

69. The Club disputes the conclusions in the BFDS reports relied upon by UEFA and it argues that it has never been criminally prosecuted and that this would be impossible if it would indeed have been involved in match-fixing activities in over 50 matches. The Club submits that the BFDS reports indicate themselves that the system cannot guarantee the accuracy of the sources of information.
70. The Club further submits that the BFDS alone does not constitute sufficient evidence to prove match-fixing, that the BFDS is not able to attribute specific responsibilities regarding the involvement in match-fixing but that the BFDS reports in respect of escalated matches are simply neutral alarms, which require to be supported by other, different and external elements pointing in the same direction.
71. The Club explains the anomalies evidenced by the BFDS reports by stating that its players may have been involved in match-fixing without the Club's involvement and that the Club can therefore not be held responsible.
72. Finally, the Club relies on domestic Albanian legislation in submitting that gambling companies can only award a maximum profit per bettor of about EUR 3,500 and that Albanians are prohibited from accessing international betting websites.
73. In its argumentation, UEFA relies heavily on four matches of the Club that took place in UEFA's European competitions:
- Crusaders FC v. the Club (UEFA Champions League, 21 June 2015)
 - NK Dinamo Zagreb v. the Club (UEFA Champions League, 25 August 2015)
 - Sporting Clube de Portugal v. the Club (UEFA Europa League, 22 October 2015)
 - The Club v. FC Lokomotiv Moskva (UEFA Europa League, 10 December 2015)
74. The Panel will therefore particularly focus on these four matches and observes that the following conclusions are drawn by the BFDS in respect of these four matches:

Crusaders FC v. the Club (UEFA Champions League, 21 July 2015):

"The match ended in a 3:2 victory for Crusaders FC.

There was suspicious live betting evident throughout the final period of the match with the scoreline at 1:2, despite the opening 78 minutes of the game trading in a completely regular manner. During this closing period, there was suspicious betting seen for at least one further goal being scored, despite there clearly being significant time constraints on the creation of goal scoring opportunities. This confidence in a late fourth goal to be scored can simply not be justified by any degree of match action, and the behaviour of the odds in the market indicates that heavy betting was taking place for this outcome. It is wholly irregular for bettors to remain so resolutely confident in a late goal being scored, irrespective of the diminishing time in the game, and to witness live betting markets become distorted in this manner is of serious concern from an integrity standpoint. Given the large betting limits available in Asian markets for a fixture of this calibre, it is clear that large amounts were being bet for at least one late goal to be scored in an organised manner.

To reiterate, these betting patterns fundamentally contradict normal betting logic, and have to be treated as reflecting prior knowledge of a late fourth goal materialising.

It is important to analyse why suspicious betting was only evident in the final period of the game with the scoreline at 1:2. Given that [the Club] held a commanding 6:2 aggregate lead in the tie at this stage, this presented the opportunity for them to manipulate the closing portion of the match for corrupt betting purposes. Simply put, they could attempt such a scheme without putting their qualification to the next round at any significant risk, and could generate large betting profits even from just this last section of the game, given the highly liquid betting markets available.

In terms of match action, there are some key incidents to document. Firstly, in the 11th minute, [the Club's] Renato Arapi was dismissed following an off the ball incident. He was alleged to have kicked out at opponent Billy Joe Burns following a foul, and was duly sent off. Although [the Club] recovered from this, and held a 1:2 lead heading into the closing 10 minutes of the game, their defending in this final period was a serious concern, with erratic decision making and a lack of effort displayed during the final minutes by several [Club] players. Of specific interest was the poor performance of Bajram Jashanica, Kristi Vangjely and Esquerdinha during this period. They displayed questionable positional awareness and effort for both the defending of a cross which resulted in Crusaders FC's second goal, and also for a crossed ball just prior to this which resulted in Crusaders FC hitting the post. This collective defensive effort can only be viewed with serious concern given the betting patterns witnessed during this stage of the match.

