

International Tennis Integrity Agency

and

Sylvester Emmanuel

**DECISION ON SANCTION UNDER SECTION
G.1.E.IV OF THE TENNIS ANTI-
CORRUPTION PROGRAM (“TACP”)**

Before Anti-Corruption Hearing Officer:

Amani Khalifa

**Representing the International Tennis Integrity
Agency:**

Ben Rutherford and
Onside Law

Sylvester Emmanuel:

Not represented by
outside counsel

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I. INTRODUCTION

1. Pursuant to Section F.4. of the Tennis Anti-Corruption Program (*TACP*) 2024, the International Tennis Integrity Agency (the *ITIA*) served a Notice of Major Offense (the *Notice*) on Sylvester Emmanuel (*SE*) on 21 August 2024. The Notice informed SE that he was being charged with various breaches of the TACP 2017 and TACP 2018 and of his right to have this matter determined at a Hearing before the Anti-Corruption Hearing Officer (*AHO*) if he disputed the ITIA's allegations.
2. To exercise this right, SE was required to submit a written request for a Hearing within ten (10) Business Days from receipt of the Notice. SE failed to submit a written request for a Hearing by the deadline and as a result, pursuant to Section G.1.e of the TACP 2024, has been deemed to have: (i) waived his entitlement to a Hearing; (ii) admitted that he has committed the Corruption Offenses specified in the Notice; and (iii) acceded to the potential sanction specified in the Notice.
3. Pursuant to Section G.1.e of the TACP 2024, the AHO is now issuing a decision confirming the charges and the imposition of sanctions on SE.
4. Ms. Amani Khalifa holds the appointment as an AHO as per section F.1 of the TACP 2024. The AHO was appointed without objection by either party as the independent and impartial adjudicator to rule on the case.

II. BACKGROUND

5. The ITIA was granted access to certain evidence collated by the Belgian authorities following their investigations into a suspected organised criminal network involved in an international match-fixing operation. The Corruption Offences against the Player mentioned in the Notice arise out of those investigations.
6. The primary evidence obtained comprises messages downloaded from mobile devices and records of money transfers. The individual at the centre of the

Belgian match fixing investigation, ██████████ (██████████) communicated with corrupt tennis players and intermediaries to fix matches. ██████████ used a network of associates to ensure payment of players, one of whom was Franco Feitt (*FF*). Both ██████████ and FF have been found guilty of numerous corruption offenses including match fixing. ██████████ and FF exchanged a number of messages related to the Corruption Offences contained in the Notice including discussions related to payments to SE (via a third party) which have been admitted into evidence by the ITIA in these proceedings.

7. The ITIA have also submitted that it received alerts from ██████████ regarding suspicious bets placed on one of SE's matches. As part of its investigations into this alert regarding Match 1 (defined below), the ITIA conducted an interview with SE on 16 April 2018 and the transcript of this interview has also been submitted into evidence.

III. THE APPLICABLE LAW AND JURISDICTION

8. The applicable rules are TACP 2017 and TACP 2018 with regards to the alleged Major Offenses and TACP 2024 with regards to the procedure.
9. Neither party has objected to the appointment of the AHO to hear this matter. She has been properly appointed and seized of the matters in dispute.
10. No other matters relating to jurisdiction or other preliminary objections have been raised by either party.

IV. THE NOTICE OF MAJOR OFFENSE

11. SE has been charged with two (2) breaches of the TACP 2017 and four (4) breaches of the TACP 2018. The ITIA has provided the details of these charges in the Notice which are summarised as follows:

- (a) One (1) alleged breach of Section D.1.b of the TACP 2017 by directly or indirectly soliciting or facilitating any other person to wager on the outcome of Match 1¹;
- (b) One (1) alleged breach of Section D.1.d of the TACP 2017 by directly or indirectly contriving or attempting to contrive the outcome of Match 1;
- (c) One (1) alleged breach of Section D.1.b of the TACP 2018 by directly or indirectly soliciting or facilitating any other person to wager on the outcome of Match 2²;
- (d) One (1) alleged breach of Section D.1.d of the TACP 2018 by directly or indirectly contriving or attempting to contrive the outcome of Match 2;
- (e) One (1) alleged breach of Section D.1.f of the TACP 2018 by directly or indirectly soliciting or accepting any money, benefit or consideration with the intention of negatively influencing a Player's best efforts in Match 2; and/or
- (f) One (1) alleged breach of Section D.2.a.i of the TACP 2018 by failing to report the approach by FF who offered a monetary or other form of benefit in return for influencing the outcome or any other aspect of the Matches;

(together, the *Charges*).

