

Match-fixing before the CAS – issues and challenges faced by the defense when dealing with Sports Corruption

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This article aims to provide a practical insight into the challenges faced by lawyers defending individuals accused of match fixing in the Court of Arbitration for Sport (CAS) in Lausanne¹ and follows our presentation of the module “A lawyer’s perspective on issues and challenges faced with sports corruption and defence rights”, at the online seminar on 20th February 2024 about “Countering Sports Corruption in the EU”, invited by ERA – Academy of European Law.

I. Introduction

Corruption in sports holds practices that undermine the integrity of sporting competitions. Match-fixing is not a new phenomenon and encounters its definition in the Council of Europe’s Convention on the Manipulation of Sport Competitions (also known as Macolin Convention): “*Intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for the other.*”

Historical evidence suggests that match-fixing occurred even in ancient times: the first known bribery is an alleged contract dated A.D. 267 to fix a wrestling match in Egypt. The agreement established that one of the competitors had to “*fall three times and yield*” and in exchange he would receive “*three thousand eight hundred drachmas of silver of old coinage*”.^{2 3}

While historically rooted, technological innovations and the spread of sports betting transformed the landscape, elevating corruption to a global scale. The

shift from simpler attempts to influence game outcomes to complex schemes driven by financial motives has created new challenges for investigations and legal proceedings.

Given the substantial financial potential and opportunities within the sports betting market, it inevitably captures the attention of organized crime.⁴ The intersection of a match manipulation and sports betting presents a unique avenue

for investment, challenging legal action due to the dominance of fixed matches and betting frauds on a global scale. The rise of online betting markets helped this growth, operating across international borders, beyond the jurisdiction of individual states.⁵ The increase of this new reality has significantly influenced the investigation of such crimes and, more importantly, has shaped how courts interpret the acquired evidence and establish the standard of proof.

II. Match-fixing

The illegal manipulation of the result of a sports match, or elements of a match, represents a comprehensive challenge that transcends sporting boundaries.

Some examples of conducts that imply match fixing are: (i) intentionally losing a match or a segment thereof for various motives⁶; (ii) deliberate underperformance by a competitor or improper withdrawal before the match’s conclusion⁷; (iii) purposeful misapplication of sports rules by referees or other match officials.⁸

The manipulation of sporting events can stem from various sources, including both direct and indirect influencers. Direct influencers, such as players and match officials, hold control over the outcome of the game through their actions on the field. Nonetheless, indirect influencers, such as agents or sports club owners, carry their power off the field, shaping the environment in which the event unfolds.

In individual sports like tennis, conspiracy between players can lead to predetermined⁹ outcomes, where agreements are made prior to matches regarding who will emerge victorious or yield specific phases of the play. Another common tactic involves one player deliberately conceding defeat or withdrawing from the contest for reasons unrelated to the sport, often unnamed to their opponent. Additionally, arrangements may be made to allow certain players to progress in tournaments, enhancing their ranking, while others receive compensation to lose.

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These elaborate arrangements underscore the widespread nature of match-fixing and the various tactics employed to manipulate sporting outcomes.

In team sports like football, match-fixing often entails prearranged agreements between both teams or select groups of players. These agreements typically revolve around determining the outcome of the match, specific segments thereof, or the anticipated number of goals scored. Alternatively, if only one team or a group within a team is implicated, the fix usually entails purposefully conceding defeat or manipulating the scoreline during certain phases of the match.

Furthermore, alternative methods exist for influencing match outcomes, such as through referees

and other match officials. However, it's crucial to recognize that the approach to fixing matches varies depending on the unique dynamics within each sport. For instance,

in horseracing, one tactic for illegally manipulating match results involves administering drugs to horses, thereby improving or impairing their performance.¹⁰ Certain sports are inherently more susceptible to match-fixing than others due to their unique characteristics. Take tennis, for example, as highlighted by the Panel in *Köllner*¹¹, where the nature of the game makes it “*extremely vulnerable to corruption as a match-fixer only needs to corrupt one player (rather than a full team)*”.

Now that we established what match fixing is, considering the seriousness of allegations regarding sports result manipulation, it becomes relevant to determine the standard of proof that the CAS deems adequate for a conviction.