Following the match, Crusaders FC goalkeeper Sean O'Neill took to the social media platform Twitter to voice suspicions about the game, suggesting that he believed some kind of 'betting scam' took place in the last ten minutes of the match. He communicated that he had 'never seen football like it', suggesting that [the Club's] players deliberately underperformed in the final period of the game. Allegations of this nature are clearly very rare from a footballer who has actually taken part in a game, and whilst they are just a personal opinion, they are important to highlight given the speculation that has surrounded the integrity of this match.

Finally, the immensely suspicious history of [the Club] must also be taken into account when analysing this match. They have featured in an extraordinary number of suspicious matches throughout their history, including multiple escalated games during the qualifying phase of this competition in past seasons. To see [the Club] once again involved in a suspicious match in European competition can only increase integrity concerns.

*Suspicious live betting for a late fourth goal scored
Very poor defensive performance of [the Club] in the closing stages of the match
Extremely suspicious history of [the Club]*

In summary, there is credible evidence to support the conclusion that this match was manipulated for betting purposes. The suspicious betting patterns observed exceed the acceptable threshold, and the BFDS are satisfied that corrupt betting profits were generated on this match”.

NK Dinamo Zagreb v. the Club (UEFA Champions League, 25 August 2015):

“The match ended in a 4:1 victory for NK Dinamo Zagreb.

There was highly suspicious live betting which developed abruptly midway through the second half. With the score at 3:1 – and NK Dynamo Zagreb playing with a numerical disadvantage – bettors suddenly became supremely confident that [the Club] would lose the remainder of the match. Whilst NK Dinamo Zagreb were the better team during this period of the game, no amount of match action can possibly justify the severe betting patterns that emerged, and it is clearly evident that it was not primarily driven by events taking place on the field of play. There was additional betting of an even more suspicious nature at 3:1 for at least five goals to be scored, with odds again forced down to extreme levels. This betting was so severe and so illogical that it is clear bettors were aware of at least one more goal being scored in the match. Indeed, bettors were attempting to extract the maximum possible profits from all live betting markets, as they frequently do in matches which are manipulated for betting purposes.

Furthermore, following NK Dynamo Zagreb’s fourth goal (4:1), severe betting ensued for [the Club] to concede another unanswered goal. It is particularly worrying to see strong live betting for [the Club] to concede late goal(s) in the game, as there were severe time constraints on goal scoring opportunities being created. Clearly, such betting patterns have to be treated with the utmost concern, and it is clear that extraordinary amounts were being bet in order for markets to react in the way they did.

The timing of the suspicious betting is potentially very informative about the nature of the manipulation. Indeed, suspicious betting developed soon after [the Club] trailed 3:1, at which point their chances of progressing from their tie were very slim. This suggests that [the Club] were ready to exploit the match for corrupt betting purposes when the opportunity presented itself, indicating a premeditated and carefully planned scheme. Whilst only one of these goals actually materialised, meaning the desired outcome was only partially successful, considerable corrupt betting profits would still have been generated across multiple markets as a result.

In terms of match action, it must be noted that [the Club’s] performance levels dropped noticeably at 3:1. Whilst this may be partially understandable as the tie was effectively over, they did have a man advantage at this point so should still have been competitive. Furthermore, the goal that [the Club] conceded in the 80th minute must be highlighted. Renato Arapi of [the Club] was very slow to react to a through ball that set up this goal and then failed to chase the onrushing forward, which allowed ample time and space for the goal scoring chance to develop. Goalkeeper Orges Shebi could also have handled the situation better, choosing to stay rooted to his line for the one on one rather than coming out to close down the angle, which arguably most goalkeepers would have done. Unquestionably, these match incidents have to be documented considering the thoroughly suspicious betting witnessed.

Finally, the extremely suspicious history of [the Club] must also be taken into account when analysing this match. They have featured in an extraordinary number of suspicious matches throughout their history, including in the second qualifying round of the UEFA Champions League against Crusaders FC on 21/07/2015. That match featured strikingly similar suspicious live betting patterns indicating [the Club] deliberately conceded a late goal. Once again, the suspected manipulation was executed when the tie was no longer competitive, on that occasion once [the Club] held a commanding aggregate lead. To see

[the Club] once again involved in match displaying similar suspicious betting highlights the highly coordinated and sophisticated nature of their corrupt betting practices.

