

FANTASY COURT

SYLLABUS

BEN v. STEPHEN

Petition for review of the Commissioner's nullification of a league-ratified trade and proposed imposition of draft-pick sanctions

No. 26-1527-1. Heard and decided September 23, 2026

The Ringer Fantasy Football Show, “Dart Goes Down, Power Ranking the Best Fantasy Buy-Low Trade Targets, Fantasy Court, and Laxative Max,” at 1:13:34–1:19:20

Petitioner Ben, of Northern Virginia, is a member of a high-buy-in dynasty league formed by high school friends upon their graduation in 2019. Respondent Stephen, the league’s reigning champion, having parlayed several years of deliberate tanking and aggressive trading into a roster featuring Josh Allen, Bijan Robinson, and Jahmyr Gibbs, accepted a counteroffer from a fellow league member under which Stephen surrendered Jahmyr Gibbs and received, in the words of the transaction log, nothing. Stephen affirmed that the acceptance was no accident, describing it as a ‘test’ of whether the league would veto an obviously lopsided trade. The counteroffer itself was sent by a league member exasperated by Stephen’s practice of spamming the league with multiple daily trade proposals, including repeated offers of Sam Darnold and a second-round pick for Drake Maye. Under the league’s veto policy, the trade received sufficient votes to pass, with Petitioner candidly admitting the affirmative votes were motivated by the fact that Stephen is ‘annoying as hell.’ The Commissioner nonetheless unilaterally announced that the trade would not go through notwithstanding the vote, and the Commissioner and several members now propose that Stephen retain Gibbs but forfeit a second-round pick as punishment. Petitioner sides with punishing Stephen and seeks the Court’s guidance on the appropriate remedy.

Held: A manager who knowingly trades Jahmyr Gibbs for nothing, and whose league votes the trade through, has lost Jahmyr Gibbs. The Commissioner may not void the trade after the count, and no draft-pick sanction may be substituted for it.

Syllabus

We held that a deliberate gift of a player is a valid trade: it has donative intent, delivery, and acceptance, and it is neither collusion nor bad-faith dealing because the giver received nothing and the recipient was not favored. Although league-wide veto votes are disfavored, a league that adopts one is bound by its result, and a Commissioner who lets the count proceed may not disregard it. We rejected the proposed sanction of returning Gibbs and forfeiting a second-round pick as a retroactive punishment for conduct no rule prohibited, one that would restore the very asset Stephen chose to surrender. The consequence of the trade is the trade.

CHIEF JUSTICE HEIFETZ delivered the opinion of the Court, in which JUSTICE KELLY and JUSTICE HORLBECK joined. JUSTICE KELLY filed a concurring opinion.

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CHIEF JUSTICE HEIFETZ delivered the opinion of the Court, in which JUSTICE KELLY and JUSTICE HORLBECK joined. JUSTICE KELLY filed a concurring opinion.

Respondent Stephen is the reigning champion of a dynasty league that Petitioner Ben and his high school friends have run since they graduated in 2019. He got there the modern way: he tanked before tanking was fashionable, traded relentlessly, and emerged with Josh Allen, Bijan Robinson, and Jahmyr Gibbs. He then traded Jahmyr Gibbs. The transaction log reads, in full: Team A receives Jahmyr Gibbs; Stephen receives nothing. No picks. Nothing.

This was not a misclick. Stephen has said so. The offer was a counteroffer from a league member exhausted by Stephen's habit of sending several proposals a day, among them Sam Darnold and a second-round pick for Drake Maye, repeatedly, in a dynasty league. Eventually Petitioner sold Stephen his vote for tight end premium (socialism for tight ends, though that question is not before us) for a promise never to be offered a trade again. The exasperated member responded with a proposal of his own: give me Gibbs, and you get nothing. Stephen accepted, and explained afterward that part of him "wanted to see if people would veto an obviously bad trade." It was, in his word, a test. Under the league's veto policy, members vote on whether a trade passes, and this one received the votes. Petitioner candidly reports the reason: Stephen is "annoying as hell." The Commissioner then announced that the trade would not be going through, votes or no votes, and he and several

members now propose that Stephen keep Gibbs and forfeit a second-round pick instead. Petitioner favors punishment and asks us what form it should take.

We hold that the punishment has already been administered. The trade was valid when accepted, the league ratified it under its own rules, and the Commissioner had no authority to set the vote aside. Stephen traded Jahmyr Gibbs for nothing. He now has nothing. That is the remedy.

I

We begin with the trade, because the proposed sanction assumes it was defective. It was not. It was a gift, and a gift is complete when it has three things: donative intent, delivery, and acceptance. Stephen supplied the first in writing, the platform the second, and Team A the third by accepting an offer he had, after all, designed. Had Stephen reported that he hit accept by mistake, this would be a different case. See *In re The Etienne Brothers Dynasty Trade*, 25-0698-1 (2025) (correcting honest, immediately reported error). A manager cannot claim mistake about a transaction he describes as an experiment.

Nor is the trade vetoable. The veto power exists to stop collusion and bad-faith dealing: concealed consideration, side agreements, or a manager who has abandoned the league and is funneling assets to a favored contender. *Dakota v. League*, 25-0717-3 (2025). None of that is here. There was no consideration to conceal. His counterparty was not a favored friend but an irritated one. And Stephen has not abandoned the league; his sin is an engagement so total that his league mates have negotiated for relief from it. What remains is a champion who gave away a star running back to see what would happen. “Foolishness is not collusion.” *In re Blind Swap of the Third and Fourth Overall Rookie Picks*, 26-1478-1 (2026). Neither is curiosity. As we said in *Dakota*, “this is America. You have the right to be stupid.” Stephen exercised it.

