

**In the Matter of a Notice of Major Offense of Alleged Corruption Offense under the
TENNIS ANTI-CORRUPTION PROGRAM**

Rakhimbek Ibrakhimov
(hereinafter “Ibrakhimov” or the “Covered Person”)

- and -

International Tennis Integrity Agency
(hereinafter the “ITIA”)

Representing the Covered Person: Self Represented

Representing the ITIA: Julia Lowis

Anti-Corruption Hearing Officer,
Tennis Anti-Corruption Program Diana Tesic
(hereinafter “AHO”)

DISPOSITON SUMMARY

The orders found at the end of this Decision are repeated here for the convenience of the reader.

ORDERS

1. *Rakhimbek Ibrakhimov, a Covered Person as defined in Section B.10 and B.27 of the TACP 2024, is liable for a Corruption Offense pursuant to Section F.2.b of the TACP 2024.*
2. *Pursuant to the TACP and the Sanctioning Guidelines, the sanction imposed on the Covered Person for this breach of the 2024 TACP is a ban from Participation in any Sanctioned Event for a period of twenty-one (21) months in accordance with Section H.*
3. *The above ordered suspension shall commence on and is effective from the day after this Decision. The period begins on 4 July 2025 and ends at midnight on 3 April 2027.*
4. *Under Section H.1.a.(i), a fine of \$5,000 USD is imposed. A payment plan may be agreed between the parties for payment of this fine.*

A. Parties:

5. The International Tennis Integrity Agency (“ITIA”) is the independent body responsible for enforcing the Tennis Anti-Corruption Program (“TACP” or “the Program”) across professional tennis worldwide. It is responsible for investigating and prosecuting cases of alleged corruption offenses in professional tennis.
6. Mr Rakhimbek Ibrakhimov (the “Player” or “Covered Person” or “Mr Ibrakhimov”) is a professional tennis player from Uzbekistan. At all material times he held an active ITF IPIN and was therefore a “Covered Person” within the meaning of the TACP.
7. Diana Tesic holds the appointment as the Anti-Corruption hearing Officer (“AHO”) under the TACP.

B. Procedural History

8. On 29 November 2024, the ITIA issued a Notice of Major Offense (“Notice”) to Mr Ibrakhimov alleging one breach of Section F.2.b (failure to co-operate).
9. On 9 December 2024 there was a WhatsApp exchange between Mr Ibrahimov and Ms Carlton, the ITIA’s investigator, to confirm whether the Notice was received. Mr Ibrahimov confirmed his email address, and the notice of charge was resent to him. The Covered Person did not respond.

10. Due to the failure to reply within the time period specified under the TACP, the President of the AHO Panel, Prof Richard McLaren, on 9 January 2025 sent a letter to Mr Ibrakhimov informing him that AHO Tesic was appointed to adjudicate the matter.
11. On 27 January 2025 AHO Tesic wrote to the Covered Person, confirming her appointment and fixed a deadline of 31 January 2025 for him to confirm his desire for a hearing. No reply was received.
12. On 11 February 2025 the AHO, applying Section G.1.f, deemed that she would issue a decision based on the ITIA's submissions alone. Later that same day the Covered Person emailed the AHO stating he had only just regained access to his mailbox, denied wrongdoing, and requested additional time to respond.
13. By the ITIA's consent, an extension to 26 February 2025 was granted; on 23 February 2025 he wrote denying the charge and requested an oral hearing.
14. A procedural call, assisted by an Uzbek interpreter, was held on 12 March 2025 via Microsoft Teams. Present were the AHO, Ms Julia Lewis and Ms Jodie Cox for the ITIA, and the Covered Person (briefly, before disconnecting owing to technical issues). No party raised objections to the AHO's jurisdiction or appointment. The broad timetable was agreed and formalised in Procedural Order 1 ("PO #1") of that same date which fixed: ITIA submissions: 2 May 2025 (subsequently extended from 25 April), Player submissions: 8 May 2025 (extended from 2 May), and a full Zoom hearing on 11 June 2025.
15. The ITIA complied with PO #1. It filed its witness statements and written brief on 2 May 2025, and on 9 June 2025 supplied an official Uzbek-English translation of Exhibit GS-2.
16. The Covered Person met the extended filing date by lodging three PDFs on 9 May 2025. He produced no witness evidence and did not engage counsel.
17. On the morning of 11 June 2025, roughly two hours before the scheduled start of the hearing, the ITIA received an e-mail from the Covered Person stating that he had to attend a relative's funeral and could not participate. The AHO vacated the hearing and, through Procedural Order 2 ("PO #2"), required evidence of bereavement by 13 June 2025, expressly warning that failure to comply would amount to a waiver of the right to appear. The Covered Person did not respond to the PO #2 and no evidence was provided.
18. In the absence of any supporting documentation, the AHO converted the matter to a shortened hearing and fixed 18 June 2025 for the ITIA to provide their oral arguments.
19. A one-day remote hearing took place on 18 June 2025 via Zoom. The Covered Person did not attend. The ITIA was represented by Ms Julia Lewis and Ms Jodie Cox. Ms Lewis presented oral submissions; no witnesses were required. The record was closed at the conclusion of that session.
20. Those in attendance were:

AHO	Diana Tesic
For the ITIA	Julia Lewis

ITIA Secretariat Jodie Cox
ITF Observer Stuart Miller

C. Background Facts

21. Two match-alert reports were issued by the International Betting Integrity Association ("IBIA") in respect of two singles matches played by Mr Ibrakhimov at the ITF [REDACTED] event in [REDACTED] on [REDACTED] December 2022. The alerts indicated concentrated in-play wagering and abnormal score-line betting patterns.
22. On 26 July 2023, ITIA investigator Helen Carlton located the Player at the ITF M25 tournament in Astana. She conducted an interview and performed a forensic download of his mobile telephone. During that interview the Player denied any involvement in match-fixing.
23. ITIA analyst Glen Shackel subsequently reviewed the handset data. Although no material directly linked to the December 2022 matches was found, Mr Shackel identified several Telegram conversations suggestive of corrupt activity:
- a. 3 December 2022: exchange with fellow Uzbek player [REDACTED]: *"He will throw one set... Don't think that we'll go there for free."*
 - b. 21 December 2022: chat with player [REDACTED] referring to the Federation *"considering [REDACTED] case"* and asking if the Player was *"clean."*
 - c. [REDACTED] January 2023: further chat with [REDACTED] giving betting instructions: *"to break in the [REDACTED] set... 7.5 more."*
 - d. [REDACTED] January 2023: messages with an individual [REDACTED] including the phrase *"[REDACTED] set / [REDACTED] serve"* and the exchange of tennis betting odds dated [REDACTED] January 2023.
24. Those messages raised reasonable suspicion of offences under Sections D.1.d (contriving an event) and D.2.b (facilitating betting) of the TACP 2024 and rendered a second interview essential.
25. Ms Carlton therefore attempted to re-interview the Player on the following dates all resulting in no reply:

Date	Method	Result
8 Mar 2024	E-mail & WhatsApp – five proposed interview slots	No reply
11 Mar 2024	WhatsApp reminder	No reply
8 Apr 2024	Second e-mail & WhatsApp	No reply

26. Anticipating the Player's next event, Ms Carlton arranged for ITF Supervisor [REDACTED] to serve a Demand Letter in both Uzbek and English when Mr Ibrakhimov signed in at the ITF M15 Ust-Kamenogorsk on 24 June 2024. Mr [REDACTED] witnessed the Player read, sign and return the letter. The letter required Mr Ibrakhimov contact the ITIA within seven days. No response was ever received.
27. The Player's silence prevented the ITIA from questioning him about the Telegram material, verifying potential co-actors, or obtaining pass-codes for encrypted applications.
28. Consequently, on 29 November 2024 the ITIA charged him with failure to co-operate contrary to Section F.2.b TACP 2024 which states that:
- a. *"All Covered Persons must cooperate fully with investigations conducted by the ITIA including giving evidence at hearings, if requested... A Covered Person's failure to comply with any Demand, preserve evidence related to any Corruption Offense or otherwise cooperate fully with investigations conducted by the ITIA, may result in an adverse factual inference against the Covered Person in any matter referred to an AHO."*

D. The Applicable Law and Jurisdiction

29. The alleged misconduct occurred in 2024; therefore, by virtue of Section K.6 TACP 2024, the 2024 edition governs both the substantive offense (Section F.2.b) and all procedural steps in this arbitration.
30. Neither Party has questioned the jurisdiction of the Anti-Corruption Hearing Officer or the arbitrability of the dispute. The AHO was duly appointed by the Chair of the AHO Panel on 9 January 2025 in accordance with Section G.1.a and confirmed her mandate during the procedural call of 12 March 2025.
31. The ITIA bears the burden of proof throughout, and under Section G.3 TACP 2024 the standard is on the preponderance of the evidence.