12. The ITIA has provided a summary of the evidence on which it relies in the Notice. That evidence relates to the following matches in which SE played:

- (a) **Match 1:** Men's [REDACTED] [REDACTED] [REDACTED] tournament in [REDACTED] Zimbabwe on [REDACTED] June 2017 with [REDACTED] against [REDACTED] and [REDACTED] [REDACTED] and
- (b) **Match 2:** Men's [REDACTED] [REDACTED] tournament in [REDACTED] Zimbabwe on [REDACTED] May 2018 against [REDACTED];

¹¹ Defined at paragraph 12 below.

² Defined at paragraph 12 below.

(together the *Matches*).

13. The ITIA alleges that SE intentionally lost Match 1 in order to facilitate betting on this match in breach of section D.1.b of the TACP 2017. In doing so, SE also contrived the outcome of, or an aspect of, an Event in breach of section D.1.d of the 2017 TACP.
14. The ITIA alleges that prior to Match 2, SE agreed with FF, who was acting on behalf of [REDACTED] that he would accept money to contrive the outcome of, or an aspect of, this match in breach of section D.1.d of the TACP 2018. The ITIA alleges that SE did this to facilitate betting on Match 2 and that he received money for doing so in breach of sections D.1.b and D.1.f. Further, and/or alternatively, the ITIA alleges that SE failed to report the corrupt approach made to him in breach of sections D.2.a.i.
15. Under sections G.1.e.ii and G.1.e.iii of the TACP 2024, by failing to answer the Charges brought against him, SE has admitted liability for the Charges and acceded to the potential sanctions specified in the Notice.
16. Under Section B of the Notice, the ITIA stated that it provisionally considered that, in line with the TACP Sanctioning Guidelines (the *Guidelines*), the above charges against SE may be categorised as Culpability B and Impact 2, which has a starting point of 3 years' ineligibility and a potential fine of up to US\$5,000 per major offense, in addition to the repayment of any corrupt payments SE may have received.
17. The Notice also provided that SE was entitled to have the matter determined by the AHO at a Hearing if he disputed the ITIA's allegations. The Notice provided the details of the procedure and the deadline for submitting a request for a Hearing.

V. THE PROCEDURAL BACKGROUND

18. On 10 June 2024, the ITIA sent the Notice to SE via [REDACTED] outlining the allegations and charges against him

and informing him that Amani Khalifa had been appointed as AHO in this matter. SE was given ten (10) Business Days to submit a written request for a Hearing. SE did not respond to the Notice before the deadline or at all.

19. The ITIA informed the AHO that it received a delivery receipt from SE but could not confirm that the Notice had been viewed by SE. Accordingly, the ITIA corresponded with SE's National Federation in Nigeria (the ***National Federation***) to confirm his contact details. On 13 August 2024, ITIA investigator Alan Boyd (***AB***) also contacted SE via WhatsApp. Following these further enquiries, the National Federation and SE both confirmed to the ITIA that [REDACTED] was the correct contact email address. On 21 August 2024 the ITIA resent the Notice to SE at this email address and AB sent the Notice to him on WhatsApp.
20. On 17 September 2024, the AHO informed the parties that SE had failed to file a written request for a Hearing by the deadline. The AHO noted that in accordance with Section G.1.e of the TACP 2024, SE had, *inter alia*, waived his entitlement to a hearing; admitted that he is liable for all Corruption Offences for which he was charged in the Notice and acceded to the potential sanctions set out in the Notice. The AHO therefore requested (i) counsel for the ITIA to file written submissions regarding the recommended sanction by 1 October 2024, and (ii) SE to file his written submissions on sanction by 15 October 2024.
21. On 1 October 2024, the ITIA filed its submissions on sanctions (the ***Sanctions Submissions***) as directed.
22. SE failed to file any submissions within the deadline provided and has not done so as of the date of this decision.
23. Pursuant to Section G.1.e.iv. of the 2024 TACP, the AHO now proceeds to order the imposition of sanctions.

VI. ITIA'S WRITTEN SUBMISSIONS

24. The AHO has carefully considered the Sanctions Submissions which are summarised below. Additional facts and allegations found in the ITIA's submissions may be set out, where relevant, in connection with the discussion that follows. The AHO refers in her award only to the submissions and evidence she considers necessary to explain her reasoning.

