

## **TENNIS ANTI-CORRUPTION PROGRAM**

### **INTERNATIONAL TENNIS INTEGRITY AGENCY**

and

### **STEFANO REITANO**

#### **DECISION OF ANTI-CORRUPTION HEARING OFFICER**

##### **I. The Parties**

1. The International Tennis Integrity Agency (“ITIA”) is the independent entity responsible for enforcing the Tennis Anti-Corruption Program (“TACP”).
2. Stefano Reitano is a 27-year-old Italian professional tennis player. At all times relevant to this case, Mr. Reitano was a “Covered Person” bound by the TACP.

##### **II. The Notice of Offense**

3. On 28 April 2025, ITIA sent Mr. Reitano a Notice of Offense alleging that he had placed bets on tennis matches and encouraged and/or promoted betting on the outcome of tennis matches. Specifically, the ITIA alleged that Mr. Reitano had:
  - a. Placed bets on tennis matches on 32 occasions between May 2018 and April 2022 in breach of Section D.1.a of the TACP; and
  - b. Encouraged and/or promoted betting on the outcome of tennis matches through communications on 12 February 2023 and 14 February 2023 with fellow Italian professional tennis player [REDACTED] in breach of Section D.1.b of the TACP.
4. On 6 May 2025, Mr. Reitano admitted the charges, stating that he did “not contest the facts alleged and acknowledge full responsibility for the conduct found to be in breach of the . . .

TACP” but made a “request for a review of the sanction’s severity (both in terms of duration and financial amount) . . . by the Anti-Corruption Hearing Officer.”

### **III. Procedural Background**

5. On 8 May 2025, I was appointed to serve as the Anti-Corruption Hearing Officer (“AHO”) to adjudicate this matter.

6. Because Mr. Reitano admitted the offenses but sought to mitigate the sanction, I must determine the appropriate sanction(s) that should apply in the circumstances under Section F.6.d of the TACP without a hearing based on the written submissions of the parties.

7. Shortly after notice of my appointment was served, the following schedule was issued for written submissions on the issue of sanction:

- a. ITIA’s submission was due on or before 27 May 2025;
- b. Mr. Reitano’s submission was due on or before 10 June 2025.

8. On 27 May 2025, ITIA timely provided its submission. In its submission, ITIA contends:

- a. The potential maximum sanction for Mr. Reitano under Section H.1.a of the 2024 TACP is a three-year period of ineligibility and a \$250,000 fine as well as repayment of any winnings Mr. Reitano received from betting on tennis.
- b. Under the TACP Sanctioning Guidelines effective 1 January 2024 (the “Guidelines”), the appropriate level of sanction for Mr. Reitano is:
  - i. A period of seven months ineligibility, accounting for Mr. Reitano’s early admissions; and
  - ii. A fine of \$10,000.

9. On 9 June 2025, Mr. Reitano timely provided his submission. In his submission, Mr. Reitano contends that “the proposed sanction of 7 months of suspension and a \$10,000 fine

appears disproportionate to the actual gravity of the conduct.” Mr. Reitano contends the appropriate level of sanction instead is:

- a. A suspension “to a maximum of 3 months, with 1 month conditionally suspended subject to participation in an ITIA educational program”;
  - b. Full or partial conversion of the \$10,000 fine into educational initiatives, with “any financial sanction . . . adjusted to reflect [his] actual financial capacity” and “[m]onthly instalment payment of any remaining monetary sanction”;
  - c. “A written commitment to permanently refrain from any form of sports betting, including non-tennis betting, to be signed and transmitted to the ITIA.”
10. On 17 June 2025, pursuant to ITIA’s request, I issued the following schedule for further submissions:
- a. ITIA’s reply submission was due on or before 24 June 2025;
  - b. Mr. Reitano’s reply submission was due on or before 8 July 2025.
11. On 19 June 2025, ITIA filed its reply submission.
12. On 8 July 2025, Mr. Reitano filed his reply submission.
13. No party objected to my jurisdiction or to my being an independent, impartial, neutral adjudicator to render a determination in this case.