III. Standard of proof

To better understand the challenges faced by the defense, it is important to try to identify the level of certainty and the degree of evidence needed to convict an agent for match fixing, *i.e.* the standard of proof before CAS. In legal proceedings, traditional standards of proof include the balance of probabilities, commonly seen in civil law, and beyond reasonable doubt, prevalent in criminal law. However, sports arbitration introduces additional criteria and variations. These include comfortable satisfaction, a level falling between civil and criminal standards, and personal conviction, a concept similar to comfortable satisfaction as outlined in Article 97 of the FIFA Disciplinary Code – 2011 edition.¹² In the 2023 Edition of the FIFA Disciplinary Code, Article 39, it's now established that the standard must be comfortable satisfaction thus seeming to set aside personal conviction.

In fact, disciplinary proceedings frequently rely on the standard of comfortable satisfaction. This standard provides a heightened level of assurance for the accused, surpassing the typical limit seen in civil matters – comfortable satisfaction is “*greater than a mere balance of probability but less than proof beyond a reasonable doubt bearing in mind the seriousness of the allegation which is being made*”.¹³ Its application is grounded in both explicit regulatory provisions and its recognized appropriateness in cases lacking specific guidelines.¹⁴

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The first scenario occurs when a sports organization has defined the standard of proof within its regulations. In such cases, CAS decisions highlight the autonomy of sports organization in establishing their own rules of evidence. One of the most notorious case where that happened was *Daniel Köllner v. Association of Tennis Professionals, Women's Tennis Association, International Tennis Federation & Grand Slam Committee*.¹⁵ The player has signed a consent form, where it agreed “*to the standard of proof provided for by the applicable rules i.e. the 'preponderance of the evidence' or proof on the balance of probabilities' which 'is met if the proposition that a player engaged in attempted match fixing is more likely to be true than not true*”¹⁶. In such situations, CAS emphasizes “*there is no requirement for a CAS panel to apply a different standard of proof on the basis of CAS jurisprudence, as there is no universal (minimum) standard of proof for match-fixing offence*”.¹⁷ However, being imposed with a life ban sanction, the Player than claimed that the correct standard of proof to be applied by the CAS Panel should be the aligned with the CAS jurisprudence instead of the balance of probabilities since, due to the severity of the sanction, it would be against the principles of *public order*. Nonetheless, the Panel reaffirmed that the sports organizations have the right to establish their own standard of proof.

The second scenario occurs when no standard of proof is specified in the regulations of sports organizations and the CAS Panel is tasked with determining the appropriate standard. The Panel asserted that match-fixing cases should adhere to CAS doping jurisprudence, thereby requiring a threshold of comfortable satisfaction in proving facts.¹⁸ However, there are occasions where more than the standard of proof is proved, for example in CAS

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2010/A/2172 where “the Panel concludes that it has been proven not only to its comfortable satisfaction but indeed beyond reasonable doubt (...)”¹⁹

One of the most known case is FK Pobeda, *Aleksandar Zabrcanec, Nikolce Zdraveski v. UEFA*²⁰ and it precisely expresses that “the Panel is of the opinion that cases of match fixing should be dealt in line with the CAS constant jurisprudence on disciplinary doping cases. Therefore, the UEFA must establish the relevant facts «to the comfortable satisfaction of the Court having in mind the seriousness of allegation which is made (CAS 2005/A/908 nr 6.6)»”²¹

It is important to note that in UEFA Disciplinary Regulations “The standard of proof to be applied in UEFA disciplinary proceedings is the comfortable satisfaction of the competent disciplinary body” (Article 24), while, for example, the Section G(3)(a) of the Uniform Tennis Anti-Corruption Program states that “(...) The standard of proof shall be whether the ITIA has established the commission of the alleged Corruption Offense by a preponderance of the evidence” meaning that this standard is met when the fact that the player engaged in attempted match fixing is more likely to be true than not.

With the comfortable satisfaction and the preponderance of the evidence at the forefront, let’s turn our attention to the obstacles/challenges encountered by the defense.

IV. The challenges: means of evidence, satisfying the standard of proof, the hardness of the sanctions

In the realm of match-fixing cases handled by the CAS, various forms of evidence have been employed in an effort to meet the standard of proof outlined *supra*. Different types of evidence are commonly presented in these cases, each with its own set of challenges and considerations.

