



# Executive Director's Update

Massachusetts Interscholastic Athletic Association

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## An Update from Executive Director Robert Baldwin

Massachusetts Interscholastic Athletic Association

December 11, 2025

### In Support of Game Officials



As we begin the winter season, the purpose of this Executive Director's Update is to be unequivocal in our support for game officials by including a compilation of submitted court documents from two recent legal proceedings where the MIAA served as defendants in support of game officials. Within a four-week period of time this fall, your Association was a defendant in two court injunctions that attempted to overturn game officials' decisions regarding disqualifications. Your Association opposed the Plaintiffs' motions for Preliminary Injunctions and argued that granting the motions would cause significant harm to the MIAA and its member schools.

For reference, during the 2024-25 school year, game officials' issued 431 one- or two-game suspensions for student-athlete disqualifications across all sports, a dramatic increase from 248 such suspensions in 2021-22, 314 in 2022-23, and 364 in 2023-24. Over four years, MIAA has issued 1,357 suspensions based on game officials' real-time judgment calls.

In joining the MIAA, all members agree to read, understand and abide by the Association's rules. Moreover, members have an interest in ensuring that these carefully crafted rules are consistently enforced. It is disappointing that school employees and an assignor that was not at the game, either testified or submitted affidavits in support of the filings for court injunctions, when MIAA Rule 49.1.3 unambiguously states: *"Judgments of game officials are not subject to appeal or review."* This longstanding rule, in effect for years, reflects the fundamental principle that real-time officiating decisions must be final to preserve the integrity and orderly administration of athletic competition. If schools, supervising officials, and families are enabled to circumvent these rules through litigation, the deterrent effect of consistent adherence to Association rules and the support of game officials will be lost.

Rule 49.1.3 is wholly consistent with the national standards for high school sports. For example, as described in the National Federation of State High School Associations ("NFHS") Football Rules, which govern high school football nationwide, *"The referee has authority to rule promptly, and in the spirit of good sportsmanship, on any situation not specifically covered in the rules. The referee's decisions are final in all matters pertaining to the game,"* and *"game officials have the authority to make decisions for infractions of the rules."*

In addition, the automatic two-game suspension listed in MIAA Handbook Rule 49.3.6 for fighting, punching, kicking, or spitting is absolutely clear. Once a game concludes and the Disqualification Form is filed with the boxed checked indicating such a violation, there is no choice but to apply Rule 49.3.6 and any other handbook rules as written.

Again, the purpose of this Executive Director's Update is to be unequivocal in our support for game officials by including a compilation of submitted court documents from both lawsuits. It is undisputed that the MIAA's rules do not allow for an appeal of game official's calls made during a game. To date, suits to overturn the judgement of officials have been unsuccessful. As an association of schools, it is imperative that we continue our support of officials and the contributions that they make to the interscholastic athletic experience every day.

The MIAA acknowledges the persistent and growing shortage of game officials. To support our member schools' efforts in this important area, the MIAA is expanding and enhancing its energies with our strategic partner RefReps to grow a new generation of game officials. In addition, the MIAA is working with State Legislators on four different pieces of legislation in order to strengthen and support our game officials. If you have any questions about these initiatives, please contact the MIAA staff.

### Winter 2025-26 Game Officials Newsletter

[Click here](#) to access the latest edition, featuring important NFHS rules updates and other valuable information.



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## A COMPILATION OF COURT DOCUMENTS PURSUANT TO HAMPDEN, ss. SUPERIOR COURT HAMPDEN COUNTY

On or about October 25, 2025, defendant Massachusetts Interscholastic Athletic Association ("MIAA") imposed a suspension barring [REDACTED], a Longmeadow High School varsity football team player, from playing in the next game, which was scheduled for October 30, 2025. Plaintiff [REDACTED] filed this action on October 28, 2025.

The court notes that this is not a case based on the denials of any constitutional right; as stated, there is no such right to participate in high school athletics.

Plaintiffs contention that enjoining the MIAA's decision will maintain the status quo overlooks the fact that [REDACTED] was penalized "for not playing by the rules on the basis of a judgment made by a duly authorized sports official who was present and made observations that led him . . . to impose the disqualification penalty. . . The intervention of this court at this stage may seriously impair the integrity of defendant's system for ensuring compliance with the rules of the various sports that it administers and oversees." DelBuono, 20 Mass. L. Rptr.

The court is guided by the reasoning of J. Agnes in DelBuono, a case similar to this one, in which two suspended high school hockey players asked the court to enjoin their suspensions so that they could play in their team's last playoff game of the season. In the DelBuono decision, J. Agnes concluded that the balancing of harms did not tip in favor of enjoining the officials' suspension decision.

