

In the Matter of Determination of Sanctions in Corruption Offenses under the

**TENNIS ANTI-CORRUPTION PROGRAM (“the TACP”)**

Major Offenses Notice to Alberto Rojas Maldonado, Christopher Diaz-Figueroa, Antonio Ruiz-Rosales, Orlando Alcantara Rangel and Jose Antonio Rodriguez  
(hereinafter collectively the “Players”)

- and -

International Tennis Integrity Agency (the “ITIA”)

**Representing the ITIA:**

Stephen D. Busey  
John R. Thomas

Anti-Corruption Hearing Officer,  
Tennis Anti-Corruption Program

Professor Richard H. McLaren, O.C.  
(hereinafter “AHO”)

## *DISPOSITION SUMMARY*

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

1. Alberto Rojas Maldonado (hereafter "Maldonado"), a Covered Person under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 1 to the Notice.
2. Maldonado pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of permanent ineligibility to Participate in any Sanctioned Events.
3. The above ordered period of ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and runs permanently.
4. Maldonado is ordered to pay a fine of \$250,000 USD in accordance with Section H.1.a.(i), which also takes into account \$55,109.02 USD received in respect of committing the Corruption Offenses. Terms of payment may be arranged with the ITIA.
5. Christopher Diaz-Figueroa, a Covered Person (hereafter "Diaz-Figueroa") under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 5 to the Notice.

6. Diaz-Figueroa pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of permanent ineligibility to Participate in any Sanctioned Events.
7. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and runs permanently.
8. The AHO orders that Diaz-Figueroa pay a fine of \$75,000 USD in accordance with Section H.1.a.(i), which also takes into account \$1,500 USD received in respect of committing the Corruption Offenses. Terms of payment may be arranged with the ITIA.
9. Antonio Ruiz-Rosales, a Covered Person (hereafter “Ruiz-Rosales”) under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 7 to the Notice.
10. Ruiz-Rosales pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of 10 years ineligibility to Participate in any Sanctioned Events.
11. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and ends on 29 September 2033.

12. It is further ordered that Ruiz-Rosales pay a fine of \$30,000 USD in accordance with Section H.1.a.(i), which also takes into account \$6,000 USD in respect of committing the Corruption Offenses. Terms of payment may be arranged with the ITIA.
13. Orlando Alcantara Rangel, a Covered Person (hereafter “Rangel”) under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 8 to the Notice.
14. Rangel, pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of two years of ineligibility from Participation in any Sanctioned Events.
15. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and ends on 29 September 2025.
16. It is further ordered that Rangel pay a fine of \$10,000 USD in accordance with Section H.1.a.(i). Terms of payment may be arranged with the ITIA.
17. Jose Antonio Rodriguez, a Covered Person (hereafter “Rodriguez”) under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 6 to the Notice.

18. Rodriguez pursuant to Section H.1.a.(iii) of the TACP, is to serve a 12 year period of ineligibility to Participate in any Sanctioned Events.
19. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and ends on 29 September 2035.
20. It is further ordered that Rodriguez pay a fine of \$25,001 USD in accordance with Section H.1.a.(i). Terms of payment may be arranged with the ITIA.
21. This sanctions Decision herein is to be publicly reported in full as required by Section G.4.e. of the TACP.
22. Subject to the appeal rights in Section I. of the TACP, under Section G.4.d. this Decision is a *“full, final and complete disposition of the matter and will be binding on all parties”*.
23. The Decision herein may be appealed pursuant to Section I.1. The deadline for filing an appeal under Section I.4. is a period of *“twenty business days from the date of receipt of the decision by the appealing party.”* The appeal is to the Court of Arbitration for Sport in Lausanne, Switzerland.

## **AWARD of the AHO**

### **Parties**

1. The International Tennis Integrity Agency (“ITIA”) is an independent body established in 2021 by the International Governing Bodies of Tennis to promote, encourage, enhance and safeguard the integrity of tennis worldwide. They have the responsibility to administer the Tennis Anti-Corruption Program (“TACP” or “the Program”).<sup>1</sup>
2. Alberto Rojas Maldonado, Christopher Diaz-Figueroa, Antonio Ruiz-Rosales, Orlando Alcantara Rangel and Jose Antonio Rodriguez are collectively referred to as “the Players” in this Decision. Otherwise, they are individually referred to by their family name. The Players are subject to the TACP and have agreed to comply with the TACP due to the registration of their IPIN.
3. Richard H. McLaren holds an appointment as an Anti-Corruption Hearing Officer (“AHO”) under Section F.1. of the Program. The Players did not respond to communications from the ITIA. Therefore, it is considered that no Party made any objection to the jurisdiction of the AHO nor to his being an

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<sup>1</sup> All capitalized words or acronyms take their defined meaning from this text or the TACP 2023 Definitions.

independent, impartial and neutral adjudicator to render a determination in this case.

