

***In the matter of alleged Corruption Offenses under the Tennis Anti-Corruption Program
(TACP)***

The International Tennis Integrity Agency (ITIA)

-and-

Armando Belardi

SUMMARY

- On 21 March 2024, the ITIA issues a *Notice of Major Offense under the 2024 Tennis Anti-Corruption Program* ('Notice of Major Offense') to Mr. Armando Belardi.
- Pursuant to Section G 1. of the Tennis Anti-Corruption Program ('TACP') Mr. Belardi accepts liability for all the Charges brought against him and waives his entitlement to a hearing in relation to the seven (7) Charges and twenty-six (26) TACP Offenses detailed in the Notice of Major Offense.
- Further to both parties being given an opportunity to make Submissions on Sanction, the AHO decides that the appropriate sanctions to impose on Mr. Armando Belardi, as a result of his twenty-six (26) TACP Corruption Offenses, are a lifetime period of ineligibility and a fine of \$75 000.

INTRODUCTION

1. This dispute involves the ITIA and Armando Belardi, a Venezuelan National Chair Umpire.
2. On 21 March 2024, the ITIA charged Mr. Belardi (or the 'Covered Person') with various Tennis Anti-Corruption Program ('TACP') Corruption Offenses. As outlined later in this decision, the seven (7) Offenses consisting of twenty-six (26) TACP violations relate to Mr. Belardi attempts and successful contriving, soliciting, facilitation of various professional tennis matches in 2019 and 2021 involving among others but notably Mr. [REDACTED] a [REDACTED]
3. Although having been given the opportunity to do both, Mr. Belardi has neither submitted an answer to the Notice of Major Offense nor made Submissions on Sanction. As a result,

pursuant to Section G.1. of the TACP, he has effectively accepted liability for the twenty-six (26) Charges and deferred the decision on sanction to an Anti-Corruption Hearing Officer ('AHO').

4. Significantly and unusually, Mr. Belardi has recently served another sanction of two years and six months (plus a \$5,000 fine, \$4,000 of which was suspended but which is now activated given that Mr. Belardi committed further Corruption Offenses in his period of ineligibility) for failing to report two corrupt approaches and failing to cooperate with the investigation into the allegations against him. That sanction was imposed by AHO Richard McLaren in June 2020. Mr. Belardi is thus considered a recidivist.
5. 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 decide this matter as set out in the TACP 2024, which applies to all procedural aspects of this dispute.
6. The following is the AHO's Decision on Sanction.

THE PARTIES

7. The ITIA is appointed by the Governing Bodies who participate in the TACP, namely the ATP Tour 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 and to bring charges against Covered Persons where they conclude that there are sufficient grounds to do so.
8. Mr. Belardi is a Venezuelan Chair Umpire and defined as a Covered Person under the TACP.
9. The Covered Person is considered an "Official" under the ITF Code of Conduct and as "Tournament Support Personnel" under the TACP. He has completed the Tennis Integrity Protection Programme ('TIPP'), an ITF requirement, on a yearly basis from 2013 until his sanction in 2020. The TIPP is a mandatory online educational tool to assist Covered Persons, including Officials, understand their responsibilities under the TACP and how to identify when other individuals breach the TACP (including match-fixing and corrupt approaches).

THE NOTICE OF MAJOR OFFENCE

10. The alleged Corruption Offenses that Mr. Belardi has been charged with are set out in the ITIA's 21 March 2024 Notice of Major Offense: Seven (7) Offenses consisting of twenty-six (26) TACP Violations.

11. The Notice of Major Offense sent to Mr. Belardi sets out the factual background giving rise to each Corruption Offense brought against him. These are reproduced below as the AHO could not summarize them any better. It is noteworthy that the following is not an exhaustive list of all of the evidence the ITIA submits it holds.