CAS frequently draws upon evidence from disciplinary or administrative proceedings that run-in sync with criminal investigations. Phone taps transcriptions have been regularly employed in CAS proceedings given its robust evidential value and substantial influence. Similarly, CAS also includes evidentiary sources of decisions from parallel criminal proceedings. These judgements provide substantial backing for CAS decisions “while a criminal conviction on the higher standard is not automatically conclusive, it is very unlikely that proceedings before CAS, on the lower standard of comfortable satisfaction, will result in a contrary conclusion”²²

CAS also admitted anonymous witness statements since the court recognized the potential reluctance among informants to provide identifiable statements.

However, this anonymous witness statements are made under strict conditions, assuring “that the witnesses were properly identified and that they were alone at the time of the examination-in-chief and the cross-examination”²³

While most of these methods of proof share similarities with those used in other types of sports offenses, one distinct method emerges in cases of manipulation: the identification of suspicious betting patterns, often facilitated by sophisticated systems like the Betting Fraud Detection System. Suspicious betting patterns reports are one of the most complex and challenging forms of evidence. For example, UEFA boasts its own robust Betting Fraud Detection System – where they support their investigations including other circumstantial evidence –, operational since July 2009, cooperating with Sportradar. In the year 2022 alone, Sportradar Integrity Services uncovered 1,212 suspicious matches spanning 12 different sports across 92 countries. Notably, Europe witnessed the highest number of suspicious matches, totaling 630, while North America recorded the lowest count at 24. Leading the tally of suspicious matches by country are Brazil (152 matches), Russia (92 matches) and the Czech Republic (56 matches). Despite soccer’s enduring popularity, it witnessed a decrease in the proportion of suspicious matches, accounting for 64 % in 2022 compared to 77 % in 2021. Conversely, basketball and tennis experienced a rise in suspicious match numbers throughout 2022. This trajectory suggests a looming trend of escalating suspicious match figures beyond the realm of soccer in the years to come. Indeed, over a span of just four years, we have witnessed a notable uptick in suspicious match figures across sports beyond soccer, skyrocketing from 130 in 2019 to 437 in 2022, marking a staggering 236 % increase.²⁴

The reports provided by these systems “are founded on algorithms and mathematical analysis that are able to qualitatively indicate if the betting patterns of a particular sports competition present a statistically significant deviation from the expect model”²⁵ They function as proactive guards, capable of flagging irregular betting patterns even before the competition kicks off, thanks to their robust quantitative assessments. As events unfold on the field, these alerts bear meticulous qualitative evaluation, with every action and maneuver scrutinized for alignment with suspicious betting trends. When the on-field developments seamlessly correspond with flagged anomalies, it presents a compelling indication of manipulation, supported by a high level of certainty. To ensure ac-

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While these reports hold significant weight as valuable evidence, they constitute only one facet of the investigative puzzle, requiring the discerning eye of qualitative expert analysis and supplementary corroborative evidence. This complex interaction between technology and human insight was exemplified in *Igor Labuts v. Football Association of Ireland*²⁷, where the Panel “considered the emergence of three betting patterns as indicated in very clear terms by the BFDS report, which remained essentially unchallenged by the Appellant, to be convincing evidence that the Match was manipulated”.²⁸ In this case, these reports and expert interpretation played a pivotal role in uncovering match manipulation “but countered this evidence with analysis of other on-field behaviour to conclude that the appellant goal-keeper was not himself primarily responsible for the fix”.²⁹

In another notable instance, emphasizing the significance of suspicious betting patterns and how they triggered the investigation, we find *Guillermo Olaso de la Rica v. Tennis Integrity Unit (TIU)*.³⁰ Here, a betting operator flagged suspicious betting patterns and promptly alerted the Tennis Integrity Unit. Despite being the higher-ranked player, *Guillermo Olaso* was on the losing end of the suspicious match, prompting an investigation by the Tennis Integrity Unit. Subsequently, Mr. *Olaso* faced charges of corruption and failing to report a corrupt approach under the rules of Uniform Tennis Anti-Corruption Program. In addition to the suspicious betting patterns, the investigation led to the confiscation of two mobile phones and a laptop belonging to Mr. *Olaso*, from which investigators extracted incriminating Skype messages exchanged between Mr. *Olaso* and his co-conspirator.

