



FOOTBALL MOST FOUL

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FITTINGLY, IT WAS IN NUREMBERG – and just following the diamond anniversary of the city’s famed trials – where last summer’s FIFA World Cup¹ emphatically deteriorated from the planet’s most-watched sporting event² into its largest judicial proceeding. On the evening of June 25, 2006, in a knockout match held in Nuremberg’s Franken-Stadion, Portugal and the Netherlands reenacted their sixteenth-century war for the East Indies with a savage demonstration of athletic cynicism. Russian referee Valentin Ivanov – acting “more like a croupier than the

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¹ The Fédération Internationale de Football Association, founded in 1904, is soccer’s world governing body and the host of the quadrennial World Cup tournament. *See generally* www.fifa.com/en/index.html.

² The 2002 World Cup was televised in 213 countries and had a cumulative in-home audience of 28.8 billion viewers. *See 2002 FIFA World Cup TV Coverage*, FIFA, www.fifa.com/en/marketing/newmedia/index/0,3509,10,00.html; Mark Rice-Oxley, *World Cup Boosts Growth, Binds Ties, Even Sparks War*, *Christian Science Monitor*, June 9, 2006, at 1 (“Question: What quadrennial sporting extravaganza brings the world together for weeks on end, transcending war, poverty, class, and culture, and culminating in the most watched television event ever? If you guessed the Olympics, odds are you’re an American. The rest of the world knows better.”). For the 2006 World Cup, 198 countries from all six inhabited continents took part in the year-and-a-half long process to qualify for a place among the thirty-two teams invited to the final tournament in Germany. *See id.*

match official”³ – awarded a record number of official citations, including sixteen yellow cards (formal cautions for foul play) and four red cards (ejections).⁴

In something of an afterthought, Portugal eventually won the game one-nil and went on to beat England in a quarter-final (most memorable for a red card earned by English wunderkind Wayne Rooney after he put his boot into a particularly sensitive segment of Portuguese anatomy)⁵ before losing to France in a semi-final decided by a solitary penalty kick.⁶ Those three games were a microcosm of the entire tournament: forgettable athletic contests that turned most critically on the administration of justice.⁷

Indeed, each of the thirty-two teams participating in Germany received at least five of the record 346 yellow cards that referees brandished during the month-long competition. This total was an increase of seventy-four cards, or twenty-seven percent, over the previous record of 272 from the 2002 World Cup. The sanctions

³ Mandeep Sanghera, *Verdict on that 20-Card Trick*, BBC Sport World Cup Blog, www.bbc.co.uk/blogs/worldcup/2006/06/verdict_on_that_18card_trick.html.

⁴ The game prompted widespread condemnation of the quality of refereeing at the tournament. According to press reports, “Sepp Blatter, FIFA’s president, joined in, saying that Ivanov deserved a yellow card.” Nathaniel Vinton, *Judging the Referees as the Cards Stack Up*, *The International Herald Tribune*, July 10, 2006, at 16; see also *Portugal 1 – 0 Holland*, BBC Match Report, June 25, 2006, news.bbc.co.uk/sport2/hi/football/world_cup_2006/4991538.stm (“Both teams finished the game with nine men after a game which equaled the World Cup record for bookings – 16 – and broke the record for red cards.”).

⁵ See *England 0 – 0 Portugal*, BBC Match Report, July 1, 2006, news.bbc.co.uk/sport2/hi/football/world_cup_2006/4991618.stm (“The young striker [Rooney] endured a frustrating game and his patience finally snapped as he got tangled up with Carvalho and Armando Petit and appeared to aim a stamp at [Carvalho’s] groin.”). Although the game ended nil-all, Portugal won three-one in a penalty shoot-out. See *id.*

⁶ See *Portugal 0 – 1 France*, BBC Match Report, July 5, 2006, news.bbc.co.uk/sport2/hi/football/world_cup_2006/4991632.stm (“[Zinedine] Zidane struck [the penalty] coolly past Ricardo on 33 minutes after Thierry Henry was tripped inside the box by Ricardo Carvalho.”).

⁷ For another discussion of this topic, see William Birdthistle, *Relegating the Twelfth Man*, *Chi. Trib.*, July 12, 2006, at 19.

