

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

The International Tennis Integrity Agency (ITIA)

-and-

Artsiom Dabryian

SUMMARY

- On 25 September 2024, the ITIA issues a *Notice of Major Offense under the 2024 Tennis Anti-Corruption Program and referral to Anti-Corruption Hearing Officer* ('Notice of Major Offense') to Mr. Artsiom Dabryian (hereinafter Mr. Dabryian or the 'Covered Person').
- The Notice of Major Offense contains three charges against Mr Dabryian arising from a doubles match which took place on [REDACTED] February 2023 in the [REDACTED] round of the [REDACTED] of the ITF [REDACTED] tournament in [REDACTED]
- Mr Dabryian does not respond to the Notice of Major Offense.
- Pursuant to Section G.1.e. iv. TACP of the Tennis Anti-Corruption Program ('TACP') the AHO has promptly proceeded with issuing a Decision confirming the commission of the Corruption Offense as Mr. Dabryian's failure to respond to the Notice of Major Offense equates to an implicit acceptance of liability for all the Charges brought against him as well as a waiver of his entitlement to a hearing in relation to multiple TACP Offenses detailed in the Notice of Major Offense.
- Further to the AHO giving both Parties an opportunity to make Submissions on Sanction, which the Covered Person elected not to do, the AHO issues this Decision on Sanction and orders the imposition of a three-year ban from participation and a \$4,500 fine upon Artsiom Dabryian for committing Major Offenses under the TACP.

INTRODUCTION

1. This dispute involves the ITIA and Artsiom Dabryian (or the 'Covered Person'), a professional tennis player from Poland.
2. Further to charging Mr. Dabryian with Major offenses under the TACP and issuing the Notice by email and post, Mr. Dabryian has not engaged whatsoever in this proceeding.
3. The Notice of Major Offense contained three charges against Mr Dabryian arising from a doubles match which took place on [REDACTED] February 2023 in the [REDACTED] round of the [REDACTED] of the ITF [REDACTED] tournament in [REDACTED] Mr Dabryian and his

partner [REDACTED] [REDACTED] played against [REDACTED] [REDACTED] and [REDACTED] [REDACTED] and lost [REDACTED] [REDACTED] ('the Match').

4. As provided in Section G 1.f of the TACP, due to procedural delays and personal reasons AHO Olga Hamama, who was initially appointed to this matter, was substituted by Janie Soublière as the appointed AHO.
5. Ms. Soublière holds an appointment as an AHO per section F.1 of the TACP. Without objection by any party to these proceedings, she was appointed to replace AHO Hamama as the independent and impartial adjudicator to decide this matter as set out in the TACP 2024.
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. 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. Dabryian is a Professional Tennis Player from Poland and defined as a Covered Person under all applicable versions of the TACP. He reached a career high singles ATP ranking of 1764 in 2015. Mr. Dabryian. He completed the Tennis Integrity Protection Program ("TIPP"), an online educational tool designed to assist players in recognising and adhering to their obligations under the TACP on four occasions, 16 March 2017, 21 March 2019, 14 April 2022 and 29 April 2022. The TIPP is a mandatory ITF online educational tool that assists Covered Persons understand their responsibilities under the TACP including identifying and reporting match-fixing and corrupt approaches.

PROCEDURE

9. On 14 January 2025, AHO Hamama was appointed and ordered as follows:

According to Sections F.4., G.1. TACP, the ITIA shall refer a matter to the AHO and send a Notice of Major Offense to the Covered Person with a copy to the AHO. Following my appointment yesterday, on 14 January 2025, I confirm the receipt of a copy the Notice of Major Offense that has been communicated to the Covered Person via email on 25 September 2025 and via post on 10 October 2024.

Since the AHO has been appointed following the communication of the Notice of Major Offense to the Covered Person, I would like to kindly request the ITIA to

inform the Covered Person of AHO appointment in this matter and send the Covered Person a Notice of Major Offense as well as an invitation to submit a written request to the AHO for a hearing to be received as soon as possible, but not later than within ten Business Days of the date of the receipt of the Notice of Major Offense.

