

**IN THE MATTER OF A NOTICE OF MAJOR OFFENSE OF ALLEGED CORRUPTION OFFENSES  
UNDER THE TENNIS ANTI-CORRUPTION PROGRAM**

**BETWEEN**

**THE INTERNATIONAL TENNIS INTEGRITY AGENCY**

**AND**

**GABRIEL PETIT**

**DECISION OF THE ANTI CORRUPTION HEARING OFFICER**

1. Mr Gabriel Petit (the 'Player') is a French professional tennis player with a career high ranking of 451 (singles) and 490 (doubles).
2. By letter dated 23 August 2024, the International Tennis Integrity Agency (the 'ITIA') sent the Player a Notice of Major Offense (the 'Notice') pursuant to Section F.4 of the Tennis Anti-Corruption Program (TACP). The Notice set out (i) the specific Corruption Offenses the ITIA alleged the Player had committed, (ii) the facts giving rise to the alleged Corruption Offenses, (iii) the potential sanctions that apply to the Corruption Offenses and (iv) notice of the Player's right to have this matter determined by the Anti-Corruption Hearing Officer (AHO) at a hearing and what the Player must do to exercise this right.
3. I was appointed AHO in relation to this matter on 25 October 2024.

**Service of the Notice of Major Offense**

4. Section F.8 of the 2024 TACP provides in relation to contact requirements:

*"Each Covered Person shall be determined to be immediately contactable at their current (i) postal address, (ii) personal mobile telephone or (iii) personal email address. A Notice or communication sent to any postal address, email address or mobile telephone number provided by the Covered Person to a Governing Body or directly to the ITIA shall be deemed to have been sent to the Covered Person's current address or mobile telephone number. In each case it is the responsibility of the Covered Person to ensure that the relevant Governing Body has been provided with the necessary up to date contact details. Any Notice or other communication delivered hereunder to a Covered Person shall be deemed to have been received by the Covered Person (i) in the case of a postal address, on the date of delivery to such address in the confirmation of delivery provided by the relevant courier service company or (ii) in the case of a personal mobile telephone or personal email address, at the time the relevant communication was sent. "*

5. On 11 July 2024, the French Tennis Federation (the 'FFT') confirmed with the ITIA that the Player's ITF registered email address matched its records.

6. On 23 August 2024, the ITIA delivered, to the Player's ITF registered email address, English and French copies of the Notice, which stated:

*"You are entitled to have this matter determined by the AHO at a Hearing if you dispute the ITIA's allegations. If so, under Section G.1.b of the TACP, you must submit a written request to the AHO for a Hearing so that it is received as soon as possible, but in any event within ten (10) Business Days of the date of your receipt of this Notice. If you do not file a written request for a hearing within ten (10) Business Days, the AHO will, under section G.1.e of the TACP, issue a Decision confirming the commission of the Corruption Offense alleged in this Notice and ordering the imposition of sanctions."*

7. In the covering email, the ITIA directed the Player to respond by 9 September 2024.
8. Delivery of this email was confirmed as complete. No reply was received from the Player, and the ITIA case management system showed that the Notice had not been viewed online.
9. In order to ensure that the Player was aware of the charges against him, the ITIA requested the FFT to provide his registered home address for physical service. This was provided by the FFT on 11 September 2024. On 8 October 2024 the ITIA instructed a French bailiff (via French lawyers) to serve the Notice at the Player's home address. On 9 October 2024, the ITIA received confirmation that the French bailiff (who had been engaged to personally serve the Player with a copy of the Notice at his home address) had taken steps which amount to notification in person under French civil law. The Bailiff noted that the Player was not present, however, his name was on the mailbox and neighbours confirmed that he resided at the address. The Bailiff left written instructions at the address for the Player to collect the Notice, which (so far as the ITIA is aware) has to date not occurred.
10. The Player has not made any contact with the ITIA.