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came at the furious pace of 5.4 per match throughout the tournament's sixty-four games – more than double the rate of the 2.3 goals scored per game.⁸

In the midst of this confetti of Prussian paperwork, a single actor repeatedly emerged as the central protagonist in each game: the referee. Referees took center stage in many games by providing the most dramatic plot twist – either by handing out red cards, which they did at a record pace, or awarding penalty kicks, which provided the winning goal in almost ten percent of the tournament's games.⁹

For much of the viewing public, however, the most vivid scenes from the tournament may have been the players' performances of injury and outrage. Anyone who watched even the briefest portion of a game was likely to have seen many of the contestants indulge their equal talents as thespians and athletes, flopping to the ground at minor or nonexistent contact and thrashing about in apparent agony.



Why should a perfectly strapping specimen make such an unmanly – and transparently bogus – spectacle of himself?

⁸ Several reputable organizations maintain records of the 2006 World Cup statistics, including FIFA, the British Broadcasting Corporation, and ESPN. The occasional discrepancies that exist between those sources stem principally from different methods of recording unusual events rather than from error. In perhaps the most notorious instance, the BBC lists a total of 346 yellow cards for the tournament, whereas FIFA lists only 345, with the outlier being the fault of English referee Graham Poll, who lost track of the number of yellow cards he showed to Josip Simunic of Croatia in a match against Australia. Poll failed to eject Simunic after showing him a second card, as FIFA rules require, and eventually went on to award him a third caution. The BBC includes that erroneous third card in its tally, while FIFA does not. See *World Cup 2006 Statistics*, BBC Sport, news.bbc.co.uk/sport2/hi/football/world_cup_2006/5060036.stm; Statistics, FIFA World Cup Germany 2006, fifaworldcup.yahoo.com/06/en/w/stats/index.html.

⁹ See *Results*, BBC Sport World Cup 2006, news.bbc.co.uk/sport2/hi/football/world_cup_2006/results/default.stm.

Clearly, one imagines, to influence the referee. A well-perpetrated dive¹⁰ in soccer may trigger the aforementioned judicial remedies, either as punishment to the fouler or reward to the victim.

If the referee believes that an infraction has been committed and that the foul is of a sufficiently grievous nature, FIFA rules authorize the issuance of a yellow card to the perpetrator. If the perpetrator has already received a yellow card in the game, a second yellow card results in an automatic red card and, thus, ejection. Or, if the perpetrator's foul is sufficiently flagrant, he may receive a "straight" red card and thus be ejected without having been previously cautioned with a yellow card. A player who has been red-carded in either situation must leave the field and cannot be replaced for the duration of the game.¹¹ With ten outfield players per team in soccer, even a single red card leads to an immediate tithe in a team's strength which – as it would in any world-class athletic contest – creates a significant imbalance between the teams. This skewing is particularly acute if the red card goes to an especially valuable player. In fact, so debilitating is a red card that in last summer's World Cup, only one team scored a goal after any of the twenty-eight red cards was awarded. Naturally, that goal came from a penalty.¹²

A penalty, of course, is the counterweight to the punishment conveyed by a referee's card. It is the reward a referee may offer to the victim of a foul. After a foul occurs and the referee stops play,

¹⁰ FIFA uses the phrase "simulation" or "simulating action" to describe the phenomenon commonly known as diving. See, e.g., Law 12 – Fouls and Misconduct, Laws of the Game 2006, FIFA, July 2006, at 40, 71.

¹¹ Yellow cards may be shown to any player who is guilty of one of seven proscribed offenses, including dissent by word or action, delaying the restart of play, entering or leaving the field of play without the referee's permission, and unsporting behavior (which includes a wide array of fouls). See *id.* at 38-39.

¹² See *Italy 1–0 Australia*, BBC Match Report, June 26, 2006, news.bbc.co.uk/sport2/hi/football/world_cup_2006/4991534.stm. "Francesco Totti came off the bench to score an injury-time penalty and put 10-men Italy into the quarterfinals." *Id.*

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the fouled team wins the ball and may restart play with a free-kick.¹³ Free-kicks are regularly doled out for a wide range of infractions that occur all throughout the soccer field. As fouls – and thus their corresponding free-kicks – occur closer and closer to the goal-mouth, however, they become increasingly dangerous scoring opportunities for shots directly on target.

The term “penalty” applies to the specific subset of free-kicks awarded for fouls that meet a relatively low threshold of seriousness (which includes any physical foul)¹⁴ and that occur within the penalty box. A penalty consists of a free shot on goal from a designated spot thirteen yards from the goal mouth, which may be defended only by the opposing team’s goalkeeper. In the 2006 tournament, referees awarded seventeen penalties; the fouled teams scored goals on thirteen – or seventy-six percent – of those shots. And of those thirteen goals scored, six turned out to be game winners. Indeed, only 2.1 goals per game were scored by means other than a penalty.