In case the Covered Person fails to file a written request for a Hearing, the AHO shall promptly proceed with issuing a Decision confirming the commission of the Corruption Offense as per Section G.1.e.iv. TACP. The ITIA will be then invited to file a written submission on the recommended sanction.

10. The ITIA Cases Secretariat made reasonable efforts to contact Mr Dabryian by using the contact details he provided for his Baseline account: which is registered with the ITF. The ITIA received confirmation of Mr. Dabryian's email address from the ITF on 29 August 2024, confirming the email address he used to register for tournaments in August 2024. This is also the email address to which the Notice of Charge was issued and sent and the email to which all AHO to the Parties correspondence was sent.
11. AHO Hamama's directions were sent to Mr Dabryian on 14 January 2025, giving him an additional opportunity to submit a written request for a hearing within 10 Business Days. No response was received from Mr Dabryian by the requested deadline or in fact throughout the process so far.
12. On 31 January 2025, AHO Hamama requested that the ITIA file written Submissions on Sanction by Friday 28 February 2025, which it did.
13. The matter was then suspended with no activity until, pursuant to Section G 1.f of the TACP, AHO Soublière was appointed as AHO to replace AHO Hamama on 15 July 2025.
14. Upon being appointed to the matter and to ensure due process in a conscious effort for all parties to be fully aware and agreeable to the procedure going forward, AHO Soubliere promptly communicated with the parties by way of the Cases Secretariat. The 17 July 2025 communication from the AHO sought the Parties' input as to whether they wished to have a Directions Meeting to explain the process going forward as the new AHO appointed to the case. The Parties were asked for confirm availability within a specific deadline. The AHO also expressly specified that should no meeting take place, the AHO would be reverting to the parties in short order with a deadline for the Covered Person (s) to file their written submissions.
15. The ITIA responded promptly indicating its willingness to attend such a meeting and providing its availability for the same. The Covered Person did not respond.
16. Further to the Covered Person's lack of response, no meeting was convened. The AHO then sent Procedural Directions to the parties, instructing the Covered Person to file his Response to the ITIA Submissions on Sanction by 04 August 2025 and that her Decision on Sanction would be forthcoming shortly thereafter.

17. The AHO notes that Section F.8 of the 2024 TACP notes 'each Covered Person shall be determined to be immediately contactable at their current (i) postal address, (ii) personal mobile telephone or (iii) personal email address'. For the reasons also set out herein below, the AHO is therefore satisfied that Mr. Dabryian received the numerous correspondences sent to him and elected not to respond and/or elected not to participate in the process whatsoever.
18. The Covered Person did not respond to the Notice of Major Offences, did not engage with the process under AHO Hamama, and did not engage with the process under AHO Soublière nor file Response Submissions by the 04 August 2025 deadline. Pursuant to Section G.1.e of the TACP and all its subsections, Mr. Dabryian is deemed to have waived his entitlement to a hearing, admitted that he committed the Corruption Offenses specified in the Notice of Major Offense and acceded to the potential sanctions specified therein.
19. Further to the written procedure being closed, the AHO issues this Decision on Sanction in accordance with Section G.1.e.iv. of the TACP with reference to the applicable Sanctioning Guidelines (the "Guidelines").

BACKGROUND TO THE MAJOR OFFENSES

20. By way of his failure to answer any of the correspondences sent to him, in particular the Notice of Major Offense, pursuant to Section G.1 of the TACP and its subsections, Mr. Dabryian has tacitly admitted, and therefore liability for the same has been established, to committing three breaches of the TACP in relation to the Match. Two under the 2023 TACP and one under the 2024 TACP:
 - A breach of Section D 1.b of the TACP 2023 by facilitating betting for the outcome of Set ■ Game ■ of the Match;
 - A breach of section D.1.d of the TACP 2023 by contriving the outcome of Set ■ Game ■ of the Match; and
 - A breach of section F 2.b. of the TACP 2024 due to his failure to cooperate with the ITIA investigation.
21. The Charges were the results of an ITIA investigation which included:
 - Analysis of the doubles match which took place on ■ February 2023 in the ■ round of the ■ of the ITF ■ tournament in ■ in which the Covered Person partnered ■ against ■ and ■ (the "Match"), including a report from the Chair Umpire. Mr Artsiom and ■ lost the Match ■
 - Analysis of the betting which took place in relation to the Match including (i) a betting alert received by the ITIA from SportRadar; (ii) suspicious betting activity and data provided by multiple gambling operators. The betting alert received