12. Offense 1 - Summary

In late 2019, you made a corrupt approach to ██████████ ██████████ and offered him the opportunity to receive money if he manipulated the scores in the professional tennis matches which he was umpiring. ██████████ declined your approach, although admits that he did not report this to the TIU4 at the time. The ITIA alleges that you did this in breach of sections D.1.d (Contriving) and D.1.k of the TACP (Soliciting).

13. Offense 2 – Summary

In October 2021, you were, again, in contact with ██████████ admits that this time, he contacted you and that you then instructed him to manipulate the score in certain games, and at specific points, of at least six matches he was umpiring. In order to do this, you instructed ██████████ to call out the correct score so that it was recorded on the audio device, but to enter a different score into the handheld electronic scoring device ("HESD"). The score which is entered into the HESD is transmitted to the betting operators. You informed ██████████ that he would receive payment for manipulating the scores.

You also, in October 2021, introduced ██████████ to ██████████ ██████████ arranged for bets to be placed on the specific games and points for which you had instructed ██████████ to manipulate the score. ██████████ arranged payment for ██████████ – she sent money to you, and you arranged for ██████████ to receive payment via Western Union.

██████████ also stated that, as he often struggled to remember which points to manipulate, you arranged for a player to stand 'courtside' and give hand signals/instructions to him as to which points he should manipulate the score of.

On ██████████ October 2021, at the ██████████ tournament in ██████████ Peru, ██████████ played against ██████████ ██████████ was the umpire in that match. ██████████ stated, in his interview with the ITIA, that, before that match you instructed ██████████ to manipulate the score in certain games. You then arranged payment for ██████████

The ITIA alleges that you solicited and/or attempted to agree with ██████████ to commit a Corruption Offense by contriving the outcome of an aspect of an Event (i.e., the score) in

breach of section D.1.o (Solicitation) and/or D.1.n (Attempt) and D.1.d (Contriving) of the TACP. The ITIA alleges that you did this in order to facilitate betting on the specific points in breach of section D.1.b (Facilitation) of the TACP.

14. Offense 3 - Summary

On [REDACTED] October 2021, at the [REDACTED] [REDACTED] tournament in [REDACTED] Peru, [REDACTED] and [REDACTED] played against [REDACTED] and [REDACTED]. [REDACTED] was the umpire in that match. [REDACTED] stated, in his interview with the ITIA, that, before that match you instructed [REDACTED] to manipulate the score in certain games within the match.

The ITIA alleges that you solicited and/or attempted to agree with [REDACTED] to commit a Corruption Offense by contriving the outcome of an aspect of an Event (i.e., the score) in breach of section D.1.o (Solicitation) and/or D.1.n (Attempt) and D.1.d (Contriving) of the TACP. The ITIA alleges that you did this in order to facilitate betting on the specific points in breach of section D.1.b (Facilitation) of the TACP.

15. Offense 4 - Summary

On [REDACTED] October 2021, at the [REDACTED] [REDACTED] tournament in [REDACTED] Peru, [REDACTED] played against [REDACTED]. [REDACTED] was the umpire in that match. [REDACTED] stated, in his interview with the ITIA, that, before that match you instructed [REDACTED] to manipulate the score in certain games within the match.

The ITIA alleges that you solicited and/or attempted to agree with [REDACTED] to commit a Corruption Offense by contriving the outcome of an aspect of an Event (i.e., the score) in breach of section D.1.o (Solicitation) and/or D.1.n (Attempt) and D.1.d (Contriving) of the TACP. The ITIA alleges that you did this in order to facilitate betting on the specific points in breach of section D.1.b (Facilitation) of the TACP.

16. Offense 5 – Summary

On [REDACTED] October 2021, at the [REDACTED] [REDACTED] tournament in [REDACTED] Peru, [REDACTED] played against [REDACTED]. [REDACTED] was the umpire in that match. [REDACTED] stated, in his interview with the ITIA, that, before that match you instructed [REDACTED] to manipulate the score in certain games within the match.