Moreover, the tournament’s two finalists, Italy and France, reached the grand finale only after surviving a playoff game in which each triumphed one-nil on the strength of a solitary penalty. Italy won their first playoff against Australia on a penalty kick that was the game’s very last touch of the ball¹⁵; France scraped into the final after their aforementioned semifinal over Portugal in which Zinedine Zidane scored from a penalty.¹⁶

¹³ See *Laws of the Game*, *supra* note 10 at 36-37.

¹⁴ A number of infractions that are more technical than physical do not result in penalties, even if they occur within the penalty box. If a goalkeeper, for instance, holds on to the ball for more than six seconds or touches the ball with his hands after a teammate has kicked it to him, no penalty would be awarded. Instead, an indirect free-kick would be awarded, which would allow the defending team to place all their players behind the ball and prohibit the attacking team from scoring until at least two players touched the ball. See *id.* at 37-41.

¹⁵ See *Italy 1 – 0 Australia*, *supra* note 12.

¹⁶ See *Portugal 0 – 1 France*, *supra* note 6. Ultimately, Italy stole away with the trophy following a turbulent final “in which the player voted best of the tournament, Zinedine Zidane, embodied the festival of crime and punishment first by scoring from a penalty and then by winning a red card for his ... cranial reenactment of Napoleon at Marengo.” Birdthistle, *supra* note 7.

A well-delivered dive, therefore, may induce a referee either to impose a severe handicap on the fouling team or to bestow a substantial boon upon the fouled team. Little wonder, then, that so many players appeared willing to sacrifice their dignity in the hope of triggering the referee's awesome and game-changing powers.¹⁷



Any system of human order that bestows such sweeping authority upon its magistrates invites the risk of perjury. To stave off this peril, though, such systems regularly impose sanctions on perjurers to keep the fact-finding process as pure as possible. Not surprisingly, FIFA has instituted the following rule to punish players who physically bear false witness: "A player who attempts to deceive the referee by feigning injury or pretending to have been fouled is guilty of simulation and must be cautioned for unsporting behavior."¹⁸ The noted English commentator and former international player Gary Lineker has proposed that the cards for such offenses be pink.¹⁹

Despite the record-breaking number of cards awarded at the 2006 World Cup, however, hardly any were handed out for diving, notwithstanding FIFA's stringent-sounding rule. FIFA has also attempted to curtail simulation through its policy of requiring any player who falls to the ground with the indicia of injury to be car-

¹⁷ One of the starkest examples of how strenuously players will petition a referee to mete out punishment to an opponent occurred in the World Cup quarterfinal tie between Portugal and England. After Englishman Wayne Rooney committed his notorious stamp, Portuguese players surrounded the referee and demanded a red card. Leading the (ultimately successful) advocacy was Cristiano Ronaldo, a teammate of Rooney's on Manchester United in the English Premier League. See *Ronaldo Will Be Jeered*, BBC Sport Football, August 1, 2006, news.bbc.co.uk/sport2/hi/football/teams/m/man_utd/5236674.stm ("Manchester United legend Sir Bobby Charlton has warned Cristiano Ronaldo he will have to cope with some fierce barracking from fans this season.").

¹⁸ Laws of the Game, *supra* note 10 at 71; see also *id.* at 40.

¹⁹ See *The Great Dive Row Rocking Soccer*, The Sun, March 25, 2006 ("Two pinks and they're off. It would soon stop.").

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ried off the field on a stretcher. Once removed, such a player can return to the pitch only with the approval of the referee.²⁰ Presumably, FIFA hoped that the humiliation of returning to full strength and asking to rejoin the fray mere seconds after being too debilitated to walk would serve as a check on excessive simulation. Players at the World Cup, however, had no qualms about carrying out these enactments of miraculous healing. And referees seemed curiously content to wave them back on to the field at the first opportunity following these visits to Lourdes.

If the 2006 tournament was marred by a surfeit of judicial rulings and appeals, three years remain to address the game's problems before the next World Cup, to be held in South Africa in 2010. Possible solutions might take one of two broad angles of attack: either improving the game's police force or adjusting its sentencing guidelines.