Extremely suspicious live betting for [the Club] to lose the match by at least three and four goals

Equally suspicious live betting for at least five and six goals to be scored

Very poor defending from [the Club] which led to the final goal

Very suspicious history of [the Club], including previous escalations in European competition

In summary, there is overwhelming evidence that this match was manipulated for betting purposes in a precise and premeditated manner, with corrupt betting profits generated as result”.

Sporting Clube de Portugal v. the Club (UEFA Europa League, 22 October 2015):

“The match ended in a 5:1 victory for Sporting Clube de Portugal.

Late in the match with the score at 4:0, highly suspicious live betting emerged for at least six goals to be scored. These wholly suspicious odds movements developed abruptly, indicating that the final 20 minutes of the match were specifically targeted for the purpose of generating corrupt betting profits. Indeed, there were no signs of irregular betting occurring in any live markets prior to this point. [The Club] duly conceded a fifth goal in the 77th minute, just five minutes after these suspicious betting patterns materialised. When betting markets reopened with the score at 5:0, there was a further wave of highly suspicious betting for a late sixth goal to be scored, and also additional suspicious betting for [the Club] to lose by a minimum six-goal margin. Namely, the bettors who were heavily active in the marketplace strongly anticipated both a late goal, and [the Club] being the team to concede said goal. Even with just five minutes of normal time remaining, there was an unrelenting betting confidence on display, and this can only be treated as reflecting prior knowledge of the match result, given the severe time constraints on these outcomes materialising. The betting was in fact so unusual that it led to one prominent Asian bookmaker removing live markets before the end of the game. A decision by an Asian bookmaker to cease live trading prematurely is very concerning, as it demonstrates that they likely held their own concerns regarding the nature of the betting being executed in the closing period of the match.

The highly suspicious betting for at least six goals to be scored ultimately proved successful courtesy of Sporting Clube de Portugal’s fifth goals, and [the Club’s] very late consolation goal. However, when all live betting patterns are viewed in conjunction, it is abundantly clear that bettors expected [the Club] to be the team to concede the late sixth goal as well. Although this did not occur, it does not make the betting patterns observed any less concerning. Indeed, there is substantial betting evidence that this match was a manipulation attempt by [the Club], and corrupt profits were clearly generated for the live market relating to a minimum of six goals being scored, albeit not maximised as a whole, as [the Club’s] losing margin was ultimately only four clear goals.

In terms of the match action, earlier match incidents must also be documented. Firstly, Hamdi Salibi of [the Club] received a second yellow card for deliberate handball in only the 24th minute of the match. His decision to handle the ball from his own sides attacking corner can only be regarded as highly unusual. Secondly, [the Club] conceded two penalties at the end of the first half, which led to Sporting Clube de Portugal leading 2:0 at half-time. Bajram Jashanica was penalised for tripping a Sporting Clube de

Portugal forward for the first penalty, whilst minutes later, referee Clayton Pisani deemed that Kristi Vangeli fouled the same player just inside the penalty area and awarded another penalty. Whilst all these incidents clearly harmed [the Club's] chances in the match, it should be noted that the highly suspicious betting patterns did not emerge until long after these incidents took place. However, it is notable that the tempo of the match slowed in the final period of the game, with neither side showing a significant attacking threat. This demonstrates that the aforementioned highly suspicious betting patterns were not driven by events unfolding on the field of play itself, raising integrity concerns even further.

Finally, the escalation history of [the Club] must also be taken into account when analysing this match, as they are one of the most suspicious teams in the history of the BFDS. Of particular concern is that two of their UEFA Champions League qualification matches from this season against NK Dinamo Zagreb on 25/08/2015 and Crusaders FC on 21/07/2015 were also escalated. These matches featured strikingly similar betting patterns for [the Club] to concede late unanswered goals, and to witness this repeated pattern of betting strongly indicates that this is a specific method of manipulation which [the Club] are employing in European Competition.

*Extremely suspicious live betting for at least six goals to be scored
Additional suspicious live betting for [the Club] to lose by at least six goals
Very suspicious history of [the Club]*

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 suspicious betting only produced mixed results, this match was clearly targeted for the purpose of generating corrupt betting profits”.

