

*In the matter of alleged Corruption Offences under the Tennis Anti-Corruption Program*

The International Tennis Integrity Agency

-and-

Edvinas Grigaitis

Before Anti-Corruption Hearing Officer :

Janie Soublière

Representing the International Tennis Integrity Agency :

Ross Brown

Lilly Elliott

Edvinas Grigaitis:

Self-represented

**RULING ON LIABILITY AND SANCTION**

**SUMMARY**

The International Tennis Integrity Agency (the 'ITIA') charged Edvinas Grigaitis with three Major corruption Offences (and one further Offence) in contravention to the Tennis Anti-Corruption Program ('the Program' or the 'TACP').

As detailed herein, the two main charges brought against Edvinas Grigaitis encompass the following four TACP breaches and relate to the alleged fixing and betting on various matches in 2022.

Charge 1

- Section D.1.b, reads: *"No Covered Person shall, directly or indirectly, facilitate, encourage and/or promote Tennis Betting ..."*

- Section D.1.m, reads: *“No Covered Person shall purposely delay or manipulate entry of scoring data from any Event for any reason.”*
- Section D.1.n, reads: *“No Covered Person shall, directly or indirectly, attempt, agree, or conspire to commit any Corruption Offense.”*

## Charge 2

- Section D.1.a reads: *“No Covered Person shall, directly or indirectly, Wager on the outcome or any other aspect of any Event or any other tennis competition.”*

Further to the conclusion of a disciplinary and adjudication process conducted to his satisfaction, Edvinas Grigaitis has been found liable on a balance of probabilities (“preponderance of the evidence”) for all above enumerated TACP breaches and banned for 3 years.

## INTRODUCTION

1. This dispute involves the ITIA and Edvinas Grigaitis (Mr. Grigaitis or ‘the Covered Person’), a Lithuanian National Chair Umpire.
2. On 23 August 2023, the ITIA sent the Covered Person a Notice of Major Offense (“the Notice) pursuant to Section G.1. a of the 2023 TACP. As outlined throughout this award, the two (2) charges brought against the Covered Person, which encompass four (4) TACP breaches relate to his involvement in the fixing of various professional tennis matches he officiated in 2022.
3. Mr. Grigaitis denied the charges and requested a hearing before an AHO.
4. Janie Soublière holds an appointment as an AHO per Section F.1 of the TACP. The AHO was appointed without objection by any party to these proceedings as the independent and impartial adjudicator to determine this matter as set out in the 2023 TACP, which governs all procedural aspects of this dispute.
5. This is the AHO’s Decision on liability and sanction.

## THE PARTIES

6. The ITIA is appointed by the Governing Bodies who participate in the TACP, namely the ██████ Inc., the Grand Slam Board, the International Tennis Federation (ITF) and the Women’s Tennis Association (WTA) Tour Inc., to administer the TACP and the actions of all

Covered Persons bound thereto, including Chair Umpires. The ITIA is empowered to investigate potential breaches of the TACP by anyone who is bound by the TACP and other applicable Codes of Conduct and to later bring charges against Covered Persons where they conclude that there are sufficient grounds to do so.

7. Mr. Grigaitis is a Lithuanian Chair Umpire who is defined as a Covered Person under the TACP. He is considered an “Official” under the ITF Code of Conduct and “Tournament Support Personnel” under the TACP. He last completed the Tennis Integrity Protection Programme (‘TIPP’) on 22 March 2019. The mandatory TIPP is an online educational tool to assist a Covered Person with understanding their responsibilities under the TACP and how to spot when other individuals are breaching the terms of the TACP (including match-fixing and corrupt approaches).

## THE FACTUAL BACKGROUND

8. The alleged Corruption Offences that Mr. Grigaitis has been charged with are outlined in the ITIA’s 23 August 2023 *Notice of Major Offence under the 2022 Tennis Anti-Corruption Program and referral to Anti-Corruption Hearing Officer* (‘Notice’).
9. Schedule 1 of the Notice sent to Mr. Grigaitis outlines the factual background giving rise to each Charge brought against him:
10. For Charge 1, the Notice explains :

*On [REDACTED] January 2022, the ITIA received a betting alert from the International Betting Integrity Association (“IBIA”) where the betting operator, [REDACTED] had identified suspicious betting activities in relation to a match which you officiated. That match took place at the ITF [REDACTED] tournament in [REDACTED] Lithuania on [REDACTED] January 2022 between [REDACTED] and [REDACTED] (the “Match”).*

*After investigation by the ITIA, it was concluded that you were intentionally delaying and/or manipulating the scores of the Match that were entered into your handheld electronic scoring device (the “Scoring Device”) in order to ensure that specific and targeted betting outcomes occurred. The Scoring Device is used to record the scores in a professional tennis match and those scores are directly linked to the international online betting markets. The ITIA reviewed the audio from the Match and compared the scores announced by you verbally with the scores you entered into the Scoring Device. It was observed that there were discrepancies between them. As you will appreciate, in a correctly umpired match, there should be no discrepancies between the audio score called by the umpire on court and the score the umpire enters into the Scoring Device.*

Betting data

██████ reported suspicious betting from five existing accounts registered in Spain on the day of the Match. The suspicious bets were as follows:

Set ███ Game ███

(i) There were 12 bets placed by five bettors on Mr. ████████ to win point ███ of this game.

(ii) There were eight bets placed by four bettors on Mr. ████████ to win point ███ of this game.

Set ███ Game ███

(iii) There were four bets placed by four bettors on Mr. ████████ to win point ███ of this game.

(iv) There were seven bets placed by three bettors on Mr. ████████ to win point ███ of this game.

These 31 bets were all placed in the period between ████████ and ████████ GMT (██████████ Lithuanian time), which was immediately prior to the start of the Match, with the total amount staked being £4,018.54 pounds sterling.

Audio/scorecard discrepancies

A ████████ with the point-by-point data and the audio of Set ███ Games ███ and 2 shows discrepancies.