The ITIA alleges that you solicited and/or attempted to agree with [REDACTED] to commit a Corruption Offense by contriving the outcome of an aspect of an Event (i.e., the score) in

breach of section D.1.o (Solicitation)(and/or D.1.n (Attempt) and D.1.d (Contriving) of the TACP. The ITIA alleges that you did this in order to facilitate betting on the specific points in breach of section D.1.b (Facilitation) of the TACP.

17. Offense 6 - Summary

On [REDACTED] October 2021, at the [REDACTED] [REDACTED] tournament in [REDACTED] Peru, [REDACTED] [REDACTED] and [REDACTED] played against [REDACTED] and [REDACTED] [REDACTED] was the umpire in that match. [REDACTED] stated, in his interview with the ITIA, that, before that match you instructed [REDACTED] to manipulate the score in certain games within the match.

The ITIA alleges that you solicited and/or attempted to agree with [REDACTED] to commit a Corruption Offense by contriving the outcome of an aspect of an Event (i.e., the score) in breach of section D.1.o (Solicitation) and/or D.1.n (Attempt) and D.1.d (Contriving) of the TACP. The ITIA alleges that you did this in order to facilitate betting on the specific points in breach of section D.1.b (Facilitation) of the TACP.

18. Offense 7 – Summary

On [REDACTED] October 2021, at the [REDACTED] [REDACTED] tournament in [REDACTED] Peru, [REDACTED] [REDACTED] played against [REDACTED] [REDACTED] was the umpire in that match. [REDACTED] stated, in his interview with the ITIA, that, before that match you instructed [REDACTED] to manipulate the score in certain games within the match.

The ITIA alleges that you solicited and/or attempted to agree with [REDACTED] to commit a Corruption Offense by contriving the outcome of an aspect of an Event (i.e., the score) in breach of section D.1.o (Solicitation) and/or D.1.n (Attempt) and D.1.d (Contriving) of the TACP. The ITIA alleges that you did this in order to facilitate betting on the specific points in breach of section D.1.b (Facilitation) of the TACP.

19. The last paragraph of the Notice of Major Offense sent translated into Spanish for the Covered Person reads as follows:

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

confirming the commission of the Corruption Offense alleged in this Notice and ordering the imposition of sanctions.

APPLICABLE LAW AND JURISDICTION

20. It is uncontested that the applicable rules are substantively the 2019 and 2021 TACP with regards to the alleged offenses and the 2024 TACP with regards to the procedure.
21. No party has objected to the appointment of the undersigned AHO to hear this matter. She has been properly appointed and seized of the matters in dispute.
22. No other matters relating to jurisdiction or the arbitrability of these matters have been raised by any party.

PROCEDURAL BACKGROUND

23. On 21 March 2024 the ITIA issued, in English and Spanish, the Notice of Major Offense to Mr. Belardi notifying him of the allegations and charges against him and informing him of the identity of the AHO responsible for deciding this dispute. He was given ten Business Days to respond, either requesting a hearing, making submissions, or other.
24. Mr. Belardi does not respond to the Notice of Major Offense within the deadline provided.
25. Pursuant to Section G.1.e of the TACP and all its subsections, Mr. Belardi has *inter alia* admitted that he is liable for all Corruption Offenses for which he was charged in the Notice of Charge and waived his entitlement to a hearing.
26. Further to the deadline lapsing for Mr. Belardi to answer the Notice of Charge, and in accordance with the TACP, on 11 April 2024, the AHO sent the Parties a Procedural Ruling and Directions in which she requests that Counsel to the ITIA file submissions on Sanction by 18 April 2024, and for Mr. Belardi to file his submissions on Sanction by 25 April 2024, after which the AHO would issue her decision within the timelines provided in the TACP. To act with caution and to ensure their comprehension, the AHO's Ruling and Directions were also sent in Spanish.
27. The ITIA filed its Submissions on Sanction on 15 April 2024.
28. On the same day, the AHO sent Mr. Belardi Directions, inviting him to file submissions on Sanction in answer to the ITIA's submissions. The correspondence sent both in Spanish and in English reads as follows:

Dear Mr Belardi

Dear ITIA

Further to receipt of the ITIA's Submissions on Sanction filed in the above captioned matter on 15 April 2025, the AHO writes to Mr. Armando Belardi, the Covered Person, once more to reiterate the contents of the Procedural Ruling and Directions that were sent to the Parties on 11 April 2024.