Let us begin by considering the first possible tactic: improving the referee's investigative work. A pair of perennial complaints at every World Cup is that referees are so blind that they miss obvious fouls and so gullible that they award non-existent ones.²¹ If the game's peacekeepers might be aided in gathering facts more accurately, they would presumably be able to render more precise judgments as to what is, and what is not, a foul. Players would then learn quite quickly that any simulated petitions they might lodge in hopes of a foul would be readily dismissed or, worse, penalized as false oaths.

One way to improve the monitoring of the game would be to increase the number of officials with authority over a match. Currently, each World Cup game is arbitrated by a referee, two assistant referees (formerly known as linesmen), and a fourth official who keeps track of time, sorts out substitutions, and watches the

²⁰ See *Laws of the Game*, *supra* note 10 at 73.

²¹ See *Birdthistle*, *supra* note 7.

game from the sidelines.²² One suggestion, then, would simply be to add a second referee. The more sets of eyes regulating the game, the better the arbitrator-to-activity ratio. American sports make great use of this principal of employing more officials per square foot of playing surface, providing three referees for National Basketball Association games, four umpires for Major League Baseball games (six for playoffs), and nearly enough officials in National Football League games to field a third team.

A second, technologically related proposal would be to allow the use of television replays in the adjudication of goals and fouls. When a foul is called or a goal is scored in soccer, play automatically stops for a brief time. When a foul is not called or a shot does not appear to have scored, play may continue for a while but will inevitably soon come to a halt through the normal course of play (such as goal-kicks, corners, throw-ins, or other stoppages). During those pauses, a referee – perhaps the comfortably seated fourth official – could review the panopticonical television footage to render a more informed decision. If a goal or a caution was incorrectly awarded, it could easily be expunged without fear of too much reliance; conversely, if a goal or a caution was incorrectly not awarded, awarding one a few moments later would not materially affect the course of the game. The debate, enactment, repeal, and further debate of rules governing the use of television replay have a tortuous history in U.S. sports, which FIFA could easily canvass for lessons.

A third technique for increasing the quality of the game's policing would be to encourage retroactive²³ adjustments to any punishments imposed or not imposed during the course of a match. A panel of rules officials could be convened to review footage or any

²²The role of this fourth official gained new prominence with the active participation of one in the famous dismissal of Zinedine Zidane in the final match. *See Zidane Ref Ponders Quitting Game*, BBC Sport, July 13, 2006, news.bbc.co.uk/sport2/hi/football/world_cup_2006/teams/france/5178644.stm (“Fourth official Luis Medina Cantalejo has already insisted that he did not rely on video evidence to determine whether France’s Zidane had headbutted Materazzi.”).

²³*See, e.g., FIFA Rule Out Retrospective Action Against Divers*, ESPNsoccernet, April 4, 2006, soccernet.espn.go.com/news/story?id=363800&cc=5901.

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other evidence of controversial incidents during a game. If a majority of such adjudicators concluded, in the dispassionate and cooler temperatures of an office building, that a red or yellow card was incorrectly awarded to a player due to a compelling, yet false, performance of injury by that player's opponent, then the panel could correct the errors. The ability to adjust the punishment retroactively would not only allow the card to be expunged from wronged player's record but would also enable the panel to award the opponent a pink citation.

In the United States, sports leagues routinely impose fines and suspensions upon players well after the fact. In a World Cup, the ability to review cards would be particularly relevant because, under current FIFA rules, a player who accumulates multiple cards across games may be suspended from future matches. In this most recent tournament, several cards that referees awarded appeared after the fact to be clearly erroneous and yet nevertheless led to the suspension of important players in subsequent – and usually increasingly significant – games.

Here, then, are three possible methods of increasing official vigilance of the playing field.²⁴ But can any of them ameliorate what ails the game? Would all this additional scrutiny put an end to footballers' challenging the veracity of official judgment? Even with the liberal use of all these techniques in American sports, players routinely question the wisdom and eyesight of their arbitrators. Balls and strikes are debated in every game of baseball; in basketball, drives to the basket regularly result in contact that referees attribute with apparent caprice; and in football, some manner of holding takes place on almost every play of the game. But while U.S. sports are not free from objections to official judgments, they rarely feature soccer's mobs of players hounding officials with operatic petitions.

²⁴ Commentators and officials have considered versions of some of these suggestions, though not in the context of a comprehensive effort to reduce the role of the referee. See, e.g., Jonathan Wilson, *Officials Win Praise for Playing Cards Right*, Financial Times, July 6, 2006, at 13 ("Certainly [FIFA President Sepp Blatter's] proposal this week that there could be two referees on the pitch come the 2010 World Cup is unlikely to come into effect.")

