

Origin of the case?



'Tax fraud within the KBVB'





OECD International Academy for Tax Crime Investigation



'Tax fraud within the KBVB'



'JPL audits Tax fraud within the KBVB'

















What would you do?

'Unannounced visit'























The day after... at the crack of down...

























Any ideas?







Ministery of Finance



Prosecutor























1) Contracts and companies involved:



Pro League represents the clubs and negotiates on behalf of the clubs





Pro League concludes a contract with MP & Silva to assist the JPL (advisory) with the sale of the TV rights.







Pro League sells the TV contracts to various providers



pro<mark></mark>≋imus













2) MP & Silva and the 2014-2015 TV rights:

MP & SILVA

IRELAND

MP & SILVA

LUXEMBOURG

MP & SILVA

MONACO

MP & SILVA Monaco has an advisory agreement with PRO LEAGUE (dd. February 17th 2014).

MP & SILVA IRELAND wires an 'advanced payment' of **5.000.000,00** € into the account of Pro League on February 19the 2014

On June 26th 2015 the Pro League issues an invoice of 4.931.106,04 € to MP&Silva

MONACO as a 'shortfall'

MP & SILVA LUXEMBOURG wires an 'advanced payment' of **5.000.000,00** € into the account of Pro League on February 19th 2014













2) Invoice flow and numbers:

Coenk Coenk

Σ 70.000.000,00€

Clubs make invoices (instructed by PL) for TV rights to NV Pro League

Season total '14-'15: 65.277.757,80 €

NV Pro League sends invoices to the providers

Season total: 14-115: 65.068.893,96 €

KBVB

2nd division clu



- Commercial rights G5

Season total '14-'15: 4.722.242,20 €

MP & SILVA

NV Pro League sends invoice to MP&Silva MONACO concerning the 'shortfall'

Season total '14-'15: 4.931.106,04 €



Jupiler:















What else have we got?

Concerning the TV-rights, the clubs are allowed to bring 85% costs into account!

As a result of a ruling with the Ministery of finance.

Increminating e-mails concerning the ruling,

ruling was negotiated in the business seats.







Any ideas?

Money Laundering?
Bribery & corruption?
VAT problem?













VAT, FRAUD ... & FOOTBALL ALL GROUPS



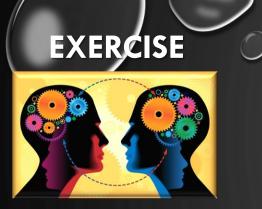
'IS THERE A SPECIFIC VAT PROBLEM?'

'IF SO, WHAT DO YOU THINK THE PROBLEM IS?'









'IS THERE A VAT PROBLEM?'

Look at the full picture!

What are the TV-rights really worth?

65.000.000,00 euro?

or

70.000.000,00 euro?

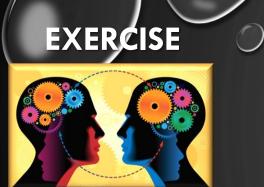












'IS THERE A VAT PROBLEM?'

What had to be invoiced?

What is the taxable amount?



For the purposes of this Directive, 'open market value' shall mean the full amount that, in order to obtain the goods or services in question at that time, a customer at the same marketing stage at which the supply of goods or services takes place, would have to pay, under conditions of fair competition, to a supplier at arm's length within the territory of the Member State in which the supply is subject to tax.











'IS THERE A VAT PROBLEM?'

What is the taxable amount?

Where no comparable supply of goods or services can be ascertained, 'open market value' shall mean the following:

(1) in respect of goods, an amount that is not less than the purchase price of the goods or of similar goods or, in the absence of a purchase price, the cost price, determined at the time of supply (2) in respect of services, an amount that is <u>not less than</u> the full cost to the taxable person of providing the service.

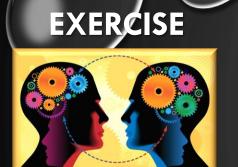












'IS THERE A VAT PROBLEM?'

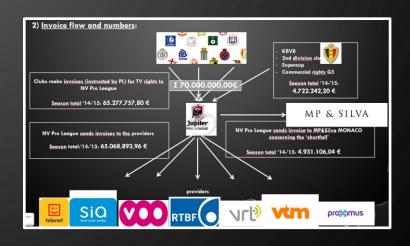
What is the taxable amount?