Because Mr. Belardi failed to file a response to the Notice of Charge within 10 Business Days from its receipt, and because Mr. Belardi failed to submit a written request to the AHO for a hearing within 10 business days from receipt of the Notice of Charge as provided in Section G.1.b of the Tennis Anti-Corruption Program (TACP), in accordance with Section G.1.e of the TACP, Mr. Belardi is deemed among others to have waived his entitlement to a Hearing and to have admitted that he has committed the Corruption Offense(s) specified in the Notice of Major Offense under the 2024 Tennis Anti-Corruption Program sent to him on 21 March 2024.

On 11 April 2024, the AHO ruled that Mr. Belardi has now accepted liability for all the charges that have been brought against him in the ITIA Notice of Major Offense and directed the Parties to file their Submissions on Sanction within the procedural calendar provided.

The ITIA has now filed its Submissions on Sanction as requested and in a timely manner. The ITIA has proposed that the following sanctions be imposed on Mr. Belardi:

A lifetime period of ineligibility and a fine of \$75 000.00

In accordance with the Ruling and Procedural Order of 11 April 2024, the AHO hereby once again invites Mr. Belardi to file submissions in answer to the ITIA's proposed sanctions. Mr. Belardi may wish to identify any mitigating elements that the AHO should consider when issuing her Decision on Sanction.

Mr. Belardi's Submissions on Sanction are to be received not later than 25 April 2024. No further reminders will be provided. A final decision will be issued thereafter.

Should further clarifications be required, please do not hesitate to direct them to the Cases Secretariat who will relay them to the AHO.

29. Mr. Belardi again elects not to file submissions within the deadline provided by the AHO.

PARTIES' SUBMISSIONS ON SANCTION

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 her award only to the submissions and evidence she considers necessary to explain her reasoning.

I. ITIA

31. The ITIA relies on the Tennis Integrity Supervisory Board Sanctioning Guidelines (the 'Guidelines'). The Guidelines outline a five-step process by which to determine the appropriate sanction in a particular case:

- a. Determining the category of offence.
- b. Assessing the starting point for a sanction and where in the applicable range in which Mr. Belardi's case falls. This includes due consideration to all applicable aggravating or mitigating factors.
- c. Consideration of any appropriate reduction for early admission.
- d. Consideration of any other factors which may allow a reduction in sanction, such as the provision of Substantial Assistance to the ITIA.
- e. Assessing the amount of any applicable fine.

32. The ITIA submits that Mr. Belardi has been found liable for twenty-six (26) Corruption Offences in contravention to the 2016, 2017 and 2018 TACP and describes in greater detail the charges provided in their 12 October 2022 Notice of Major Offense, as outlined above, arising out of his involvement in seven fixed matches.

33. Whilst recognizing the AHO's full discretion as to whether to apply or depart from the Guidelines', the ITIA submits that the Guidelines should be followed in this case.

34. The ITIA further underlines that the TISB spent considerable time in the preparation of the Guidelines with the intention that they be used to justify an AHO's imposition of an appropriate sanction which is proportionate to the offenses committed in any given proceedings. In drafting the Guidelines, and in line with tennis' stated 'zero tolerance of corruption policy', the TISB included the need for any sanction imposed as a result of a breach of the TACP to be able to serve as a deterrent to others. Given the alarming trend of Chair Umpire corruption the ITIA has uncovered recently (15 Chair umpires sanctioned in the past 24 months), the ITIA submits that deterrence in this type of case is crucial.