E. Position of the Parties

32. The AHO has thoroughly reviewed all the evidence and the written and oral submissions from both parties. Below is a summary of the key contentions presented by the parties. Any evidence or submissions not explicitly mentioned are still considered in the AHO's overall analysis.

The ITIA

33. On 2 May 2025 the ITIA filed its written brief. It alleges that Mr Ibrakhimov committed a single Major Offense under Section F.2.b of the 2024 TACP by wilfully failing to co-operate with an integrity investigation. Although only the non-co-operation charge is before the AHO, the ITIA submits that the gravity of the breach must be assessed in light of the serious corruption concerns that gave rise to the investigation.
34. Direct evidence of the non-co-operation consists of a paper-trail demonstrating that the

Player was repeatedly and unequivocally asked to engage with investigators and did not comply. This includes:

- a. Three written requests (e-mail and WhatsApp) dated 8 March, 11 March and 8 April 2024 proposing follow-up interview slots. All went unanswered.
- b. A Demand Letter in English and Uzbek, hand-delivered and signed by the Player on 24 June 2024, requiring him to make contact within seven days. He never responded.
- c. Witness statements from Ms Helen Carlton, the ITIA investigator, and Mr [REDACTED], an ITF supervisor, attesting to service, signature, and the Player's subsequent silence.

35. The ITIA submits that there is circumstantial material pointing to serious underlying integrity concerns, which explain why the follow-up interview was critical and why the Player's silence caused material prejudice.

- a. IBIA betting alerts on two Sharm El Sheikh singles matches played by the Player on [REDACTED] December 2022, evidencing heavy, targeted in-play wagering inconsistent with normal market behaviour.
- b. Telegram chats recovered from the Player's phone in which the Player and fellow Uzbek player [REDACTED] discuss "throw[ing] one set," and in which the Player exchanges betting instructions with [REDACTED] and [REDACTED] (e.g., "to break in the [REDACTED] set... 7.5 more").
- c. Betting slips and odds images dated [REDACTED] January 2023, shared by the Player with [REDACTED] showing wagers on high-profile ATP contests, conduct that itself breaches the betting prohibitions in Section D.1.a.
- d. A first-instance interview and phone download conducted in Astana on 26 July 2023 by ITIA investigator Helen Carlton, during which the Player denied wrongdoing.
- e. Forensic analysis by ITIA analyst Glen Shackel, linking the Telegram language and structures to known fixing templates and concluding that further questioning of the Player was essential.

36. The ITIA contends that these facts establish a clear, repeated notice of the obligation to co-operate; a deliberate, prolonged refusal to comply, thereby frustrating investigative steps to determine whether the December 2022 alerts and Telegram messages constituted breaches of Sections D.1.d and D.1.a; and material prejudice to the integrity inquiry.

37. In its oral submissions on 18 June 2025 the ITIA argued that the above behaviour warrants a sanction within Culpability B / Impact 2 of the Sanctioning Guidelines and invited the AHO to impose a suspension of 15 months and a fine of US \$10,000, with an uplift of at least six additional months to reflect the Player's obstruction of the hearing process itself given his failure to appear on 11 June and 18 June 2025 without evidence.

The Covered Person

38. The Player's position is contained exclusively in three brief PDF documents filed on 9 May 2025, together totalling four pages. Those documents do not address the Section F.2.b non-co-operation charge at all. Instead, they offer short comments on the Telegram extracts and betting material, asserting that:
- a. The quoted phrases are being "misunderstood"; he "did nothing wrong" and "never fixed matches."; and
 - b. Any reference to sets, breaks or odds was "general discussion" unrelated to illicit activity.
39. The Player provides no explanation for his failure to reply to the March to April 2024 interview requests or to the 24 June 2024 Demand Letter, nor does he supply evidence to substantiate the claimed funeral that prevented his appearance on 11 June 2025.
40. He offers no submissions on sanction and no evidence in mitigation.

F. Applicable Provisions of the 2024 TACP

41. Sections H of the 2024 TACP read as follows:

"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:

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.