#### **IV. Findings**

14. Section H of the TACP addresses sanctions against players who breach a provision of the TACP:

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

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 . . .”

15. The Guidelines provide a framework for the issuing of sanctions under the TACP to support fairness and consistency. The Guidelines are not binding on AHOs but set out various principles and factors that AHOs may consider appropriate to take into account. An AHO retains full discretion in relation to the application of or departure from the Guidelines.

16. The five steps in the Guidelines are as follows:

- a. Determining the offense category;
- b. Starting point and category range (which includes a non-exhaustive list of aggravating and mitigating factors);
- c. Consideration of any reduction for early admissions;
- d. Consideration of any other factors which may merit a reduction, such as substantial assistance to the ITIA;
- e. Setting the amount of the fine (if any).

17. The Guidelines also address the issue of multiple charges against a Player:

Where there are multiple Corruption Offenses, in the interests of efficiency, they should ordinarily be taken together in one concurrent sanctioning process (albeit taking particular cognizance of the offense(s) which carry(ies) the highest sanction). It is also noted that multiple offenses is a factor for the purposes of categorization of the impact with a greater number of Corruption Offenses ordinarily leading to a higher categorization.

18. An application of the Guidelines involves, in the first instance, ascertaining the category of the offenses which have been committed. This in turn involves assessing both the level of culpability of the Covered Person's actions (subdivided into categories A to C) and the level of impact those actions have had (subdivided into categories 1 to 3).

19. ITIA contends that Mr. Reitano's culpability sits mostly within Category B:

- a. "Based on the WhatsApp exchange with fellow professional tennis player [REDACTED], Mr. Reitano clearly bet on tennis 'in concert with others,' and, arguably,

was also involved ‘initiating or leading others to commit offenses’ (category A).

It is clear from the communication that Mr. Reitano’s betting on tennis entailed a deliberate and habitual pattern of behaviour involving ‘some planning premeditation’—as opposed to placing bets spontaneously or randomly.”

- b. “In addition to breaching TACP Section D.1.b, Mr. Reitano has admitted to placing 32 bets on tennis, each of which constitutes a breach of TACP Section D.1.a, across a four-year period, which arguably amounts to ‘multiple offenses over a protracted period of time’ (category A), and certainly amounts to several offenses’ (category B).”

20. Mr. Reitano contends that his conduct was of “episodic, non-malicious, and marginal nature,” and involved “an impulsive lapse of judgment.” Mr. Reitano asserts that he “never manipulated or attempted to manipulate match outcomes, never received payments from third parties, never facilitated corrupt arrangements, nor . . . ever involved fellow athletes in any systemic corrupt practices.” Mr. Reitano submits that “the reference to informal WhatsApp conversations cannot, under the standards of international sports criminal law, be construed as ‘active promotion of betting,’ particularly considering the tone and content of such conversations.” He further submits that Mr. [REDACTED] “was no longer a professional player at the time of the WhatsApp message in question.”

21. I find that Mr. Reitano’s culpability falls mostly within Category B for the following reasons:

- a. The WhatsApp exchange between Mr. Reitano and Mr. [REDACTED] is somewhat ambiguous and does not clearly reflect that Mr. Reitano was “initiating or leading [Mr. [REDACTED] to commit offenses.” It does, however, evidence that Mr. Reitano was

“acting in concert with” Mr. [REDACTED] rather than acting alone, regardless of whether Mr. [REDACTED] was a professional player at the time of the messages in question. Mr. Reitano’s assertion that the messages should not be viewed as “active promotion of betting” is inconsistent with his admission of the charged offense under Section D.1.b and is rejected.

- b. The communications with Mr. [REDACTED] evidence “some planning or premeditation” by Mr. Reitano.
- c. Although placing 32 bets on tennis over a four-year period could fairly be viewed as “[m]ultiple offenses over a protracted period of time” under Category A, I find, having considered all of the evidence, that Mr. Reitano’s culpability is most fairly viewed as falling principally within Category B.