(2) in respect of services, an amount that is not less than the full cost to the taxable person of providing the service.

What is the full cost for the Pro League?

What amount was invoiced to the Pro League?

70.000.000,00 euro?



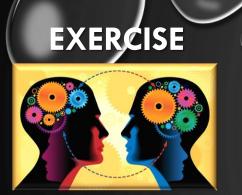












'IS THERE A VAT PROBLEM?'

What is the taxable amount?

(2) in respect of services, an amount that is not less than thefull cost to the taxable person of providing the service.

70.000.000,00 euro?

70.000.000,00 - 65.068.893,96 = 4.931.106,04 euro

 $4.931.106,04 \times 21\% \text{ VAT} = 1.035.532,27 \text{ euro}$













VAT, FRAUD ... & SPORTS

'SIMULAR SYSTEMS ARE USED IN VARIOUS SPORTS'

'THESE FRAUD SCHEMES APPLY TO ALL TYPES OF SPORTS'























VAT, FRAUD ... & SPORTS

'THIS INVESTIGATION WAS ONLY THE START'

'ORGANIZED CRIME'

'MATCH FIXING'

'CORRUPTION & BRIBERY'

'MONEY LAUNDERING'

OPERATION CLEAN HANDS













'OCTOBER 10, 2018'

44 house searches took place throughout Belgium.

Football clubs

Board members (football club chairmen)

Football federations

Player agents

Trainers

Referees

Lawyers & judges

KEY FIGURE:

22 arrests were made!



PLAYER AGENT DEJAN VELJKOVIC





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Born on February 20, 1970 in Nis (Serbia).

Played profession football in Serbia and Belgium until 1994.

Player agent since 1997.

Arrested on October 10, 2018.

Released from prison on November 22, 2018.

Married to Marija Bogojevska and father to 4 kids.



WHO ELSE IS INVOLVED IN THE SCHEME?

Branko Veljkovic, Dejan's father.

Goran Veljkovic, Dejan's brother.

Luc Anthonissen, a banker.

Ugljesa Jankovic, Dejan's associate.



• • •





THE 'COACH'









400.000,00 € <u>CASH</u> (advance) Out of his Luxembourg bank account.

Player agent





Invoice from

scouting Report

Season 1

Paid into a Belgian Bank account



Cash withdrawals and handover

Branko Veljkovic

Season 2

Season 3



1.050.000,00 €

350.000,00 € 350.000,00 € 350.000,00 €

- 200.000,00 € - 200.000,00 €

- 100.000,00 € - 100.000,00 € - 100.000,00 €

Coach



His demands:

3-year contract

350.000,00 €/season

400.000,00 € advance

100.000,00 €/year of the books in **CASH**



Cooperating banker



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THE 'COACH' CASE:



At the end of the season the football club wins the Belgian cup! The Coach wants a new and better contract!

Season 1	Season 2	Season 3	Σ
350.000,00 €	350.000,00 €	350.000,00 €	1.050.000,00 €
	- 200.000,00 €	- 200.000,00 €	
- 100.000,00 €	- 100.000,00 €	- 100.000,00 €	

250.000,00 € Official wages received at the end of Season 1:

Effective amound received at the end of Season 1: 750.000,00 € (= 400.000,00 (advance) + 100.000,00 (scouting) + 250.000,00)

New contract =

The advance is definitively acquired!

New 3-year contract...with a new advance payment of... 400.000,00 €!

History repeats itself...again and again.



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THE 'COACH' CASE:

Easy scheme, but why could it go on for years and years? What did we learn?

- SAR's can be easily avoided
- Intra-Community invoicing = smoke and mirrors
- The use of strawmen = still very effective
- No written contract between 'Dejan Veljkovic' and the 'coach' = smoke and mirrors
- What happened with the CASH the 'coach' received? Cash still interesting to fraudsters.
- Follow the money!

