

Date: 06 October 2025

Sent to:

Football Association of Malaysia
c/o Serge Vittoz

Facundo Tomas Garces
Rodrigo Julian Holgado
Imanol Javier Machuca
c/o Elite Law SA

Joao Vitor Brandao Figueiredo
Jon Irazabal Iraurgi
Gabriel Felipe Arrocha
Hector Alejandro Hevel Serrano
c/o Alejandro Pascual Madrid

Copy:

AFC
Real Federación Española de Fútbol
Asociación del Fútbol Argentino
Federación Colombiana de Fútbol

Notification of the grounds of the Decision

Ref. no. FDD-24394

Dear Madam, Dear Sir,

Please find attached the grounds of the decision passed in the aforementioned case by the Deputy Chairperson of the FIFA Disciplinary Committee on 25 September 2025.

The Football Association of Malaysia is kindly requested to forward this decision to the players Gabriel Felipe Arrocha, Facundo Tomas Garces, Rodrigo Julian Holgado, Imanol Javier Machuca, Joao Vitor Brandao Figueiredo, Jon Irazabal Iraurgi, and Hector Alejandro Hevel Serrano without delay.

We would appreciate your taking due note of this decision and ensuring its implementation.

Yours faithfully,

FIFA

A handwritten signature in blue ink, appearing to read 'L. Villas-Boas Pires'.

Luis Villas-Boas Pires
Director of the FIFA Judicial Bodies

Decision of the FIFA Disciplinary Committee

passed on 25 September 2025

DECISION BY:

Jorge PALACIO (Colombia), Deputy Chairperson

ON THE CASE OF:

Football Association of Malaysia

Gabriel Felipe Arrocha

Facundo Tomas Garces

Rodrigo Julian Holgado

Imanol Javier Machuca

Joao Vitor Brandao Figueiredo

Jon Irazabal Iraurgi

Hector Alejandro Hevel Serrano

(Decision FDD-24394)

REGARDING:

Art. 22 of the FIFA Disciplinary Code – *Forgery and falsification*

I. FACTS OF THE CASE

1. The following summary of the facts does not purport to include every single contention put forth by the parties at these proceedings. However, the Deputy Chairperson of the FIFA Disciplinary Committee (the **Committee**) has thoroughly considered in the discussion and deliberations any and all evidence and arguments submitted, even if no specific or detailed reference has been made to those arguments in the following outline of its position and in the ensuing discussion on the merits.
2. This case is about an infringement of article 22 of the FIFA Disciplinary Code, ed. 2025 (**FDC**) concerning forgery and falsification by the Football Association of Malaysia (**FAM**) and the following players (hereinafter all together, the **Players**). All the Players were born outside of Malaysia:

Reference	Name	Birthplace
Player 1	Gabriel Felipe Arrocha	Santa Cruz de la Palma, Spain
Player 2	Facundo Tomás Garcés	Santa Fe, Argentina
Player 3	Rodrigo Julián Holgado	Buenos Aires, Argentina
Player 4	Imanol Javier Machuca	Rosario, Argentina
Player 5	João Vítor Brandão Figueiredo	São Paulo, Brazil
Player 6	Jon Irazabal Iraurgi	Bilbao, Spain
Player 7	Héctor Alejandro Hevel Serrano	Leidschendam, the Netherlands

a. Facts preceding the initiation of the disciplinary proceedings

3. On 19 March 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGIBILITY OF PLAYER, HECTOR ALEJANDRO HEVEL TO PLAY FOR MALAYSIA NATIONAL FOOTBALL TEAM"*. In particular, the FAM enclosed the mentioned player's grandfather's birth certificate dated 06 January 2025 which indicated that the latter, Mr Hendrik Jan Hevel, was born on 03 February 1933 in Malacca Straights, Malaysia. Such case was filed under ref. FPSD-18682.
4. On 20 March 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGIBILITY OF PLAYER, GABRIEL FELIPE AROCHA TO PLAY FOR MALAYSIA NATIONAL FOOTBALL TEAM"*. In particular, the FAM enclosed the mentioned player's grandmother's birth certificate dated 03 January 2025 which indicated that the latter, Ms María Belen Concepción Martin, was born on 17 May 1956 in Malacca, Malaysia. Such case was filed under ref. FPSD-18683.
5. On 24 March 2025, FIFA sent a letter to the FAM in the context of case FPSD-18682 explaining, *inter alia*, that on the basis of the information provided, the Player 7 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).

