United Kingdom Office
1 Brassey Road,
Old Potts Way Shrewbury,
SY3 7FA United Kingdom

Australian Office
Level 4, 110 George Street
Parramatta NSW 2150 Australia

E: info@esic.gg W: esic.gg

PUBLIC REPORT

# INVESTIGATION INTO ATOX ESPORTS

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# TABLE OF CONTENTS


**1. INTRODUCTION ..... 3**

1.1. Background of the ATOX Investigation ..... 3

**2. INVESTIGATION TIMELINE ..... 3**

**3. PERSISTENT PATTERN OF SUSPICIOUS BETTING ACTIVITY (70 IDENTIFIED BETS) ..... 7**

**4. SUMMARY OF INFRINGEMENTS OF EACH PARTICIPANT ..... 8**

4.1. Gan-Erdene "dobu" Batbold (Lifetime Ban) ..... 8
4.2. Bat-Enkh "kabal" Batbayar (Lifetime Ban) ..... 8
4.3. Ana-Erdene "nuka" Baasantogtokh (Lifetime Ban) ..... 8
4.4. Temuulen "MiQ" Byambadalai (1-Year Ban) ..... 8
4.5. Otgonlkhagva "AccuracyTG" Batjargal (8 Month Ban) ..... 8
4.6. Munkhsaikhan "Zesta" Erdenebaatar (8 Month Ban) ..... 9
4.7. Tuguldur "flyNN" Gansuk (3-Year Ban) ..... 9

**5. FORMAL ENFORCEMENT ACTION (AS OF 5 MARCH 2025) ..... 10**

5.1. Lifetime Bans ..... 10
5.2. Non-Lifetime Bans ..... 12

**6. RELATED PARTICIPANTS UNDER INVESTIGATION ..... 15**

**7. CLOSING REMARKS ..... 15**


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# 1. INTRODUCTION

## 1.1. Background of the ATOX Investigation

Esports Integrity Commission (ESIC) first received allegations of match-fixing involving the ATOX esports team in late 2024. The alleged match-fixing occurred during an **ESL Pro League Season 20** match featuring ATOX versus Team Falcons. ESIC proceeded to share preliminary notice through its **SBAN network** (Suspicious Betting Alert Network) to verify irregularities.

Subsequently, on **9 January 2025**, an ESIC Anti-Corruption supporter supplied statistical data that showed further anomalies in this ATOX–Team Falcons fixture. ESIC then undertook a formal investigation into ATOX's roster. ESIC issued Notices of Charge on **13 February 2025** against multiple ATOX players. However, **new evidence** continued to emerge, culminating in a more extensive inquiry leading to revised Notices of Charge on **5 March 2025**. Simultaneously, ESIC took immediate decisive action against the implicated participants on **5 March 2025** by suspending them from all ESIC competition pending the conclusion of ESIC's investigation activity. Finally, ESIC delivered its **formal sanction by way of a Notice of Enforcement Action** on **15 April 2025**, imposing a range of sanctions on the implicated participants.

# 2. INVESTIGATION TIMELINE

1. **Late 2024**
    - ESIC received a **report** alleging ATOX's potential match-fixing activities during an **ESL Pro League** match versus Team Falcons.
    - ESIC circulated an **SBAN alert** regarding unusual betting patterns in the ATOX vs. Team Falcons match, prompting more focused observation.
    - ESIC received information from several of its Anti-Corruption supporters, which prompted ESIC to conduct further investigations and queries through its partner, member and affiliate network.

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2. **9 January 2025**

   - An **ESIC Anti-Corruption supporter** provided additional statistical evidence, in response to ESIC enquiries, highlighting suspicious irregularities in the same ATOX–Team Falcons match. This information included:
     - Betting slips
     - Account / IP correlation

3. **13 February 2025**

   - Having completed a preliminary investigation, ESIC issued a **Notice of Charge** directed at the then-active ATOX roster (Charged Participants):
     - Gan-Erdene “dobu” Batbold
     - Bat-Enkh “kabal” Batbayar
     - Temuulen “MiQ” Byambadalai
     - Tuguldur “flyNN” Gansuk

   - Within 24 hours of sending the notice, ESIC was advised that the Charged Participants had retained legal counsel and they requested further time to arrange a reply to the Notices of Charge served on them.

   - In the interest of due process and natural justice, ESIC afforded an extended window of reply to the Charged Participants considering the seriousness of the charges made out by ESIC against them.

4. **5 March 2025 (morning)**

   - The Charged Participants, through legal counsel, scheduled an **interview** with ESIC. During the interview, legal counsel for the Charged Participants presented evidence to ESIC for consideration.
   - In addition to the interview, ESIC received **Further Intelligence** via the ESIC SBAN indicating that match-fixing activity involving ATOX was more extensive than previously understood. This intelligence included:
     - Chat logs
     - Testimonial evidence
     - Phone call recordings
     - Voice recordings

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- Upon further examination, ESIC discovered:
  - A long and extensive history of match-fixing which fell outside the event originally brought to ESIC's attention;
  - The match-fixing behaviours was team based in nature, going beyond the Charged Participants; and
  - The match-fixing behaviour was linked to organised crime syndicates originating in China.