In Game ███ with Mr. ████████ serving, there was the discrepancy highlighted in red between the point-by-point data and the audio recording:

Point number	Point by Point Data	Audio
██████	██████	██████
2	██████	██████
3	██████	██████
4	██████	██████
5	██████	██████
6	██████	██████

7	Advantage ██████████	Advantage ██████████
8	Game ██████████	Game ██████████

*In relation to point ██████ the outcome required for the suspicious betting matched the outcome that took place on court. In relation to point ██████ the audio shows that you called the score as ██████ awarding the point to Mr. ██████ but you entered ██████ into the Scoring Device, awarding the points to Mr. ██████*

*Mr. ██████ was serving for Game ██████ In Game ██████ there are the following discrepancies between the point-by-point data and the audio recording:*

Point number	Point by Point Data	Audio
1	██████	██████
2	██████	██████
3	██████	██████
4	██████	Game ██████
5	Game ██████	██████ ██████ ██████ ██████

11. With regard to Charge 1, the ITIA submits that:

- i. The Covered Person was a part of a scheme with one or more individuals to manipulate the online betting markets for financial profit in breach of section D.1.b of the 2022 Program.
- ii. His role, for which the ITIA believes he would be paid, was to enter a pre-agreed score into the Scoring Device in relation to pre-agreed points of pre-agreed games of the Match which he was umpiring. He did this on multiple occasions within the Match. On some occasions the score he entered into the Scoring Device on a pre-agreed point would match the true score that he would call audibly. On other occasions the Scoring Device score and the true score were different. Where there is a discrepancy, this amounts to manipulation in breach of section D.1.m of the 2022 Program.
- iii. One or more individuals would place bets at an appropriate moment that the pre-agreed score in the pre-agreed point and game would transpire and in doing so would realise a profit when the bet was successful. The Covered Person has

therefore acted in breach of section D.1.n of the 2022 Program given that he has clearly attempted, agreed or conspired to commit a Corruption Offense.

11. For Charge 2, the Notice provides the following factual background:

*In the interview held between yourself and ITIA Investigators Mark Fletcher and Vivienne Inglis on 16 January 2023, you admitted to placing five bets on tennis matches on 5 November 2022 as follows:*

- [REDACTED] to win against Marek [REDACTED] in the [REDACTED] event in [REDACTED] Australia. You won this bet.
- [REDACTED] [REDACTED] to win against [REDACTED] in the [REDACTED] event in [REDACTED] Australia. You lost this bet.
- [REDACTED] [REDACTED] and [REDACTED] to win against [REDACTED] and [REDACTED] [REDACTED] at the [REDACTED] [REDACTED] event in [REDACTED] France. You won this bet.
- There would be over 23.5 games in total in the match between [REDACTED] and [REDACTED] in the [REDACTED] [REDACTED] in [REDACTED] France. You lost this bet.
- [REDACTED] and [REDACTED] to win against [REDACTED] and [REDACTED] in the [REDACTED] [REDACTED] in [REDACTED] France. You won this bet.

12. With regards to Charge 2, the ITIA submits that the five bets placed in November 2022 amount to a clear breach of section D.1.a of the 2022 Program which reads: “No Covered Person shall, directly or indirectly, Wager on the outcome or any other aspect of any Event or any other tennis competition.”

13. The Covered Person denied all Charges outlined in the Notice and requested a Hearing before an AHO.

## APPLICABLE LAW AND JURISDICTION

14. Officials agree to be bound by the ITF Code of Conduct for Officials on an annual basis. Pursuant to the same, Officials agree that:

*4. Officials shall be aware of, understand, comply with, and, as applicable, enforce the Rules of Tennis, the Duties and Procedures for Officials, the relevant Governing*

*Body Rules for the Tennis Events at which they are officiating, the Tennis Anti-Corruption Program, the Tennis Anti-Doping Programme, and all other policies applicable to Officials which may be introduced by the Governing Bodies from time to time (including, but not limited to, the Ban on Mobile Phone/Smart Watch Policy).*

*11. Officials shall complete the on-line Tennis Integrity Protection Programme and any other integrity education required by the ITIA or a Governing Body. Officials shall not be endorsed, employed, sponsored or otherwise engaged by any entity that directly offers and/or accepts wagers in connection with the outcome or any other aspect of any Tennis Event or any other tennis competition, including, without limitation, bookmakers and any person or entity who operates websites, applications, retail, credit, telephone, online and/or mobile tennis betting services; casinos operating sports books with tennis betting; and lotteries operating sports books with tennis betting.*

15. The TACP expressly applies to Tournament Support Personnel. Tournament Support Personnel refers to *“any tournament director, official, owner, operator, employee, agent, contractor or any similarly situated person and ATP, ITF, GSB and WTA staff providing services at any Event and any other person who receives accreditation at an Event at the request of Tournament Support Personnel.”*

16. Mr. Grigaitis does not contest that he is bound both by the ITF Code of Conduct and the TACP.

17. The Parties agree that the substantive allegations of this dispute are governed by the 2022 TACP, which was in force when the alleged Corruption Offences brought against him occurred and that he is considered a Covered Person under the 2022 TACP.

18. The Parties agree that the procedural rules applicable to the resolution of this dispute are the 2023 TACP and that Mr. Grigaitis is considered a Covered Person under the same.

19. Neither Party has objected to the appointment of the AHO, undersigned, to hear this matter. She has been properly appointed and seized of the matters in dispute.

20. No other matters relating to jurisdiction or the arbitrability of these matters have been raised by Mr. Grigaitis.

## **BURDEN AND STANDARD OF PROOF**

21. Section G.3.a of the TACP provides that *the ITIA shall have the burden of establishing that a Corruption Offense has been committed. The standard of proof shall be whether the ITIA*

*has established the commission of the alleged Corruption Offense by a preponderance of the evidence.*

22. Section G.3.c. of the TACP provides that *the AHO shall not be bound by any jurisdiction’s judicial rules governing the admissibility of evidence. Instead, facts relating to a Corruption Offense may be established by any reliable means, as determined in the sole discretion of the AHO.*

23. Thus, as expressly provided in the TACP, the ITIA bears the burden of proof with regards to the Charges brought against Mr. Grigaitis and the standard of proof to establish the Corruption Offences is on *a preponderance of the evidence* which is the equivalent of the English law’s “balance of probabilities”; pursuant to Section G.3. d of the TACP, the burden and standard of proof can be satisfied by any reliable means.

## PROCEDURAL BACKGROUND

24. Further to the Covered Person requesting a hearing, a Conference Call was convened with all Parties, their Counsel and the AHO in order to set a Procedural Calendar. Directions were discussed and agreed upon by all Parties.

25. Further to this call, and after giving the Parties an opportunity to comment on the same, Procedural Order 1 (‘PO1’) was formally issued reflecting the directions agreed upon.