by the ITIA indicated that there had been a significant amount of suspicious betting activity for Mr. Dabryian and his playing partner to lose Set ■ Game ■ of the Match. This was one of Mr. Dabryian's service games and he served one double fault and made three unforced errors (all on the third shot of the rally, without any involvement from his playing partner).

22. Having tacitly admitted to committing the above Offenses, the Covered Person is liable for the same.

APPLICABLE LAW AND JURISDICTION

23. It is uncontested that the applicable rules that apply to this matter are, substantively, the 2023 and 2024 TACP with regards to the charges and, procedurally, the 2024 TACP.
24. No party has objected to the appointment of the undersigned AHO to resolve and decide this matter. She has been properly appointed and seized of the matters in dispute.
25. No other matters relating to jurisdiction or the arbitrability of these matters have been raised by any party.

PARTIES' SUBMISSIONS ON SANCTION

26. 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

27. ITIA submits that the appropriate sanctions for Mr. Dabryian's established TACP Offences are a four-year ban from tennis, together with a fine of \$10,000.
28. The Corruption Offenses that Mr. Dabryian has been charged with and been found liable for, are set out in the ITIA's Notice of Major Offense: Specifically:
- An alleged breach of section D.1.b of the TACP 2023 by facilitating betting for the outcome of Set ■ Game ■ of the Match
 - An alleged breach of section D.1.d of the TACP 2023 by contriving the outcome of Set ■ Game ■ of the Match; and
 - An alleged breach of section F.2.b of the TACP 2024 due to Mr Dabryian's failure to cooperate with the investigation conducted by the ITIA.

29. The Notice of Major Offense also made reference to and enclosed a link to the Sanctioning Guidelines (the 'Guidelines'), issued by the Tennis Integrity Supervisory Board, and which are drawn on historical precedent. These provide a framework for the issuing of sanctions under the TACP to support fairness and consistency. They are not binding on AHOs but set out various principles and factors which AHOs may consider appropriate in their decision making. As rightly clarified by the ITIA its submissions, AHOs retain full discretion in relation to the sanctions to be imposed.
30. The categories in the Guidelines contain a number of indicative starting points and ranges as guidelines in terms of sanctioning for ineligibility and fines and set out a five-step process to determine the appropriate sanction in a particular case. The Guidelines provide that an AHO may then consider any adjustment from that starting point by considering any aggravating or mitigating factors.
31. The ITIA recalls that the five steps in the Guidelines are as follows:
- i. Determining the offense category.
 - ii. Starting point and category range (which includes a non-exhaustive list of aggravating and mitigating factors).
 - iii. Consideration of any reduction for early admissions.
 - iv. Consideration of any other factors which may merit a reduction, such as substantial assistance to the ITIA.
 - v. Setting the amount of the fine (if any).

Period of ineligibility

32. The ITIA's submissions set out considerations relevant to the AHO's determination on sanction. The category for an offense is split into two parts. The first is the level of culpability which is determined by "weighing up all the factors of the case" and then ranked against various criteria in categories A to C. The second is the level of impact on the sport that a Covered Person's actions have had. These are then ranked against various criteria in categories 1 to 3.

Step one

33. As to culpability, the ITIA considers that, in weighing up all the factors of his case, Mr Dabryian falls under Culpability B (Medium). The factors under the "the Medium Culpability" heading are dealt with in turn:

34. The Offences involved some planning or pre-mediation:

- The specific nature of Mr Dabryian's score manipulation, comprising three unforced errors and one double fault in Set ■ Game ■ is such it would have necessitated "some planning or premeditation". There were 125 bets placed on Mr Dabryian and his partner to lose Set ■ Game ■ There must have been some planning given the need for Mr Dabryian to agree with a third party as to which points of which games the relevant bets should be placed on and what Mr Dabryian must do on court to ensure that outcome was achieved.