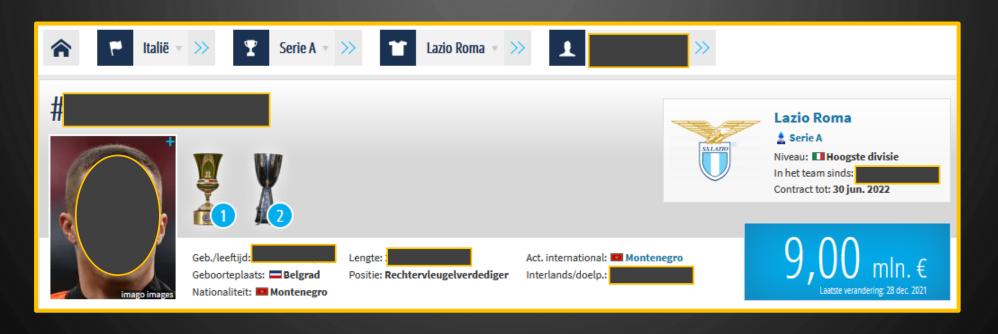




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THE 'MONTENEGRO' CONNECTION



Football player X is transferred from one Belgian football team to another Belgian football team!













81/es/2016

- 1) KM FSO,000 € + 10 % op meercoele
- (2) DOD MAYMUM 600,000 € gespred over 4 behelvege hissen
 15 los / 2016 on 15 los / 2018
- (3) COLT 75.000 € per seizen els spler nog ocher 13 x 4:300.000 € bij Uro (maximael 4 x per 15/08)

 1.860.000 € AUL-IN (-50)

2366/2016

- (1) KM 700.000 € + 10 % op neurode bonn 1.000.000 €
- Duri 2017
- B KM 200,000 € 90 MASENZ
- (4) DOO MASMIN 420, 000 & gesprend over 4 bekelingen zie boier
- (5) COLT 50.000 € 15/08/16
 50.000 € 15/08/16
 69.000 € 15/08/18
 75.000 € 15/08/18

IION CLEAN HANDS

'MONTENEGRO' CONNECTION

The player is sold from one Belgian club to another Belgian Club ...

...but...

...several parties involved wanted a piece of the pie!

Financial kickbacks!

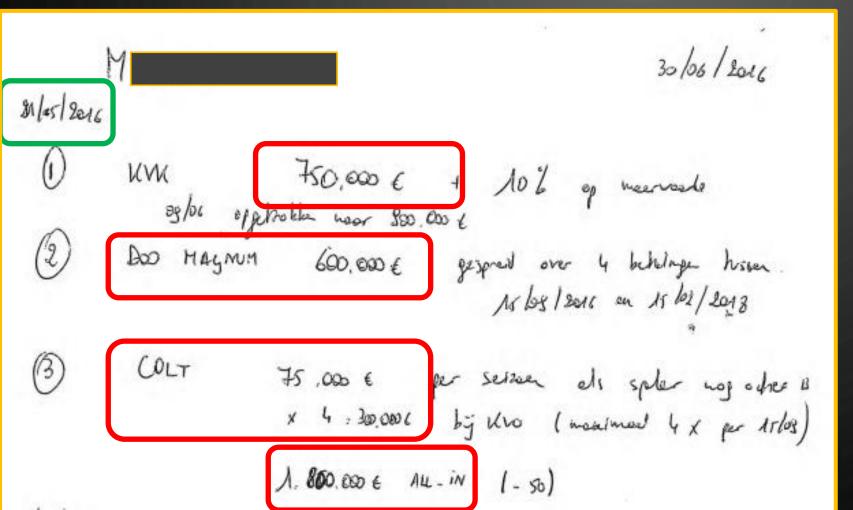




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THE 'MONTENEGRO' CONNECTION



Total transfer price = 1.850.000,00 €

Invoiced by the FC = 750.000,00 €

DOO Magnum ??? = 600.000,00 € 2.

COLT \$\$\$ = 300.000,00 €

Notes dated May 21th 2016!



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THE 'MONTENEGRO' CONNECTION



The lawyer of the buying team sends the team manager an email...

...warning the team manager that the scheme is not complicated enough

...and way to transparent! Transfer fee should be realistic!

29 juni 2016 09:55

Email dated June 29th 2016!





