).
325. In this sense, FK Pobeda was banned from competing in UEFA competitions for eight (8) years, after the CAS Panel confirmed that, based principally on irregular betting patterns and further circumstantial evidence, the club had manipulated **two UCL qualifying matches for betting purposes**.
326. The above-referenced CAS award, while determining the applicable sanction on a case-by-case basis taking into consideration the objective and subjective elements of each case, concurs in defending UEFA's zero tolerance policy against match-fixing by imposing strict sanctions against clubs who have had individuals involved in such activities. Among other considerations of the CAS panel, the following are useful and shall be borne in mind when determining the disciplinary measures to apply in this case, since that Panel confirmed at paras. 116-117 that match-fixing can only be punished and deterred by imposing strong disciplinary measures that signal to clubs and players that any action on their part to influence the outcome of a match will have severe consequences:

116. [...] Only reactions inside the clubs can prevent that games are manipulated, and only strong sanctions against the clubs will set the necessary signal to the officials and the players that the direct or indirect support of match fixing activities are not tolerated but can lead to severe consequences for the entire club and not only for the leading actors of the plot. Such sanctions should not only prevent

individuals from manipulating games, but also encourage the other members of the club to take action when they become aware of such manipulations.

117. Article 11 2004 DR provides for the possibility to sanction clubs for actions of their players or officials. The objective of this provision can only be reached by a rigorous application of the sanctions provided under article 14 2004 DR. [...]

327. Considering the particular circumstances of Skënderbeu's case, it is respectfully submitted that a very strong sanction is required. It is clear from all of the facts and evidence provided that Skënderbeu's case is much worse than the UEFA precedent mentioned above (FK Pobeda). Notably, Skënderbeu:
- i. Fixed or attempted to fix at least six UCL and UEL matches, with four of these only in the 2015/2016 season, with the damage to UEFA's worldwide reputation being particularly relevant.
 - ii. Carried a highly organized scheme to obtain betting profits from its matches for itself and/or third parties, with absolute disregard and disrespect for the competitions that they were participating in or their opponents.
328. For the foregoing reasons, it is respectfully requested that Skënderbeu is excluded from UEFA club competitions for at least ten (10) years.
329. On top of that, it is respectfully requested that Skënderbeu is fined with €1,000,000, a financial penalty which cannot be considered disproportionate not only looking at the facts of this case also considering the revenues obtained by Skënderbeu from its participation in UEFA competitions during seasons in which the club fixed different matches (seasons, 2013/2014 and 2015/2016⁷¹).

VIII. CONCLUSIONS

330. This case is the natural consequence of the first case involving Skënderbeu whereby the club was declared ineligible, first by the UEFA disciplinary bodies and later on by the CAS, from participating in the UEFA Champions League for season 16/17.
331. Indeed, and as stated above the Panel, in *CAS 2016/A/4650 KS Skenderbeu v. UEFA*, was comfortably satisfied that the evidence presented by UEFA consisted of:

⁷¹ Total revenues of: €7,974,249.

*"...convincing evidence that the Club **is at least indirectly involved in match-fixing activities.** [...]"*

332. The evidence presented in the first case was deemed to be enough for the administrative measure envisaged by Article 4.02 UCLR, leaving the room for additional sanctions open. UEFA is convinced that the evidence presented in this report shows that there are also enough elements to prove that Skënderbeu should also be sanctioned with a disciplinary measure according to Article 4.03 UCLR.
333. As it has been argued throughout this report, UEFA considers this case to be until now the biggest case of match-fixing involving a single football club. In UEFA's opinion, whilst the CAS panel in the first case was convinced that the club is involved at least indirectly in match-fixing activities, this report shows that there is also evidence to prove that players, officials and financial backers of Skënderbeu fixed matches in order to gain advantages for themselves or third parties, making the club in breach of Article 12 of the UEFA DR.
334. It has been exhaustively explained in this report that the UEFA BFDS has been certified by independent experts as being a very powerful mechanism to identify fixed matches and that a consistent number of 'escalated' matches show that a club is indeed fixing football matches. Skënderbeu has had, over the past years, more than 50 matches that have been escalated by the BFDS, including all four matches that have been escalated by the BFDS for UEFA club competitions in season 15/16. This number represents more than double the amount of matches for Skënderbeu than the club in Europe with the next highest amount of matches escalated. Indeed UEFA has never experienced such a high number of escalated matches coming from one club alone!
335. Together with expert opinions, the reliability of the BFDS is also being confirmed in this case by another independent company, Odds Reports, that has confirmed that a qualitative analysis of only the betting data of ten football matches of Skënderbeu, whose data is the one relied upon by the BFDS and does not include the names of the teams and players taking part in such matches, has returned the same conclusions as those reached by the BFDS. Therefore, there is absolutely no doubt that the BFDS is correct, and consequently this also means that the matches involving Skënderbeu that have been 'escalated' have been escalated correctly.
336. But it's not only the number of matches escalated by the BFDS that has convinced UEFA that Skënderbeu has indeed fixed a large number of matches. Other evidence provided, such as the involvement of key figures in the administration of Skënderbeu in the betting industry and in corrupt acts, the distrust that reputable international betting operators, such as the Hong Kong Jockey Club, have in matches involving Skënderbeu, and also declarations made by opponents of Skënderbeu, such as the goalkeeper of Crusaders, on social media, show that there are too many elements that are pointing in one distinct and clear direction: **Skënderbeu has fixed football matches!**