26. As agreed and ordered, and in accordance with the Calendar set out in PO1, both Parties submitted a full and complete production of all documents and information which they intended to rely upon during the hearing along with their written submissions on liability and sanction.

27. The hearing was held via video conference, as scheduled, on 27 and 28 November 2023.

28. Attending the hearing were:

AHO	Janie Soublière
For the ITIA	Ross Brown - Counsel Lilly Elliott - Counsel Mark Fletcher- Witness Mark Swarbrick – Witness
For Mr. Grigaitis	Edvinas Grigaitis – Covered Person



29. Prior to the closing of the hearing, Mr. Grigaitis confirmed that he was satisfied that the hearing had been conducted in respect of his right to natural justice.

## **PARTIES' SUBMISSIONS**

30. The AHO has carefully considered the totality of the Parties' written submissions. They are summarised below. Additional facts and allegations found in the Parties' submissions and evidence may be set out, where relevant, in connection with the legal discussion that follows. The AHO refers in its award only to the submissions and evidence she considers necessary to explain her reasoning.

### **I. ITIA'S SUBMISSIONS AND EVIDENCE**

#### **A. Liability**

31. The ITIA submits that, on the preponderance of the evidence, Mr. Grigaitis is liable for the two Charges brought against him.

#### Charge 1

32. With regards to Charge 1, the ITIA relies on the following sources of evidence:

- a. A betting alert from the International Betting Integrity Association and underlying betting data from [REDACTED]
- b. Audio data recorded by Mr. Grigaitis on his handheld electronic scoring device (the PDA).
- c. Point by point data records showing each point that was entered into the PDA during the match between [REDACTED] [REDACTED] and [REDACTED] [REDACTED] dated [REDACTED] January 2022 (the Match).
- d. The Match scorecard.
- e. Evidence from Mr. Fletcher, an ITIA Investigator in this matter.
- f. Evidence from Mr. Swarbrick, an ITIA Betting Liaison Officer.
- g. Information provided by Mr. Grigaitis during the interview with Mr. Fletcher held on 16 January 2023 (the Interview).

33. The ITIA submits that, on the preponderance of the evidence, Mr. Grigaitis is liable for Charge 1. There is strong evidence to suggest that Mr. Grigaitis manipulated the scores

that he entered into the PDA across four points in two games. The ITIA submits that Mr. Grigaitis did so in order to facilitate the betting of third parties and submits that an inference can be drawn that he acted as part of a conspiracy with those third parties. That, according to the ITIA, is the most logical conclusion to draw from the available evidence.

34. Two parts of the evidence are significant. Firstly, there is the discrepancy between the audio recording of Mr. Grigaitis calling the score on the court and the different scores he then enters, no more than seconds apart, into the PDA. Secondly, there is the betting evidence which betting operators have found suspicious and happens to coincide with the games with the scoring discrepancies.
35. Relying on the scoring discrepancies described by Mr. Fletcher in relation to the discrepancies between the audio recording and point by point data ( [REDACTED] according to the audio, as opposed to 5 in the PDA) , the ITIA submits that the audio and point by point data do not match up on any of the points in the second game.

*E.g.: Mr. Grigaitis entered a [REDACTED] point on the PDA when he only audibly called four of them. The betting was for the game to go to [REDACTED] This could not happen in reality as the player won [REDACTED] so Mr. Grigaitis added a point to the PDA, and then had to keep entering wrong scores in the PDA in order to finish the game.*

36. With regards to Game [REDACTED] the circumstances and betting was similar to Game [REDACTED] in that there were 19 bets on the score being [REDACTED] and then [REDACTED] (again, as identified by Mr. Fletcher and Mr. Swarbrick in their evidence). That again transpired in the scores entered into the PDA which created a discrepancy with what happened on court as regards the second point only. The difference is that by entering the wrong score on the second point and, therefore, correcting it by entering the wrong score on the third point (as Mr Fletcher highlights in his evidence), Mr. Grigaitis was able to bring the score called by him audibly back into line with the score being entered on to the PDA.

#### The suspicious betting data:

37. The ITIA relies on Mr. Swarbricks' expert evidence but also submits that there are obvious concerns that anyone could conclude with regards to:
- a. Targeted and specific betting – the more targeted/specific the bet, the more suspicious it can be. The more common bets are, of course, bets on a player to win a match or win a set. Bets on players to win certain points or games to reach specific scorelines are far less common.

b. No rational explanation – linked to the point above, the more targeted/specific the bet, the more difficult it is for a bettor to offer a rational explanation to justify it. In this case, it was the beginning of the match and the first service game for each player. There is no obvious explanation for why a bettor might think the returner would win the first point of each service game or the score would reach [REDACTED] – there is nothing in the match itself that might suggest whether that was likely or not. There is also no obvious reason as to why the bettors would abruptly stop and not target any other markets in the rest of the match. Contrast that approach with the example Mr Swarbrick gives of a player holding serve five times in a row meaning there is a logic to that player being backed to win the [REDACTED] service game.

c. Multiple bets – placing a suspicious bet is one thing but clearly the more that the same bettors place the same suspicious bets, the greater the concern. That happens here with multiple bets on markets there is no obvious basis for.

d. Multiple bettors – it is again a logical conclusion that the more bettors placing suspicious bets increases the concerns yet further. Here five betting accounts, all registered in Spain, are placing the exact same bets. It looks coordinated and planned.

e. Timing and Quantum – the coordination and planning conclusion is only further enhanced when it is seen that multiple bettors are placing their bets at almost the exact same time periods and, more importantly, for the exact same sums. Whilst that may be partly explained by betting at maximum betting limits, it is highly unusual to see such overlap and again looks coordinated.

38. The ITIA also relies on Mr. Swarbrick’s opinion that the bettors were sophisticated and knew what they are doing based on his forensic analysis of:

- the two waves of betting with some bets prior to the match and some bets “in-play” with each of the bettors adopting that same approach, and
- the attempt to get around maximum betting limits.

39. The ITIA concludes that there must be a reason for the coordination of the bettors and the only logical basis for that is that those bettors were working with Mr. Grigaitis, whether directly or indirectly, to carry out a specific plan with the aim of defrauding the betting operators. The bettors must have known what the outcome of their bets would be in advance, otherwise they would never have placed them.

40. Finally, the most significant point of all to the ITIA is that this very suspicious series of bets runs alongside the very suspicious way in which Mr. Grigaitis entered the scores of the exact same points and games into his PDA. It is clear to the ITIA that this match was fixed.