FION CLEAN HANDS

'MONTENEGRO' CONNECTION

- 1) KM 750,000 € + 10 % op meeroode
- (2) DOO HAYMUM 600,000€ gespred over 4 behelvige hissen

2366/2016

In les / 2016

- € KM 700,000 €
- Bearmedstrijd, behow
- DULI 2017
- Portasenz
- B KM 200.000 €
- 4) DOO MASMIN 420, 000 £

gesprend over 4 behelingen 24 boxan

(5) COLT 50,000 € 15/08/16
50,000 € 15/08/16
69,000 € 15/08/18
75,000 € 45/08/19

- 1. Invoiced by the FC = 700.000,00 €
- 2. Invoiced by the FC = 187.000,00 €

Exhibition match + retain in the First Division

- 3. Previous transfer = $200.000,000 \in$
- <mark>4.</mark> DOO Magnum ??? = <mark>420.000,00 €</mark>
- 5 COLT ??? = 243.000,00 €

Total transfer price = 1.750.000,00 €



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'MONTENEGRO' CONNECTION

- Invoiced by the FC = 700.000,00 €
- Invoiced by the FC = 187.000,00 €

Exhibition match + retain in the First Division

- Previous transfer = 200.000,00 €
- DOO Magnum ??? = 420.000,00 €
- COLT ??? = 243.000,00 €

Total transfer price = 1.750.000,00 €

- Plain and simple invoice.
- Contract concerning exhibition match...

WORDT OVEREENGEKOMEN ALS VOLGT:

Oefenwedstrijd

De Partijen gaan akkoord om hun respectievelijke eerste elftallen op zondag 16 juli 2017 om 14u30 een vriendschappelijke wedstrijd te laten spelen (hierna "de Oefenwedstrijd") in het kader van de voorbereiding op het voetbalseizoen 2017-2018.

1.5. zal een factuur opstellen tot betaling van het bedrag bepaald in artikel 1.4. van deze Overeenkomst, dwz minimaa EUR 87.000, uiterlijk op 18 juli 2017. Het bedrag bepaald onder artikel 1.4. van deze Overeenkomst, dwz minimaal EUR 87.000, zal door KV worden betaald op uiterlijk 31 juli 2017.

2. Bonus

betaalt aan KV KV (

een bijkomende en voorwaardelijke vergoeding.

Deze vergoeding bedraagt 100,000 EUR en is verschuldigd door KV ontyangst van de overeenstemmenge ractuur, op voorwaarde dat KV klasse tijdens het seizoen 2016 - 2017.

op uiterlijk 1 juli 2017, mits zich handhaaft in eerste

Selling FC invoices 87.000,00 €.

Selling FC invoices 100.000,00 € when the buying FC retain their position in the First Division???



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THE

'MONTENEGRO' CONNECTION

Tussen KV met zetel te stamnummer vertegenwoordigd door de heer stamnummer en gedelegeerd en en ge

Enig Artikel

De Club doet beroep op de diensten van Doo Magnum in het keder van haar betrachting om haar speler.

Hiertoe geeft de Club aan Doo Magnum de opdracht om begeleiden.

Interfoot zal ten behoeve van de Club aan de speler naar best vermogen volgende diensten en prestaties leveren :

- · Algemene juridische bijstand
- Algemene fiscale bijstand
- · Algemene administratieve bijstand

hierna " Doo Magnum " genaamd, anderzijds

Specifieke sportieve en psychologische bijstand

Voor de uitvoering van seze diensten betaalt de Club aan Doo Magnum een éénmalig gegarandeerd commissieloon (600.000€) voor het contract en wel als volgt, onder voorbehoud dat K Previous transfer.

Suddenly an addendum was made to a previous transfer?

4. Who's DOO Magnum?

Montenegrin company represented by... Ugljesa Jankovic

Dejan Veljkovic associate!

A remarkable contract!



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'MONTENEGRO' CONNECTION

OVEREENKOMST

Tussen

met zetel te ertegenwoordigd door de heer

Sportief Directeur, gedelegeerd

hierna "de club" genaamd, enerzijds

DOO Magnum, met zetel te 85310 BUDVA, Montenegro, vertegen woordige door de JANKOVIC, Spelers Makelaar,

hierna " Doo Magnum " genaamd, anderzijds

Enia Artikel

De Club doet beroep op de dienster van Doo Magnum in het keder van haar betrachting om haar speler.