### **Procedure**

4. The Corruption Offenses at issue in this proceeding took place during the calendar years of 2016 to 2018. Therefore, the 2016, 2017 and 2018 rules of the TACP apply to the merits of this proceeding. The procedural aspects of this matter are governed by the 2023 TACP rules.
  
5. The Players were served with a Notice of Major Offense (“Notice”) on 15 September 2023. A single Notice was served on ten tennis Players, with an individual appendix relevant to each Player. Each Player’s individual appendix referred to alleged breaches of the Sections of the TACP in the relevant years and is summarised below. In some cases, the alleged breaches occurred multiple times during the indicated years. The Notice and accompanying appendices are attached to this Decision and referenced in the Decision.

**Alberto Rojas Maldonado (Appendix 1):**

Section D.1.b., D.1.d., D.1.e., D.1.f. (2016)

Section D.1.b., D.1.d., D.1.e., D.1.f., D.1.g. (2017)

Section D.1.b., D.1.d., D.1.e., D.1.f., D.1.g. (2018)

**Christopher Diaz-Figueroa (Appendix 5):**

Section D.1.b. and D.1.d. (2017)

Section D.1.b., D.1.d. and D.2.a.i. (2018)

**Antonio Ruiz-Rosales (Appendix 7):**

Section D.1.b. and D.1.d. (2018)

**Orlando Alcantara Rangel (Appendix 8):**

Section D.1.d. and D.2.a.i. (2018)

**Jose Antonio Rodriguez (Appendix 6):**

Section D.1.b. and D.1.d. (2017)

Section D.1.b. and D.1.d. (2018)

6. In accordance with Section G.1.b. of the 2023 TACP, the Players were required to respond to the Notice on or before 29 September 2023. The Notice set out the various legal options and choices of dispute resolution that the Players had in pursuing the matter before the AHO. No response was received from three of the Players and responses by Rodriguez and Diaz-Figueroa were ruled by the AHO to be out of time and ineffective.

**Application of Section G**

7. Section G.1.e. of the 2023 TACP provides that the Players, having failed to provide a written request for a Hearing by the deadline set out in the Notice as provided for in Section G.1.b., are deemed to have:



- *“Waived entitlement to a Hearing; (G.1.e.i.)*
- *Admitted ... to having committed the Corruption Offense(s) set out in the applicable appendix of the Notice; and (G.1.e.ii.)*
- *Acceded to the potential sanctions specified in the Notice.” (G.1.e.iii.)*

In these circumstances the AHO is required under Section G.1.e.iv. to “... issue a Decision confirming the commission of the Corruption Offense(s) alleged in the Notice.” This Decision determines the quantum of sanctions after requesting a written submission from the ITIA of their proposal for the recommended sanctions.

### **Summary of ITIA Proposed Sanctions**

8. On 19 October 2023 counsel for the ITIA filed with the AHO its submissions on the recommended sanctions.

9. Section H.1 of the TACP<sup>2</sup> provides:

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:

*“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)*

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<sup>2</sup> Reference is to the 2018 TACP because the most recent Corruption Offenses of the Players occurred in that year. The wording of earlier versions of the TACP varies slightly, but the nature and extent of the potential sanctions is consistent across all applicable years. Otherwise, citations are to the 2023 TACP, which governs the procedural aspects of this proceeding.

*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 (d)-(j), 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.”*

10. The ITIA used the Sanctioning Guidelines (“the Guidelines”)<sup>3</sup> effective from 1 July 2022 to formulate their submissions on Sanctions. The Guidelines provide:

*“The guidelines are a reference tool for AHOs which aim to provide a framework to support fairness and consistency in sanctioning across the sport. The guidelines **are not binding on AHOs** but set out principles and various indicators and factors which AHOs may consider appropriate to take into account in their decision making. **AHOs retain full discretion in relation to the sanctions to be imposed in accordance with the TACP and may apply or depart from the guidelines in accordance with the circumstances of the case.** For the avoidance of doubt, an AHO’s departure from the guidelines is not a valid ground for an appeal.”*

Guidelines at p. 1 (emphasis in original).