41. As to Mr. Grigaitis's anticipated line of defence that these were all honest and genuine mistakes, the ITIA submits that:

- such an argument would necessarily be based upon there being multiple mistakes by Mr. Grigaitis, a professional Chair Umpire, in the relevant games which, presumably coincidentally, just happen to overlap with the suspicious betting. That, to the ITIA, is near impossible by chance.
- there is no evidence of such mistakes having been made by Mr. Grigaitis before or since.
- there is a simple way of rectifying any mistake. As noted by Mr Fletcher, there is an "undo" button that appears on the PDA for that very purpose. There is no basis for suggesting that umpires would not use a simple function that is available to them.
- no assertion of a mistake impacts the existence of the suspicious betting. That is still there. It is plainly unlikely for betting operators to identify a handful of points/games where they have suspicions in a match and some of those to consistently be points/games where mistakes are asserted
- there is no evidence of any mistakes on the audio recordings. That suggests that Mr. Grigaitis is clear on what the score is on the court. It is unlikely that he would then make a mistake a matter of seconds before or after when entering a different outcome of a point onto the PDA.

42. For the following reasons, the ITIA thus submits that its evidence is sufficient to demonstrate that Mr. Grigaitis is liable for the first Charge and all three 2022 TACP breaches committed under the same under Section D.1.b, D.1.m and D.1.n:

#### *D.1.b. Facilitation of betting*

43. To the ITIA, this is an inferential charge but a compelling one. It acknowledges that there is no evidence of communication, in the form of social media exchanges or other, where Mr. Grigaitis is in correspondence with a third party or where he makes an agreement to enter the score into the PDA in a certain way for specific points or games. However, the ITIA submits that it is appropriate for the AHO to make the inference that some form of arrangement was made and that Mr. Grigaitis' actions must have facilitated the evidenced betting.

#### *D.1.m. Manipulating entry of scoring data*

44. The ITIA submits that this breach does not require any inference as the discrepancies between the audio recording and the point-by-point data clearly evidences Mr. Grigaitis manipulating the entry of scoring data. To the ITIA, it is simply not credible to suggest that this is just a series of mistakes, mistakes which also happen to occur on points that enable suspicious betting to be rendered successful.

#### *D.1.n. Conspiracy to commit a Corruption Offense*

45. This to the ITIA is also an inferential but compelling charge. It is clear that Mr. Grigaitis cannot be the person placing the suspicious bets when he is sat as a Chair Umpire officiating the relevant match. But, if it is accepted that he is manipulating the score entry into the PDA and facilitating the betting activity of third parties, then it must be the case that he is conspiring with them in some way to achieve that. He cannot have been working alone. In addition, when approached from the bettor's perspective, there is no rationale for the confidence and coordination the bettors display unless they knew the scores that Mr. Grigaitis was going to enter into the PDA at the relevant moments.

#### Charge 2

46. With regards to Charge 2 the ITIA submits that Mr. Grigaitis has breached Section D 1. a of the TACP which reads:

*"No Covered Person shall, directly or indirectly, Wager on the outcome or any other aspect of any Event or any other tennis competition."*

47. For this Charge, the ITIA relies on the following evidence as described in the evidence of Mr. Fletcher:

- information provided by Mr. Grigaitis during the Interview; and
- screenshots taken by the ITIA which show bets placed from Mr. Grigaitis' betting account.

48. The ITIA submits that, on the preponderance of the evidence, Mr. Grigaitis is liable for Charge 2 as there is strong evidence that Mr. Grigaitis placed bets on the outcome of an Event.

- Mr. Grigaitis has himself admitted in the Interview that he was not aware that he was prohibited from betting on tennis.
- He has also admitted having placed bets on ATP events.

49. As a result of these admissions, the ITIA accessed Mr. Grigaitis' betting account which showed that five bets were placed from Mr. Grigaitis' account on 5 November 2022 while Mr. Grigaitis was a Covered Person.
50. The ITIA anticipates that Mr. Grigaitis will argue that the betting account referred was used by [REDACTED] (as stated in his response to the Notice on 6 September 2023). However, the ITIA rejects this argument as at no time during his interview did he explain that [REDACTED] had access to or used his betting account.
51. In any event, and in the alternative to the ITIA's main submission that Mr. Grigaitis directly wagered on tennis in contravention of section D.1.a, should the AHO accept that Mr. Grigaitis' father placed the bets from Mr. Grigaitis' account, this would still constitute a breach of the TACP, through section E.1.
52. Section D.1.a prohibits betting by any Covered Person. The definition of Covered Person includes (emphasis added) *"any Player, Related Person, or Tournament Support Personnel . . ."* Related Person is in turn defined as (emphasis added) *"any coach, trainer, therapist, physician, management representative, agent, family member..."*. The ITIA submits that Mr. Grigaitis' father is therefore prohibited from placing bets on tennis and would, in this scenario, have committed a Corruption Offense himself.
53. In accordance with section E.1 (emphasis added):  
*"Each Player shall be responsible for any Corruption Offense committed by any Covered Person if such Player either (i) had knowledge of a Corruption Offense and failed to report such knowledge pursuant to the reporting obligations set forth in Section D.2. above or (ii) assisted the commission of a Corruption Offense. In such event, the AHO shall have the right to impose sanctions on the Player to the same extent as if the Player had committed the Corruption Offense."*
54. As Mr. Grigaitis appears to have had knowledge or [REDACTED] actions or, at least, was assisting them through the provision of access to his betting account, the ITIA submits that Mr. Grigaitis is responsible for the Corruption Offense committed by [REDACTED]. The ITIA thus submits that that is clear evidence of a breach of Section D.1.a of the 2022 TACP and alternatively that Mr. Grigaitis breached Section E.1 of the 2022 TACP.

