

CASE UPDATE

Court of Arbitration for Sport dismisses appeal by FC DAC 1904 against UEFA regarding non-compliance with multi-club ownership rules

On 14 July 2025, the Court of Arbitration for Sport (**CAS**) dismissed an appeal by Slovakian football club FC DAC 1904 Dunajská Streda (**DAC**) 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 follows CAS' recent dismissal of Drogheda United FC's appeal against UEFA regarding their removal from next season's Conference League. Both cases have important implications for 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 ownership, management, 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. 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, read our previous updates [here](#) and [here](#).

Facts

DAC and Hungarian club Győri ETO FC (**ETO**) both qualified for the Conference League 2025/26 through their domestic league performance in the 2024/2025 season.

On 26 June 2025, UEFA's Club Financial Control Body decided that DAC and ETO did not comply with the MCO Rules as of the 1 March assessment date. This assessment was based on (i) both clubs' ownership structures including the financial holding company EEA Holding B.V. (**EEA**) and (ii) three members of the same family being involved in the shareholding and governance of both clubs.

The MCO Rules provide, in the case of a breach, that the team which finished lower in their domestic league would be removed from UEFA competition. Both clubs

finished fourth in their respective domestic leagues last season. In such a scenario, the MCO Rules provide that the club from the country with the lower UEFA coefficient is removed. DAC were therefore removed as Slovakia has a lower coefficient than Hungary.

Appeal and Decision

DAC appealed to CAS, arguing that: UEFA's change in the relevant assessment date this year (from 3 June to 1 March) was invalid and unenforceable; and there was no possibility of EEA exerting influence over the club.

The CAS panel [dismissed](#) their appeal in an expedited procedure. It held that: the change in assessment date was in accordance with the procedures established by the UEFA statutes; and that DAC had breached the MCO Rules as the same person is both the Managing (and sole) Director of ETO and the CEO, Vice-President and a board member of DAC. Hence, this person is "not only directly involved in the management of both clubs, but also able to exercise a decisive influence in the decision-making of both clubs".

The decision to remove DAC from the Conference League was therefore upheld. DAC will be [replaced](#) by FK Košice, the next best-placed club in last season's Niké Liga (Slovakia's top division).

Key Takeaways

This case follows CAS' [decision](#) last month to uphold Drogheda United's removal from next season's Conference League for breaches of the MCO Rules. Both cases demonstrate that UEFA is prepared to strictly enforce its MCO Rules and exclude clubs from UEFA competitions if they do not comply.

Investors should take note and ensure that any proposed MCO model is structured from the outset to comply with the MCO Rules, with appropriate safeguards in place to enable potential restructuring.