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<sup>3</sup> <https://www.itia.tennis/media/eo5ff2ca/itia-sanctioning-guidelines-effective-1-july-2022.docx>

11. The Guidelines outline a process for calculating an appropriate sanction in the event the AHO determines that the ITIA has established that Corruption Offenses have occurred. In this case the Corruption Offenses are deemed to have been admitted by Section G.1.e. The ITIA recommended sanctions are set out below under the individual Player's name.

12. Alberto Rojas Maldonado

The ITIA recommended a sanction of (i) permanent ineligibility from Participation in any Sanctioned Events and (ii) a fine of \$250,000 USD which also takes into account the \$55,109.02 USD received in corrupt payments.

13. Christopher Diaz-Figueroa

The ITIA recommended a sanction of (i) permanent ineligibility from Participation in any Sanctioned Events and (ii) a fine of \$75,000 USD, which also takes into account the \$1,500 USD received in corrupt payments.

14. Antonio Ruiz-Rosales

The ITIA recommended a sanction of (i) permanent ineligibility from Participation in any Sanctioned Events and (ii) a fine of \$50,000 USD, which also takes into account the \$6,000 USD received in corrupt payments.

15. Orlando Alcantara Rangel

The ITIA recommended a sanction of (i) two years of ineligibility from Participation in any Sanctioned Events and (ii) a fine of \$25,000 USD.

16. Jose Antonio Rodriguez

The ITIA recommended a sanction of (i) permanent ineligibility from Participation in any Sanctioned Events and (ii) a fine of \$50,000 USD.

**AHO DECISION**

17. Based upon the Players' failure to respond to the Notice, the AHO confirms that the following Players: Alberto Rojas Maldonado; Christopher Diaz-Figueroa; Antonio Ruiz-Rosales; Orlando Alcantara Rangel and Jose Antonio Rodriguez have committed the Corruption Offenses listed in their applicable appendix (a copy of which is attached to this Decision).

18. The Sanctioning Guidelines issued by the ITIA on 1 July 2022 are not binding on the AHO. They are intended to set out a framework to support consistency in sanctioning. The Guidelines provide that where there are multiple Corruption Offenses the AHO may only need to follow the sanction process for the offense which carries the highest sanction. The Guidelines provide a starting point and a permissible sanction range for each category of offense.

## Alberto Rojas Maldonado

19. Mr. Rojas Maldonado (“Maldonado”) is deemed to have committed 92 Major Offenses over the years 2016 to 2018. One third of those Major Offenses involved contriving aspects of matches in each year escalating to twenty-two of them occurring in 2018. He also facilitated wagering on aspects of Events in all three years, again with the worst year being 2018, representing an increase in corrupt conduct year after year. He further facilitated players’ use of less than best efforts in a similar rising pattern over the three years. He also accepted money intending to negatively influence a player’s use of best efforts and in two separate years, provided money to players who did not use their best efforts.
20. While I agree with the ITIA submission on how the Guidelines ought to apply to Mr. Rojas Maldonado, I do not find this is a situation where the Guidelines need to be applied. There is a continuing pattern of widespread and increasing corrupt conduct in every year under consideration. Maldonado dealt with and encouraged corrupt activities with each of the other nine Players in the Notice. The ITIA also submitted that they identified \$55,109.02 in payments received by Maldonado.
21. In the AHO’s determination of the sanctions, reference is made to previous CAS decisions where no Guidelines were in place. The cases of *Kollerer v. ATP, et al. (CAS 2011/A/2490)*, *Savic v. PTIOs (CAS 2011/A/2621)* and *Jakupovic v. TIU, et al. (CAS 2016/A/4388)* inform my Decision. Each case concluded that permanent ineligibility was essential to effectively deter other tennis players