"This court is aware of the fact that human error may contribute to a disputed decision, especially with respect to organized sports. However, this court is not in any position to review the penalty assessment decisions made by the referees at the time those decisions were made. The Superior Court is not the arena for contesting 'bad calls.' There are no established standards for this court to follow in reviewing a videotape of a sports program to enable it to correct the judgment of an official. If this court were to entertain lawsuits from high school age students grounded on disagreements over decisions made by referees during sports contests, the floodgates would open to a new wave of litigation that might severely damage the ability to maintain competitive sports programs." DelBuono, 20 Mass. L. Rptr. 740, 2006 WL 1345563 at \*3.

In sum, "the law does not provide a remedy for every wrong that a person may suffer." DelBuono, 20 Mass. L. Rptr.

...this court's refusal to enjoin such, valuable lessons are to be learned. One being that "[p]laying by the rules in a high school athletic contest sometimes means accepting the unfortunate consequences of a referee's judgment or decision that most people might agree was wrong." Id.

For the foregoing reasons, Plaintiffs Emergency Motion for Temporary Injunction was DENIED.

Amy Larangekis Justice of the Superior Court  
DATE: November 5, 2025

## A COMPILATION OF COURT DOCUMENTS PURSUANT TO WORCESTER COUNTY SUPERIOR COURT

On November 21, 2025, the plaintiff filed a complaint seeking review of a decision by defendant Massachusetts Interscholastic Athletic Association ("MIAA") pursuant to G.L. c. BOA, § 14. In sum, the complaint alleges that the plaintiff was ejected from a high school football game by an in-game referee for punching another player after a play. The call resulted in a mandatory two-game suspension.

Following the game, the plaintiff obtained video footage of the incident and an affidavit from the supervising official in the region (Central Massachusetts) concluding that the plaintiff had not "punched" the opposing player. (The complaint concedes that the plaintiff pushed the opposing player.) The plaintiff then sought review of the in-game referee's decision by the MIAA. Pursuant to MIAA rule 49.1.3, MIAA is prohibited from reviewing the decisions of in game officials. Accordingly, MIAA refused to review the decision. The complaint seeks judicial review of the MIAA's decision pursuant to G.L. c. 30A, and injunctive relief. In particular, the plaintiff asks the court to stay imposition of the suspension pending a resolution of the case on its merits.

It is undisputed that the MIAA's rule does not allow for an appeal of game official's calls made during a game. As the SJC has made clear unless a decision is made in an adjudicatory proceeding it is not subject to G.L. c. 30A. *School Committee of Hudson v. Board of Educ.*, 448 Mass. 565, 576 (2007). Furthermore, no provision of law or the constitution that has been violated. As the Supreme Judicial Court has held, a student-athlete's ability to participate in interscholastic athletics does not create any property interest and is a privilege and not a right. See *Mancuso v. MIAA*, 453 Mass. 116, 125 (2009).

The Plaintiff has not established, and cannot establish, that MIAA's imposition of the penalty agreed to by its membership following a game officials on field judgment call and action is arbitrary and capricious. It is undisputed that MIAA is a voluntary membership organization that conducts interscholastic athletic competitions for its members under member adopted rules that the MIAA enforces.



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In joining MIAA, all members agree to read, understand and abide by MIAA's rules. Moreover, the rules are consistently enforced.

MIAA Rule 49.1.3 unambiguously states:

"Judgments of game officials are not subject to appeal or review." *Id.* at Attachment 2. This longstanding rule, in effect for years, reflects the fundamental principle that real-time officiating decisions must be final to preserve the integrity and orderly administration of athletic competition. See *Attorney General v. MIAA*, 378 Mass. 342, 362-63 (1979) (The SJC has recognized MIAA's expertise in managing interscholastic athletics, holding that MIAA and its designees "are far abler than ourselves to decide what means they need to adopt to promote athletics"). Moreover, MIAA Rule 49.1.3 is wholly consistent with the national standard, as described in the National Federation of High School ("NFHS") Football Rules, which governs high school football nationwide. ("The referee has authority to rule promptly, and in the spirit of good sportsmanship, on any situation not specifically covered in the rules. The referee's decisions are final in all matters pertaining to the game."), 1-1-9 ("game officials have the authority to make decisions for infractions of the rules.").

Under these indisputable facts and clear rules, Plaintiff cannot show that MIAA acted arbitrarily or capriciously in following its longstanding policy that game officials' judgment calls are final and unreviewable. Once the game concluded and the Disqualification Form was filed with it, MIAA simply had no choice but to apply Rule 49.3.6 as written. The in-game official made a judgment call in real time that ■ punched an opposing player. That unreviewable call triggered an automatic two-game suspension under Rule 49.3.6.<sup>1</sup>

It is absolutely clear that MIAA Rule 49.3.6's automatic suspension for fighting, punching, kicking, spitting etc. serves compelling objectives: protecting student-athlete safety and promoting sportsmanship. The data demonstrates the rule's importance. During the 2024-25 school year, MIAA issued 431 one- or two-game suspensions for student-athlete disqualifications across all sports, a dramatic increase from 248 such suspensions in 2021-22, 314 in 2022-23, and 364 in 2023-24. Over four years, MIAA has issued 1,357 suspensions based on game officials' real-time judgment calls. *Id.* This escalating trend underscores the critical need for maintaining firm, consistently enforced rules that deter dangerous conduct.