337. From a strictly legal point of view the behaviour of its players, coaches and club officials makes the club strictly liable for these persons' behavior according to Article 8 of the UEFA DR and therefore the club should be punished with an exemplary disciplinary sanction.
338. UEFA submits that such a disciplinary sanction should not, and cannot, be less than a 10-year exclusion for Skënderbeu from all UEFA club competitions. The UEFA Champions League and UEFA Europa League are two of the most important football competitions in the world. These competitions, apart from being a commercial success, are the two single competitions that inspire children worldwide to fall in love and start playing this beautiful sport. It is UEFA's firm opinion that the UEFA disciplinary bodies can't allow clubs like Skënderbeu to put at risk all the positive that is generated from these two competitions.
339. This is why UEFA is asking for a strong message to be sent by the UEFA disciplinary bodies to all persons who have the intention or are currently fixing football matches for their personal illicit gain. The evidence is clear; the behavior of Skënderbeu is for all to see. This club has been fixing football matches like nobody has ever done before in the history of the game. UEFA believes there is enough evidence to make the UEFA disciplinary bodies feel comfortably satisfied to declare that Skënderbeu is guilty of match-fixing offences and that such offences shall not be tolerated.

IX. EVIDENTIARY REQUEST

340. UEFA reserves its rights to summon the following witnesses and experts at the hearing:
- Mr. Tom Mace. Director of Security Services Sportradar.
 - Prof. David Forrest. Professor of Economics. Liverpool University
 - Mr. Affy Sheikh. Global Head of Security and Integrity. Starlizard.
 - Coaches Michael Appleton, Jacques Crevoisier and/or Hans Leiterd, members of the UEFA Expert Panel appointed to evaluate the performance of Skënderbeu and its players.
 - Mr. Ardjan Takaj, President of Skenderbeu.

X. REQUEST FOR RELIEF

341. Based on the above-mentioned considerations, the undersigned Ethics and Disciplinary Inspectors respectfully request the UEFA Control, Ethics and Disciplinary Body to:

1. Refer the case to the UEFA Appeals Body in accordance with Article 34(3) of the UEFA Statutes and Article 29(3) DR.

In any event, it is respectfully requested that the competent UEFA disciplinary body:

2. Declares that KS Skënderbeu is excluded from participating in UEFA club competitions for ten (10) years.
3. Imposes a fine of € 1,000,000 on KS Skënderbeu

The undersigned Ethics and Disciplinary Inspectors reserve their rights to supplement or amend this report should further information and/or evidence arise in relation to the present matter.

Nyon, on 7 February 2018.