from engaging in corruption. Maldonado interacted with nine Players. The *Kollerer* decision states that it is “imperative” to apply permanent ineligibility to those who invite other players to fix matches. The CAS panel in *Savic* agreed with *Kollerer* and stated that permanent ineligibility is “the only truly effective means of purging a sport of corruption.” The panel went on to say that permanent ineligibility for match-fixing “does not violate public policy and is not disproportionate to the offences committed in the present case” *Id.* at 8.35. The *Jakupovic* case is to a similar effect. See also decision of AHO Parker upheld by CAS in an award dated 24 August 2022 *Franco Feitt v. PTIOs* (CAS 2021/A/7975). AHO McLaren, O.C. determined on 21 November 2021 that an Uzbekistani professional tennis player Albina Khabibulina who had also not responded to a Notice of Major Offenses should be banned for life and fined \$150,000 USD. Furthermore, most recently in September 2022, AHO Mulcahy, Q.C. sanctioned a Chilean professional tennis player turned coach, Sebastian Rivera (“Rivera”) with a lifetime ban and a fine of \$250,000 USD. Similar to this case but less prolific in his conduct, Rivera committed sixty-four match-fixing offenses which was at that time the highest number of match-fixing offenses ever detected for any Covered Person by the ITIA or its predecessor, the Tennis Integrity Unit (“TIU”). Maldonado now has this dubious distinction.

22. For all of the foregoing reasons, the AHO fixes the period of ineligibility under Section H.1.a.(iii) (2018) to be “... ineligibility from Participation in any Sanctioned Events for a maximum period of permanent ineligibility.” The maximum fine of \$250,000 USD ought to apply particularly because it is

possible to identify that Maldonado gained at a minimum the sum of \$55,109.02 from his corrupt activities. The maximum fine is also consistent with the case law cited. Terms of the fine may be arranged with the ITIA.

### **Christopher Diaz-Figueroa**

23. Mr. Christopher Diaz-Figueroa (“Diaz-Figueroa”) is deemed to have committed 13 Major Offenses over the years 2017 to 2018. Four of those Major Offenses involved contriving aspects of his own matches in each year. He also facilitated wagering on aspects of Events in both years. He further failed to report five corrupt approaches made to him in 2018 by Mr. Rojas Maldonado.
24. While I agree with the ITIA submission on how the Guidelines ought to apply to this Covered Person I do not find this case to be a situation where the Guidelines need to be applied. There is a continuing pattern. The ITIA also submitted that they identified \$1,500 USD in payments received by Diaz-Figueroa.
25. Diaz-Figueroa at all times acted in concert with Maldonado to contrive each of his fixed matches and in so doing engaged in a pattern of corruption in 2017 and 2018. To facilitate wagering on the matches there had to be careful planning of what matches would be selected and how they would be fixed so the corrupt benefactors, in the form of the bettors, could benefit from the fixed arrangements. Diaz-Figueroa has previous sanctions under the TACP. This aggravates the conduct now under consideration as there was obviously

no remorse or correction of his behaviour. He also impeded the investigation by denying his activities when interviewed by the ITIA investigators in his 18 September 2018 interview. The AHO finds that the repeat conduct exhibited here combined with deliberate misleading of the investigators justifies the maximum sanction of Permanent Ineligibility from Participation in any Sanctioned Events.

26. In respect of the fine Diaz-Figueroa committed four instances of contriving aspects of his own matches. In doing so the ITIA was able to identify a financial benefit of at least \$1,500 USD in corrupt payments. The Guidelines provide for a minimum sanction of \$50,001 USD in the circumstances of Diaz-Figueroa's case. The fine ought to be set above the minimum reflecting the fact that there are identified financial benefits to the corrupt activities in at least \$1,500 USD corrupt payments and he is a repeat offender. The fine is set at \$75,000 USD. Terms of the fine may be arranged with the ITIA.

### **Antonio Ruiz-Rosales**

27. Mr. Antonio Ruiz-Rosales ("Ruiz-Rosales") is deemed to have committed seven Major Offenses in 2018. Four of the Major Offenses involved contriving or attempting to contrive aspects of matches and he also facilitated wagering on three of his own matches.
28. The Player satisfies the B-1 offense categorization in the Guidelines. In comparing the time period and the number of Major Offenses the AHO notes that the conduct is less egregious in this person's case than that of Diaz-



Figueroa and Maldonado. All the conduct occurred in one year (2018) and he has no prior Corruption Offenses. The conduct involved four matches where the aspects of the matches were contrived. He also wagered on three of his own tennis matches which on a stand-alone basis is a violation that would only result in a maximum of a three year sanction in accordance with Section H.1. of the TACP. However, in this case there was not the added issues of other infractions within the TACP surrounding the wagering such as facilitating the use of less than best efforts that were part of Diaz-Figueroa's infractions. For these reasons, the AHO sets the sanction at 10 years ineligibility.