G. Decision

42. The AHO has carefully considered all the facts, allegations, legal arguments and evidence submitted by the Parties in the present proceedings. Reference is made in this Decision only to the evidence and submissions considered necessary to explain the reasoning.
43. The single charge before me is whether Mr Ibrakhimov breached his duty to co-operate under Section F.2.b of the TACP. This duty is fundamental to the Program's effectiveness and requires active, timely, and good-faith engagement with any legitimate ITIA

investigation. Without it, the ITIA's ability to police the integrity of the sport is rendered ineffective.

44. I acknowledge that the Player co-operated with the ITIA's initial requests on 31 July 2023, when he submitted to an interview and provided his mobile phone for forensic analysis. However, the obligation to co-operate under the Program is not discharged after a single interview or demand. Section F.2.a of the TACP explicitly grants the ITIA the right to conduct an *"initial interview and follow-up interviews, if necessary as determined solely by the ITIA"*. Therefore, the duty to co-operate is a continuing one that lasts until the ITIA deems its investigation complete.
45. In this case, following the discovery of highly suspicious material on the Player's phone, the ITIA determined a follow-up interview was essential. What proceeded was a clear and sustained pattern of non-cooperation with the next phase of the ITIA's investigation. Four discrete demands were issued, each documented in the evidence of the ITIA investigator Ms Helen Carlton. Attempts were made via email and Whatsapp messages on 8 March 2024, 11 March 2024 and 8 April 2024 to arrange a second interview between March and April 2024. The Player did not respond to these requests.
46. When the ITIA's remote attempts to contact the Player between March and April 2024 failed, the ITIA took the significant step of arranging for a formal Demand Letter to be physically served upon Mr Ibrakhimov. On 24 June 2024, at the ITIA's request, Tournament Supervisor [REDACTED] personally handed a Demand letter to the Player at the ITF M15 tournament in Ust-Kamenogorsk. The letter was provided in the Player's native Uzbek language, eliminating any possibility of a misunderstanding due to a language barrier.
47. The uncontroverted evidence from Mr [REDACTED] is that he witnessed the Player read and then sign the letter, acknowledging its receipt. The Player raised no issues with the Tournament Director at that time, nor did he ask for clarification. This event constitutes direct evidence not only of receipt but of the Player's understanding of what was being requested of him. His signature is an explicit acknowledgment of the demand. His subsequent, continued silence cannot be viewed as an oversight or a result of confusion; it can only be interpreted as a deliberate and willful decision to ignore a formal demand from the sport's integrity body.
48. The Player's written submissions are notable not for what they say, but for what they completely omit. They attempt to rebut the underlying integrity suspicions but offer no explanation whatsoever for his failure to respond to the ITIA's requests between March and June 2024 or to the aforementioned Demand letter. I regard it as significant that the Player has not made any statement seeking to explain his non-cooperation.
49. I am therefore left with the inevitable impression that the Player's prolonged silence was for reasons which did not have an innocent foundation. I find his engagement in this process has been hollow and devoid of substance. The only logical explanation for this conduct is that it was a tactic to evade questioning and conceal potential wrongdoing related to the match-fixing and betting discussions found on his own device.
50. Drawing together the unrefuted witness evidence, the documentary record, and the Player's complete failure to offer any substantiated excuse, my findings are clear. The ITIA's requests for a follow-up interview, culminating in the Demand Letter, were lawful

and necessary investigative steps under the TACP. The evidence establishes unequivocally that the Player received and understood this Demand, having signed for it in his native language, and had ample opportunity to comply. He failed to do so and has advanced no reason for this failure.

51. For all the foregoing reasons, I find on the preponderance of the evidence that the Player has not fully co-operated with the ITIA's investigation. He has consistently and continually failed to satisfy a properly made Demand under the provisions of the TACP. This failure is a clear breach of his duty to co-operate under Section F.2.b of the 2024 TACP and constitutes a Major Offense.