6. On 06 June 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGITIBLIY OF PLAYER, FACUNDO TOMAS GARCES TO PLAY FOR MALASYA NATIONAL FOOTBALL TEAM"*. Specifically, the FAM enclosed the mentioned player's grandfather's birth certificate dated 20 January 2025 which indicated that the former, Mr Carlos Rogelio Garces Fernandez, was born on 29 May 1930 in Penang, Malaysia. Such case was filed under ref. FPSD-19517).
7. On 06 June 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGITIBLIY OF PLAYER, RODRIGO JULIAN HOLGADO TO PLAY FOR MALASYA NATIONAL FOOTBALL TEAM"*. Specifically, the FAM enclosed the mentioned player's grandfather's birth certificate dated 27 June 1975 which indicated that the former, Mr Omar Eli Holgado Gardon, was born on 27 July 1932 in George Town, Malaysia. Such case was filed under ref. FPSD-19518.
8. On 06 June 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGITIBLIY OF PLAYER, IMANOL JAVIER MACHUCA TO PLAY FOR MALASYA NATIONAL FOOTBALL TEAM"*. Particularly, the FAM enclosed the mentioned player's grandmother's birth certificate dated 29 January 2025 which indicated that the latter, Ms Concepción Agueda Alaniz, was born on 16 August 1954 in Penang, Malaysia. Such case was filed under ref. FPSD-19519.
9. On 06 June 2025, FIFA sent a letter to the FAM in the context of case FPSD-19519 explaining, *inter alia*, that on the basis of the information provided, the Player 4 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).
10. On 06 June 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGITIBLIY OF PLAYER, JOAO VITOR BRANDAO FIGUEIREDO TO PLAY FOR MALASYA NATIONAL FOOTBALL TEAM"*. Specially, the FAM enclosed the mentioned player's grandmother's birth certificate dated 27 March 2017 which indicated that the former, Ms Nair de Oliveira, was born on 26 September 1931 in Johore, Malaysia. Such case was filed under ref. FPSD-19520.
11. On 06 June 2025, the FAM submitted to FIFA an *"INQUIRY REGARDING ELIGITIBLIY OF PLAYER, JON IRAZABAL IRAURGUI TO PLAY FOR MALASYA NATIONAL FOOTBALL TEAM"*. In particular, the FAM enclosed the mentioned player's grandfather's birth certificate dated 08 January 2025 which indicated that the latter, Mr Gregorio Irazabal y Lamiquiz was born on 24 February 1928 in Kuching, Sarawak, Malaysia. Such case was filed under ref. FPSD-19521.
12. On 06 June 2025, FIFA sent a letter to the FAM in the context of case FPSD-19521 explaining, *inter alia*, that on the basis of the information provided, the Player 6 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).

13. On 09 June 2025, FIFA sent a letter to the FAM in the context of proceedings FPSD-18683 explaining, *inter alia*, that on the basis of the information provided, the Player 1 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).
14. On 09 June 2025, FIFA sent a letter to the FAM in the context of proceedings FPSD-19517 explaining, *inter alia*, that on the basis of the information provided, the Player 2 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).
15. On 09 June 2025, FIFA sent a letter to the FAM in the context of proceedings FPSD-19518 explaining, *inter alia*, that on the basis of the information provided, the Player 3 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).
16. On 09 June 2025, FIFA sent a letter to the FAM in the context of proceedings FPSD-19520 explaining, *inter alia*, that on the basis of the information provided, the Player 5 appeared to comply with all the pertinent requirements and would be eligible to play for the FAM's representative team(s).
17. The table below summarizes the proceedings in respect of the Players:

Player No.	Case Ref.	Player Name	FIFA Letter Sent
Player 1	FPSD-18683	Gabriel Felipe Arrocha	09 June 2025
Player 2	FPSD-19517	Facundo Tomás Garcés	09 June 2025
Player 3	FPSD-19518	Rodrigo Julián Holgado	09 June 2025
Player 4	FPSD-19519	Imanol Javier Machuca	06 June 2025
Player 5	FPSD-19520	João Vítor Brandão Figueiredo	09 June 2025
Player 6	FPSD-19521	Jon Irazabal Iraurgi	06 June 2025
Player 7	FPSD-18682	Héctor Alejandro Hevel Serrano	24 March 2025