Having in mind these examples, it becomes clear that the specific evidence analyzed in match fixing cases holds paramount significance, which increases

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accuracy, “the agreement from at least three experts is required”²⁶, and they will evaluate the situation, examining through potential false positives. Conversely, if there is a strong discrepancy between the quantitative and qualitative analyses, signaling a flaw in the system, and no other

evidence supports the suspicion, the case is promptly dismissed.

considering the gravity of potential sanctions looming over implicated parties. These sanctions range from bans and ineligibility for competitions to suspensions, which can extend from a mere year to several, or even a lifetime ban. Additionally,

ly, fines, disqualifications, annulment of games, and point deductions are among the common penalties imposed in such cases. Therefore, considering the severity of the sanction at stake, it becomes essential for the defense to be able to deal with the means of evidence that we have been approaching, specially in order to try to combine the identification of suspicious betting patterns (subscribed by, at least, three experts), with parallel circumstances such as the player’s performance or even the financial situation of the club.

For example, attempting to justify the deviations found by the betting systems poses a frightening challenge for the Defense, especially considering the emotional nuances inherent in sports events that can influence rational behavior. Furthermore, these reports often surface prior to the event, supporting their probative force and initiating investigations in real-time, amplifying the difficulty for the Defense.

When coupled with expert assessments of sports agents’ performance, the Defense faces an even more daunting task. Although these evaluations typically involve multiple specialists to mitigate subjectivity, they remain disputable from a Defense perspective. In fact, evaluating a player’s performance inherently invites a margin of error, compounded by instances where even uncorrupted agents deviate from expected standards. For instance, an athlete may deviate from expected standards due to various factors, such as emotional influences or unforeseen circumstances during gameplay. Therefore, when exercising the right to defend, the analysis of this evidence typically involves attempting to reveal potential external factors that could justify the observed deviation, a task filled with complexity. Thus, approaching expert analysis with caution is imperative. In simpler terms, even though expert analyses are usually very reliable, it is important to acknowledge that deviations may sometimes arise without any fraudulent intent in sports betting. In such cases, the Defense’s job is to find out what factors in the sporting event might have caused the unusual behavior.

For example, envision a player missing a seemingly easy goal, a coach making lineup decisions that perplex critics, or a referee issuing an inexplicable tackle assessment. These scenarios emphasize the need for cautious consideration of expert analysis. In essence, the Defense contends with two highly regarded pieces of technical evidence, often requiring technical counterevidence to cast doubt on conclusions reached. Even then, said evidence is hardly ever suited to reverse the decision’s trajectory, especially in cases where the standard of

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proof leans toward comfortable satisfaction or balance of probabilities (where it only needs to be more likely than not that the match was fixed).

Moreover, in our opinion, the organizational structure of the disciplinary system poses an additional challenge. Appeals to the CAS typically follow convictions by sports institutions' disciplinary bodies, shaping the analysis path before the CAS. This circumstance significantly impacts the evolution and analysis of cases, sometimes even inadvertently influencing arbitrators' perspectives.

In light of these factors, the Defense not only is faced with a proceeding reliant on expert evidence and

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a lower standard of proof, compared to state Courts, but also contends with inherent prejudice, practically imposing a proactive stance in proving innocence. An illustrative case highlighting this phenomenon is the well-known case, already mentioned,

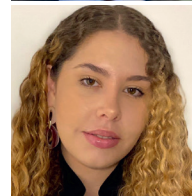
Igor Labuts v. Football Association of Ireland where after receiving a report from the UEFA Betting Fraud Detection System stating that there was a “clear and overwhelming betting evidence that the course or result of this match was unduly influenced with a view to gaining corrupt betting profits”³¹ the Irish Football Association initiated an investigation.

The Disciplinary Committee considered, based on suspicious betting activity in relation to several aspects of the match, that the match was fixed and that the Appellant (*Igor Labuts*) had taken part in the fix by deliberately failing to stop two goals from the opposite team. The Player was sanctioned with a ban for 12 months by the Disciplinary Committee. The Player filed an appeal to the Football Association of Ireland Appeal Committee that was rejected since they were “comfortably satisfied that Mr. Igor Labuts was guilty of deliberate actions designed to influence the result of the Match which took place between Longford Town FC and Athlone Town AFC on 29 April 2017”³². The case was then appealed to CAS and, in an attempt to prove that the Appellant was involved in the fix, the Football Association of Ireland enlisted three experts to assess the goalkeeper's performance. However, this time, the experts analyses lacked consensus since “it is quite difficult to ascertain whether the many errors committed in the latter stages of the games concerned are deliberate and malicious or of merely manifestations of inadequacy and fatigue”³³. On the other hand, the Appellant, to support his innocence, provided “four experts, three TV pundits and a goalkeeper coach”³⁴ and they agreed that the match was “totally inconclusive (...) and that in both goals conceded the Appellant may have made poor choices and mistakes,

but this is nothing uncommon for football at that level and there was no way to conclude that the mistakes were deliberate only from the video footage”³⁵.