Miguel Liétard Fernández-Palacios
Attorney-at-law



Karl Dhont
Betting Expert

UEFA Ethics and Disciplinary Inspectors

LIST OF EXHIBITS

- Exhibit 1:** Letter from UEFA to FAA dated 19 January 2017.
- Exhibit 2:** FAA Ethics Committee decision of 23 June 2017 (grounds – English translation).
- Exhibit 3:** Letter from UEFA to Skënderbeu of 20 June 2017
- Exhibit 4:** Meetings with Albanian General Prosecutor and Ministry of Education and Sports. Training Albanian Law-enforcement at UEFA.
- Exhibit 5:** Investigative and Final Reports of the Austrian Police.
- Exhibit 6:** Independent review of the UEFA BFDS by Prof. David Forrest, Professor of Economics at the University of Liverpool and by Prof. Ian G. McHale, Reader in Statistics, University of Manchester, in the UK.
- Exhibit 7:** (a) BFDS: Crusaders FC vs. Skënderbeu (UCL, 21/06/2015).
(b) Video.
- Exhibit 8:** Mr. Sean O'Neill (goalkeeper of Crusaders FC) Twitter statement.
- Exhibit 9:** GLMS e-mail to UEFA of 26 August 2015.
- Exhibit 10:** (a) BFDS: NK Dinamo Zagreb vs. Skënderbeu (UCL, 25/08/2015).
(b) Video.
- Exhibit 11:** (a) BFDS: Sporting Clube de Portugal vs. Skënderbeu (UEL, 22/10/2015).
(b) Video.
- Exhibit 12:** (a) BFDS: Skënderbeu vs. FC Lokomotiv Moskva (UEL, 10/12/2015).
(b) Video.
- Exhibit 13:** BFDS: Skënderbeu vs. FC Shakther Karagandy (UCL 30/07/2013).
- Exhibit 14:** BFDS: Skënderbeu vs. FC Shakther Karagandy (UCL 06/08/2013).
- Exhibit 15:** BFDS: Skënderbeu vs. Dinamo Tirana (Domestic 13/11/2010).
- Exhibit 16:** BFDS: Teuta vs. Skënderbeu (Domestic 08/12/2010).

- Exhibit 17:** BFDS: Skënderbeu vs. Shkumbini (Domestic 12/12/2010).
- Exhibit 18:** BFDS: KF Tirana vs. Skënderbeu (Domestic 03/02/2011).
- Exhibit 19:** BFDS: KS Kastrioti vs. Skënderbeu (Domestic 06/02/2011).
- Exhibit 20:** BFDS: KS Dinamo Tirana vs. Skënderbeu (Domestic 25/02/2011).
- Exhibit 21:** BFDS: Skënderbeu vs. Bylis Ballsh (Domestic 07/03/2011).
- Exhibit 22:** BFDS: KS Dinamo Tirana vs. Skënderbeu (Domestic 15/04/2011).
- Exhibit 23:** BFDS: Skënderbeu vs. KF Laçi (Domestic 20/04/2011).
- Exhibit 24:** BFDS: Skënderbeu vs. KS Kastrioti (Domestic 26/10/2011).
- Exhibit 25:** BFDS: Skënderbeu vs. Bylis Ballsh (Domestic 05/12/2011).
- Exhibit 26:** BFDS: KF Laçi vs. Skënderbeu (Domestic 04/02/2012).
- Exhibit 27:** BFDS: Skënderbeu vs. KS Pogradeci (Domestic 08/02/2012).
- Exhibit 28:** BFDS: Skënderbeu vs. KS Vllaznia (Domestic 07/03/2012).
- Exhibit 29:** BFDS: Skënderbeu vs. KF Laçi (Domestic 21/03/2012).
- Exhibit 30:** BFDS: Dajti Kamza vs. Skënderbeu (Domestic 26/03/2012).
- Exhibit 31:** BFDS: Skënderbeu vs. KS Vllaznia (Domestic 25/04/2012).
- Exhibit 32:** BFDS: KS Vllaznia vs. Skënderbeu (Domestic 24/08/2012).
- Exhibit 33:** BFDS: Skënderbeu vs. KF Laçi (Domestic 24/09/2012).
- Exhibit 34:** BFDS: KS Shkumbini vs. Skënderbeu (Domestic 08/12/2012).
- Exhibit 35:** BFDS: Skënderbeu vs. KS Kukesi (Domestic 15/12/2012).
- Exhibit 36:** BFDS: KS Kastrioti vs. Skënderbeu (Domestic 19/12/2012).
- Exhibit 37:** BFDS: Skënderbeu vs. KS Kastrioti (Domestic 04/02/2013).