18. On 10 June 2025, the Players participated in the match Malaysia v. Vietnam in the context of the AFC Asian Cup Saudi Arabia 2027™ Qualifiers Third Round Group F (final score 4:0). Both Player 5 and Player 3 scored, respectively at the 49th and 59th minute of that encounter.
19. On 11 June 2025, FIFA received a complaint regarding the eligibility of the Players 1, 3, 4, 6, and 7. Specifically, the complainant submitted *"a formal complaint regarding reason to believe that certain foreign-born players are ineligible to represent the Malaysian National Football Team [...] their arrival in Malaysia and their commencement of playing for local clubs occurred relatively recently [...] Their naturalization process and international debut took place within a questionable timeframe, raising significant questions about the validity of this process"*.

b. Investigatory Reports

20. In view of the above, the Secretariat to the FIFA Disciplinary Committee (the **Secretariat**) carried out investigations in accordance with art 30 (1) and 35 (5) of the FDC. In the scope of the investigations, the Secretariat was able to gather a copy of the original birth certificates in question which indicated the following:

Player	Grandmother/Grandfather	Birthplace
1	María Belen Concepción Martín	Santa Cruz de la Palma, Spain
2	Carlos Rogelio Fernandez	Villa María Selva, Santa Fé de la Cruz, Argentina
3	Omar Eli Holgado Gardon	Caseros, Buenos Aires, Argentina
4	Concepción Agueda Alaniz	Roldán, Argentina
5	Nair de Oliveira	Abre Campo, Brazil
6	Gregorio Irazabal y Lamiquiz	Villa de Guernica y Luno, Viscaya, Spain
7	Hendrik Jan Hevel	The Hague, Netherlands

21. The results of the above investigations were set out in two reports (the **Investigatory Reports**). In particular, the Investigatory Reports list the following evidence, which contrasted to the one filed by the FAM respectively in the proceedings FPSD-18683, FPSD-19517, FPSD-19518, FPSD-19519, FPSD-19520, FPSD-19521 and FPSD-18682:

Player	Grandmother/Grandfather	Birthplace (doctored documents)	Birthplace (original documents)
1	María Belen Concepción Martín	Malacca, Malaysia	Santa Cruz de la Palma, Spain
2	Carlos Rogelio Fernandez	Penang, Malaysia	Villa María Selva, Santa Fé de la Cruz, Argentina
3	Omar Eli Holgado Gardon	George Town, Malaysia	Caseros, Buenos Aires, Argentina
4	Concepción Agueda Alaniz	Penang, Malaysia	Roldán, Argentina
5	Nair de Oliveira	Johore, Malaysia	Abre Campo, Brazil
6	Gregorio Irazabal y Lamiquiz	Kuching, Sarawak, Malaysia	Villa de Guernica y Luno, Viscaya, Spain
7	Hendrik Jan Hevel	Mallaca Straits Settlements, Malaysia	The Hague, Netherlands

22. In this context, the Investigatory Reports outline the following conclusion:

“Based on the evidence on file, the Secretariat is comfortably satisfied to establish that the documents [submitted by the FAM in the proceedings FPSD-18682, FPSD-18683, FPSD-19517, FPSD-19518, FPSD-19519, FPSD-19520, and FPSD-19521] are forged and that the Players have made use of these documents to evade and circumvent the pertinent FIFA Regulations in order to be eligible to represent the team of the FAM.”

c. Proceedings before the FIFA Disciplinary Committee

23. On 22 and 28 August 2025, disciplinary proceedings were opened against the FAM and the Players (hereinafter all together, the **Respondents**) for the potential breach of art. 22 FDC. The Respondents were notified of the opening letter by the Secretariat via the FIFA Legal Portal. A deadline until 22 September 2025 was given to the Respondents to reply.
24. On 22 September 2025, the Respondents presented their position, as detailed in continuation.
25. On 22 September 2025, the Secretariat informed the Respondents that the case was referred to the Committee for consideration and a formal decision on 25 September 2025.
26. The operative part of the decision was notified to the Respondents on 26 September 2025. The Respondents subsequently timely requested the grounds of the decision in accordance with art. 54 FDC.