#### **Consequence of lack of contact by the Player**

11. In accordance with Section F.8 of the 2024 TACP, the Player is deemed to have received the Notice on 23 August 2024 and (again) 9 October 2024.
12. The Player failed to file a written request for a hearing by the relevant deadline (10 Business Days after 23 August 2024, and again 10 Business Days after 9 October 2024).
13. Section G.1.b and G.1.e of 2024 TACP provide as follows:

*"G.1.b. The Notice of Major Offense shall also specify that, if the Covered Person wishes to dispute the ITIA allegations, the Covered Person must submit a written request to the AHO for a Hearing so that it is received as soon as possible, but in any event within ten Business Days of the date of the receipt of the Notice of Major Offense. "*

*"G.1.e. If the Covered Person fails to file a written request for a Hearing by the deadline set out in Section G.1.b., he or she shall be deemed:*

*G.1.e.i. to have waived his or her entitlement to a Hearing;*

*G.1.e.ii. to have admitted that he or she has committed the Corruption Offense(s) specified in the Notice of Major Offense;*

*G.1.e.iii. to have acceded to the potential sanctions specified in the Notice of Major Offense; and*

*G.1.e.iv. the AHO shall promptly issue a Decision confirming the commission of the Corruption Offense(s) alleged in the Notice of Major Offense and ordering the imposition of sanctions, (after requesting and giving due consideration to a written submission from the ITIA on the recommended sanction).”*

14. The ITIA served submissions on sanction on the Player on 17 January 2025 by way of email to both of the Player’s ITF registered email addresses.
15. No response has been received from the Player at any stage.
16. In these circumstances I am required to make and publish a decision in relation to the Player.

#### **Jurisdiction**

17. The Player is a French professional player. He last competed in the ITF M25 Tournament that took place in Grasse, France between 14 June and 20 June 2021. The Player registered for an ITF IPIN and signed the Player Welfare Declaration for every year between 2010-2019, thereby accepting to abide by the provisions of the TACP. The Player first completed the Tennis Integrity Protection Program (‘TIPP’), an online educational tool designed to assist players in recognising and adhering to their obligations under the TACP, in March 2017.
18. The TACP 2024 provides:

*B.10. “Covered Person” refers to any Player, Related Person, or Tournament Support Personnel.*

*“Player” refers to any player who enters or participates in any Event. A person shall be a Player for the purposes of this Program, and shall remain bound by all provisions of this Program, until the earlier of (i) the date of the Player’s valid retirement in accordance with the requirements of the TADP, or (ii) two years after the last Event in which they enter or participate, unless, at either such time, the Player (a) is subject to a period of ineligibility under this Program or the TADP, in which case the covered period shall instead cease upon the conclusion of such period of ineligibility or (b) is aware that they are the subject of an ITIA investigation and/or a law enforcement investigation<sup>1</sup>, in which case the covered period shall instead cease upon the ITIA closing the investigation or the Player or ITIA being informed that the law enforcement investigation has been closed, or ten years, whichever is earlier.”*

19. The Player was therefore (at the time of the relevant incidents) a Player and a Covered Person within the meaning of sections B.27 and B.10 of the TACP and there is jurisdiction to determine this matter under TACP.

### **The Charges**

20. The Notice of Major Offense informed the Player that he was being charged with multiple breaches of the 2017 and 2018 TACP under Sections:

*a. D.1.d (“No Covered Person shall, directly or indirectly, contrive or attempt to contrive the outcome or any other aspect of any Event.”);*

*b. D.1.b (““No Covered Person shall, directly or indirectly, solicit or facilitate any other person to wager on the outcome or any other aspect of any Event or any other tennis competition.”); and*

*c. D.1.f (“No Covered Person shall, directly or indirectly, solicit or accept any money, benefit or Consideration with the intention of negatively influencing a Player’s best efforts in any Event.”)*

*d. D.2.a.i (“In the event any Player is approached by any person who offers or provides any type of money, benefit or Consideration to a Player to (i) influence the outcome or any other aspect of any Event, or (ii) provide inside information, it shall be the player’s obligation to report such incident to the TIU as soon as possible.”)*

### **Factual summary**

21. During the relevant period to the Player’s offenses, an organised criminal network with links to Armenia and Belgium had significant involvement in match-fixing in tennis. At the centre of that organised criminal network was an individual called Grigor Sargsyan, also referred to as “Maestro” (‘GS’). GS would communicate with corrupt tennis players (sometimes directly and sometimes through another individual, who were often other professional tennis players) to make arrangements to fix professional tennis matches.

22. Admissions made by other players and communications between GS and other implicated players establish the involvement of the Player in match fixing.