35. The ITIA submits that all three level A 'culpability' criteria are present here, namely:

- High degree of planning or premeditation: Each offence was necessarily premeditated given that they involved the prior contact with [REDACTED] and Ms. [REDACTED] [REDACTED] and instructions on how to manipulate specific points and arranging for [REDACTED] to be directed courtside on how to do so.
- Initiating or leading others to commit offenses: Mr. Belardi led [REDACTED] to commit offenses by offering him money to manipulate the score in matches.
- Multiple offenses over a protracted period of time: twenty-six separate breaches of the TACP in 2019 and 2021.

36. The ITIA also submits that Mr. Belardi's case is clearly a Category 1 as :

- He has committed twenty-six Major TACP violations;
- His actions have a significant material impact on the reputation and the integrity of tennis. That is particularly so given: a) how rare it is for match officials to be corrupting other officials in the manner set out in these proceedings; and b) that Mr. Belardi is an experienced Chair Umpire who has already been suspended once. He should be expected to know better. The impact on the reputation and/or integrity of the sport is, therefore, significant and material.
- He holds a position of trust/responsibility within the sport. Chair Umpires are the final authority for all decisions on court and therefore, necessarily, are expected to uphold the highest standards and their level of integrity should be above any reproach.
- An inference can be made that he made a relatively high or material illicit gain. The ITIA believes that [REDACTED] sent money to Mr. Belardi and that Mr. Belardi took his cut before making the payment to [REDACTED]

37. The ITIA further notes that Mr. Belardi does not satisfy any of the mitigating factors under the Guidelines. Rather, aggravating factors exist e.g.

- He is a recidivist. He was sanctioned in 2020, the year prior to most of the TACP breaches for which he has presently been found liable herein.
- He has shown no remorse, made no admissions, has ceased communications with the ITIA and failed to respond to the charges brought against him thereby "*wasting the time of both the ITIA and the AHO*". Neither substantial assistance nor a discount for early admissions are available to him.
- He has completed the TIPP on numerous occasions.

38. The ITIA thus submits that it is appropriate, if not necessary, to sanction Mr. Belardi with the maximum lifetime ban, in addition to a monetary fine.
39. With regards to the monetary fine, should the AHO accept that Mr. Belardi's conduct falls within the A1 category, then the ITIA submits that a fine of at least \$75 000 is appropriate given the Corruption Offenses that Mr. Belardi has committed. The ITIA does not seek payment of Mr. Belardi's previously unpaid fine (\$ 5000 USD in addition to this fine and submits that such a fine is necessary to act as a strong and effective deterrent to other Chair Umpires.
40. In summary the ITIA respectfully requests the AHO to impose the following sanctions on Mr. Belardi:
- A lifetime period of ineligibility; and
 - A fine of \$75 000, none of which is suspended.

Mr. Belardi's SUBMISSIONS

41. Mr. Belardi has not filed any written submissions.

DELIBERATIONS

42. The sanctions which may be imposed by the AHO in relation to the Charges are set out in section H.1.b of the 2024 TACP. That section reads as follows::

“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.”.

43. The potential sanction for Mr. Belardi under section H.1.b is a lifetime/permanent ineligibility from Sanctioned Events, a \$250,000 fine and repayment of any corrupt payments Mr. Belardi may have received.