II. RESPONDENTS' POSITION

27. The Respondents' position can be summarised as follows.

a. Facts

- The competent Malaysian authorities were presented with the applications concerning the Players, with the relevant documents and an official file of each of the Player was opened by the Malaysian Government.
- The authorities carried out all verifications and checks required as declared by the relevant Director General of the National Registration Department: *"In the present case, the applicants provided to us all the required documents together with the names and identification details of their grandparents. [...] NRD conducted a cross-examination and verification of this information" [...] "to confirm the applicant's lineage through their grandparents."*
- This confirms that the Players' ancestral connections to Malaysia were authenticated, and that the aforementioned department confirmed that the Players' nationalities were given in line with the Malaysian Constitution.
- As a result of these assessments, FAM then forwarded the relevant applications to FIFA.

- Neither the FAM nor the Players were ever aware of the circumstance that some of the documents submitted might have been falsified.
- Neither the FAM nor the Players ever played any role in the preparation of the documents that are now alleged to be false.
- The conduct of the FAM and the Players was correct and devoid of any intent or fault.

b. Law: as a preliminary matter – the uncertain nature of the alleged infringement

- The allegations against the FAM and the Players concern art. 22 FDC and the relevant part of this provision, for the present case, stipulates that “*anyone who [...] uses a forged or falsified document*” must be sanctioned (emphasis added by the Respondents).
- However, this provision provides no guidance as to what is meant by the notion of “use”. Indeed, for the infringement to be established, it appeared to be sufficient that a party make any use whatsoever of the forged or false document, regardless of whether it was aware of its forgery or falsity.
- In this context, besides that the FDC has taken the view that art. 22 FDC established a case of strict liability, it is nonetheless necessary to examine the rationale, limits and applicability of such principle.
- The FAM and the Players exercised reasonable care and cross-checked documents with national authorities and had no reason neither right to question or dispute such decision from the Malaysian authorities. Moreover, as a further proof of its commitment to regulatory compliance, FAM proactively sought further formal confirmation from FIFA regarding the Players’ eligibility status.
- The adjudicating body must apply the principle of a case-by-case analysis, taking into account the specificities of the individual case.

c. The Substantive Effects of the Alleged Violation

- In the present case, all the Players were lawfully naturalised as Malaysian citizens and fulfilled the requisites set out by the FIFA Regulations Governing the Application of the Statutes (**RGAS**) to be eligible to play for the representative team of the FAM.
- The Players’ legal status, therefore, both under ordinary law and within sports jurisdiction, is exactly the same.

- Accordingly, the FIFA Disciplinary Committee cannot but acknowledge that the violation – if any violation did occur (*quod non*) – is merely formal in nature and devoid of any substantive effect.
- Moreover, the allegedly forged documents did not give any advantage to the FAM and the Players – aiming to represent the FAM – and it shall be out of any question that there was no circumvention of the FIFA Regulations. In particular, (i) the Players were confirmed to have the Malaysian nationality (ii) the lack of participation in any official game with another football association and (iii) the biological lineage to Malaysia.
- Therefore, any alleged violation of art 22 FDC produced no substantive effect whatsoever and, if established, any violation is of a merely formal nature and was anyways cured by the Players and the FAM.

d. On the sanctions

- In the strictly denied and merely hypothetical event that the FIFA Disciplinary Committee were to find an infringement attributable to the Players and FAM warranting the imposition of a sanction, certain considerations become necessary.
- Mitigating circumstances: FAM and the Players' proactive cooperation, clean disciplinary record, and lack of intent.
- Substantive effects: as outlined above, the use of allegedly falsified documents had no substantive effect either for the Players or FAM.
- Relevant precedents: CAS and FIFA precedents show that sanctions were limited or not imposed when no substantive advantage was gained and did not take any measure against the players involved.

e. Urgent request

- To render a decision as soon as possible since the international matches of the Malaysian National Team are scheduled for 9 and 14 October 2025.
- To confirm the Players' eligibility to play for the FAM.

f. Request for relief

- FAM and the Players request that FIFA:

- Close the current investigation, declaring the relevant complaint ungrounded.
- Reject the allegations and impose no sanctions.
- Alternatively, impose only a non-severe economic fine on FAM and, if necessary, a mild admonition or fine on the Players.
- Confirm the Players' eligibility to represent the Malaysian National Team in the future.

III. CONSIDERATIONS OF THE DISCIPLINARY COMMITTEE

28. In view of the circumstances of the present matter, the Committee decided to first address the procedural aspects, namely, its jurisdiction and the applicable law, before entering into the substance of the matter.