25. SE has been charged with two (2) breaches of the TACP 2017 and four (4) breaches of the TACP 2018. The ITIA relies on the following evidence in support of the allegations:

(a) Information provided by the betting operator, [REDACTED] indicating that two (2) individual betting accounts, registered in Bulgaria and the UK respectively, placed suspicious bets on Match 1.

(b) Evidence obtained by the ITIA from the Belgian authorities, including the forensic download from [REDACTED] mobile phones, including WhatsApp messages³ exchanged between [REDACTED] and FF in relation to:

(i) the fixing of Match 2;

(ii) payments made to SE following Match 2; and

(iii) evidence of two MoneyGram payments to [REDACTED] ([REDACTED] following Match 2.

(c) Confirmation from [REDACTED] that he had collected monies on SE's behalf.

26. The ITIA submits that on a preponderance of the evidence, SE has committed the Corruption Offenses that are the subject of the Charges. Moreover, his failure to contest the charges by the deadline or at all constitutes an admission that he has committed the Corruption Offences included in the Notice of Charge.

³ These messages downloaded from [REDACTED] mobile phones were set out by the ITIA in the Notice including translations.

27. The ITIA's position in relation to each Charge is as follows:

Match 1

28. The ITIA submits that it received a match alert from betting operator [REDACTED] in respect of suspicious bets placed on Match 1 by two individual betting accounts, registered in Bulgaria and the UK. Specifically, one bet of £300 placed by the UK account at 10:10am on [REDACTED] and [REDACTED] to win the match with a return of £825 and two identical bets placed by the Bulgarian account of €154 and €200 with a return of €2,214. The ITIA has not submitted evidence of these alerts in the proceedings.
29. The ITIA avers that there was an arrangement in place for SE to receive payment for contriving the result of Match 1 in the same manner as alleged for Match 2 and described at paragraphs 31 to 34 below. However, the ITIA concedes that it does not have any documentary evidence to support this position.

Match 2

30. The ITIA submits evidence of WhatsApp messages between [REDACTED] FF and [REDACTED] [REDACTED] [REDACTED] sent on the morning of Match 2 and in the days following to support its allegations in respect of the Charges relevant to Match 2. FF is a former professional tennis player and one of [REDACTED] middlemen who was banned for life for multiple match-fixing offences in 2021. [REDACTED] was an associate of [REDACTED] who often worked to arrange payments for the fixes. In the messages sent on the morning of Match 2 [REDACTED] states:

“Amigo ? Silvester will play very soon

[REDACTED] play full ? And Silvester full ?

Silvester full also yes?”

FF replies *“Yes yes Yes, yes”*

31. Following the match, the ITIA alleges that the WhatsApp messages show [REDACTED] exchanged messages with FF and [REDACTED] in relation to the payments to SE for the

fix on Match 2. On 29 May 2018 [REDACTED] directs [REDACTED] “*Let’s do these Moneygrams today, please*”. FF provides details of the recipient, [REDACTED] to [REDACTED] and [REDACTED] confirms the details for the MoneyGram. During the period from 29 to 30 May 2018 FF and [REDACTED] then clarify the exact amounts that are to be sent:

FF: “*And ahothor [sic] thing... You will send 2500 to one guy and 500 to another from this money... Because it's the comisi3n for silvester*”

[REDACTED] “*So 1500 and 1000*

Ok?”

FF: “*So I will send you the name for the 500 silvester*”

32. On 30 May 2018, [REDACTED] asks [REDACTED] “*Bro, will you do these Moneygrams today?*” [REDACTED] replies “*Yes*”. [REDACTED] then confirms to FF that the two payments of \$US1,500 and \$US1,000 will be sent to [REDACTED] on the same day.
33. Further, the ITIA has submitted that it has evidence of two MoneyGram payments of \$US1,500 and \$1,000 made to [REDACTED] found on one of [REDACTED] devices (the “*MoneyGram Transfers*”). The ITIA alleges that this corresponds to the Match 2 WhatsApp Messages regarding payments to be made to SE for agreeing to contrive aspects of Match 2.
34. On 27 July 2021, the ITIA contacted [REDACTED] to question him about the nature of these two MoneyGram transfers. The ITIA submits that [REDACTED] confirmed that he collected the sum of \$2,500 on behalf of SE in May 2018 when SE was staying at the hostel owned by [REDACTED] explained that SE and another Nigerian player informed him that the money had been sent by his parents from overseas and that he could not personally collect it because he did not have Zimbabwean identification. The ITIA has not submitted any evidence of this conversation with [REDACTED]
35. The ITIA also submits that during an interview with the ITIA (then known as the Tennis Integrity Unit) on 7 August 2020, FF expressly confirmed that he worked with [REDACTED] to fix one of SE’s matches in return for the sum of “2,500”.