- A report from SportRadar regarding the betting for the Match shows revealed just how heavily weighted the betting was on Set ■ Game ■
- A total of 125 bets were placed on Mr Dabryian and his partner to lose Set ■ Game ■
- In the “Who wins game x of set ■ market, this represented 99% of the bets placed (€13,462 of €13,616);
- By stark comparison, the number of bets placed in that same market for Set ■ was zero;
- This significantly exceeded the traditionally more popular “which player wins the match” market, which saw only €80 in value of bets placed.

35. Acting in concert with others:

- Given not only the high volume, but also the highly specific nature of the bets placed on Mr Dabryian and his playing partner to lose Set ■ Game ■ it is inconceivable that Mr Dabryian could not have been “acting in concert with others”. Those bets were successful and therefore, the ITIA alleges, Mr Dabryian must have worked with third parties to commit the alleged offenses. The ITIA asserts that he did so to aid the bettors who placed the successful bets.

36. Several offenses:

- Mr Dabryian is charged three times, under three different sections of the TACP (both 2023 and 2024). The ITIA submits that this automatically satisfies this requirement.
- Whilst the game in question appears to have been an isolated incident in the Match, and the ITIA accepts that Mr Dabryian’s case sits on the lower end of the scale as the alleged breaches relate to a single match, it is more than the ‘single offense’ as provided for in category C, and specifically as the ITIA allege there is also an additional breach of non-cooperation. The corruption informed each of the four points played by Mr Dabryian in that game and allied to the information, the ITIA alleges he evidently provided to the third parties, and the corruption he inadvertently involved his playing player in, the ITIA submits that it is clear that Mr Dabryian’s actions in the Match comprised “several offenses”.
- Mr Dabryian then compounded his offenses in the Match by exhibiting an unwavering disregard for the ITIA’s investigation, subsequent proceedings, and the hearing process before the AHO.

37. Level of Impact. As to the level of impact, the ITIA considers that Mr Dabryian sits in Category 2. Because *inter alia* of material impact on the reputation and/or integrity of the sport, material gain:

- Corruption by score manipulation and not using best efforts threatens the very essence of tennis by attacking and damaging its reputation, integrity and value. As a professional tennis player, Mr Dabryian is expected to uphold the rules but instead deliberately sought to breach them and, as such, Mr

Dabryian's conduct can be characterised as having material impact on the reputation and integrity of the sport.

- Whilst the ITIA has no visibility on any unlawful gains made by Mr Dabryian himself, the winnings placed on the bets he facilitated - €13,462 of stakes placed resulting in €32,341 of illicit winnings - were extremely high in value for bets on low level tennis of this sort. However, the ITIA believes it is justifiable to proceed based on the existence of 'material gain' as it is inconceivable that no financial reward would have been paid to Mr Dabryian for his central involvement in the fix.

38. The ITIA thus considers that Mr Dabryian fits squarely within B2 in the offense category of the Guidelines.

Step Two

39. Having determined the appropriate categorisation, the ITIA explains that the Guidelines anticipate that AHOs will then assess the appropriate starting point for the consideration of sanction, using the table at Step 2. The ITIA notes that the starting point for a B2 offense is a three-year suspension and the category range is six months to five years.

40. The ITIA submits that in cases under Section D.1.d, contriving 10 matches or more should ordinarily be categorised in Category 1 and contriving two matches or less should ordinarily be categorised in Category 2.

41. The ITIA recognises that, given Mr Dabryian's conduct relates to only one match, it is deemed appropriate to begin at a starting point of three years. However, submits there are several aggravating factors in this case. The Guidelines set out seven factors which may be considered to increase seriousness. Those identified by the ITIA are as follows:

42. In relation to Impeding or hindering the ITIA investigation, the ITIA submits that Mr Dabryian clearly impeded the ITIA's investigation by (i) ignoring the 6 February 2024 correspondence in which Mr Dabryian was informed that a formal investigation had been opened into him and that the ITIA wished to interview him; (ii) ignoring subsequent contact from the ITIA by phone and WhatsApp message in March 2024; and (iii) ignoring a second formal request for contact and interview in correspondence from the ITIA dated 8 and 10 April 2024.