22. As to impact, ITIA submits that Mr. Reitano “sits mostly within category 3 (albeit with some elements from category 2)” because:

- a. “Mr. Reitano’s conduct involved ‘TACP offense(s) falling under Section D.1.a, D.1.b, D.1.q or D.2’ (category 3)”
- b. “Mr. Reitano arguably acquired ‘material gain’ (category 2) despite claiming that each wager was only of ‘very minor value (between EUR5 and EUR20)’” because “Mr. Reitano staked up to EUR 150 on each bet and earned a reasonable amount of profit through illegitimate betting, in the sum, of EUR 886.92.”
- c. While Mr. Reitano submits that there was no involvement in match-fixing, nor any attempt to influence matches he or others played, his conduct “may nonetheless have a ‘material impact on the reputation and/or integrity of the sport’ (category 2) as he generally bet on matches involving other top Italian

professional tennis players, including mostly [REDACTED], with whom he has a public, and private, social relationship.”

23. Mr. Reitano asserts that “the volume of bets was minimal, both in absolute and relative terms,” and “[t]he damage to the integrity of the sport was only potential, not actual.”

24. As ITIA acknowledges, the offenses at issue fall under Sections D.1.a and D.1.b. Furthermore, Mr. Reitano obtained little material gain from his gambling over the course of four years. While Mr. Reitano’s conduct was clearly improper and materially impacts the integrity and/or reputation of the sport (Category 2), having considered all the evidence, I find his conduct falls mostly within Category 3.

25. Thus, viewing culpability and impact together, I conclude Mr. Reitano’s conduct falls within Category B.3.

26. The starting point for a Category B.3. period of ineligibility under the Guidelines is six months, with a category range of admonishment to a 2-year suspension.

27. Under the Guidelines, “[h]aving identified the starting point within the category range, the AHO may then consider any adjustment from the starting point for aggravating or mitigating factors.” The Guidelines provide a non-exhaustive list of aggravating and mitigating factors that may be considered in providing for an upward or downward adjustment from the starting point.

28. Here, as a mitigating factor, Mr. Reitano has not been the subject of any previous sanction under the TACP. While he also points to his age and inexperience as mitigating factors, I do not find Mr. Reitano so young or inexperienced as to warrant a reduction in the starting point on these grounds.

29. I find the aggravating factors carry greater weight in this case and warrant an increase in the starting point of the period of ineligibility. First, Mr. Reitano does not dispute that he

completed the Tennis Integrity Protection Program (“TIPP”), an online educational tool designed to assist players in recognizing and adhering to their obligations under the TACP in March 2017, March 2019, March 2021, March 2022 and August 2023. Having completed the training five times, I reject Mr. Reitano’s contention that his conduct amounts to “naivete . . . and negligence,” rather than intentional and knowing misconduct. Indeed, Mr. Reitano admits that he “knew betting was prohibited.”

30. Second, Mr. Reitano was repeatedly unhelpful and untruthful in each of his interviews. During his 29 April 2024 interview, Mr. Reitano falsely stated that he did not bet on tennis or any other sport. Likewise, during his 19 December 2024 interview, Mr. Reitano again repeatedly denied betting on tennis. I find that Mr. Reitano intentionally impeded and hindered the ITIA investigation through his adamant and repeated denials during these interviews.

31. I conclude these aggravating factors warrant an increase in the starting suspension from 6 months to 10 months.

32. Under the Guidelines, “[t]he AHO may take account for a potential reduction an admission of the Corruption Offens(es)” or “where the Covered Person has offered no contest and waives their rights to a Hearing.” The Guidelines provide that “a full admission and cooperation before, during or soon after an interview or shortly after receiving a Notice of Charge will bring about significant efficiencies to ITIA operations and thereby the fight against corruption in tennis. In such a case, this should be a significant consideration in an alternative disposition; which may be up to a maximum of 25% reduction of the otherwise-applicable sanction for Major Offenses.”

33. While the charge here is not a Major Offense, all parties agree that Mr. Reitano is entitled to a reduction based on his admission shortly after receiving the Notice of Charge. Applying the



maximum 25% reduction to the starting suspension of 10 months, I reduce the period of ineligibility to 7 months (rounded down from 7.5 as proposed by ITIA).