Finally, while the Panel concluded that the match had been fixed, they were not comfortably “satisfied by the evidence brought forward by the Respondent that the Appellant was actually involved in manipulating the result of the Match”³⁶. This case is perfect to conclude this chapter and underlines the significant margin of error inherent in evaluating a player's performance and how it is plausible for individuals to perform below the expected standard of quality without engaging in corrupt practices, e.g. fatigue. Without the appeal to CAS and an effective defense, *Igor Labuts* would have faced a sanction for an offence that he might not have committed showing the importance of analyzing every aspect of the match though being aware that this is a very difficult job while considering all options to justify certain choices since the fatigue and emotional components represent a considerable weight in how the on-field action develops.

In any case, it is important to note that proving innocence after an expert and technical report points otherwise is not an easy job and cases such as this one end, most of the times, with convictions, normally due to the lower standard of proof that is commonly demanded.



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V. Conclusion

The illegal manipulation of sports matches is a widespread phenomenon that extends across various sports, involving practices like intentional loss, spot-fixing, and manipulation of game elements. These behaviors, originating from players, officials and behind the scenes influencers, highlight the complexity of match-fixing. The vulnerability of different sports to match-fixing differs based on their unique characteristics. CAS Panels may determine the appropriate standard of proof when no specific regulations exist, often aligning with CAS doping jurisprudence. This demands a threshold of comfortable satisfaction in proving facts, ensuring a rigorous yet fair assessment of allegations.

With standards like comfortable satisfaction and preponderance of evidence dominating, the defense faces substantial complications in crossing expert

evidence and justifying deviations in performance. Also, the organizational structure of disciplinary systems poses challenges, with appeals to CAS typically following convictions by sports institutions' disciplinary bodies, shaping the analysis path within the CAS. In light of these complexities, defense strategies must be proactive and accurate, addressing technical evidence while challenging inherent biases and assumptions.

Overall, defense in match-fixing cases demands careful examination of evidence and collaboration between stakeholders, sports organizations and legal professionals to ensure fair outcomes and protect the right of the accused, ultimately safeguarding the credibility of sports industry. 

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- 1 The Court of Arbitration for Sport (CAS) stands as a paramount international quasi-judicial entity, specializing in the resolution of disputes within the realm of sports through arbitration. Strategically headquartered in Lausanne, Switzerland, the epicenter of global sports governance. Acclaimed as the pinnacle of sports jurisprudence, CAS exercises jurisdiction over a broad spectrum of contentious matters, ranging from regulatory disputes to disciplinary actions, notably including those involving influential bodies such as UEFA, FIFA, and the Olympic Games. Its profound impact resonates across the sporting world, ensuring fairness, integrity, and adherence to established legal frameworks.
- 2 ESBERARD, Alfred, «*O controlo da legalidade das apostas online e a manipulação de resultados (match fixing)*» in *O Direito do Desporto em Perspetiva*, Coordenação: Ana Celeste Carvalho, 2015, p. 146.
- 3 JARUS, Owen, LIVESCIENCE, «*Match-Fixing Took Place in Ancient Greek Wrestling*», April 17th, 2014, in <https://www.scientificamerican.com/article/match-fixing-took-place-in-ancient-greek-wrestling/>. Accessed on 15/05/2024.
- 4 MRAVEC, Ladislav, «*Match-fixing as a Threat to Sport: Ethical and Legal Perspectives*» in *Studia Sportiva* 2021/2, p. 41, in <https://journals.muni.cz/studiasportiva/article/download/15373/14666/41229>. Accessed on 15/05/2024.
- 5 This topic, while relevant, is not the primary focus of this article. For more in-depth information on this see MRAVEC, Ladislav, «*Match-fixing as a Threat to Sport: Ethical and Legal Perspectives*» in *Studia Sportiva* 2021/2.
- 6 E. g. CAS 2009/A/1920, in <https://jurisprudence.tas-cas.org/Shared%20Documents/1920.pdf>.
- 7 E. g. CAS 2011/A/2364, in <https://jurisprudence.tas-cas.org/Shared%20Documents/2364.pdf>.
- 8 E. g. CAS 2010/A/2172, in https://arbitrationlaw.com/sites/default/files/free_pdfs/CAS%202010-A-2172%20v%20UEFA%20Award.pdf.
- 9 PALERMO, Giulio, WILLIAMS, Bryce, «*Match-fixing and the evolution of CAS Jurisprudence*», pp. 9-10, para. 6, in https://www.tas-cas.org/fileadmin/user_upload/CAS_Bulletin_2018_2-..pdf. Accessed on 17/05/2024.
- 10 Resource Guide on Good Practices in the Investigation of Match Fixing by United Nations Office on Drugs and Crime, p. 8, in https://www.unodc.org/documents/corruption/Publications/2016/V1602591-RESOURCE_GUIDE_ON_GOOD_PRACTICES_IN_THE_INVESTIGATION_OF_MATCH-FIXING.pdf. Accessed on 17/05/2024.
- 11 CAS 2011/A/2490, p. 14, para. 66, in <https://jurisprudence.tas-cas.org/Shared%20Documents/2490.pdf>.
- 12 RIGOZZI, Antonio, QUINN, Brianna; «*Evidentiary Issues Before CAS*», p. 26, in <https://lk-k.com/wp-content/uploads/publications-rigozzi-quinn-bernasoni-intl-sports-cas-2014-ev.-issues-bf.-cas-pp.-1-55.pdf>. Accessed on 17/05/2024.
- 13 CAS 2013/A/3256, p. 65, para. 277, in <https://jurisprudence.tas-cas.org/Shared%20Documents/3256.pdf>.
- 14 RIGOZZI. *Op. cit.*, p. 27.
- 15 CAS 2011/A/2490, in <https://jurisprudence.tas-cas.org/Shared%20Documents/2490.pdf>.
- 16 *Ibidem*, p. 1, para. 1
- 17 *Idem*.