This corresponds exactly to the amount sent via MoneyGram by [REDACTED] (on behalf of [REDACTED] to [REDACTED] as evidenced by the Moneygram Transfers.

The offences

36. The ITIA submits that it is clear from the evidence set out above that in respect of Match 2, SE intentionally lost that match in order to facilitate betting on the match, that SE received money for doing so and that he failed to report the approaches to the ITIA. Further, although there is not the same documentary evidence, the same arrangement existed in respect of Match 1 which SE also lost in order to facilitate betting on that match.
37. Specifically, the ITIA avers that based on the evidence, SE has committed the following offences:
 - (a) D.1.b TACP 2017 and TACP 2018 – facilitation
 - (b) D.1.d TACP 2017 and TACP 2018 – contriving
 - (c) D.1.f TACP 2018 – receipt of money
 - (d) D.2.a.i TACP 2017 – failure to report

Sanction

38. The ITIA submits that given the Charges against SE, the maximum potential sanction under section H.1.a TACP 2024 is life/permanent ineligibility from Sanctioned Events, a US\$250,000 fine and repayment of any corrupt payments he may have received.
39. The ITIA argues that in line with the Guidelines, the Charges against SE should be categorised between Category B1 and B2, with an acknowledgment that the Charges are closer to Category 2.
40. The ITIA submits that with regards to culpability:
 - (a) SE displayed a “*Some planning and premeditation*” as required for Category B, owing to the fact that there was a need for SE to liaise with third parties,

specifically FF, in order to agree to fix the Matches. The ITIA submits that there was also a degree of planning required in order to arrange payment of the fixes. The complexity of the payment arrangements in relation to Match 2 demonstrates that a well-planned arrangement was in place. The ITIA avers that it can be inferred that a similar arrangement would have also been in place for Match 1.

- (b) In light of the above, SE was also “*Acting in concert with others*” as required for Category B. Specifically, the ITIA submits that SE acted in concert with FF and, potentially unknown to him, █████ in order to contrive aspects of the Matches in order to facilitate betting on the Matches.
- (c) SE committed “*Several offenses*”, in accordance with Category B.

41. The ITIA submits that with regards to impact:

- (a) SE’s conduct involves “*Major TACP Offenses*” as required by Category 1. Match-fixing itself is one of the most serious forms of offence under the TACP, and SE was charged with multiple offences. As per the relevant definition of Major Offense, each of the Charges are capable of receiving a sanction of above a six-month suspension and fine of \$10,000.
- (b) SE’s conduct resulted in a “*Material impact on the reputation and/or integrity of the sport*” (i.e. Category 1), on the basis that all match-fixing offences damage the reputation and integrity of the sport. The ITIA submits that as SE received \$US2,500 for Match 2 this should be determined to be at least “*Material Gain*” as required by Category 2. The ITIA states that relative to SE’s legitimate earnings from professional tennis the payments he received from match fixing are arguably of a “*relatively high value*”, particularly if he also received payment in relation to Match 1 although the ITIA accepts that it does not have evidence to prove this.

42. The ITIA submits that AHOs have discretion to determine a starting point between categories, in this case, between categories 1 and 2. Accordingly, the ITIA submits the appropriate starting point for SE is a ban of four (4) years on

the basis that the starting point is ten (10) years for category B1 and three (3) years for category B2.

43. As to aggravating factors, the ITIA notes that SE completed the online Tennis Integrity Protection Programme in May 2017, approximately one month before Match 1 and answered every question correctly relating to match-fixing and other Corruption Offenses. Further, SE has failed to co-operate with the ITIA and AHO in these proceedings, refusing to engage in the process since the Notice was issued in June 2024, and failing to respond to the Notice even though it was sent to him on 3 occasions, and he was provided with additional time to respond. However, in the circumstances, the ITIA does not seek any additional sanction beyond the proposed starting point.
44. The ITIA submits that there are no mitigating factors in SE's case.
45. The ITIA submits that SE has effectively been found liable for match fixing in respect of two (2) matches. The Fines Table in the Guidelines suggests that the appropriate fine for up to five (5) Offenses is \$US0 to US\$25,000. The ITIA is mindful that in order to reflect the key aims of the TACP it is important to impose a reasonable and proportionate sanction that acts as an effective deterrent. Therefore, the ITIA submits that based on the Guidelines, \$10,000 is an appropriate fine.
46. In summary, the ITIA requests the AHO to impose the following sanctions on SE:
 - (a) a ban of four (4) years; and
 - (b) a fine of US\$10,000.