34. Mr. Reitano's reference to the cases of Diego Matos or Joan Carlos Saez does not support a shorter period of ineligibility. Mr. Matos received a life-time period of ineligibility for fixing multiple matches. Mr. Saez received an eight-year period of ineligibility for multiple violations of his cooperation obligations and his "flagrant disrespect for the dispute resolution process." While the conduct involved in those cases was different in kind than that involved here, so too were the periods of ineligibility imposed.

35. Mr. Reitano also cites to the case of Constant Lestienne, who received a seven-month period of ineligibility, with three months and two weeks suspended, after having placed more than two hundred bets on professional tennis matches. In that case, the AHO concluded that Mr. Lestienne knew that he was breaching the TACP with respect to only one of the bets. Here, Mr. Reitano had completed the TIPP both before and during his gambling activities and knew he was not permitted to bet on tennis matches. In addition, a portion of Mr. Lestienne's sentence was suspended on account of his having provided substantial assistance to ITIA. There is no evidence that Mr. Reitano has provided substantial assistance and thus there is no basis to reduce the suspension on this basis.

36. Accordingly, I conclude that a period of ineligibility of seven (7) months is proportionate and appropriate in this case.

37. As to the level of the fine, the ITIA submits that I should impose a fine of \$10,000.

38. Mr. Reitano requests "[f]ull or partial conversion of the \$10,000 fine into educational initiatives," noting that he comes "from a household with a total gross annual income of less than €40,000," he has "independently borne the majority of the costs associated with [his]

professional activity, without any public or federation funding,” and “even a modest financial sanction has a disproportionate personal impact.”

39. The Guidelines state that “[w]here a Covered Person . . . has placed multiple Wagers in breach of Section D.1.a . . . these can be considered for the purposes of setting the fine level as one Offense . . . .” Thus, for purposes of assessing the “fine scale,” Mr. Reitano is viewed as having committed two offenses, one violation of D.1.a and one violation of D.1.b, and the fine scale is \$0 to \$25,000.

40. The Guidelines state that “the financial means of the Covered Person (including without limitation where the Covered Person is a player, coach, umpire, trainer or physiotherapist and his/her primary source of income is from participation in tennis, being prize money and sponsorship, and his/her average annual income is less than the amount of the otherwise-applicable fine) may be taken into account to reduce the level of the fine (which may accordingly move to the bottom of, or even below, the relevant scale on the Fines Tables).”

41. In addition, “[w]here the Covered Person has made admissions, a portion of the fine payable may be suspended on certain conditions which should ordinarily include as a minimum there being no other Corruption Offenses committed, discovered or proven against the Covered Person for at least the period of suspension.” Further, “timing of the admission may also be a factor” and “[f]ull acceptance prior to shortly after a Notice of Offense/Major Offense may attract up to a 75% suspension of the fine.”

42. ITIA contends that Mr. Reitano’s earnings from tennis during the relevant period were as follows (in USD): \$1,750 (2018), \$600 (2019), \$0 (2020), \$1,392 (2021), and \$7,030 (2022).

Thus, Mr. Reitano’s total income from tennis during the relevant period was \$10,772.

43. In light of Mr. Reitano's financial circumstances and his early acceptance shortly after the Notice of Offense, I find that a fine of \$7,500 is appropriate, with \$3,750 conditionally suspended on the condition that no other Corruption Offenses are committed, discovered or proven against Mr. Reitano during the period of his suspension. The imposed fine may be paid in installments as determined by the ITIA.

44. I do not impose, nor has ITIA requested, any separate order for repayment of the financial gains which may have been obtained by Mr. Reitano from the admitted offenses.

45. Accordingly, my Order in respect to the Covered Person is as follows:

- a. Mr. Reitano is declared ineligible from Participation in any Sanctioned Event for a period of 7 months commencing upon the date of this Order.
- b. A fine of \$7,500 is imposed upon the Player, of which \$3,750 is suspended on the condition that he commits no further breach of the TACP during the period of his ineligibility.
- c. This Decision shall be publicly reported as set forth in Section G of the TACP.

Ordered, this 16th day of July, 2025



Jeffrey A. Mishkin