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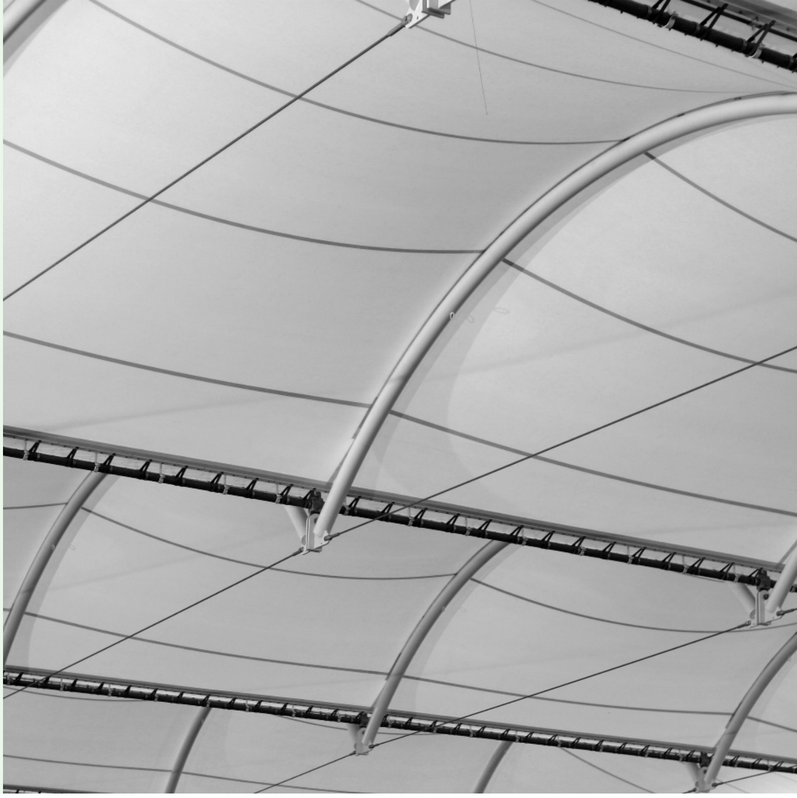

MCO in Global Football: Expansion Trends and Guardrails for the Future

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The past season has kept UEFA and FIFA busy both on the pitch and in the courtroom, as disputes over Multi-Club Ownership (MCO) surged. MCO is rapidly emerging as one of the most sophisticated models in global sport – integrating performance, infrastructure and capital into a scalable, platform-driven strategy.

By early 2025, some 147 investment groups controlled almost 400 clubs worldwide, up from 60 groups and 156 clubs in 2021. A recent example is QSI's acquisition of historic Belgian club KAS Eupen, adding to its portfolio alongside PSG and Sporting Clube de Braga.

This growing complexity underscores the need for meticulous compliance with evolving regulations to avoid costly legal challenges.

MCO rules at UEFA and FIFA level

UEFA has specific restrictions on multi-club ownership in place for each of its club competitions. Under Article 5 of the respective regulations, the restriction is triggered where a club stakeholder has '*control in, or influence over more than one club participating in a UEFA club competition*'.[1]

Meeting just one of these criteria is enough to entail control or influence, thereby engaging the ban.

In the event of a breach, only one of the clubs in its portfolio will be admitted to the relevant UEFA competition, namely the team which finished lower in their respective domestic league, or whose association has a higher UEFA coefficient, will be removed from UEFA competition.

Prompted by the review of the format of its club competitions', as of May 2024 UEFA relaxed the above effects of the breach: the excluded club is now allowed to participate in UEFA competitions in the same season, provided that each MCO club participates in a different UEFA competition.

[1] While the concept of '*control*' translates into participation of more than 50%, whilst the absence of '*influence*', including notably '*decisive influence*', is set by four criteria, as outlined in Article 5[1] and in UEFA's letter from its Club Financial Control Body dated 14 May 2024.

In response to the practical challenge of this short window, under UEFA circular n. 54 of October 2024, UEFA moved its assessment date from 3 June to 1 March of each season.

At FIFA level, substantially similar rules were enacted ahead of the FIFA Club World Cup 2025 (Art. 10.1 of the relevant Regulations).