VII. MR EMMANUEL'S WRITTEN SUBMISSIONS

47. SE has not filed any written submissions in these proceedings in relation to the Charges or the sanctions requested by the ITIA.

VIII. REASONS

48. Match fixing is a serious threat to tennis. Once admitted to or proven, match fixing is a deliberate, intentional offense that threatens competition by eliminating the uncertainty which is at the heart of professional tennis.
49. The imposition of a lenient sanction would defeat the purpose of the TACP. However, any sanction imposed must both be proportional to the offense and consistent with the sanctions imposed in similar cases to ensure consistency. There are six (6) charges against SE under the 2017 TACP and 2018 TACP which are summarised at paragraph 11 above.
50. The Guidelines provide that where there are multiple Corruption Offenses, in the interests of efficiency, they should be taken together in in one concurrent sanctioning process – *i.e.*, a single sanction is imposed.
51. Section H.1 TACP 2024 provides that:

Except as provided in Sections F.5., F.6., and F.7., 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:

H.1.a 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.

52. SE has not provided an answer to the Notice and is deemed to have accepted liability for each of the above charges under Section G.1.e.ii, as confirmed by the AHO on 17 September 2024.

53. The case against SE arose out of a previous investigation by Belgian authorities who uncovered a scheme to fix professional tennis matches globally, orchestrated by an organised criminal network with ties to Armenia and Belgium. The Player is said to have contrived the outcome of two (2) tennis matches which were accompanied by either: (i) payments made to SE by persons associated with the aforementioned criminal network or (ii) suspicious bets, flagged by ██████████ to the ITIA.
54. As stated above, the ITIA has recommended a fine of US\$10,000 and a ban of four (4) years. The AHO is not bound by the sanction recommended by the ITIA and may impose appropriate, just, and proportional sanctions pursuant to the TACP and the Guidelines, bearing in mind the circumstances of the individual case.
55. AHOs retain full discretion in relation to the sanction imposed. However, the application of the Guidelines promotes fairness and consistency in sanctioning across tennis. Therefore, the AHO has followed the Guidelines to reach her decision.
56. The Guidelines set out a five step-process to determine the appropriate sanction as follows:
- (a) Determining the offense category;
 - (b) Starting point and category range;
 - (c) Consideration of reduction for early admissions;
 - (d) Consideration of other factors which may merit a reduction including substantial assistance; and
 - (e) Setting the amount of the fine (if any).

These are addressed in turn below.

A. DETERMINING THE OFFENSE CATEGORY

57. As regards the level of culpability, the AHO accepts the ITIA's submission that SE's level of culpability falls within Category B which is medium culpability. The principal reasons for this conclusion are that SE has admitted to six (6) Major Offenses which he committed in concert with others requiring premeditation and planning.
58. As regards the level of impact, the ITIA submits that the impact of SE's conduct "*sits between Category 1 and Category 2*". The AHO considers that the impact of SE's conduct is more properly characterised as category 2 for the reasons set out below:
- (a) The AHO accepts that SE's conduct undoubtedly involves "*Major TACP Offenses*".
 - (b) The AHO is not persuaded that the impact of SE's Corruption Offences was both significant and material as indicated for category 1. She agrees that every case of match fixing threatens the integrity of tennis but many of the elements cited would be present in any instance of match fixing including the involvement of third parties. In the circumstances, a fair assessment of the impact of SE's offenses on the reputation and integrity of tennis is that it was simply material as indicated for category 2. The Charges relate only to two (2) matches and both categories 1 and 2 allow for the commission of multiple Major Offenses meaning that in a case that involves the commission of multiple Major Offenses, a Covered Person could be included in either category. Further, the ITIA has not been able to provide any documentary evidence to support the Charges related to Match 1.
 - (c) To support a category 1 classification the ITIA argued that the benefit received by SE was of a "*relatively high value*" in relation to SE's individual legitimate earnings from playing professional tennis. The AHO does accept the ITIA's submission that the benefit received may be evaluated relative to the Covered Person's own circumstances however, the AHO does not accept that the evidence of gain in this case is high either in absolute or relative terms. In