43. In relation to wasting the time of the ITIA and/or AHO in failing to cooperate with instructions on Hearings. Mr Dabryian's lack of co-operation and engagement has necessitated significant time and expense incurred by the ITIA which may not have been necessary had Mr Dabryian attended for interview and / or engaged with the ITIA at an earlier stage.

44. In relation to Contempt for the Hearing process, by not participating and not responding whatsoever to either ITIA or AHO correspondence, Mr Dabryian has shown clear

contempt for the hearing process. There was no response whatsoever to the Notice sent by the ITIA in September / October 2024. He ignored the correspondence of the AHO Hamama on 14 January 2025 and 31 January 2025. And again, he ignored the correspondence of the undersigned AHO on 17 and 23 July 2025.

45. In relation to multiple completions of TIPP training, the ITIA is aware of four occasions when Mr Dabryian completed his TIPP training. The mandatory Tennis Integrity Protection Programme (the 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. ITIA records confirm that Mr Dabryian successfully completed the modules on four occasions, the last being 29 April 2022, thus eliminating any doubt that Mr Dabryian did not have full knowledge that what he was doing was wrong and would have constituted serious breaches of the TACP.
46. The ITIA therefore submits an uplift of one year from the starting point should be considered appropriate.
47. In terms of mitigating factors, given that Mr Dabryian is a very experienced player on the professional tennis circuit – he is 32 at the age of these submissions and was 30 at the date of the Match – then the mitigating factor of “Age, lack of maturity and/or inexperience on the professional tennis circuit” should be construed against him. Given Mr Dabryian has failed to engage in these proceedings, he cannot avail himself of any other mitigating factors.

Setting the amount of the fine (if any)

48. The ITIA considers that a fine is appropriate and that would reflect the key aims of the TACP in reaching a reasonable and proportionate sanction which will act as a sufficient deterrent. The Guidelines state as follows:

The amount of any fine should ordinarily reflect the categorisation of the offense(s) such that, for example, offending categorised as A.1 in the table above may attract a fine at the higher end of the particular scale on the Fines Table below and, conversely, offending categorised as C.3 might attract a fine at the lower end of the particular scale (or no fine at all).

49. Given this is likely a B2 offense, the ITIA submits that a fine of \$10,000 would be proportionate in all the circumstances. Mr Dabryian’s conduct merits a significant fine at the mid-range of the scale.
50. The ITI submits that there are a number of aggravating factors present;
- The number of bets on Set ■ Game ■ of the Match was extraordinarily high;
 - There was a high value of bets placed for a low-level match of this sort. The Guidelines say that this factor may be taken into account to increase the level of fine and which may accordingly move the fine to “the top of, or even above,

the relevant scale...”

- The approach of Mr Dabryian to the role of the ITIA and these proceedings throughout.

51. Considering the above, the ITIA submits that it would be reasonable and appropriate for Mr Dabryian to receive a four-year ban from tennis, along with a fine of \$10,000.

II. Mr. Dabryian

52. The Covered Person Artsiom has not engaged with the process and although he was given many opportunities to make submissions on his behalf, he has elected not to do so.

DECISION

Preliminary issue

53. To address any concerns regarding potential breaches of the Covered Person’s procedural rights, the AHO would like to begin by outlining the numerous attempts that were made to contact and involve him in this process.

54. The Covered Person never responded to AHO Hamama’s Directions, nor the communications sent to him by the Cases Secretariat, including the ITIA’s Submission on Sanction.

55. Effectively, he failed to engage whatsoever with the process notwithstanding being sent numerous communications, at the same email address at which the ITIA and its investigators had previously been able to reach him and which is the current address the ITF has for him on file.

