

## CASE UPDATE

## Court of Arbitration for Sport dismisses appeal by Drogheda United FC against UEFA regarding non-compliance with multi-club ownership rules

On 16 June 2025, the Court of Arbitration for Sport (CAS) dismissed an appeal by Irish Premier Division club Drogheda United FC (DUFC) against UEFA concerning a decision to remove the club from the UEFA Conference League 2025/26, due to alleged non-compliance with UEFA's multi-club ownership (MCO) rules. The decision has important implications for both clubs and investors considering MCO structures in European football.

### Background

UEFA, the governing body of football in Europe, has Regulations in place for each of the Champions League, Europa League and Conference League competitions. Clubs that qualify for these competitions must comply with the [Regulations](#).

Article 5 of the Regulations (the **MCO Rules**) prohibit two clubs under common "control or influence" from competing in the same UEFA club competition in a given season. UEFA provided guidance on the meaning of "control or influence" for these purposes in a circular to all clubs in May 2024.

The MCO Rules are engaged when two or more related clubs qualify to compete in a UEFA club competition in the same season (**Multiple Qualification**). In the event of a breach, only one of those clubs will be admitted to the relevant UEFA competition.

For further detail on UEFA's MCO Rules and recent cases, please read our previous update [here](#).

### Facts

DUFC qualified for the Conference League 2025/26 by winning the FAI Cup in November 2024.

Both DUFC and Silkeborg IF, a club playing in the Danish Superliga who have also qualified for the competition, are reportedly owned by Trivela Group, a US-based investment entity.

On 5 June 2025, UEFA's Club Financial Control Body (**CFCB**) decided that DUFC did not comply with the MCO Rules as of the 1 March assessment date.

The MCO Rules provide that, in the case of a breach, the team which finished lower in their domestic league would be removed from UEFA competition. DUFC were therefore removed due to their ninth place finish in the Irish Premier Division 2024/25.

### Appeal and Decision

DUFC appealed to CAS, requesting that CAS annul the CFCB's decision and include DUFC in the draw for the second qualifying round on 17 June 2025.

The CAS panel [dismissed](#) their appeal in an expedited procedure to comply with the Conference League draw.

Although UEFA brought forward the assessment date this year from 3 June to 1 March, the CAS panel held that this change was properly communicated by UEFA and DUFC knew or ought to have known about it. The panel also rejected DUFC's submissions on alleged unequal treatment by UEFA.

Hence, the decision to remove DUFC from the Conference League was upheld.

### Key Takeaways

In past examples of potential breaches of the MCO Rules (including AC Milan / Toulouse in 2023 and Manchester United / Nice and Manchester City / Girona last year), the clubs in question have been able to move to a compliant structure ahead of the relevant deadline.

UEFA brought the assessment date forward to 1 March this year due to *"the complexity of the cases investigated"...."to provide sufficient time for completion of the...process and ensure the smooth running of UEFA's club competitions."* This change was communicated to all clubs by way of a UEFA circular in October 2024.

The DUFC case demonstrates that UEFA is prepared to strictly enforce its MCO Rules and exclude clubs from UEFA competitions if they do not comply.

As such, investors should ensure that any MCO model is structured from the outset to comply with the MCO Rules, with appropriate safeguards in place.