**Expert evidence:**

55. Extensive expert evidence was submitted in writing and orally by Mr. Mark Fletcher, ITIA investigator, and Mr. Mark Swarbrick, a betting liaison officer at the ITIA who has worked in the sports betting industry and specifically tennis for many years. Their evidence can be summarized as follows

## Evidence of Mr. Fletcher

56. Mr. Fletcher explains that Mr. Grigaitis was brought to the ITIA's attention following receipt of a match alert from the betting operator, ██████ on ██████ January 2022. Further to this, the ITIA decided to conduct a detailed analysis of the sources of evidence to establish whether such evidence pointed towards suspicious betting behaviour tied to the relevant match.
57. Mr. Fletcher interviewed Mr. Grigaitis on behalf of the ITIA on 16 January 2023 (the Interview), along with fellow investigator Vivienne Inglis. In the Interview, he put the suspicious match and bets to Mr. Grigaitis and questioned him on certain points of detail that the ITIA had discovered during the course of its investigations. In each instance, Mr. Grigaitis denied any corruption offense or that he had been approached to commit any corruption offense.
58. The evidence Mr. Fletcher relies upon includes evidence from the International Betting Integrity Association (IBIA) and ██████ who reported suspicious betting patterns in Mr. Grigaitis' matches. It also includes the match data evidence, including the scorecard, point by point data and available audio recording of the relevant matches.
59. He explains that the starting point should be that the score recorded on the audio is the correct score. He also explains that point by point data is a detailed record of every entry which is made into the PDA during a professional tennis match by a Chair Umpire. The point-by-point data includes which player won which points and the time that the outcome of the point was entered into the PDA. When the data is inputted into the PDA, that data is transmitted to ██████ the ITF and the online betting markets. At the end of a match, the data is capable of being extracted into a spreadsheet so that all of the data is available in a "point by point" level of detail. It should, therefore, provide a complete and accurate record of the individual entries inputted into the PDA by the Chair Umpire before, during and after the conclusion of each match.
60. His evidence is that point-by-point data has been used by the ITIA in its investigation into Mr. Grigaitis in two ways: to compare the scores audibly called by the Covered Persons to the scores entered into the PDAs, and to analyse the time taken between the entry of different points or games into the PDA as a potential indicator of score manipulation.
61. In accordance with Rule 29 of the ITF Rules of Tennis, a maximum of 25 seconds between points is allowed. Mr. Fletcher's understanding is that it is normal for players to take the majority, if not all, of the time that they are permitted between points. As a result, where point by point data shows significant discrepancies from the time periods provided for in the ITF Rules (i.e., where a period of time is significantly longer or shorter than expected),

it may be an indication that scores entered into the PDA are being manipulated by a Chair Umpire.

62. As a result of his investigation, Mr. Fletcher believes that the likely methodology adopted by Mr. Grigaitis here was that he would have agreed to target this match having spoken with one or more unknown third parties who were responsible for the betting side of the arrangements (given that Mr. Grigaitis could not place bets when on court). The relevant bets would have been agreed in advance depending upon where the likely return would be most beneficial or where bets were least likely to be detected but only placed minutes before the relevant game on court. It is also possible that other bets, not alerted to the ITIA by other operators, were knowingly placed on the manipulated outcome. At the relevant moment, Mr. Grigaitis would then call the correct score audibly on court but enter the agreed (incorrect) score into the PDA, so that no one playing or watching the match would be suspicious. That can be simple (like Set 1, Game ■ or more complicated (like Set ■ Game ■ where additional points that were not played had to be entered into the PDA). The outcome of course was that the unknown third-party bettors won any bets they placed, resulting in a profit for them but also that betting operators and innocent bettors would be defrauded because the online betting markets received the incorrect score.
63. Mr. Fletcher's belief is that Mr. Grigaitis would have been paid for his actions. However, his investigation did not uncover any evidence relating to payments so that element of the scheme remains unproven.

#### Evidence of Mr. Swarbrick.

64. Mr. Swarbrick has been working in the bookmaking industry for over 35 years and is currently the Betting Liaison Officer with the ITIA.
65. He explains that Betting operators regularly analyse betting data and that a key part of that analysis is identifying whether there are any factors which point towards suspicious betting. To the extent that a betting operator considers that the betting behaviour is suspicious, it will, among other things, send a betting alert to the ITIA, usually via an industry body such as the International Betting Integrity Association. A betting operator's own investigation may follow/continue but the betting alert is provided to assist the ITIA in conducting their own investigation as they see fit.
66. Mr. Swarbrick explains that there are a number of factors (i.e. "red flags") which might prompt a betting operator to issue a betting alert. The existence of a betting alert alone indicates that a betting operator considers there is some level of unusual activity which warrants further investigation, whether that be more detailed analysis of the betting data or considering further evidence which might suggest suspicious betting.



67. The primary question that bookmakers will seek to determine when assessing whether a bet is indicative of suspicious betting is whether there is any rational explanation for a bet being placed. The more specific and targeted the bet, the more unusual this is. This is often because there is no rational basis for the bet to be so specific. Multiple bets placed on, for example, a particular point to be won by a particular player (placed in advance of that particular point/game commencing) would be suspicious and, in his experience is clearly indicative of the outcome being predetermined when those bets turn out to be successful.

68. He also opines *inter alia* that:

- It is unusual to see multiple, seemingly distinct betting accounts placing the same bets at the same time, with the same stakes.
- The existence of high/maximum stakes is naturally a cause of suspicion to a betting operator. High-stakes betting is of course not unusual, particularly if there is an explanation behind the bet placed
- The timing of bets placed on matches can also be instructive. Where multiple similar bets are placed by multiple bettors at the same time, this indicates that the relevant betting slips were pre-loaded so as to place the bets at the same time. This suggests that there is a significant amount of coordination or collusion taking place between the bettors and that the bettors wished to place the bets as quickly as possible.
- It is unusual to see this sort of activity on lower-level tennis or less popular betting markets, so suggests that the bettors are placing bets on a pre-determined outcome and are waiting for the opportune moment to place those bets (waiting until, either, the market becomes available or waiting until the best price is available to generate the highest returns).
- It is typical to see bettors using betting operators which are prevalent in their own jurisdiction. For example, it would be usual to see a UK-registered bettor to use a UK-based betting operator, such as [REDACTED]

69. Mr. Swarbrick concedes that there could be rational explanations for each of these suspicious events and does not go so far as to say that the presence of one or two factors is definitively indicative of a match being fixed, however, each component is indicative of unusual betting behaviour. The more components that are present then moves the behaviour away from unusual and more towards suspicious. The effect is cumulative and where betting contains several components, in his view, this is highly indicative of a potential fix.