56. When AHO Soublière was appointed to take over this file, notwithstanding the apparent lack of engagement from Mr. Dabryian, and to proceed on the side of caution and procedural fairness, she requested that similar efforts be made to reach the Covered Person. The Covered Persons was then contacted on three additional occasions:

- On 15 July 2025, by email from the administrative assistant of the AHO Chair to inform him that his case had been reappointed.
- On 17 July 2025, by email to inform him of AHO Soublière’s appointment and give him the opportunity to meet with her to discuss the next procedural steps in the process and timeline for response.
- On 23 July 2025, by email to provide him with a two-week deadline to file Submissions on Sanctions further to which she would consider the written procedure closed and issue a decision.

57. It is therefore abundantly clear that significant and consistent efforts were made to contact the Covered Person to have him file a Response to the ITIA Submissions on Sanction.

CAS case law has consistently confirmed (see for example TAS 2022/A/8907 paras 74 et Seq and CAS 2020/A/7590 & 7591 para 63), that parties shall act within a time limit provided by an adjudicator from the moment when he or she could in good faith have taken cognizance of the communication/ decision.

Similarly, CAS case law provides (See for example CAS 2022/A/8598 para 121 et seq; CAS 2022/A/7494 paras 61 et seq, CAS 2-19/A/6294 paras 77-78, CAS 2017/A/5334 para 64 et seq), that a recipient's email mailbox is in their sphere of control and that *"the moment a communication (like a Decision or Procedural Directions) enters the control of the recipient where it can be retrieved from the latter's server and/or once a message leaves the sender's sphere of control, it is in principle received by the recipient"*. Finally, the same case law confirms that proof of sending the email is in principle deemed sufficient to prove that the message is complete.

The AHO also notes that Section F8 of the TACP provides that "each Covered Person shall be determined to be immediately contactable at their current (i) postal address, (ii) personal mobile telephone or (iii) personal email address."

58. Given the aforementioned points, and noting that none of the emails sent to the Covered Person at the current email address he provided to the ITF were returned as undeliverable, the AHO finds that Mr. Dabryian received all emails sent to him and elected not to engage in the process, thereby implicitly (i) accepting liability for all the Offenses the ITIA charged him with, (ii) waiving his right to a hearing, and (iii) waiving his right to file written submissions in Response to the ITIA's Submissions on Sanction.

59. The AHO is thus satisfied that that she and the ITIA Case Secretariat have done what is necessary to ensure that Mr. Dabryian's procedural rights have been respected and is comfortable issuing this Decision *in absentia*.

Applicable Sanctions

The Offenses

60. On the evidence, Mr. Dabryian made three unforced errors in addition to a double fault during Set ■ Game ■ of the Match.
61. The AHO notes that the focus of the bets placed on the Match was particularly striking as they were almost entirely concentrated on Mr. Dabryian and his playing partner to lose Set ■ Game ■ of the Match. There were 125 bets placed on Mr. Dabryian and his playing partner to lose Set ■ Game ■ of the Match, generating unlawful profit of €13,462.

62. The AHO finds on the uncontested evidence that in his role as server of this game, Mr. Dabryan was best placed to contrive the outcome and ensure the 125 bets placed to be successful. His actions allowed significant unlawful gains to be made. In the circumstances, as argued by the ITIA, and which the AHO accepts, the ITIA has established to the required legal standard that Mr. Dabryan contrived the outcome of this aspect of the Match in order to facilitate and, by definition, encourage / promote Tennis Betting, in breach of D.1.b TACP 2023. Considering the betting on the precise point in the match where Mr. Dabryan made unforced errors, the evidence allows for the inference that he contrived the outcome of Set ■ Game ■ in order to allow those multiple bets to be successful, in breach of Section D.1.d of the TACP.
63. The ITIA's evidence is uncontested and compelling and by way of his silence, pursuant to Section G.1.e.iv of the TACP, the Covered Person is deemed to have admitted the Corruption Offences. He is therefore liable for them.
64. The AHO must therefore determine if the sanctions proposed by the ITIA are reasonable and proportionate.
65. The AHO notes the ITIA's view that sport sanctions serve to punish breaches, vindicate rule-abiding participants, deter future violations, and maintain public trust in fair competition. Those considerations are at the forefront of the AHO's decision making process.

The Sanctions

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

“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”.