A plaintiff must prove irreparable harm to prevail in a motion for a preliminary injunction. See *Abner A.*, 490 Mass. at 545. In this matter, Plaintiff generally asserts that they will suffer irreparable harm because there are only a finite number of football games and there is no final judgment that will vindicate the loss of the opportunity and experience to play football.

First and foremost, participation in interscholastic athletics is not a protected legal right. As the SJC clearly stated in *Mancuso*, 453 Mass. at 125-126: Thus, no constitutional or statutory rights are being lost.

There is absolutely no evidence that missing two games -- while no doubt disappointing -- constitutes irreparable harm.

The balance of potential harms and the public interest weigh decisively against granting the injunction. When a party seeks to enjoin government action, the Court must consider whether the requested relief promotes the public interest or will adversely affect the public. *Garcia*, 480 Mass. at 747.

In this matter, the public consists of the 385 MIAA member schools and their student athletes and the integrity of MIAA rules. Granting Plaintiff's motions would cause significant harm to MIAA and its members, who have adopted rules that imposed penalties for violation of them. MIAA and its members have an interest in ensuring that their carefully crafted rules are enforced.

To date, suits to overturn the judgement of officials have been unsuccessful. In the *Delbuono* case, Judge Agnes denied a temporary restraining order to two hockey players disqualified from a semi-final Central Massachusetts hockey game and any subsequent playoff games in the 2006 season for conduct during their quarter final game. See ADD. at 1. As in this case, the student athletes argued that the infractions did not occur as ruled by game referees and sought the court to intervene and make its own determination. The court rejected the suggestion that it review a videotape to correct the alleged error by the game officials and stated:

<sup>1</sup> / Even assuming *arguendo* that video review suggests the contact was not a punch, this does not warrant judicial intervention. The on-field official was present at the game, in close proximity to the incident, and made an immediate judgment call based on what he observed in real time. The official was positioned to see the play unfold, to observe the players' body language and movements, and to assess the situation as it happened, advantages that no video

replay can fully replicate. Video footage, while valuable, has inherent limitations. It captures only certain angles, may not show the full context of the interaction, and cannot convey the speed, intensity, or physical dynamics that an official experiences while standing mere feet from the players. The official's real-time assessment, made in the heat of competition with full sensory awareness of the situation, deserves deference.



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[t]he Superior Court is not the arena for contesting "bad calls." There are no established standards for this court to follow to reviewing a videotape of a sports program to enable it to correct the judgment of an official. If this court were to entertain lawsuits from high school age students grounded on disagreements over decisions made by referees during sports contests, the flood gates would open

to a new wave of litigation that might severely damage the ability of schools to maintain competitive sports programs....It is inappropriate for this court to review the penalty assessment and to risk a flood of litigation by parents who allege their children were the unfortunate victims of human error when no showing is made as to the injury suffered above and beyond the punishment itself. *Id.* at 2.

Moreover, MIAA's sportsmanship rules exist to protect student-athletes from dangerous conduct and to promote positive values in athletic competition. If schools and families can circumvent these rules through litigation, the deterrent effect of automatic suspensions will be lost. The result could be more dangerous conduct on the field, more injuries, and a degradation of the sportsmanship values that interscholastic athletics are meant to promote.

Overall, "for not playing by the rules on the basis of a judgment made by a duly authorized sports official who was present and made observations that led him...to impose the disqualification penalty.... The intervention of this court at this stage may seriously impair the integrity [MIAA's] system for ensuring compliance with the rules of the various sports that it administers and oversees." *Id.* ADD. at 2

[REDACTED]. The public interest strongly favors denying the injunction. The integrity and orderly administration of interscholastic athletics depend on clear rules, final officiating decisions, and consistent enforcement of disciplinary measures.

Similarly, earlier this month, Judge Karangekis denied an injunction to a football player seeking to overturn the one game suspension that results from receipt of a disqualification for a flagrant foul during a football game. ADD. at 13. The same result should occur here.

Under the highly deferential arbitrary and capricious standard, MIAA's decision was entirely reasonable and supported by rational grounds. The on-field official made a real-time judgment call that [REDACTED] punched an opposing player. Under MIAA rules, that determination triggered an automatic two-game suspension. MIAA properly declined to second-guess the official's judgment, consistent with longstanding rules and policies. This approach is neither arbitrary nor capricious, it is the application of clear rules designed to protect student safety, promote sportsmanship, and maintain the orderly administration of high school athletics.

On November 26, 2025, the court held a hearing on the plaintiff's motion for a preliminary injunction. Both parties were present. After careful consideration of the parties' filings and arguments, the request for injunctive relief is DENIED as the plaintiff has not demonstrated a reasonable likelihood of success on the merits for the reasons stated orally on the record. See *Doe v. Superintendent of Schs. of Weston*, 461 Mass.

Karin M. Bell

Justice of the Superior Court DATED: November 26, 2025