29. In respect of the fine, the AHO sets the amount at just above the Guideline minimum of \$25,001 USD. Therefore, the fine is set at \$30,000 USD which takes into account the \$6,000 USD which can be identified as received from corrupt activity and conduct. Terms of the fine may be arranged with the ITIA.

### **Orlando Alcantara Rangel**

30. Mr. Orlando Alcantara Rangel ("Rangel") is deemed to have committed two Major Offenses in 2018. One of the Major Offenses involved contriving or attempting to contrive aspects of one of his own matches. Rangel also failed to report Maldonado's corrupt approach.
31. Both Major Offenses occurred within the same match. The second one, being a breach of the Reporting Obligation in the TACP, is in reality an included offense within the first one given Rangel's co-operation with Maldonado. For

these reasons the AHO considers the matter as a single infraction of the TACP. The Player's conduct places him on the higher end of the B/C-3 category range, which is further aggravated by his awareness of his obligations under the TACP through completing TIPP training on multiple occasions. Thus, the AHO determines that a period of two years ineligibility from Participation in any Sanctioned Event is appropriate in these circumstances. The AHO sets the fine at \$10,000 USD on terms that may be arranged with the ITIA.

### **Jose Antonio Rodriguez**

32. Mr. Jose Antonio Rodriguez ("Rodriguez") is deemed to have committed eight Major Offenses beginning in 2017. One of those Major Offenses involved contriving an aspect of one of his own matches in 2017 and three of the Major Offenses involved contriving aspects of three of his own matches in 2018. He also facilitated wagering on aspects of his own matches in both 2017 and 2018.
33. Rodriguez commenced his pattern of breaching the TACP in 2017 by contriving one of his own matches in breach of Section D.1.d. He then proceeded to engage again in this misconduct in three further matches in 2018. In doing so he demonstrated an escalating pattern of misconduct knowing full well that what he was doing was a breach of the TACP given that he had completed TIPP training. He also facilitated wagering in these same four matches. These are separate offenses, but they are an aspect of the way in which he chose to breach Section D.1.d. in each Corruption Offense.

Rodriguez, acting in concert with Maldonado, was a wilful participant in a complex and well-planned match-fixing arrangement by which both players, as well as corrupt bettors, realized significant financial gain.

34. The AHO agrees with the ITIA that Rodriguez's conduct falls within the B-1 categorization. In comparing Rodriguez's breaches of the TACP his conduct is less egregious than that of Maldonado and Diaz-Figueroa but more serious than Ruiz-Rosales and Rangel because his conduct stretched over two years of professional tennis. The AHO sets the period of ineligibility from Participation in any Sanctioned Events for 12 years. The fine is set at \$25,001 USD, there being no corrupt payments to Rodriguez specifically identified by the ITIA. Terms of the fine may be arranged with the ITIA.

## **CONCLUSION**

35. Based on all of the foregoing reasons and analysis the AHO makes the following Orders.

## **ORDERS**

The AHO hereby orders with immediate effect on the date below that:

1. Alberto Rojas Maldonado (hereafter "Maldonado"), a Covered Person under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 1 to the Notice.

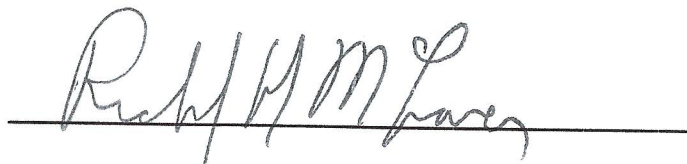
2. Maldonado pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of permanent ineligibility to Participate in any Sanctioned Events.
3. The above ordered period of ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and runs permanently.
4. Maldonado is ordered to pay a fine of \$250,000 USD in accordance with Section H.1.a.(i), which also takes into account \$55,109.02 USD received in respect of committing the Corruption Offenses. Terms of payment may be arranged with the ITIA.
5. Christopher Diaz-Figueroa, a Covered Person (hereafter “Diaz-Figueroa”) under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 5 to the Notice.
6. Diaz-Figueroa pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of permanent ineligibility to Participate in any Sanctioned Events.
7. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and runs permanently.