The Club v. FC Lokomotiv Moskva (UEFA Europa League, 10 December 2015):

“The match ended in a 0:3 victory for FC Lokomotiv Moskva.

Extremely suspicious live betting was observed for at least two and three goals to be scored in the match. This wholly suspicious betting emerged early in the second half, with odds for at least three goals to be scored decreasing steadily, in spite of the elapsing time for the required goals to be scored. Indeed, as the match entered the final 20 minutes (at 0:1), the one-sided betting for a further two goals to be scored was still occurring on a deeply suspicious scale, indicating that heavy amounts were being bet during this period. Even with less than five minutes of normal time remaining, bettors remained convinced that at least one further goal would be scored, with the bettors active in the marketplace displaying no regard for the extreme time constraints on the creation of goal scoring chances at this late stage of play.

There was also highly suspicious betting recorded for [the Club] to lose the match by at least two goals. This concerning betting did not develop until the final 10 minutes of the contest (at 0:1), as bettors suddenly and inexplicably displayed a suspicious level of confidence in [the Club] losing the match by at least two goals. Odds decreased against all expectations, reaching low and unrealistic levels with just minutes remaining in regulation time. This period of betting is rendered even more suspicious with a review of the match action and statistics, which reveal that the contest was far from one sided, with [the Club] actually recording a very similar number of dangerous attacks to FC Lokomotiv Moskva during the final

15 minutes. When examining all the live markets as a whole, it appears clear that bettors were primarily anticipating at least three goals to be scored in this match and were also expecting [the Club] to concede the late goals to render all the betting successful. Given the high profile nature of the UEFA Europa League and the associated high betting limits, it is abundantly clear that vast sums of money must have been traded on these outcomes to force odds to behave in such an illogical and suspicious manner.

In terms of the match action, the strange nature of the final two goals must be documented. The second goal of the game was scored as a result of miscommunication between [Club] goalkeeper Orges Shehi and defender Bajram Jashanica. A long, hopeful ball was not dealt with by Bajram Jashanica, who inexplicably hesitated, allowing the opposition striker to beat both himself and Orges Shehi to the ball for a simple finish into an unguarded net. Similarly, the third and final goals of the game was also characterised by some highly questionable defending from [the Club]. Not one the defenders attempted to mark an opposition player or close down the man with the ball, allowing FC Lokomotiv Moskva to find an unmarked striker in the box who then proceeded to shoot into the goal under absolutely no pressure. A review of the match action shows there was an obvious drop in performance and focus from [Club] players in the later stages of the match, with players making little to no effect to close down and disrupt opposition players. Considered alongside the highly suspicious betting patterns discussed, the notable match incidents have to be viewed critically.

Finally, the vast escalation history of [the Club] must also be taken into account when analysing this match. Of particular concern is that two of their UEFA Champions League qualification matches from this season against NK Dinamo Zagreb on 25/08/2015 and Crusaders FC on 21/07/2015 were also escalated, as well as their recent UEFA Europa League fixture against Sporting Clube de Portugal on 22/10/2015. These matches featured strikingly similar betting patterns for [the Club] to concede late unanswered goals, and to witness this repeated pattern of betting strongly indicates that this is a specific method of manipulation which [the Club] are employing in European competitions.

*Extremely suspicious live betting for at least three and two goals to be scored
Further highly suspicious live betting for [the Club] to lose by at least two goals
Extremely questionable defensive performance of [the Club], in particular Bajram Jashanica
Highly suspicious history of [the Club]*

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”.

75. The Panel observes that UEFA basically relies on these BFDS reports without adding much information in its written submissions that is not already taken into account in the BFDS reports. The conclusions in the BFDS reports regarding specific on-field actions of players are corroborated with video footage.
76. Commencing with its analysis, the Panel finds the fact that the Club, its officials or its players have not been criminally tried does not prove at all that the Club has not been involved in match-fixing. This is also by no means a precondition for UEFA to declare the Club ineligible to participate in its European competitions. Indeed, as happened in other situations, the