23. The Player has been deemed to have admitted (and therefore liability has been established for) seven breaches of Section D.1.d of the TACP, by contriving or attempting to contrive an aspect of an Event, in relation to the following tennis matches (the seven matches):

a. **August 2017** at the [REDACTED] Latvia, Petit vs [REDACTED];

b. **September 2017** at the [REDACTED] Tunisia, Petit/[REDACTED] vs [REDACTED];

c. **March 2018** at the [REDACTED] France, Petit/[REDACTED] vs [REDACTED];

d. **May 2018** at the [REDACTED] [REDACTED], Petit/[REDACTED] vs [REDACTED];

e. **May 2018** at the [REDACTED] Sweden, Petit vs [REDACTED];

f. **May 2018** at the [REDACTED] Tunisia, Petit/[REDACTED] vs [REDACTED]; and

g. **June 2018** at the [REDACTED] Tunisia, Petit vs [REDACTED].

### **The seven matches: summary of conduct**

24. ■ August 2017 at the ■ Latvia, Petit vs ■;

The Player contrived and agreed to ■ the ■ set ■.

25. ■ September 2017 at the ■ Tunisia, Petit ■ vs ■;

The Player and ■ contrived and agreed to ■ the match ■ sets ■ and to ■ their ■ service game in ■.

26. ■ March 2018 at the ■ France, Petit ■ vs ■;

The Player contrived and agreed to ■ the ■ set ■.

27. ■ May 2018 at the ■ Grasse, Petit ■ vs ■;

The Player contrived and agreed to ■ the match ■ sets ■.

28. ■ May 2018 at the ■ Sweden, Petit vs ■;

The Player contrived and agreed to ■ the ■ set ■.

29. ■ May 2018 at the ■ Tunisia, Petit ■ vs ■;

The Player contrived and agreed to ■ this match ■ sets ■.

30. ■ June 2018 at the ■ Tunisia, Petit vs ■.

The Player contrived and agreed to ■ the match ■ sets ■ and ■ his ■ service game in the ■ set.

31. In relation to the seven matches:

- a. It is to be inferred that the Player received money for each of the above fixes; and
- b. The Player failed to report the offers made to him.

32. For each of the seven matches, the Player committed a breach of Section D.1.b of the TACP, by contriving or soliciting to contrive the outcome and/or aspects of those matches in order to facilitate wagering on those matches by other persons.

33. For each of the seven matches, the Player committed a breach of Section D.1.f of the TACP, by soliciting or accepting money to contrive or solicit to contrive the outcome and/or aspects of those matches.

34. For each of the seven matches, the Player committed a breach of Section D.2.a.i of the TACP, by failing to report each of the approaches made to him by an organised criminal network to contrive aspects of those matches.

#### **Two further matches**

█.05.2018 Sweden █, Men's █ – Petit v █

35. The Player received an offer to fix this match by losing a specific set or game of this match. He did not agree to that offer but failed to report this offer to contrive this match.

█.05.2018 Tunisia █, Men's █ – Petit/█ v █

36. The Player received two separate offers to fix this match by losing this match and / or by losing the first set. The Player did not agree to these offers but failed to report these offers to contrive this match.

37. The Player is also deemed to have admitted a further two breaches of Section D.1.a by failing to report approaches made to him contrive aspects of the following tennis matches:

- a. █ May 2018 at the █ Sweden, Petit vs █; and
- b. █ May 2018 at the █ Tunisia, Petit/█ vs █.

#### **Conclusion as to the nine matches**

38. Thus the Player has been deemed to have admitted (and therefore liability has been established for) breaches of the TACP in relation to nine matches between August 2017 and June 2018.

#### **Sanctions**

39. The sanctions which may be imposed by the AHO in relation to the Charges are set out in section H.1.a of the 2024 TACP:

*“H.1 ... the penalty for any Corruption Offense shall be determined by the AHO in accordance with the procedures set forth in Section G, and may include:*

*With respect to any Player, (i) a fine of up to \$250,000 plus an amount equal to the value of any winnings or other amounts received by such Covered Person in connection with any Corruption Offense, (ii) ineligibility from Participation in any Sanctioned Events for a period of up to three years unless permitted under Section H.1.c., and (iii) with respect to any violation of Section D.1., clauses (c)-(p), Section D.2. and Section F. ineligibility from Participation in any Sanctioned Events for a maximum period of permanent ineligibility unless permitted under Section H.1.c.”*