8. The AHO orders that Diaz-Figueroa pay a fine of \$75,000 USD in accordance with Section H.1.a.(i), which also takes into account \$1,500 USD received in respect of committing the Corruption Offenses. Terms of payment may be arranged with the ITIA.
9. Antonio Ruiz-Rosales, a Covered Person (hereafter "Ruiz-Rosales") under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 7 to the Notice.
10. Ruiz-Rosales pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of 10 years ineligibility to Participate in any Sanctioned Events.
11. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and ends on 29 September 2033.
12. It is further ordered that Ruiz-Rosales pay a fine of \$30,000 USD in accordance with Section H.1.a.(i), which also takes into account \$6,000 USD in respect of committing the Corruption Offenses. Terms of payment may be arranged with the ITIA.
13. Orlando Alcantara Rangel, a Covered Person (hereafter "Rangel") under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 8 to the Notice.

14. Rangel, pursuant to Section H.1.a.(iii) of the TACP, is to serve a period of two years of ineligibility from Participation in any Sanctioned Events.
15. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and ends on 29 September 2025.
16. It is further ordered that Rangel pay a fine of \$10,000 USD in accordance with Section H.1.a.(i). Terms of payment may be arranged with the ITIA.
17. Jose Antonio Rodriguez, a Covered Person (hereafter "Rodriguez") under the TACP, pursuant to Section G.1.e.ii. is deemed to have admitted all the Corruption Offenses specified in the Notice of Major Offenses and listed in Appendix 6 to the Notice.
18. Rodriguez pursuant to Section H.1.a.(iii) of the TACP, is to serve a 12 year period of ineligibility to Participate in any Sanctioned Events.
19. The above ordered ineligibility shall commence on and is effective from the day after the expiration of the time specified in the Notice of Offence to appeal the Notice as prescribed in Section F.6.h.(i) of the TACP. The period begins on 30 September 2023 and ends on 29 September 2035.
20. It is further ordered that Rodriguez pay a fine of \$25,001 USD in accordance with Section H.1.a.(i). Terms of payment may be arranged with the ITIA.

21. This sanctions Decision herein is to be publicly reported in full as required by Section G.4.e. of the TACP.
22. Subject to the appeal rights in Section I. of the TACP, under Section G.4.d. this Decision is a *“full, final and complete disposition of the matter and will be binding on all parties”*.
23. The Decision herein may be appealed pursuant to Section I.1. The deadline for filing an appeal under Section I.4. is a period of *“twenty business days from the date of receipt of the decision by the appealing party.”* The appeal is to the Court of Arbitration for Sport in Lausanne, Switzerland.

**DATED at LONDON, ONTARIO, CANADA THIS 31<sup>st</sup> DAY OF OCTOBER 2023.**

A handwritten signature in black ink, appearing to read "Richard H. McLaren", is written over a solid horizontal line.

**Professor Richard H. McLaren, O.C.**

**AHO**



15 September 2023

*By Electronic Mail to:*

*Alberto Rojas Maldonado* ( [REDACTED] )

[REDACTED] ( [REDACTED] )

[REDACTED] ( [REDACTED] )

[REDACTED] ( [REDACTED] )

*Christopher Diaz-Figueroa* ( [REDACTED] )

*Jose Antonio Rodriguez* ( [REDACTED] )

*Antonio Ruiz-Rosales* ( [REDACTED] )

*Orlando Alcantra Rangel* ( [REDACTED] )

[REDACTED] ( [REDACTED] )

[REDACTED] ( [REDACTED] )

Re: Notice of Major Offenses under 2016 through 2018 Tennis Anti-Corruption Programs and referral to Anti-Corruption Hearing Officer

[REDACTED]

In accordance with Sections G.1. and F.4. of the Tennis Anti-Corruption Program (“Program”),<sup>1</sup> this letter provides Notice that the International Tennis Integrity Agency (“ITIA”) concluded after an investigation that there exists a realistic prospect that each of you have committed the Corruption Offenses described below and in the attached appendices. As a consequence, the ITIA is sending this Notice of Major Offenses (together with the enclosed appendices, this “Notice”) to Professor Richard McLaren, an independent Anti-Corruption Hearing Officer (the “AHO”), at the same time as the ITIA is sending this Notice to you. Any capitalized term not defined in this Notice has the meaning set out in the Program.

This is a formal Notice issued under the Program. **To assist your understanding, a summary of the process is enclosed (“Summary”).** In the event of any inconsistency between the Program and this Notice or the Summary, the terms of the Program control.

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<sup>1</sup> Unless otherwise noted, references are to the 2023 Program.