Application of the Sanctioning Guidelines to the Facts of this Case

52. Having found Mr Ibrakhimov guilty of a Major Offense under the TACP, I now turn to determine the appropriate sanction. The Sanctioning Guidelines emphasise that penalties must be both punitive and deterrent, and must remove any incentive to obstruct an investigation.
53. A failure to co-operate with an anti-corruption investigation is a most serious offense. It is a cornerstone of the Program that players engage fully with any legitimate integrity investigation. A failure to do so strikes at the heart of the TACP and allows potential corruption to go unchecked. As the Sanctioning Guidelines make clear, the penalty for non-cooperation must be linked to the seriousness of the underlying investigation to avoid creating an incentive for players to obstruct inquiries into the most serious matters. The investigation here concerned potential match-fixing.
54. Applying the framework of the Sanctioning Guidelines, the Player's offense falls within Category B2. The Culpability is 'Medium' (B), given the deliberate and sustained period of silence. The Impact is 'Category 2' albeit on the lower end. While his actions frustrated an investigation, I note that the non-co-operation materially delayed, but did not destroy, an investigation into a Major Offense. This classification carries a starting point of a 3-year suspension, with a category range of 6 months to 5 years.
55. I identify several significant aggravating factors in this case:
- a. The non-cooperation was deliberate and prolonged, continuing even after the Player personally acknowledged the Demand by signing for it.
 - b. This conduct was carried out to conceal and frustrate an investigation into serious corruption allegations revealed on his own mobile device.
 - c. The Player further hindered the disciplinary process itself through his non-attendance at the 11 June 2025 hearing and his failure to comply with my direct order.
56. For the avoidance of doubt, the Player was afforded extraordinary procedural latitude throughout these proceedings. Despite failing to meet the original response deadline to the Notice of Charge, he was granted an extension; despite ignoring three investigatory requests and a signed Demand, he was still offered an oral hearing; despite withdrawing on the morning of 11 June 2025, he was given a further opportunity to

substantiate his asserted bereavement. At each juncture he was warned of the consequences of continued silence.

57. No mitigating evidence has been offered. Potential factors such as youth, remorse, or financial hardship have not been advanced. I do note that Ms Carlton asked the Player during his interview what his income was and he responded it being approximately 150 USD per week. I also note that this is the Player's first offense.
58. In determining the appropriate sanction, the AHO notes that while the Sanctioning Guidelines indicate a starting point of three years for a Category B2 offense such as this, it has also considered the ITIA written and oral submissions on sanction. The ITIA requested a period of ineligibility of 15 months and a fine of \$10,000. At the final hearing on 18 June 2025, counsel for the ITIA argued that an additional uplift of at least six months was warranted due to the Player's subsequent conduct in hindering the hearing process itself. Having considered these submissions, and in light of the Player's multiple aggravating factors and complete failure to offer any mitigation, I find the ITIA's final requested sanction to be appropriate. Accordingly, a total period of ineligibility of twenty-one (21) months will be imposed.
59. In relation to a fine, given the evidence suggesting a potential for financial gain from the underlying activity ("*Don't think that we'll go there for free*"), a financial penalty is both proportionate and necessary for deterrence. I also consider the Player's weekly earnings. While limited income does not mitigate the suspension length, I have taken it into account when setting the fine. I therefore impose a fine of US\$5,000. Should the Player face difficulty in making payment, he may seek to agree upon a payment plan with the ITIA.

ORDERS

60. Rakhimbek Ibrakhimov, a Covered Person as defined in Section B.10 and B.27 of the TACP 2024, is liable for a Corruption Offense pursuant to Section F.2.b of the TACP 2024.
61. Pursuant to the TACP and the Sanctioning Guidelines, the sanction imposed on the Covered Person for this breach of the 2024 TACP is a ban from Participation in any Sanctioned Event for a period of twenty-one (21) months in accordance with Section H.
62. The above ordered suspension shall commence on and is effective from the day after this Decision. The period begins on 4 July 2025 and ends at midnight on 3 April 2027.
63. Under Section H.1.a.(i), a fine of \$5,000 USD is imposed. A payment plan may be agreed between the parties for payment of this fine.
64. This Decision shall be publicly reported in full as prescribed in Section G.4.e of the 2024 TACP.
65. Under Section G.4.d, this Decision is the "full, final and complete disposition of the matter and will be binding on all parties."
66. The Decision herein is appealable under Section I of the 2024 TACP to the Court of Arbitration for Sport ("CAS") in Lausanne, Switzerland. Under Section I of the TACP, the

deadline for filing an appeal with CAS must be made within a period of “twenty business days from the date of receipt of the decision by the appealing party.”

67. Under Section I.2 of the 2024 TACP, the suspension ordered herein shall remain in effect while under appeal unless CAS orders otherwise.

Dated at Belgrade, Serbia this 3rd day of July 2025



Diana Tesic, Anti-Corruption Hearing Officer