particular, the AHO notes that although [REDACTED] and FF have confirmed to the ITIA that SE received \$US2,500 for the Match 2 fix, no evidence of these interviews have been submitted by the ITIA and the WhatsApp Messages sent by [REDACTED] regarding the MoneyGram transfers indicate that although [REDACTED] received \$US2,500 it is not clear that the total amount was received by SE. FF writes to [REDACTED] *“And ahothor [sic] thing... You will send 2500 to one guy and 500 to another from this money... Because it's the comisi3n for silvester. [...] So I will send you the name for the 500 silvester”*, which suggests that SE may have received only \$US500. Moreover, the ITIA has not submitted any evidence as to the alleged illicit gains received in respect of Match 1. For these reasons, the AHO considers that the gain is more appropriately characterised as being ‘material’ but not a ‘high value of illicit gain’ as required for category 1. Therefore, it can be concluded that SE enjoyed a “material” gain in line with category 2.

59. For all these reasons, the AHO considers that SE’s offense category is B2.

B. STARTING POINT AND CATEGORY RANGE

60. Under the Guidelines, the starting point for a category B2 offense is a three (3) year suspension and the category range is a six (6) month to five (5) year suspension. The AHO considers that due to the number of Charges and proof of gain received by SE, a three-year suspension is appropriate in the circumstances.

61. The AHO accepts the ITIA’s submissions that although there are aggravating circumstances present in this case, this should not result in any additional sanction beyond the starting point in the Guidelines.

62. The AHO agrees that there are no mitigating circumstances.

C. CONSIDERATION OF REDUCTION FOR EARLY ADMISSIONS

63. The AHO notes that SE has not made any early admissions.

D. OTHER FACTORS WHICH MAY MERIT A REDUCTION INCLUDING SUBSTANTIAL ASSISTANCE

64. The AHO notes there are no other factors which merit a reduction in SE's sanction. SE has not given any substantial assistance to the ITIA, has not made any admissions and has ignored the ITIA's correspondence.

E. THE FINE

65. The Guidelines include The Fines Table which shows several scales based on the number of Major Offenses that are proven or admitted. In the present case, SE has effectively admitted six (6) offences which, in accordance with the Guidelines, yields a fine of between \$US25,001 and US\$50,000. However, the ITIA has submitted that SE has admitted two charges and conceded that based on comparable cases a fine of \$10,000 is appropriate.

66. The Guidelines further provide that the amount of any fine should reflect the categorisation of the offense. Considering the number of offenses, the categorisation of the offense as B2 and the ITIA's submissions, the AHO notes that although the ITIA has not applied the correct starting point for a fine, she agrees with the ITIA that a departure from The Fines Table is warranted and the appropriate fine in this case is US\$10,000.

IX. DECISION

67. SE, a Covered Person as defined in Section B.10 of the 2017 TACP, is liable for Corruption Offenses pursuant to the following sections of the TACP 2017:

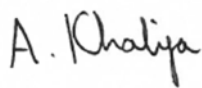
- (a) D.1.b – facilitating betting – one charge; and
- (b) D.1.d – contriving the outcome of a match – one charge.

68. SE, a Covered Person as defined in Section B.10 of the 2018 TACP, is liable for Corruption Offenses pursuant to the following sections of the TACP 2018:

- (a) D.1.b – facilitating betting – one charge;

- (b) D.1.d – contriving the outcome of a match – one charge;
 - (c) D.1.f – receipt of money – one charge; and
 - (d) D.2.a.i – failure to report – one charge.
69. Pursuant to the TACP 2024 and the Guidelines, the sanctions imposed upon SE as a result of these Corruption Offenses are:
- i. A ban of three (3) years from Participation, as defined in section B.26 of the TACP 2024, in any Sanctioned Event as defined in section B.31 TACP 2024 and as prescribed in section H.1.a TACP, effective on the date of this Decision; and
 - ii. A US\$10,000 fine as prescribed in section H.1.a TACP.
70. Pursuant to section G.4 TACP, this award on sanction is to be publicly reported.
71. Pursuant to section G.4.d TACP this award on sanction is a full, final, and complete disposition of this matter and is binding on all parties.
72. This Decision can be appealed to Court of Arbitration for Sport in Lausanne, Switzerland within twenty business days from the date of receipt of the Decision by the appealing party.

6 November 2024



Amani Khalifa, Anti-corruption Hearing Officer