The ITIA recommends that you obtain legal advice about this Notice. If you are unable to pay for legal advice, you may contact your national federation to determine whether legal assistance may be available.

In accordance with Section G.1.a. of the Program, this Notice sets out: (i) the Corruption Offenses the ITIA alleges you have committed, (ii) the facts giving rise to the alleged Corruption Offenses, (iii) the potential sanctions that apply to the Corruption Offenses, and (iv) notice of your right to have this matter determined by the AHO at a Hearing and what you must do to exercise this right.

This proceeding will be governed by the 2016 through 2018 Programs because the alleged Corruption Offenses occurred in those years. The 2023 Program contains the procedural rules applicable to this proceeding. Copies of the 2016–2018 and 2023 Programs are attached to this Notice.

### **Operation Belgium**

Between 2014 and 2018, Belgian law enforcement authorities investigated a suspected organized criminal network that those authorities believed to be operating to fix tennis matches worldwide (“Operation Belgium”).

As part of the investigation, the ITIA was granted access to evidence obtained by the Belgian authorities in 2020, including transcripts of interviews, the content of forensic downloads of four mobile phones, and numerous records of money transfers. At the center of the suspected organized criminal network is ██████████ (“██████████” also referred to as “██████████”, “██████████”, and “██████████” among other aliases. ██████████ had a network of persons who acted as a conduit in the corruption of tennis matches.

Handwritten notes found at ██████████ house included the name “██████████” and the telephone number of Mr. Rojas Maldonado, which ends in ██████████ ██████████ mobile phones also contained ██████████ telephone number, as well as Telegram and WhatsApp accounts linked to the same number. Forensic downloads of ██████████ mobile phones included numerous screenshots of money transfer documents, evidencing 49 transfers to Mr. Rojas Maldonado or his ██████████

On ██████████ ██████████ 2023, the ██████████ ██████████, ██████████ entered a Verdict convicting ██████████ of engaging in organized crime relating to match fixing, sentencing ██████████ to five years in prison and imposing monetary penalties. The ██████████ court also convicted several of ██████████ associates in his criminal network, including ██████████ ██████████ on whom the court imposed a two-year prison sentence and monetary penalties.

The ITIA initiated an investigation of Mr. Rojas Maldonado after receiving this information from Belgian law enforcement. Mr. Rojas Maldonado admitted to the ITIA that he acted as a conduit between ██████████ and professional tennis players willing to contrive

aspects of tennis matches for money. The remaining nine addressees of this Notice are such players.

### Corruption Offenses

The Corruption Offenses alleged by the ITIA for each player receiving this Notice are described in the ten individual player-specific appendices attached to this Notice.

### The Sanctions

Section H of the Program<sup>2</sup> provides in relevant part:

H.1. The penalty for any Corruption Offense shall be determined by the AHO in accordance with the procedures set forth in Section G of the Program, 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.

### The Process

If you dispute the ITIA's allegations, you are entitled to have the dispute determined by the AHO at a Hearing conducted by the AHO. 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 Business Days** of the date of your receipt of this Notice.

If you do not make a written request for a Hearing within **ten Business Days**, you will be deemed to have (i) waived your right to a Hearing, (ii) admitted the alleged Corruption Offenses, and (iii) acceded to the potential sanctions. Under such circumstance, 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.

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<sup>2</sup> The Sanctions provisions of the 2016–2018 Programs are substantially similar to the 2023 Program (quoted here) and are located at H.1.a. of the respective years. Copies of those Programs are included with this Notice.

Please review Section G.1.d. of the Program (2023) for alternatives available to you to avoid a Hearing before the AHO.

Sincerely,

Ben Rutherford, Esq.  
Senior Director, Legal  
International Tennis Integrity Agency  
[REDACTED]

Enclosures

- Index of Matches
- Player-Specific Appendices (Appendices 1–10)
- Combined Appendix (Appendix 11; AHO McLaren only)
- Tennis Anti-Corruption Program 2016, 2017, 2018, and 2023
- Summary of the Process

c: Richard H. McLaren, O.C., C.Arb.  
Anti-Corruption Hearing Officer

Katy Stirling, Esq.  
Legal Counsel  
International Tennis Integrity Agency  
[REDACTED]

Stephen D. Busey  
[REDACTED]

John R. Thomas  
[REDACTED]  
Smith Hulsey & Busey  
Counsel for the ITIA

**APPENDICES INTENTIONALLY NOT INCLUDED**