- Exhibit 38:** BFDS: Apolonia Fier vs. Skënderbeu (Domestic 17/02/2013).
- Exhibit 39:** BFDS: KS Shkumbini vs. Skënderbeu (Domestic 20/02/2013).
- Exhibit 40:** BFDS: KF Laçi vs. Skënderbeu (Domestic 01/03/2013).
- Exhibit 41:** BFDS: KS Kukesi vs. Skënderbeu (Domestic 06/03/2013).
- Exhibit 42:** BFDS: Skënderbeu vs. KS Kastrioti (Domestic 12/03/2014).
- Exhibit 43:** BFDS: Skënderbeu vs. KS Kukesi (Domestic 30/04/2014).
- Exhibit 44:** BFDS: FK Partizani vs. Skënderbeu (Domestic 11/09/2014).
- Exhibit 45:** BFDS: Skënderbeu vs. KF Elbasani (Domestic 29/10/2014).
- Exhibit 46:** BFDS: KS Vllaznia vs. Skënderbeu (Domestic 21/12/2014).
- Exhibit 47:** BFDS: KF Elbasani vs. Skënderbeu (Domestic 25/01/2015).
- Exhibit 48:** BFDS: Skënderbeu vs. KF Laçi (Domestic 31/01/2015).
- Exhibit 49:** BFDS: Skënderbeu vs. KS Flamurtari (Domestic 18/02/2015).
- Exhibit 50:** BFDS: KS Flamurtari vs. Skënderbeu (Domestic 16/05/2015).
- Exhibit 51:** BFDS: Skënderbeu vs. KF Tirana (Domestic 21/09/2015).
- Exhibit 52:** BFDS: Skënderbeu vs. KS Teuta (Domestic 16/10/2015).
- Exhibit 53:** BFDS: Skënderbeu vs. Terbuni Puke (Domestic 22/11/2015).
- Exhibit 54:** BFDS: Skënderbeu vs. Vllaznia (Domestic 17/02/2016).
- Exhibit 55:** BFDS: Skënderbeu vs. KF Laçi (Domestic 20/04/2016).
- Exhibit 56:** BFDS: Skënderbeu vs. Silkeborg IF (Friendly 24/01/2013).
- Exhibit 57:** BFDS: Skënderbeu vs. SV Mattersburg (Friendly 31/01/2013).
- Exhibit 58:** BFDS: FC Energie Cottbus vs. Skënderbeu (Friendly 04/07/2013).

- Exhibit 59:** BFDS: FC Shakhtar Donetsk vs. Skënderbeu (Friendly 25/06/2014).
- Exhibit 60:** BFDS: Skënderbeu vs. KV Oostende (Friendly 11/01/2015).
- Exhibit 61:** BFDS: FC Dynamo Kyiv vs. Skënderbeu (Friendly 06/07/2015).
- Exhibit 62:** Anonymized match data provided by UEFA to Starlizard.
- Exhibit 63:** Starlizard Reports: anonymized betting analysis of 10 matches.
- Exhibit 64:** Table: comparison of Starlizard and BFDS conclusions.
- Exhibit 65:** BFDS Skënderbeu Suspicious Activity Overview (23/01/2017).
- Exhibit 66:** UEFA Expert Panel Report.
- Exhibit 67:** Recording of hearing of 4 July 2016 (*CAS 2016/A/4650 KS Skënderbeu v. UEFA*).
- Exhibit 68:** Extract from Deakes N., Match-fixing in football: The epistemology of the Court of Arbitration for Sport Jurisprudence, Australian and New Zealand Sports Law Journal, 2014 9(1), p. 67.
- Exhibit 69:** Extract from Boniface et al., Study: Sports betting and corruption, How to preserve the integrity of sport, IRIS et al., 2012, p. 15.
- Exhibit 70:** Extract from Asser Institute report: *The Odds of Match Fixing - Facts & Figures on the Integrity Risk of Certain Sports Bets* (January 2015).
- Exhibit 71:** BFDS: KS Kastrioti Kruje and KS Vllaznia (02/10/2011).
- Exhibit 72:** Eurobest Sh.a Company and Website Registration.
- Exhibit 73:** Companies owned by Ardjan Takaj (Skënderbeu President).
- Exhibit 74:** Eurobest website registration extension by Ardjan Takaj.
- Exhibit 75:** Star Bet Registration information.
- Exhibit 76:** Tropikal Resort Resgistration (Albanian – relevant notes in English).
- Exhibit 77:** Top-Bast Website Address Analysis.

- Exhibit 78:** Eccobet.com Website Registration by Ilir Dokle.
- Exhibit 79:** ITSGA (Baste-Live) Shareholders and Registration extract (Albanian – relevant notes in English).
- Exhibit 80:** Bast-live.com Website Registration.
- Exhibit 81:** Tropikalresort.com Website Registration.
- Exhibit 82:** Website domains registered by Ilir Dokle.
- Exhibit 83:** Illir Vrenozi Instagram photos with Skenderbeu president and players.
- Exhibit 84:** Ilir Vrenozi Instagram pictures of betting document and information.
- Exhibit 85:** (a) Video of Super-Bast as a Skenderbeu sponsor in stadium.
(b) Video of Super-Bast as a Skenderbeu sponsor in stadium.
(c) Photos of Super-Bast as a Skenderbeu sponsor in stadium and at press conferences.
- Exhibit 86:** Stuart Briers statement on Twitter.
- Exhibit 87:** Banner from Skenderbeu fans at home match v. Partizani (19/12/2015).