A. Jurisdiction of the FIFA Disciplinary Committee

29. First of all, the Committee noted that at no point during the present proceedings did the Respondent challenge its jurisdiction or the applicability of the FDC.

30. Notwithstanding the above and for the sake of good order, the Committee found it worthwhile to emphasise that, in view of arts. 2 (1), 22 and 55 FDC, ed. 2025– edition applicable to the present matter as outlined below –it was competent to evaluate the present case and to impose sanctions in case of corresponding violations.

B. Applicable law

31. In order to duly assess the present matter, the Committee deemed that it had to determine which edition of the FDC applied to the substance of the case.

32. In these circumstances, the Committee noted that the potential disciplinary offense at stake, i.e., the use of forged documents by the Respondents, was apparently committed on the FIFA proceedings under reference FPSD-18682 (i.e., on 19 March 2025), FPSD-18683 (i.e., on 20 March 2025), FPSD-19517 (i.e., on 6 June 2025), FPSD-19518 (i.e., on 6 June 2025), FPSD-19519 (i.e., on 6 June 2025), FPSD-19520 (i.e., on 6 June 2025), and FPSD-19521 (i.e., on 6 June 2025).

33. Bearing in mind that the current and applicable 2025 edition of the FDC entered into force on 5 September 2025, it is determined that any potential offense committed on 19 and 20 March 2025 shall be assessed under the current edition of the Code.

34. This is because art. 4 (2) of the FDC, which states that “[the 2025 ed.] also applies to all disciplinary offences committed prior to the date on which it comes into force, subject to any milder sanction that would apply under previous rules”. Effectively, this provision allows for a retroactive application of the current code to the extent that the sanctions under the new code are more favourable to the accused than those under the previous edition.
35. In this regard, the Committee noticed that art. 22 of the 2023 ed. and art. 22 of the 2025 ed. referred both to “*Forgery and falsification*” and empowered FIFA Judicial Bodies to sanction the perpetrator(s) of forged or falsified documents, but also to make the association (or club) to which the perpetrator(s) belong(s) responsible for this behaviour. In fact, the Committee underlined that both provisions have identical wording, which means that there is no distinction to be made in the sense of penalties to be applied.
36. Finally, the Committee observed that the Respondents did not contest the applicability of a specific version of the FDC to the present proceedings.
37. The above having been clarified, the Committee decided to begin by recalling the content and the scope of the relevant provisions of the 2025 ed. FDC applicable to the present case, the aforementioned being without prejudice to other rules that may also be at stake:

“Article 22 - Forgery and falsification

1. *Anyone who, in football-related activities, forges a document, falsifies an authentic document or uses a forged or falsified document will be sanctioned with a fine and a ban of at least six matches or for a specific period of no less than 12 months.*
2. *An association or a club may be held liable for an act of forgery or falsification by one of its officials and/or players.”*

38. As explained *supra*, this article aims at sanctioning the perpetrator(s) of forged or falsified documents, as well anyone who makes use of such documents, but also to make the association (or club) to which the perpetrator(s) belong(s) responsible for this behaviour, in accordance with art. 22 (2) FDC. In other words, the association (or club) concerned is therefore liable for the offence committed by one of its members, even if the association (or club) is not directly at fault. The Committee would therefore be entitled to sanction not only the author of the forged or falsified document, or their user, but also the club or association to which the latter belongs, in order to ensure the implementation of FIFA's statutory objectives¹.

¹ Cf. art. 2 lit. g) of the FIFA Statutes.

39. In particular, the Committee emphasised that the aforementioned principle of strict liability is a fundamental element of the football regulatory system, as well as one of the few legal tools available to prevent such serious offences from occurring and going unpunished.
40. Finally, in light of the allegations concerning the potential ineligibility of the Players on the basis of nationality, the Committee deemed it appropriate to preliminarily clarify that the question of the Players' eligibility to represent the FAM is governed by the RGAS. Furthermore, any potential breach related to the match Malaysia v. Vietnam would fall under the competence of the Asian Football Confederation (**AFC**), whose relevant adjudicatory body would be entitled to assess and determine the consequences of any finding of ineligibility. On this note, the Committee underlined that it is a well-established principle in football that associations and clubs are responsible for fielding eligible players only.
41. The relevant provisions having been outlined; the Committee subsequently turned its attention to the merits of the case.