Club aan Doo Magnum de opdracht om maay speler

Interfoot zal ten behoeve van de Club aan de speler naar best vermogen volgende diensten en

- · Algemene juridische bijstand
- Algemene fiscalé bijstand
- Algemene administratiève bijstand
- Specifieke sportieve en psychologische bijstar

Voor de uitvoering van deze diensten betaalt de Club aan Doo Magnum een éénmalig andeerd commissieloon (600.000€) voor het contract en wel als volgt, onder voorbehoud een overeenkomst kan bereiken met voor een transfer van de

A remarkable contract!

- Contract is drawn up in Dutch.
- The content of the contract:

Interfoot will provide the following services and performance to the player on behalf of the Club to the best of its ability:

- General legal assistance
- General tax assistance
- General administrative assistance
- Specific sporting and psychological assistance

- The contract was cancelled on June 29th 2016.



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THE 'MONTENEGRO' CONNECTION

OVEREENKOMST

Tussen

met zetel te stamnummer Sportief/Directeur, Gedelegeerd ertegenwoordigd door de heer KBVE

Bestuurder hierna "de club" genaamd, enerzijds

En

COLT SPORT, met zetel 85310 BUDVA (Montenegro)! vertegenwoordigd/ Ugljesa JANKOVIC, Spelers Makelaar hierna " Colt Sport " genaamd, anderzijds

Enig Artikel

van de spøler :

De Club doet beroep op de dienster van Colt Sport in Herkader van haar betrachting om haar speler A een zo hoog mogelijk sportier propau te laten halen.

Hiertoe geeft de Club aan Colt Sport de optigate om haar speler begeleiden.

Colt Sport zal ten behoeve van de Club aan de speler naar best vermogen volgende diensten en prestaties leveren :

- Algemene juridische bijstand
- Algemene fisøale bijstand
- Algemene administratieve Bijstand
- Specifieke sportieve en psychologische bijstand

uitvoering van deze diensten betaalt de Club alen Oolt Sport een commissie op en dit voor de duur van het contract van de speller een overeenkomst kan bereiken met voorbehoud/dat

Who's COLT???

A copy of the DOO Magnum-contract!





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THE

'MONTENEGRO' CONNECTION

Contract is drawn up in English.

AGREEMENT

-=000=-

BETWEEN:

COLT SPORT, a Limited Liability Company incorporated under Montenegro law, Trade Register Number 50733528, Trade Identification Number 03052265, located at Zgrada Akademija Znanja BB 85310 BUDVA (Montenegro) represented by Mr Ugljesa JANKOVIC, Director.

For the first part, Hereinafter called "The Company"

AND

KV club of football "Rémunéré 1A" duly affiliated to the Belgian Football Federation (URBSFA), VAT: 1 , registered office and duly represented by Mr Sporting Director.

For the second part, Hereinafter called "the Club" Broader content.

Article 1: Subject

The Club entrusts the Company with the following general mission:

- To supervise international players or young players with great potential developing in first and second division clubs in Serbia, Montenegro, and Macedonia who are likely to be of interest to the club and to follow their development with a view to keeping the Club regularly informed and fruitfully advising it when these players are selected at any sporting meetings (championship, cup, European competitions, ed.),
- To make fruitful enqui which the Club is intewith the said clubs (Se terms of transfer;
- To make fruitful enqui possible hiring of a Montenegro, Macedonia

Executed in 29 June 2016

In two copies, each party having received their copy containing 6 pages (including this one).

For the Company

Mr. U. JANKOVIC As Director

For the Club

Your Jeanest



OECD International Academy for Tax Crime Investigation

Interesting date!









'DEJAN'S CONFESSION'





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'GHOST PLAYER'

Malaysian Social Security was scammed and football was used to launder the money!

Who are the key figures?

Mr. P & Mr. T

Mr. T is a Malaysian Chinese businessman and investor.