40. The ITIA seek a period of ineligibility of 6 years and 6 months and a fine of USD \$35,000. The grounds on which they seek this sanction are as follows.
41. In March 2021, the Tennis Integrity Supervisory Board (“TISB”) issued Sanctioning Guidelines (“the Guidelines”). An updated version of the Guidelines was approved by the TISB and took effect from 1 January 2024.
42. The Guidelines provide that where:
- “there are multiple Corruption Offenses, in the interests of efficiency, they should ordinarily be taken together in one concurrent sanctioning process (albeit taking particular cognizance of the offense(s) which carry(ies) the highest sanction”*
43. The Guidelines provide a five-step process by which to determine the appropriate sanction in a particular case, as follows:
- a. Determining the category of offense.
  - b. Assessing the starting point for a sanction and where in the applicable range of categories the case of the Player falls. This includes the impact of applicable aggravating or mitigating factors.
  - c. Consideration of any appropriate reduction for early admissions.
  - d. Consideration of any other factors which may merit a reduction in sanction, such as the provision of Substantial Assistance to the ITIA.
  - e. Determining the appropriate fine (if any)
44. The category for an offense is split into two parts. The first is the level of culpability which is determined, under the Guidelines, by “weighing up all the factors of the case” and then ranked against various criteria in categories A to C. The second is the level of impact that a Covered Person’s actions have had which are then ranked against various criteria in categories 1 to 3.
45. The ITIA submits that as to culpability, elements from both category A and B are present and that as to impact the impact of the offenses sits between categories 1 and 2:
46. Having determined the appropriate categorisation, the Guidelines anticipate next assessing the appropriate starting point for the consideration of sanction, using the table at Step 2. The starting point for offending conduct in either category A2 or B1 is a 10-year suspension, and the starting point for offending conduct in category B2 is a three year suspension.
47. The ITIA submits that the midpoint of B1 and B2 is appropriate, due to the presence of factors falling within impact category 1 and 2, yielding a starting point of a six-year and six-month period of ineligibility. As the Player has not responded to the Notice or provided any submissions in this matter, no mitigating or (or known aggravating) factors are applicable. The Player has not offered early admissions to the ITIA and there are accordingly no reasons justifying a reduction in this regard. The Player has not offered any Substantial Assistance to the ITIA so cannot benefit from a reduction for that reason. There are no other reasons to merit a reduction.

48. As to the applicable fine the Guidelines state:

*“Section H.1.a(i) of the TACP allows for fines of up to \$250,000 to be imposed alongside suspensions. The amount of any fine should ordinarily reflect the categorisation of the offense(s) such that, for example, offending categorised as A.1 in the table above may attract a fine at the higher end of the particular scale on the Fines Table below and, conversely, offending categorised as C.3 might attract a fine at the lower end of the particular scale (or no fine at all).”*

49. The Player is treated as admitting to fixing seven matches in return for payment and failing to report approaches to match-fix in relation to two matches. His known involvement took place over a period of close to one year. A sum of money being payable by the Player is appropriate to reflect the key aims of the TACP in reaching a reasonable and proportionate sanction which acts as an effective deterrent as well as redressing repayment of sums earned through the breaches of the TACP.

50. The Fines Table in the Guidelines suggests that the appropriate fine for 5-10 Offenses is \$25,001 - \$50,000. The ITIA submits that the appropriate fine is \$35,000 on the basis of fixing seven matches. The ITIA have said that according to Section J.2 of the TACP, they are happy to agree a payment plan for any fine which is ordered.

51. Whilst in accordance with the above provisions the Player is deemed to admit and accept the above sanctions, I should say that, in accordance with the offenses deemed to have been admitted, I regard these sanctions as reasonable and proportionate. Indeed, they seem to me to be on the low side given the offenses deemed to be admitted.

## **Disposition**

52. The Player has not responded to the Notice of Charge served on him. In those circumstances under TACP 2024 G.i.e he is deemed (i) to have waived his entitlement to a Hearing (ii) to have admitted that he has committed the Corruption Offense(s) specified in the Notice of Major Offense (iii) to have acceded to the potential sanctions specified in the Notice of Major Offense

53. I find the charges deemed to have been admitted and the Player is deemed to have acceded to the sanction proposed by ITIA.

54. I therefore impose:

- (i) a period of ineligibility of six years and six months to commence from the date of publication of this decision to the Player;
- (ii) a fine of USD \$35,000.

The Player has a right to appeal this decision to the CAS in accordance with the terms of Section I of TACP 2024.



A handwritten signature in black ink that reads "Charles Hollander". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Charles Hollander KC

AHO

21 March 2025