70. After review of all the betting data and evidence relevant to the first charge brought against Mr. Grigaitis, which was specific and targeted in nature he notes that:

- He expected to see that the 27 bets placed on the [REDACTED] match would have been placed in advance of the first two games being played, and that is exactly what happened.
- He noted that two waves of betting occurred, one prior to the match the other in real time which allowed bettors to maximize their profits.
- He also noted that the stakes were consistent across the betting account placing bets and exceeded 4000, which in his view is a significant amount to be staked on such a low level of tennis.
- The style of betting utilised also shows an intricate understanding of the betting limits of bookmakers; the fact that all three accounts choose the same match to include here when there would have been multiple matches of that price range available on the day also strongly indicates a level of collusion between the bettors.

71. He described several of the key “red flags” which allowed him to come to his conclusions. However, the key concern that he has is the multiple examples of multiple bets being placed on identical markets, with identical (or very similar stakes) across the same time period from five seemingly distinct accounts. In his experience, this number of repeated attempted bets across a number of different accounts on such specific outcomes for a match at this level is extremely unusual and, in his view, is indicative of a clear degree of confidence from the bettors that the outcomes would materialise and that there was some level of collusion between the bettors and in turn Mr. Grigaitis.

72. In his expert opinion, the betting data he reviewed is highly suspicious and is indicative of the underlying match being fixed by Mr. Grigaitis.

### Conclusion

73. On the basis of a) the evidence set out by Mr. Fletcher and Mr. Swarbrick and b) its written and oral Submissions, the ITIA submits that Mr. Grigaitis should be found liable for all the TACP breaches in the Charges brought against him.

### **B. Sanction**

74. The ITIA relies on the Tennis Integrity Supervisory Board Sanctioning Guidelines (the Guidelines) which provide for a five-step process by which to determine the appropriate sanction in a particular case, as follows:

- a. Determining the category of offence.

- b. Assessing the starting point for a sanction and where in the applicable range the case of Mr Grigaitis falls. This includes the impact of applicable aggravating or mitigating factors.
- c. Consideration of any appropriate reduction for early admission.
- d. Consideration of any other factors which may merit a reduction in sanction, such as the provision of Substantial Assistance to the ITIA.
- e. Assessing the amount of any applicable fine.

75. As to culpability, the ITIA submits that Mr. Grigaitis sits closest to Category B as all three factors set out in that category are relevant to him:

- f. Mr. Grigaitis clearly displayed “Some planning or premeditation” in the offences with which he is charged. The level of coordination between the bettors and the specificity, timing and quantum of the betting is indicative of considerable thought having been given to the betting approach to take. Those bets were rendered successful indicating prior knowledge of the outcome. This was carefully planned and was not coincidence. Mr Grigaitis’ involvement was an integral part of the scheme so he would have been closely involved with the planning.
- g. It is clear that Mr. Grigaitis can also be said to be “Acting in concert with others”. The inference of the ITIA is that from the betting data, and discrepancies in the audio recording, it is clear that Mr. Grigaitis must have been involved in facilitating bets and contriving an aspect of the Event. There is no evidence that Mr. Grigaitis initiated or led others to commit offences which would have been required for Category A. However, the clear inference must be, if the ITIA’s case is approved of, that Mr Grigaitis did act in concert with others since he is not in a position to place the various bets whilst preparing in advance of officiating and during the course of officiating the match.
- h. Mr. Grigaitis has committed “Several offenses”. The Charges relate to four separate alleged breaches of the TACP, the majority of which, and most serious of which, related to January 2022. Given that the charges all relate to conduct in 2022, this does not constitute a “protracted period of time” as required for Category A, but it does demonstrate that there were several offences.

76. As to impact, the ITIA submits that Mr. Grigaitis sits in between Category 1 and Category 2 as factors in both categories apply to him:

- i. Mr. Grigaitis’ conduct involves “Major TACP Offenses”. The manipulation of the score on the PDA, and the conspiracy to commit a Corruption Offense are both Major TACP Offenses given they are match-fixing offences. The facilitation of betting, whilst a lesser offence, is still a Major TACP Offense as defined under the

TACP and, of course, relates to the match-fixing offences. For the avoidance of doubt, the ITIA does not consider the betting offence under section D.1.a to be a Major TACP Offense.

- j. Mr. Grigaitis' conduct results in either a "Significant material impact on the reputation and/or integrity of the sport" or a "Material impact on the reputation and/or integrity of the sport". The role of officials in tennis, and especially chair umpires, is a vital one. An Umpire is there to uphold the rules but instead Mr. Grigaitis has deliberately sought to breach them and undermine the integrity of his position. There may be a significant impact if liability is found, and the outcome of these proceedings are published. However, the ITIA acknowledge that there is only one Charge directly relating to Mr. Grigaitis being an Umpire which was in a lower profile ITF event, which may have an impact on the degree of impact on reputation and/or integrity.
- k. As a Chair Umpire, Mr. Grigaitis holds "a position of trust/responsibility within the sport", a position where the individual must be a model of integrity, as noted above.
- l. It is unknown as to whether Mr. Grigaitis received any money for the actions the ITIA alleges. As a minimum, the ITIA submits that it can be inferred from the evidence available that it was the intention that Mr. Grigaitis earned money from his match-fixing that was at least "material".

77. The ITIA has identified Mr. Grigaitis' age and lack of experience on the professional circuit as mitigating factors to be considered by the AHO and while it considers his multiple completions of TIPP training as an aggravating factor, the ITIA does not consider this an aggravating factor that should increase the sanction it proposes.

78. As to the fine, if the ITIA's proposed categorisation of Mr. Grigaitis' alleged offending as being between Categories B1 and B2 is accepted, then the ITIA submits that Mr Grigaitis is around the middle of the range for one to five Major Offenses. As a result, the ITIA submits that the appropriate fine would be in the range of \$10,000 to \$12,500, without any portion being suspended.

79. On the assumption that he is found liable for all of the Charges, the ITIA is seeking the imposition of a ban of five years from the sport of tennis together with a fine in the range of \$10,000 to \$12,500.