C. Merits of the dispute

I. Issues of review in light of the provisions relating the forgery and falsification

42. Having established the above, the Committee then proceeded to examine the evidence at its disposal, namely the Investigatory Reports along with the different enclosures, but also all other documents and information provided in the context of these disciplinary proceedings, in order to determine any violations of the FDC.
43. That being established, the Committee then observed that the Respondents have not denied the fact that the documents in question might have been forged and/or falsified, highlighting (i) the due diligence of the FAM and the Players in the preparation of the documentation, (ii) that there is no substantive effect of the alleged violation (if any), and (iii) the FIFA's confirmation on the Players' eligibility.
44. The Committee therefore turned its attention to the documents in question that are the subject of these proceedings. In view of the Respondent's allegations, the Committee considered that it had no choice but to take into account the analysis and conclusions of the Investigatory Reports in order to assess whether or not these documents were forgeries and/or had been falsified.
45. In this context, the Committee acknowledged that the Secretariat was able to gather a copy of the original birth certificates in question and compared with the birth certificates submitted by the Respondents in the relevant FIFA proceedings.

46. In this regard, the Committee wished to highlight that it concurred with the conclusion of the Investigatory Reports, specifically, that the original birth certificates indicated a sharp contrast to the documentation provided. In particular:

Player	Grandmother/Grandfather	Birthplace (birth certificates submitted by the Respondents)	Birthplace (original birth certificates gathered by the Secretariat)
1	María Belen Concepción Martín	Malacca, Malaysia	Santa Cruz de la Palma, Spain
2	Carlos Rogelio Fernandez	Penang, Malaysia	Villa María Selva, Santa Fé de la Cruz, Argentina
3	Omar Eli Holgado Gardon	George Town, Malaysia	Caseros, Buenos Aires, Argentina
4	Concepción Agueda Alaniz	Penang, Malaysia	Roldán, Argentina
5	Nair de Oliveira	Johore, Malaysia	Abre Campo, Brazil
6	Gregorio Irazabal y Lamiquiz	Kuching, Sarawak, Malaysia	Villa de Guernica y Luno, Viscaya, Spain
7	Hendrik Jan Hevel	Mallaca Straits Settlements, Malaysia	The Hague, Netherlands

47. Moreover, the Committee observed that the relevant statement of the Director General of the National Registration Department (NRD) in Malaysia, which was filed by FAM itself, is of particular relevance. The NRD confirmed that the Malaysian authorities never received the original birth certificates. Instead, the NRD issued its own copies based on secondary information and foreign documents from Argentina, Brazil, and Spain. The NRD further admitted that it could not retrieve the original handwritten records and therefore issued official copies based on evidence that a birth had occurred. This admission, so finds the Committee, indicates that the Malaysian government's validation process may not have been based on original documents, which calls into question the thoroughness of FAM's verification process.

48. Based on these elements, the Committee was comfortably satisfied that the birth certificates submitted by the Respondents in the FIFA proceedings FPSD-18682, FPSD-18683, FPSD-19517, FPSD-19518, FPSD-19519, FPSD-19520, and FPSD-19521 have been forged and/or falsified, in that they were doctored to alter the birthplace listed therein.
49. In light of the foregoing, the Committee decided to analyse whether the Respondents could be held liable for such violation.

II. Was art 22 of the FIFA Disciplinary Code infringed?

50. In this regard, and for the purpose of art 22 FDC as explained above, the Committee is entitled to sanction the perpetrator(s) of forged or falsified documents, *in casu* the Players, but also to make the association (or club) to which the perpetrator(s) belong(s) responsible for this behaviour, in accordance with art 22 (2) FDC, *in casu*, the FAM. The Committee noted that in this respect the wording of such provision is purposely broad, with the aim of encompassing all forms of document forgery or falsification, or their use in general, regardless of intent. This provision has been designed to prevent the use of defenses based on ignorance or procedural compliance, and it carries severe sanctions, as forgery is considered a criminal offence in most jurisdictions.
51. With this in mind, the Committee was left without doubt, and contrary to the Respondents' assertion of diligence, the fact that FIFA was able to obtain the relevant original documents without hindrance demonstrates that FAM and the Players did not exercise the necessary level of scrutiny or care. What is more, the FAM's own admission that it was contacted by external agencies regarding the Players' heritage and yet failed to independently verify the authenticity of the documentation, further highlights a lack of proper diligence.
52. In addition, the Committee was of the view that on the basis of the documentation at hand, the use of forged or falsified documents was not a mere formality but a decisive factor in the Players' eligibility. As a consequence, it rejected the position of the Respondents that there is no substantive effect of the forgery or falsification of the birth certificates in question. As a matter of fact, the Committee underlined the effect of the forgery is severe and goes beyond as a mere technicality as the Respondents tried to depict it. The offence had a direct impact on the Players' eligibility and the integrity of the match played as all Players (five in the starting eleven) played the above-mentioned match, and two of them scored the two first goals.
53. Finally, the Committee deems that the Respondents' assertion that FIFA issued a "confirmation" on the Players' eligibility is misleading. In this respect, according to the documentation on file, FIFA's correspondence merely stated that the players "appeared to be eligible" **on the basis of the information provided at the time**. The Committee