Scenes of simulation and outrage are relatively absent from American playing fields less because U.S. sports boast omniscient officials with greater acuity than soccer referees, or because there are no bad calls in America, but because the consequences of any official error are much less harmful. Except in relatively rare circumstances, American referees simply do not wield the power to work a game's bouleversement with one blow of the whistle. Certainly, it is almost unheard of in the United States for a referee to be able to decimate (in the original sense) one team's playing strength or to award another team the game's only score. In soccer, however, a referee's red card is regularly the most critical development in a match, and a penalty frequently leads to the game's only goal. Last year's champions, Italy, will readily attest to this principle. Indeed, so important is the power and personality of a referee that in Italy, media listings for domestic soccer fixtures routinely include – along with the teams, the date, and the venue – the official's name.



Thus, rather than focusing solely on ways to improve the game's constabulary, perhaps reform should come primarily through an overhaul of the sport's sentencing guidelines – that is, the carrots and sticks the referee can administer. No matter how accurate the officiating is or appears to be, players and fans will always decry as illegitimate a penalty awarded in the last minute of a tied game. To reduce the role of the game's arbitrator, and the corresponding impression that the game is more about appeals and rebuttals than athletics, the power of the referee to turn an entire match must be diluted. With a less omnipotent judge running things, players will have fewer incentives to petition the referee and more incentives to win the game through their own efforts as athletes.

This approach involves two possible reforms. First, FIFA should consider reducing the size of the sticks a referee carries. As the results of the most recent World Cup demonstrate, a red card almost entirely eliminates the penalized team's subsequent ability to score a goal. In the extra time period of the final between Italy and France,

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for instance, the French were pressing intensely to score a winner, and the engine of their momentum was almost entirely Zidane. He was the creative source of their onslaught and personally fired a dangerous header that passed inches away from winning the tournament. With his dismissal in the 109th minute, however, the French attack was effectively neutered. Not only was the game more or less immediately consigned to the lottery of a penalty shoot-out, but viewers across the planet were deprived of enjoying the French captain's entertainment.

Of course, a first-degree head-butt to the sternum can hardly go unpunished. Perhaps somewhere between permanent exclusion and complete amnesty lies fertile ground for a more customized punishment. Presumably, the yellow card is meant to fill this role, but even an avalanche of them at the latest World Cup did nothing to improve the game. Instead, FIFA should consider measures taken in that most soccer-like of North American sports, hockey. The National Hockey League has long used a system of penalties in which players may be removed from the ice for a particular number of minutes corresponding in length to the seriousness of the offense. The resulting imbalance in manpower gives the other team a significant advantage, and a substantial percentage of goals in hockey come on such power plays. Similarly, in rugby union – a sport closer to the home of such traditional soccer-playing nations as England and France – the governing body amended rules as recently as 2000 to permit referees to sentence malefactors to ten minutes in the “sin bin.”²⁵ In soccer, fouls that are currently designated red or yellow card offenses could easily translate into major and minor penalties that would result in longer or shorter suspensions off the field.

Potential sinners could also include those who have faked their maladies, such that any player who writhes in injury would be forced not only to leave the field but to remain there for a fixed pe-

²⁵ See *Sin Bin for Six Nations*, BBC News, January 21, 2000, news.bbc.co.uk/2/hi/sport/rugby_union/613890.stm (“The sin bin is to be introduced to the Six Nations, after international rugby chiefs launched sweeping changes to the game.”). I thank Richard Epstein and David Fagundes for proposing the sin bin.

riod of minutes, unless his aggressor received a card. In essence, referees would be forced to choose between punishing either a fouler or a faker.²⁶ Whatever the offense, sin-binning in soccer would give one team a temporary advantage in players and thus prompt attacking. The imbalance would not be permanent, however, so with the offender's return would come the possibility of redemption.

Second, just as the referee's sticks should be moderated, so too should the carrots. Awarding a penalty is very frequently tantamount to awarding a goal and, in such low-scoring affairs as the knock-out games of a World Cup (which featured a scoring rate of just 1.7 goals per game in 2006),²⁷ a single goal is enormously significant. Last year's tournament suggests that there may be an inverse relationship between official cautions and scoring. Just as the number of cards issued in 2006 reached an all-time high, the number of goals scored by the "golden boot" (*i.e.*, the competition's leading scorer; in 2006, Miroslav Klose of Germany) fell to the lowest total in forty-four years: five. The greater the percentage of goals scored that are a direct result of referees' intervention, the more incentive players will have to coax such awards out of the referees. To counter these incentives, the relative importance of penalties must be diminished.