## II. MR. GRIGAITIS'S SUBMISSIONS

80. The entirety of MR. Grigaitis's submissions are reproduced below.

- *I fully respect Mr. Swarbrick's, Mr. Fletcher's and ITIA's analysis and hard work.*
- *This period of time is really stressful waiting for this case to end. I can say that this situation that occurred to me about myself involved in conspiracy to fix or to manipulate a match is confusing and wrong. (sic)*
- *As much as I can remember about that tournament which was almost two years ago that it was really stressful. The matches were very intense and I tried my best to not make a mistake. (sic)*
- *All experience that I gained from other simpler tournaments isn't comparable with professional adult tournaments like it was in [REDACTED] because it was very serious not like in kids or junior tournaments. It was my second tournament of this type. But from the first one a lot of time has passed. (sic)*
- *I cannot fully remember why I mislicked and put the wrong score in these two games but I know that as soon as I did it I panicked and not to press 'undo' button was wrong but I still continued and prayed to not make any mistakes. (sic)*
- *Before matches the supervisor told us to try not to use the 'undo' button many times. I can't remember correctly but he said something about betting and if this button is used many times then it will come to ITF attention. So again, when I put the wrong score I panicked and just tried to resolve these situations by just continuing and didn't think of it much.*
- *Later I found from ITIA that someone was betting on my match.*
- *I want to state that NO ONE has asked me to fix a match and I didn't get any money from it. I have not ever even thought about it.*
- *The information from ITIA states that there were made a lot of bets from an account based in Spain and I cooperated with these people. That is just ridiculous. I assume that someone is very good at betting and I have been accidentally involved in this insane betting scandal.*
- *I want to add something I didn't share in the first interview because of personal reasons. My grandparent was in a hospital at that moment when I was an umpire in [REDACTED] and I think that it really affected my psychological state because any of my family did not know if my grandpa will get better.*

- *The bet I admitted my father made on tennis tournament on my personal betting account was just out of personal ignorance and although I knew something that me as a covered person cannot do this but I thought only if I am not umpiring for this particular tournament not like roughly tennis. My family is very interested in sports and even in tennis because I grew up playing it and we just wanted to place a bet. I am regretful about it and I take full responsibility for it. (sic)*

81. In summary, Mr. Grigaitis denies all the Charges brought against him with the exception of the wagering charge, conceding that ██████ made the bet from his account in breach of the TACP and accepting full responsibility for the same. He has made no submissions on sanction.

## DELIBERATIONS

82. The AHO has carefully assessed all the evidence and makes her findings on Charges at a time.

### *Charge 1*

83. The AHO accepts that the audio recording must be correct because players would be heard challenging the score if it were not correct. The AHO further accepts that as the audio for Game █ reveals no such player challenges, a strong inference can be made that Mr. Grigaitis was calling out the correct score. As that premise is accepted, then the AHO also finds that Mr. Grigaitis entered the wrong score in the PDA for every point of Game █ whilst simultaneously calling out a different score. Mr. Grigaitis insists that this was merely a mistake. However, the AHO finds as submitted by the ITIA, that *one mistake may be explainable but not five in a row and not the entry of a point that never happened.*

84. The AHO finds the evidence related to Game █ particularly instructive as it highlights the issue for a Chair Umpire who seeks to manipulate the score entry when the true score on court does not give him or her the chance to rectify their “mistake” by making a further “mistake” in the opposite way to ensure the audible score and the PDA score match up again. As argued by the ITIA, because Mr. ██████ won Game █ in four straight points, it appears that Mr. Grigaitis had no choice but to enter five points into the PDA to complete the game.

85. The AHO accepts Mr. Fletcher’s forensic evidence that Mr. Grigaitis’ incorrect entries with minimal time are unrealistic. Notably between the 4<sup>th</sup> and █ points only 11 seconds passed. This is unrealistically short given that a lot would need to happen in that time period including a whole point being played. The ITIA submits that both players recovering from the previous point and both players being prepared to start the next one to the fifth

point then being played quickly and the score then entered by Mr. Grigaitis could not have happened in 11 seconds. The AHO agrees.

86. The evidence related to Game ■ is as the ITIA submit, not as clear cut. It appears that the same Modus Operandi was in force according to the betting evidence and the scoring evidence. However, on this occasion, the real points played allowed for Mr. Grigaitis to correct his mistake after the fact – but also after the bets had been made and won.

87. The ITIA thus submits that Mr Grigaitis can be found liable because a) the methodology of Games ■ and ■ clearly overlap and taken together demonstrate an ongoing aim to enter the wrong scores into the PDA, b) the wrong scores were clearly entered and c) the suspicious betting for Games ■ and ■ also very clearly overlap.

88. The AHO accepts that given the evidence adduced, an inference can be made that Game ■ and Game ■ were to be manipulated in the same way. This is most notably due to the betting data related to both - which Mr. Swarbrick has opined, from his significant experience in the betting industry, was indicative of the relevant bettors having a high degree of confidence in the outcome and which, in turn, meant that Mr. Grigaitis must have been manipulating the entry of the scores into his PDA.

89. As to the Covered Person's defense, the AHO finds that:

- The possibility of Mr. Grigaitis, a professional Chair Umpire, making so many mistakes in the relevant games that overlap with the suspicious betting is near impossible by chance.
- No evidence has been adduced off such mistakes having been made by Mr. Grigaitis before or since.
- Mr. Grigaitis failed to try to rectify his "mistakes", which on Mr. Fletcher's evidence is simple to do by pressing the "undo" button that appears on the PDA for that very purpose. Mr. Grigaitis' explanation that he was scared to do so because he had been told this was frowned upon is not convincing. The AHO rather accepts Mr. Fletcher's evidence that the button was installed in the PDA for it to be used. Of course umpires are encouraged to make the fewest mistake they can, but no one at the ITF has ever told an umpire no to use the button.
- The existence of the suspicious betting is compelling. The AHO accepts the arguments that it is unlikely for betting operators to identify a handful of points/games where they have suspicions in a match to consistently be points/games where Mr. Grigaitis asserts he simply made mistakes. As submitted by the ITIA at the hearing *"One mistake can be explained – but 7 mistakes which coincide suspiciously with betting activity cannot be explained that simply."* The AHO agrees.

- There is no evidence of any mistakes on the audio recordings which suggests that Mr. Grigaitis was clear on what the score was on the court. It is unlikely that he would consistently then make a mistake a matter of seconds before or after when entering a different outcome of a point onto the PDA, not recognize this mistake and not rectify it by using the undo button.

90. Mr. Swarbrick's evidence that betting operators do not expect to see anything like this amount of targeted and seemingly coordinated betting with over £4,000 bet upon this match across the suspicious bets to be quite compelling. The AHO thus accepts that if it was a big and obvious red flag to [REDACTED] and the basis for them reporting their concerns, the only logical basis for that is that those bettors are working with Mr Grigaitis, whether directly or indirectly, to carry out a specific plan with the aim of defrauding the betting operators. Based on Mr. Grigaitis' testimony, the AHO is inclined to think that they were indirectly working with him.