- 18 MURILLO, Nahik Solano, «*Exploring the Standard of Proof in Match-Fixing Proceedings before the Court of Arbitration for Sport*», pp. 24-25, in https://www.academia.edu/43023152/Exploring_the_Standard_of_Proof_in_Match_Fixing_Proceedings_before_the_Court_of_Arbitration_for_Sport?f_r=9382. Accessed on 17/05/2024.
- 19 CAS 2010/A/2172, p. 14, para. 37, in https://arbitrationlaw.com/sites/default/files/free_pdfs/CAS%202010-A-2172%20v%20UEFA%20Award.pdf
- 20 CAS 2009/A/1920, in <https://jurisprudence.tas-cas.org/Shared%20Documents/1920.pdf>
- 21 *Ibidem*, p. 14, para. 26
- 22 CAS 2013/A/3256, p. 128, para. 544, in <https://jurisprudence.tas-cas.org/Shared%20Documents/3256.pdf>.
- 23 CAS 2009/A/1920, p. 12, para. 16, in <https://jurisprudence.tas-cas.org/Shared%20Documents/1920.pdf>.
- 24 All of this data, and more, is available at *Betting Corruptions and Match-Fixing in 2022, a review by Sportradar Integrity Services*, March 2023, pp. 8-12 in <https://sportradar.com/wp-content/uploads/2023/03/Betting-Corruption-And-Match-Fixing-In-2022.pdf>. Accessed on 20/05/2024.
- 25 DIACONU, M., KUWELKAR, S., KUHN, A., «*The court of arbitration for sport jurisprudence on match-fixing: a legal update*», in *The International Sports Law Journal*, 2021, p. 16, in <https://link.springer.com/article/10.1007/s40318-021-00181-3>. Accessed on 17/05/2024.
- 26 PALERMO, *Op. Cit.*, p. 21, para. E.
- 27 CAS 2018/A/6075, in <https://jurisprudence.tas-cas.org/Shared%20Documents/6075.pdf>
- 28 *Ibidem*, p. 15, para. 52.
- 29 DIACONU, *Op. Cit.*, p. 16.
- 30 CAS 2014/A/3467 in <https://jurisprudence.tas-cas.org/Shared%20Documents/3467.pdf>.
- 31 CAS 2018/A/6075, p. 2, para. 5, in <https://jurisprudence.tas-cas.org/Shared%20Documents/6075.pdf>.
- 32 *Ibidem*, p. 2, para. 9.
- 33 *Ibidem*, pp. 17-18, para. 58.
- 34 *Ibidem*, p. 8, para. 25.
- 35 *Ibidem*, p. 8, para. 25.
- 36 *Ibidem*, pp. 18, para. 65.

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