Most relevant case law

Against this regulatory backdrop, a number of disputes on this matter have hit the courts. UEFA's MCO rule has, in fact faced multiple tests over past years, including:

Year / Date	Case(s)	Judicial Authority	Outcome / Key Points
2017	Two Red Bull-affiliated clubs qualified for Champions League	UEFA	Required structural changes to comply with MCO rules
2023	Aston Villa and Vitória S.C.	UEFA	UEFA required ownership restructuring, shareholding reduction, inter-club agreements revision, branding changes, and restrictions on transfers
	Brighton & Hove Albion and Union Saint-Gilloise	UEFA	Same compliance measures as above
	AC Milan and Toulouse FC	UEFA	Same compliance measures as above
July 2024	Girona FC and Manchester City	UEFA	Blind trust workaround accepted temporarily due to time constraints, following managerial changes[2]
	Manchester United and OGC Nice	UEFA	Blind trust workaround accepted temporarily as above
6 May 2025	Club de Fútbol Pachuca and Club León	CAS	Trust structure insufficient; breach of FIFA MCO rules
16 June 2025	Drogheda United vs UEFA	CAS	Appeal dismissed: confirmed decisive influence over the club's decision-making process, and timely UEFA deadline
14 July 2025	FC DAC 1904 Dunajská Streda vs UEFA	CAS	Appeal dismissed; similar reasoning as Drogheda case
11 August 2025	Crystal Palace vs UEFA	CAS	Appeal dismissed; failure to meet blind trust deadline; reasoning pending

[2] '*Significant changes*' made by the clubs and accepted by UEFA included as follows:
- replacement of all management with directors chosen by trustees;
- prohibition for owners to exercise any influence over sporting decisions, veto rights or to provide funding;
- end of consolidated financial statements; and
- undertaking not to make any reciprocal player transfers and to terminate any collaboration, sponsorship, scouting or similar agreements between the clubs.

The proper and timely structuring of MCO groups is becoming increasingly central to 'playing by the rules'; specifically, to prevent any undue influence across clubs competing in the same competition.

Recently, Juventus minority owner Tether reportedly avoided an MCO conflict by replacing its planned board appointee Juan Sartori (also on Monaco's board) with Francesco Garino, thus preventing dual roles on clubs competing in the same UEFA competition.

What are MCO drivers?

The diversification of business portfolios is one of the key drivers behind the rise of MCO, which translates into both economic and sporting benefits:

- From the economic perspective: MCO allows owners to spread financial risk, generate operational synergies (such as sourcing and developing players at local cost, and sharing sports science, data, scouting and operational infrastructure), and leverage economies of scale in marketing and scouting. It also enhances revenue potential through global sponsorships, digital rights monetisation and cross-market fanbase growth.[3]
- From the football perspective: By holding stakes in both smaller satellite clubs and higher tier teams, MCO groups can strategically develop young talent, offering players game time in less competitive leagues before moving them to the flagship club. The Red Bull "springboard" strategy – seen in the progression of players like Upamecano and Laimer from FC Liefering to RB Salzburg to RB Leipzig – is a leading example.

Risks behind MCO

MCO across different sports poses minimal risk, so no restrictions apply. Within the same sport, however – even across countries – the key concerns are as follows:

- Competition integrity: Clubs under common ownership may compete in the same tournament, even face each other. This creates potential pressure on managers to favour one team, undermining fairness and unpredictability. This concern was central to the landmark *ENIC* case (CAS 98/200), later confirmed by the European Commission. CAS upheld UEFA's new rule on club independence, introduced in 1998, after three ENIC-owned clubs reached the UEFA Cup Winners' Cup quarterfinals. UEFA thus excluded one club and postponed the rule's entry into force by a season to allow compliance.
- Market distortion: Intragroup transfers – including loans – can limit genuine competition and place smaller, independent clubs at a

[3] One example of this is the ten-year partnership between Puma and City Football Group (covering Manchester City and five other clubs owned by the Group): according to Forbes, this partnership is worth around USD 860 million in total.

structural disadvantage. This debate has gained renewed prominence as policymakers consider whether, and how, to further tighten the loan limitations introduced under Art. 10 of the RSTP in 2022.

Guardrails against these risks: options for the future

MCO marks a shift from traditional club ownership to a platform model focused on talent, technology and global reach – aimed at generating sustainable returns: City Football Group's plan to redevelop Palermo's stadium ahead of Euro 2032 illustrates this value-compounding approach.

Investor interest remains strong, but the regulatory framework is increasingly complex. Key measures include:

- Italy: Article 16bis (amended in July 2022) bans ownership of multiple professional clubs; divestment required if promotion creates MCO.
- England: The Owners and Directors Test applies to anyone with 25% or more control and caps acquisition debt at 65% of equity value.
- UEFA/National: Related-party transactions must meet fair market value standards to ensure transparency.

With uncertainty over whether "blind trust" structures will satisfy UEFA rules, MCO groups must structure deals carefully and embed safeguards to maintain compliance and flexibility for future restructuring.

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