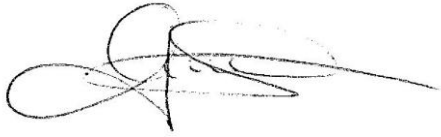
67. By reference to and reliance on the Guidelines, the ITIA has provided a thorough analysis of the principles it relied upon to propose the sanctions that it did. The AHO need not repeat the same as it is set out above.
68. The ITIA has also enumerated numerous aggravating circumstances which it believes allow for an uptick of one year in the sanction provided under the Guidelines. In establishing the starting point for the fine, the ITIA has relied on the same aggravating factors.
69. The evidence, even if uncontested, is not direct. Nothing directly links Mr Dabryian to the betting accounts, there is no direct evidence that Mr Dabryian communicated with those who orchestrated these bets, for example text or WhatsApp messages as is often the case in these match fixing matters, there is no evidence of any payment or tangible benefit being exchanged between Mr. Dabryian and the bettors, or again no communication related to any earnings or alleged payment for these. The ITIA's case is largely inferential and the evidence in this matter is predominantly circumstantial. Additionally, the Offences all relate to one single match. These considerations must be balanced against the totality of the evidence, even if liability has been implicitly established.
70. As it remains uncontested and has been reasonably set out by the ITIA, the AHO accepts the categorisation of Mr. Dabryian's offences as B2 under the Guidelines. The AHO also accepts that the established and uncontested Offences, inordinate number of bets placed on this match and the earnings made allow for a finding that a three-year suspension is the starting point.
71. Mr. Dabryian's complete lack of engagement in the ITIA investigative and adjudicatory processes are indeed aggravating circumstances that should be construed against him. But given that the Offences related solely to one match, the AHO finds that it is more appropriate and reasonable here to apply the aggravating circumstances to the fine or to the sanction, but not both.
72. Therefore, having considered the ITIA's uncontested submissions, keeping in mind that the corrupt activity only related to one match, the AHO finds that the three-year sanction proposed by the ITIA is appropriate, notably to punish Mr. Dabryian, and to restore the public image of tennis.
73. Regarding the fine, here, there is no evidence whatsoever in the case file (even indirect) that the Covered Person did make earnings from his corrupt activity. Even on the assumption that he did (as no one would not match-fix for nothing), there is no evidence of how much money this would have been. Even if the earnings made off the Match were important, the AHO finds that it would be inappropriate to impose a fine of \$10,000 as suggested. The AHO finds that as a starting point a \$3,000 Fine is appropriate.

74. There is no doubt that Mr. Dabryian's complete lack of engagement in the process both in the investigatory stage and before the AHO is considered an aggravating factor. He has cost the ITIA a considerable amount of time, money, and resources. Therefore, the AHO tacks on an additional \$1,500 to the applicable fine.
75. Given the impact of Mr. Dabryian's corrupt activities on tennis, and to deter others from going down this path, the AHO finds that the imposition of a three-year sanction and \$4,500 fine to be reasonable and appropriate discipline to the Covered Person's admitted TACP Offences.

ORDER

76. Artsiom Dabryian, a Covered Person as defined in the 2023, 2024 TACP, is liable for Corruption Offences in breach of the following TACP sections from 2023 and 2024.
- D.1.b (Facilitating betting)
 - D.1.d (Contriving)
 - F 2.b (Failure to cooperate)
77. Pursuant to the TACP the sanctions the AHO imposes for these Corruption Offences are:
- i. A three-year ban from Participation, as defined in Section B.27 of the 2024 TACP, in any Sanctioned Event as prescribed in TACP Section H.1.a.(i), effective on the date of this Decision.
 - ii. A \$4,500 fine as prescribed in TACP section H.1.a.(iii).
78. Pursuant to TACP Section G.4.e., this award on sanction is to be publicly reported.
79. Pursuant to TACP Section G.4.d. this Decision on Sanction is a full, final, and complete disposition of this matter and is binding on all parties.
80. Pursuant to TACP Section I, 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 6th day of August 2025



Janie Soublière C. Arb. Anti-Corruption Hearing Officer