Mr. T is owner of:

- A Premier League team (UK)
- A Pro League team (Belgium)
- A Premijer Liga team (Bosnia)

Mr. T has interests in:

- Water utilities
- Internet related businesses
- media
- telecommunications
- FOOTBALL





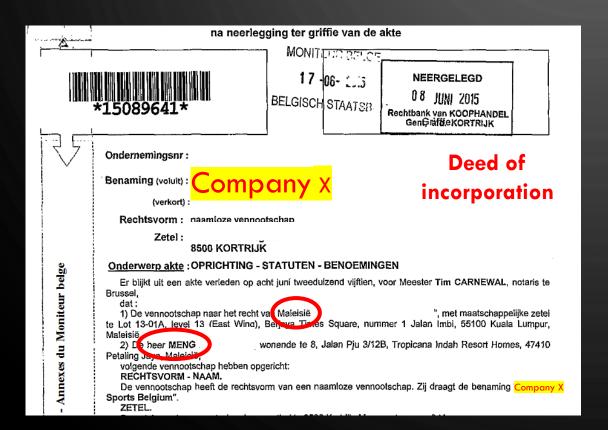
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THE 'GHOST PLAYER'

Mr. T buys the Belgian Team in May 2015.

In Juni 2015 Mr. T founded Company X at the same address as the Belgian football team.



Share holders of Company X are:

- Mr. T's Malaysian Holding Company.
- Mr. Meng.



Who is Mr. Meng?

THE 'GHOST PLAYER'

Who is Mr. Meng?

The founders responsibility:

Het kapitaal werd volledig volgestort.
OPRICHTERSAANSPRAKELIJKHEID.

De vennootschap naar het recht van Maleisië " verklaart hierbij de volledige oprichtersaansprakelijkheid te zijnen laste te nemen, dit overeenkomstig artikel 450, 2° van het Wetboek van vennootschappen

De heer MENG is bijgevolg enkel te beschouwen als eenvoudige inschrijver.

Mr. Meng is exempted from all responsibility!









THE 'GHOST PLAYER'



Transfer History of I This page contains an overview of the all the transfers nade in his career. started his career at KV Woluwe Zaventem and his last transfer was from to Retired in 2019. Transfer date From club To club Transfer Fee Unkn. 12 Feb 2019 No Team Unkn. 1 Jul 2018 No Team 1 Jul 2016 1 Jul 2014 **RWDM Brussels Football Club** Westerlo **Zulte Waregem RWDM Brussels Football Club** Unkn. 27 Aug 2013 31 Aug 2012 **Zulte Waregem** RWDM Brussels Football Club Loan Koninklijke Voetbalclub Woluwe-1 Jul 2012 Zulte Waregem Unkn. Total transfer fees (known) for Frédéric Gounongbe:

Free transfer from KVC Westerlo to the Premier League team of Mr. T!





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'GHOST PLAYER'





Free transfer from KVC Westerlo to the Premier League team of Mr. T!

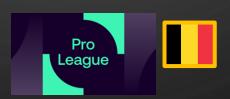


Transfer History of Unkn. Unkn. 1 Jul 2018 No Team 1 Jul 2016 1 Jul 2014 RWDM Brussels Football Club

Transfer price: 2.200.000,00 €

 ${\sf Scouting/consulting/etc.}$

2.200.000,00 €



Belgian team of Mr. T





Fake transfer from Belgian Mr. T-team to

the Premier League team of Mr. T!

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Tweet



The Belgian Football Podcast @BelgianPodcast

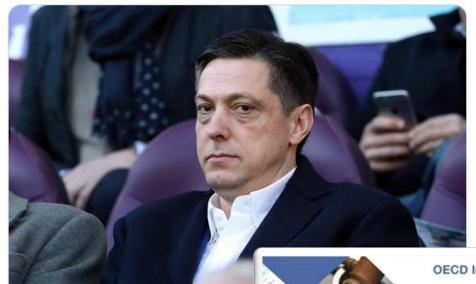
3:34 p.m. · 14 jan. 2022 · Twitter for Android



| Operation Clean Hands Update...

The Federal Prosecutor's Office will formally pursue *57 high profile individuals from across Belgian Football for fraud, corruption and forgery charges.

It includes club chairman (past and present) Head Coaches, Agents and Officiators.



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CASE EXAMPLES

Mestans



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Thank you listening (3)



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