44. The case against Mr. Belardi is grounded in uncontested evidence of the various fixes, of how the corrupt approaches to fellow Chair Umpire ██████████ were made, how the scores were manipulated by deciding in advance when the manipulation in the handheld device would occur and how the messages would be passed along by hand signals by a third- person court-side, of how the plan relied on those involved in the fix, and then how Mr. Belardi or his associates received their share of the profits. As indicated in ██████████ interview transcript, Mr. Belardi paid him first in cash then by Western Union Money transfers via his ██████████ then the payments stopped coming until ██████████ got involved with the fixes and the payments.
45. To the AHO, Mr. Belardi's Offenses are all the more egregious because he has effectively solicited ██████████ to join his web of match fixing and to commit TACP Offenses *"to get a lot of extra money working for him"* which led other umpires (██████████) to do the same.
46. As stated above, for the reasons outlined, the ITIA has recommended a fine in the amount of \$75 000 and a lifetime period of ineligibility. The AHO is not bound by the sanction recommended by the ITIA and may impose appropriate, just and proportional sanctions pursuant to the TACP bearing in mind all of the particular circumstances of each individual case.
47. Mr. Belardi has not answered the Notice of Major Offense, is deemed to have accepted liability for each of the above charges as ruled by the AHO on 11 April 2024 and has not submitted any reason to reduce the sanctions sought by the ITIA.
48. The AHO reiterates that match fixing is a serious threat to tennis. Once admitted and proven, match fixing committed by Officials is even more abhorrent as it is a deliberate, intentional offense committed by the very individuals entrusted with the task of ensuring that tennis matches are played within the parameters of well-established rules. Chair Umpires are the de facto custodians of honest on-court tennis rules.
49. The flouting actions of umpires, like Mr. Belardi, who repeatedly violate these rules and approach and coerce others into further tarnishing and corrupting the sport must neither be left unpunished, nor disciplined lightly.
50. As the TACP attempts to eradicate corruption in tennis, the imposition of lenient sanctions would defeat the purpose not only the TACP's efforts to circumvent recidivism but also the TACP's efforts to deter others from being swayed by the possible windfalls of match fixing, which the AHO fully appreciates are often considerably greater than a Covered Person's usual earnings.

51. Conversely, as case law has established in all spheres, any sanction imposed must both be proportional to the offense and within the usual sanctions imposed in similar circumstances in order to ensure as a matter of fairness and justice that a certain degree of consistency need be applied in the imposition of sanctions resulting from TACP Offenses.
52. The AHO is satisfied here that the sanctions she imposes are reasonable, proportional and consistent with those imposed in similar circumstances, notably in the many recent match fixing cases involving umpires prosecuted by the ITIA.

The Period of Ineligibility

53. The AHO has little flexibility in applying sanctions be in terms of applicable regulations or jurisprudence.
54. As did the ITIA, the AHO refers to and relies upon the Sanctioning Guidelines under which the Offenses committed by Mr. Belardi are classified as Category A offenses: offenses displaying a high level of culpability, a high degree of planning or premeditation, initiating or leading others to commit multiple offenses over a protracted period of time.
55. The ITIA has categorised Mr. Belardi's offenses as High Culpability (A) Category 1 offenses and Mr. Belardi has not offered any rebuttal to this assertion.
56. This A1 categorisation is based on objective elements and factors provided in the Guidelines. It reflects the impact that Mr. Belardi's repeated corruption offenses actions have had on the integrity of the sport, most notably considering that he sought out the involvement of various other Officials in his match manipulation scheme. The fact that Mr. Belardi has admitted liability for bringing other Covered Persons like (at least) [REDACTED] [REDACTED] into his web of match fixing cannot and must not be disregarded nor condoned. On this point, the AHO strictly abides by the finding in the *Ikhlef* matter relied upon by the ITIA when the AHO stated:

" Finding others to add to the web of fixers by putting them into the corruption net is a more serious form of breach of the TACP provision" .

57. The presumptive sanction for Category A1 offenses (as defined in the Guidelines) remains that of a lifetime ban. It is only where a Covered Person is able to demonstrate with compelling objective and subjective evidence that his or her circumstances warrant a reduction in this presumptive sanction that some flexibility may be afforded to such

Covered Person. Here, Mr. Belardi has not done so and has not brought forward any evidence at all, let alone mitigating, in his defence.