91. The evidence as presented by Mr. Fletcher and Mr. Swarbrick is compelling and the Covered Person's explanation in the face of this seems unsatisfactory. If Mr. Grigaitis was innocent, as he argues he is, and there was no score manipulation, as he argues he did not do, a series of bettors from the same country would have had to independently decide to bet on this specific match at the same time for the same amount. The AHO accepts that the likelihood of that happening by chance is close to zero if not impossible. The bettors must have known what the outcome of their bets would be in advance, otherwise they would never have placed them. This is notably so considering the level of tennis match involved.

92. Given the very suspicious series of bets and the very suspicious way in which Mr. Grigaitis entered the scores of the exact points in his PDA, the AHO finds that it is more probable than not that this match was fixed. A reasonably strong inference can be made as a result that Mr. Grigaitis facilitated betting and that he was part of a "conspiracy" to commit a match fixing offence as he surely was not acting alone. As the ITIA submitted at the hearing

*"Mr. Grigaitis's defence that this is all a big mistake is convenient. For all of this to have occurred without his knowledge, he would need to be extremely unfortunate as the chances all these bets being independently placed are impossible".*

93. Indeed, Mr. Grigaitis' defence which relies solely on mistakes being made has been rebutted by the ITIA with considerable compelling evidence; evidence that a deflated Mr. Grigaitis conceded in the course of the hearing "did not look good".

94. Therefore, on a balance of probabilities, and in the face of the compelling evidence adduced by the ITIA, the AHO finds it more likely than not that Mr. Grigaitis manipulated



the scoring and thus breached the TACP. All three (3) TACP breaches alleged by the ITIA in Charge 1 are therefore established by virtue of all being related and dependant upon each other in order to be successful, which on a preponderance of the extensive evidence, e.g. the betting, scoring and forensic evidence, the AHO finds they were.

### Charge 2

95. The evidence in relation to this charge is conclusive. Bets were placed on tennis matches by Mr. Grigaitis' own betting account. Mr. Grigaitis' admission regarding the same is conclusive. That he was not aware that neither he nor ██████ could bet on tennis is of no assistance to him. It has long been held that ignorance of the rules is not a satisfactory defence.

96. In the face of the compelling evidence that indicates that bets were placed from Mr. Grigaitis' betting account, the AHO finds that he either placed the bets himself or that ██████ placed them. Thus, while the AHO finds that he has not breached TACP Section D.1.a by wagering himself, he has breached TACP Section E.1 as a result of ██████ wagering on the outcome or any other aspect of any Event or any tennis competition.

### Sanctions

97. The AHO considers each sanction separately relying on Section H.1.b of the TACP which reads:

*H.1. Except as provided in Sections F.5. and F.6., 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.b. With respect to any Related Person or Tournament Support Person, (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, 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.*

### Ban

98. Mr. Grigaitis admitted that he made mistakes that have led him to understand that "this particular job is not for him because it carries too much responsibility". He now faces a considerable ban from this job because of these "mistakes".

99. The AHO finds that Mr. Grigaitis' offences are of medium culpability or of a "B Category" under the Guidelines. The AHO has already found that preparing to manipulate the data in

the PDA required some planning or premeditation, and an inference was drawn that Mr. Grigaitis acted in concert with others to commit offenses.

100. With regards to impact, the AHO finds that he falls within Category 2 and 3 as his breaches involved Major Offences, certainly had an impact on the integrity of sport, even if it was a very low-level tennis match, and because above all tennis Umpires are expected to respect their Code of conduct and maintain the integrity of the sport. Yet, on the evidence adduced by the ITIA, or lack thereof, the AHO finds that there was little or no material gain for Mr. Grigaitis with regards to both Charges. This makes this case all the more unfortunate.

101. Applying the Guidelines, and considering the mitigating elements identified by the ITIA including his age and lack of experience, because the AHO has determined that the Covered Person's Offences should be classified as a B 2 leaning towards a B3, and the Guidelines provide for a Category range between 6 month to 5 years for the such a classification, the AHO finds that an appropriate and reasonable ban to be imposed on Mr. Grigaitis is of 3 years.

#### *Fine*

102. With regards to the fine, the AHO has not identified any aggravating factors, but finds Mr. Grigaitis' relative inexperience and good character to be limited mitigating factors.

103. The fact that all the offences committed under Charge 1 singularly relate to the same match does mitigate his culpability. In this regard, the AHO is tempted to treat them all as one and the same for the purposes of determining his fine. His genuine remorse for his wagering offence is also noted.

104. The ITIA provided post hearing a quantification of the money that would have been made on the bets had ██████ paid them out.

- Total Stakes – £4,018.54
- Total Returns – £8,926.33
- Total profit – £4,907.79

105. However, given the suspicious activity and concerns raised on these bets, ██████ refused to pay out on any of the successful bets. Therefore, Mr. Grigaitis would effectively have made no money from the same.

106. As the AHO treats his (3) Major Offences as one for the purposes of this legal exercise, as no evidence has been brought forward that could quantify how much money

Mr. Grigaitis may have made from the either the match fixing or the bets that were placed other than the anticipated returns which were never paid out by [REDACTED] and that he appears to have made little or no money from [REDACTED] own wagers, the AHO finds that no fine should be imposed under the circumstances in addition to the ban.

## RULING AND ORDER

107. The Covered Person, Edvinas Grigaitis, is liable for the two Charges laid out in the ITIA's Schedule 1 to the 23 August 2023 Notice of Major Offense and has been found to have breached:
- a. Section D.1.b of the 2022 TACP
  - b. Section D.1.m of the 2022 TACP
  - c. Section D.1.n of the 2022 TACP
  - d. Section E.1 of the 2022 TACP
108. The applicable sanction ordered as a result of these breaches and pursuant to TACP Section H.1.b is a three-year ban from the date of this award with a credit for any period of Provisional Suspension previously served.
109. Pursuant to TACP Section G.4.e., this Decision on Sanction and Liability is to be publicly reported and is a full, final, and complete disposition of this matter that is binding on all Parties.
110. This Decision can be appealed to the Court of Arbitration for Sport in Lausanne, Switzerland within twenty business days from the date of receipt of the decision by the appealing party.

Dated at Beaconsfield, Quebec this 14th day of December 2023



Janie Soublière C. Arb.  
Anti-Corruption Hearing Officer