II

The league then did something we have discouraged: it put the trade to a vote. This Court has said that “there should not be votes for vetoing

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trades,” and that commissioners “should act and rule with an iron fist, intervening only when clear evidence of collusion or bad faith dealing exists.” *Dakota*, 25-0717-3. Had this Commissioner reviewed the trade himself, confirmed that Stephen meant it, and processed it, we would have nothing to say. That is what an iron fist looks like: one decision by one accountable person under a rule everyone knew.

That is not what happened. This league governs trades by vote, and a league that adopts a vote is bound by its output. The Commissioner did not suspend the policy in advance, did not stop the count, and did not identify collusion. He let the members vote, watched the trade pass, and then announced that it had not. “Fantasy football leagues are not autocracies. Commissioners are not dictators.” *Andrew v. Commissioner*, 24-0826-1 (2024). We censured a commissioner who unilaterally voided a trade out of “personal preference” rather than collusion, *HG v. Commissioner*, 21-1262-1 (2021), and ordered a trade processed where a commissioner rewrote the veto threshold after the vote went against him. *Josh v. Commissioner*, 22-1135-1 (2022). Disregarding a completed vote is the same abuse with less paperwork. JUSTICE HORLBECK observed at argument that the popular vote does not always decide an election. True. But this league has no electoral college, and the Commissioner may not appoint himself one.

The members’ reason for voting yes changes nothing. The veto power is narrow, but the franchise is not: a member may vote to let a trade through because it is fair, because it is funny, or because the seller has sent him nine offers since Tuesday. Annoyance is a permissible motive for a vote. It is not a basis for a sanction, and the league cannot convert the one into the other by remembering, after the count, that it takes itself seriously.

III

Now the proposed remedy. The league would have Stephen keep Gibbs and lose a second-round pick. That restores the asset Stephen chose to give away and takes one he never put on the table. It punishes a trade by undoing it. As JUSTICE HORLBECK put it at argument: if the league wants Stephen punished, he lost Jahmyr Gibbs. A sanction that leaves

the champion with Josh Allen, Bijan Robinson, Jahmyr Gibbs, and one fewer second-round pick is not a sanction. It is a rebate.

Second, no rule of this league prohibited what Stephen did. One of us has written before that a league confronting conduct it never contemplated should legislate prospectively rather than punish retroactively, because “retroactive punishment seems inequitable.” *Steve v. Pat*, 25-1427-1 (2025) (Heifetz, C.J., concurring in the judgment). The Court adopts that principle today. If the league wants a rule against gratuitous transfers, a cap on daily offers, or a cooling-off period for proposals involving Sam Darnold, it may adopt one for next season. It may not invent one now and bill Stephen for it.

Stephen’s own defense supplies the last word. He says the trade tested whether the league would veto an obviously bad deal. The result is in: it would not. A test whose result the experimenter refuses to accept is not a test. It is a bluff, and the league called it. Petitioner adds that this is a high buy-in league and that everyone takes it seriously. That cuts the other way. If the stakes are serious, Stephen should not have accepted, and the members who now want him punished should not have voted yes. Both did. Actions have consequences, and in this league the consequences were put to a vote and carried.

* * *

The Commissioner’s nullification is vacated. The trade shall be processed as the log records it: Team A receives Jahmyr Gibbs, and Stephen receives nothing, which is what he asked for. No draft pick shall be forfeited. Whether Stephen remains in a league that has grown tired of him is a question for the league, not this Court, and on that subject JUSTICE KELLY has views.

Trade stands.

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JUSTICE KELLY, concurring.

I join the Court's opinion in full. Stephen gave away Jahmyr Gibbs, the league let him, and the Commissioner cannot unlet him. I write separately because Petitioner asked what the league should do about Stephen, and the Court has answered only what it should do about Gibbs.

Five seasons ago I wrote for the Court that a member who holds his participation hostage should be invited to make good on the threat, because "The league will survive without them." *In re Rishawn Holmes Accidental Drop Controversy*, 21-1246-1 (2021). This month the Court applied that rule to a member who actually walked. *In re the Prodigal League Member*, 26-1490-1 (2026) (Kelly, J., concurring). The principle runs in both directions. A league that will survive the departure of a member who quits will also survive the departure of one it declines to keep. Stephen has not threatened to leave. He has done something harder to remedy: he has made himself the reason every trade notification in this league is opened with dread, extracted a vote for tight end premium by promising to stop, and then accepted a trade for nothing to find out whether his friends would save him from himself. They would not. I would not either.

Petitioner's own advice was to end this league and start a new one with everyone but Stephen, rosters intact. That is not a punishment this Court can order, and I do not suggest it as one. It is a remedy the members already hold, and it is the only one that addresses the actual

grievance, which is not a running back but a person. The Court is right that the league may write a rule capping trade offers for next season. I note only that the league could instead put everyone else's name on a Sleeper invitation, and that today's judgment leaves Stephen's roster one running back lighter either way.

One last matter. The Court's opinion calls tight end premium socialism for tight ends. I join the opinion. I do not join the parenthetical. I like tight end premium, and I would record that it is the only thing in this case anyone should be giving away for nothing.