One way to reduce the disproportionate consequence of penalties would be to decrease their value. Why should a goal scored from a penalty be worth the same number of points as a goal scored in open play? Such a monolithic scoring regime certainly does not reflect the relative difficulty of the two achievements. Many U.S. sports take pains to place a different value on different methods of scoring. In basketball, a free throw is not worth the same number of points as a regular basket, and a regular basket is rewarded less than one scored from a particularly long distance; in football, a field goal

²⁶ I thank Kannon K. Shanmugam for suggesting this forced choice.

²⁷ Excluding the consolation game from both numerator and denominator, the number of goals scored in playoff matches was 26, and the number of those matches was 15. See *World Cup 2006 Statistics*, BBC Sport, *supra* note 8.

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is worth only half the number of points as a touchdown, while the attempt after a touchdown is worth even less.

Opponents of altering the scoring regime might ground their objection in the principle of honoring the sport's grand old traditions. What kind of person could make such an important change to this storied pastime? Perhaps the same kind as those who imposed multi-tiered scoring in such ancient sports as hurling and cricket. In the auld Gaelic game of hurling, forcing the slither into the goal is worth three points, while firing it over the crossbar is worth only one. In cricket, knocking the ball out of the park through the air is worth six points, while doing so along the ground earns just four. Not only do these equally well-established sports feature differential scoring, but their governing bodies have demonstrated a willingness to modify the scoring rules when the game has demanded it. Rugby union, for instance, has tinkered with its scoring system several times over the past century – as long ago as 1891 and as recently as 2000 – in a regular effort to perfect participants' incentives.

But if awarding half-points or double-points in soccer is too drastic a step for traditionalists and for the cross-generational integrity of statistics, then there is only one other way to diminish the impact of penalties upon the game; *viz.*, by diluting them in a larger pool of regular goals. Soccer purists have long rejected the notion that the game would be better if it featured more scoring. The very idea reeks of American gaudiness. To the extent that detractors have called for more scoring, they have often done so based on the principle of goals for goals' sake. But if the primary reason for increasing scoring is to demote the referee and thereby to squelch dives, cries, and all the other pantomimes that infect the game, perhaps the proposal might find a more welcome audience.

The debate over how to increase the number of goals scored in open play is well established. The conversation frequently focuses on the offside rule, which restrains attacking players from setting up permanent camp in the opposing goalmouth.²⁸ Since the game did

²⁸ See *Laws of the Game*, *supra* note 10 at 34-35, 62-66. Among the many other recommendations for increasing scoring are decreasing the number of players on

not begin with an offside rule, and the rule itself has been modified numerous times over the years, purists cannot object on the grounds of sanctity or tradition. The rule was originally instituted to outlaw the use of players known as “kick throughs,” who stood very far forward to poach for goals, and subsequent reductions in its severity have regularly resulted in an increase in scoring.²⁹ If eliminating or ameliorating the current version of the rule would raise the overall number of goals in the game and thereby reduce the proportional impact of penalties, FIFA should experiment with changes to the rule before the next World Cup.



The World Cup comprises more nations than either the Olympics or the United Nations.³⁰ It is therefore a rare, truly global event. Every four years, billions of fans follow the tournament hoping to enjoy the apotheosis of soccer, played by its finest artisans for the highest stakes. Instead, with pressure and finality so palpable in every game, players frequently compete with more calculation and defensiveness than they do in their wildly popular domestic leagues. The current set of referees’ rewards and punishments only exacerbates the incentives to play in this cynical style. The abiding image of the tournament now is less one of spectacular goals or surpassing sportsmanship and more one of melodramatic chicanery. But if the referees’ tools can be adjusted and their roles thereby relegated, we might look forward to future World Cups in which the beautiful game, rather than the soap opera, plays center forward.

the field, increasing the size of the goal, eliminating the use of defensive walls, and reducing the distance of corner kicks.

²⁹ On the rules of soccer generally and the offside rule in particular, see *Soccer*, Encyclopedia of World Sport, 944, 956 (David Levinson & Karen Christensen eds., 1996).

³⁰ See Rice-Oxley, *World Cup Boosts Growth*, *supra* note 2 at 1 (“The international soccer federation FIFA has more members than the United Nations (207 v. 191).”). FIFA also has more members than the number of countries – approximately 200 – that take part in the Olympics. *See id.*