deemed that, had FIFA been in possession of the original, unaltered documents, it would have arrived at a different conclusion as the relevant provisions of the RGAS require a direct link of a player's grandparents to be eligible to pay for a representative team of a member association to which it acquires the nationality. With the original, unaltered documentation, this link does not exist.

54. In light of these considerations, the Committee firmly concluded that the Players are the ultimate beneficiaries of the use of the doctored documentation in terms of the eligibility, and in conjunction with the FAM effectively, illegally, and successfully enjoyed the consequences of such use, which deserve an adequate sanction. In this vein, the Committee underlined again that article 22 FDC empowers the Committee to sanction the Member Association for the actions of the Players, *in casu*, the FAM.
55. Consequently, the Committee determined that the Respondents had infringed upon Article 22 FDC by using forged and/or falsified documents in the FIFA proceedings under reference FPSD-18682, FPSD-18683, FPSD-19517, FPSD-19518, FPSD-19519, FPSD-19520, and FPSD-19521.

III. Determination of the sanction

56. The violations of the FDC by the Respondents having been established, the Committee subsequently considered the sanction(s) to be imposed.
57. The Committee observed in the first place that the Respondents were both natural persons (the Players) and legal person (the FAM), and as such could be subject to the sanctions described under art. 6 (1), (2), and (3) of the FDC.
58. For the sake of good order, the Committee underlined that it was responsible to determine the type and extent of the disciplinary measures to be imposed in accordance with the objective and subjective elements of the offence, taking into account both aggravating and mitigating circumstances (art. 25 (1) of the FDC).
59. In this regard, art. 22 (1) FDC, provides for specific sanctions such as a fine and a ban of at least six matches or for a specified period of no less than 12 months.
60. In view of the above, the Committee considered that, among the range of sanctions provided for in the aforementioned article, a fine was the minimum sanction to be imposed in response to the FAM's conduct and with regard to the Players' conduct, a fine and a ban of at least six matches or for a specified period of no less than 12 months was the minimum sanctions to be imposed. On this note, the Committee underlined that the provision grants the Committee with a wide discretionary range considering the available sanctions.

61. With these elements in mind, the Committee went on to analyse the various circumstances of the matter at hand, namely, to define the aggravating and/or mitigating factors (if any) to be taken into account when deciding upon the sanction(s) to be imposed upon the Respondents.
62. Against this framework, the Committee acknowledged that the Respondents appeared to present a clean record before the FIFA Judicial Bodies, which serves as a mitigating circumstance.
63. Nevertheless, the Committee considered that it could not disregard the fact that the infringement occurred within the framework of the FIFA proceedings referenced as FPSD-18682, FPSD-18683, FPSD-19517, FPSD-19518, FPSD-19519, FPSD-19520, and FPSD-19521, which concerned the potential eligibility of the Players to represent the national team of Malaysia. The use of forged documentation in the context of an official FIFA procedure constitutes an especially serious circumstance, as it directly undermines the integrity and credibility of the system governing international football.
64. Furthermore, the Committee could not overlook that the act of forgery strikes at the very core of the fundamental principles of football, not only those governing a player's eligibility to represent a national team, but also the essential values of a clean sport and the principle of fair play. The Committee underlined that presenting fraudulent documentation with the purpose of gaining eligibility to play for a national team constitutes, pure and simple, a form of cheating, which cannot in any way be condoned. Such conduct erodes trust in the fairness of competitions and jeopardizes the very essence of football as an activity founded on honesty and transparency.
65. In addition, the Committee noted that the Players ultimately achieved their objective: they obtained falsified documentation, used it in the aforementioned FIFA proceedings, and were subsequently fielded in an official match with a significant impact to the end result of the match. This sequence of actions significantly aggravates the seriousness of the case, as it demonstrates a deliberate and successful attempt to circumvent the rules for personal and sporting gain. Accordingly, the Committee deems that a mere match suspension would be manifestly inadequate in light of these egregious circumstances. The sanction imposed must not only punish the wrongdoing but also serve as a strong deterrent and educational measure for the Players involved and the wider football community, reaffirming FIFA's zero-tolerance stance on fraudulent conduct.
66. In particular, the Committee made reference to the decisions issued by the FIFA Judicial Bodies in respect of cases 150901 and 150902, in which the player Camila Maria do Carmo Nobre de Oliveira and the Equatorial Guinean Football Association (FEGUIFUT) used falsified documents with the intent to deceive in judicial proceedings within the framework of the