58. There is little the AHO may do with regards reducing the presumptive sanction proposed by the ITIA as provided for in the Guidelines and as clearly established in prior AHO decisions.
59. The AHO applies the Guidelines and weighs up all the evidence and factors of this case. Given the many aggravating factors outlined above *viz*, the repeated intentional, deliberate and premeditated acts of corruption the Covered Person committed at the time of his Offenses ultimately leading others into doing the same, and the lack of any mitigating elements, the AHO finds that the only appropriate sanction to be imposed on Mr. Belardi as a result of his recidivism and twenty-six (26) established TACP Offenses which fall within the A1 Category, is a lifetime period of ineligibility.

The Fine

60. In accordance with TACP Section H.1.a., the AHO may impose a fine in addition to an amount equal to the value of any winnings or other amounts received by such Covered Person in connection with any Corruption Offense. Here, an inference can certainly be made that Mr. Belardi made money from his corrupt endeavours although the exact amount is impossible to determine or even uncover.
61. The ITIA seeks the imposition of a \$75 000 fine. They argue that such a fine is vital to the interests of the sport of tennis and that it would account for the monies Mr. Belardi earned from fixing the Matches identified in the Charges and his Offenses as well as reflect the Guidelines' intentions with regards to the imposition of Fines.
62. The Guidelines clearly provide that where, in an individual case, more than fifteen Corruption Offenses are involved, a \$75 000 fine is appropriate. In this case, Mr. Belardi is a recidivist and has been found liable for numerous violations of the TACP; the most ever for a Chair Umpire to date.
63. The Guidelines provide for a fine from \$75 000 up to \$250 000 to be imposed under the circumstances and the A1 Categorization of this case. The AHO considers it inappropriate and disproportionate to combine a life-time ban with a significant fine. The AHO nonetheless deems it appropriate to impose a fine that reflects the Guidelines as drafted, both as discipline and as deterrent.


64. In the recent *ITIA v. Milanov* case, a Bulgarian tennis official who had also previously served a period of ineligibility for betting offenses, Mr. Milanov was found liable for B1 Category Offenses, banned for 16 years and fined \$75 000.
65. As the AHO has accepted the ITIA's categorization of Mr. Belardi's Offenses as falling within the A1 Categorization, a \$75 000 fine is also appropriate here.
66. Acknowledging the severity of the seven (7) Charges and twenty-six (26) Major Corruption Offenses committed by Chair Umpire Mr. Belardi, including facilitation, solicitation and contriving, and to underline the importance of deterrence for all those who may consider acting likewise, the AHO thus also imposes a \$75 000 fine on Mr. Belardi.

ORDER

67. The Official, Chair Umpire Armando Belardi, a Covered Person as defined in the 2019 and 2021 TACP, has been found liable for Corruption Offenses in breach of the following 2019 TACP sections:
- 2019 - D.1.d (Contriving)
 - 2019- D.1.k (Soliciting)
68. He has also been found liable for Corruption Offenses in breach of the following 2021 TACP sections:
- 2021. D.1.b. (Facilitation)
 - 2021. D 1.d (Contriving)
 - 2021 D.1.n (Attempt)
 - 2021 D 1.o (Solicitation)
69. Pursuant to the TACP and the ITIA Sanctioning Guidelines, the sanctions imposed upon Mr. Belardi as a result of these Corruption Offenses are:
- i. A lifetime ban from Participation, as defined in Section B.17 of the 2024 TACP, in any Sanctioned Event as prescribed in TACP Section H.1.b. (i), effective on the date of this Decision.
 - ii. A \$75 000 USD fine as prescribed in TACP section H.1.b .(iii).
70. Pursuant to TACP Section G.4.e., this award on sanction is to be publicly reported.
71. Pursuant to TACP Section G.4.d. 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 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 7th day of May 2024

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Janie Soublière C. Arb. Anti-Corruption Hearing Officer