preliminary competition for the Women's Olympic Football Tournaments Rio 2016™, which resulted in the following sanctions:

- for Ms. De Oliveira: a fine for CHF 2,000 and a 10-month ban from taking part in matches of the representative team of the FEGUIFUT, a warning and reprimand.
- for the FEGUIFUT: a fine for CHF 40,000, the exclusion of the women's representative team of the FEGUIFUT from the Olympic Football Tournaments Tokyo 2020™, including the respective preliminary competition, a warning and reprimand.

67. The Committee equally recalled the decision in the matter FDD-8206 concerning the club Chabab Mrirt, which submitted forged settlement agreements within the FIFA proceeding with ref. FDD-7303, and was sanctioned with a fine of CHF 50,000, plus a ban from registering new players for two (2) entire and consecutive registration periods.

68. Taking into account the foregoing and after careful consideration of the entirety of the evidence at its disposal, as well as precedents of the FIFA Judicial Bodies, the Committee determined that the most appropriate and proportionate measures in view of the offence(s) committed were:

- A fine of CHF 350,000 to be imposed on the FAM, calculated on the basis of CHF 50,000 per player involved in the fraudulent use of documentation, and,
- A fine of CHF 2,000 and 12-month ban from taking part in any football-related activity to be imposed on each of the Players.

69. The Committee accepted that these measures were severe but considered them necessary to protect the integrity of football and proportionate to the seriousness of the offences committed.

Decision

1. The Football Association of Malaysia and the players Gabriel Felipe Arrocha, Facundo Tomas Garces, Rodrigo Julian Holgado, Imanol Javier Machuca, Joao Vitor Brandao Figueiredo, Jon Irazabal Iraurgi, and Hector Alejandro Hevel Serrano are found responsible for having breached art. 22 of the FIFA Disciplinary Code (*Forgery and falsification*) for having used forged and/or falsified documents in FIFA proceedings.
2. The Football Association of Malaysia is hereby ordered to pay a fine of CHF 350,000 to FIFA.
3. The players Gabriel Felipe Arrocha, Facundo Tomas Garces, Rodrigo Julian Holgado, Imanol Javier Machuca, Joao Vitor Brandao Figueiredo, Jon Irazabal Iraurgi, and Hector Alejandro Hevel Serrano are each ordered to pay a fine of CHF 2,000 to FIFA.
4. The aforementioned players are further sanctioned with a twelve (12) month suspension from all football-related activities, effective from the date of notification of this decision.
5. All fines imposed under this decision must be paid within thirty (30) days from the date of notification.

FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION

Jorge PALACIO (Colombia)

Deputy Chairperson of the FIFA Disciplinary Committee

NOTE RELATED TO THE LEGAL ACTION

This decision can be contested before the FIFA Appeal Committee (art 61 FDC). Any party intending to appeal to the FIFA Appeal Committee must announce its intention to do so in writing within three (3) days of notification of the grounds of the decision. The appeal brief must then be filed in writing within a further time limit of five (5) days, commencing upon expiry of the first-time limit of three (3) days (art 60 (4) FDC). The appeal fee of CHF 1,000 shall be transferred to the bank account below on submission of the appeal brief at the latest (art 60 (6) FDC).

Payment can be made either in Swiss francs (CHF) to account no. 0230-325519.70J, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH85 0023 0230 3255 1970 J or in US dollars (USD) to account no. 0230-325519.71U, UBS AG, Bahnhofstrasse 45, 8098 Zurich, SWIFT: UBSWCHZH80A, IBAN: CH95 0023 0230 3255 1971 U, with reference to the abovementioned case number.