**5. 5 March 2025 (afternoon)**

- Following the interview, and further analysis of the Further Intelligence, ESIC promptly issued **new revised Notices of Charge** to an expanded list of Charged Participants (Expanded Charged Participants):
  - Gan-Erdene "dobu" Batbold
  - Bat-Enkh "kabal" Batbayar
  - Temuulen "MiQ" Byambadalai
  - Tuguldur "flyNN" Gansuk
  - Otgonlkhagva "AccuracyTG" Batjargal
  - Munkhsaikhan "Zesta" Erdenebaatar
  - Ana-Erdene "nuka" Baasantogtokh

- Given the seriousness of the evidence available to ESIC, an immediate suspension was placed on the Sanctioned Participants. This suspension was communicated to all ESIC members.

- The Expanded Charged Participants were provided with a further opportunity to reply to the Notices of Charge.

**6. 15 March 2025**

- ESIC received **additional submissions** from the legal representative of Temuulen "MiQ," Tuguldur "flyNN," Otgonlkhagva "AccuracyTG," and Munkhsaikhan "Zesta."

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7. **28 March 2025**

   - ESIC received new information from the ATOX legal representatives alleged third-party intervention in the ESIC investigation.
   - After being satisfied that the allegations were not pertinent to the findings of this investigation, ESIC opened a separate investigation related to the allegations.

8. **4 April 2025**

   - ESIC received additional information from the ATOX legal representatives requiring review and assessment.
   - The information was provided in the form of written material and delivered via various conference calls with the ATOX legal team.

9. **13 April 2025**

   - ESIC completed its review of the information and concluded that it was not pertinent to its investigation and findings.

10. **14 April 2025**

    - ESIC issued its **Formal Notices of Enforcement Action** to all seven (7) Expanded Charged Participants, comprising of period and lifetime bans.
    - The Formal Notices of Enforcement Action provided a window to the Expanded Charged Participants to make appeals against ESIC's final sanctions.

11. **19 April 2025 – 8 May 2025**

    - ESIC received emails from various Expanded Charged Participants in their personal capacity (removing their legal representation) including further information for ESIC's consideration.
    - ESIC advised participants that any appeal should be submitted to the forum of the International Games and Esports Tribunal (IGET).
    - Given the serious nature of the investigation and the number of parties involved, ESIC accepted requests for various interviews from several Expanded Charged Participants to ensure that procedural fairness was maintained.

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**12. 15 May 2025**

- ESIC concluded interviews, closed the investigation and issued this report.

## 3. Persistent Pattern of Suspicious Betting Activity (70 Identified Bets)

During its investigation ESIC uncovered a sustained, systematic betting scheme surrounding ATOX fixtures that went far beyond the single ESL Pro League Season 20 match initially flagged. A forensic review of betting-slip data, account–IP correlations and SBAN alerts identified **more than seventy (70) discrete wagers** that exhibited hallmarks of corrupt conduct, all **directly linked to ATOX matches**. Key findings are set out below:

| Aspect | Observations |
|---|---|
| Temporal spread | The suspicious activity was logged **continuously across multiple tournaments between late-2024 and March 2025**, demonstrating that the corrupt activity was not an isolated incident but an entrenched practice embedded in ATOX's competitive calendar. |
| Betting channels | Wagers were placed through a **network of domestic and offshore betting accounts** that shared overlapping device IDs, IP addresses, payment instruments and social media credentials with ATOX team personnel and their immediate associates. |
| Facilitation by team analyst | Evidence revealed that *Ana-Erdene "nuka" Baasantogtokh*, while acting as analyst, **placed or facilitated the bulk of the 70 suspicious bets**. Chat logs show that he disseminated deliberately misleading tactical advice to ensure the on-server events aligned with betting positions. |
| Criminal-syndicate links | Sources traced back to accounts previously identified by law-enforcement agencies as fronts for **China-based organised-crime betting syndicates**, underscoring the broader criminal ecosystem in which the ATOX scheme operated. |

The volume, timing and consistency of the seventy flagged bets — in conjunction with corroborating digital forensics and participant admissions — confirm that ATOX's match-fixing activity was **long-running and organised**, not opportunistic or limited to a single fixture. This persistent pattern significantly undermined competitive integrity and justifies the lifetime and fixed-term sanctions imposed on the implicated participants.

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## 4. Summary of Infringements of Each Participant

### 4.1. Gan-Erdene “dobu” Batbold (Lifetime Ban)

- Proved to have spearheaded match-fixing, orchestrating bribes/bets against his own team.
- Pressured or deceived teammates into cooperating with manipulated results.
- Facilitated monetary payments to teammates to secure their silence and cooperation in corrupt conduct.
- Admitted to engaging in match-fixing behaviours and cooperating with organised criminal syndicates based in China during an interview with ESIC.

### 4.2. Bat-Enkh “kabal” Batbayar (Lifetime Ban)

- Actively participated in match manipulation strategies and bets, often in collaboration with “dobu.”
- Received monetary reward in exchange for not disclosing corrupt conduct.
- Facilitated monetary payments to teammates to secure their silence and cooperation in corrupt conduct.

### 4.3. Ana-Erdene “nuka” Baasantogtokh (Lifetime Ban)

- While working as an analyst, placed or facilitated a large number of suspicious bets (over 70) tied to ATOX matches.
- Actively provided false or misleading in-game tactics to ensure results aligned with corrupt betting interests.

### 4.4. Temuulen “MiQ” Byambadalai (1-Year Ban)

- Received offers of monetary reward in exchange for silence and non-reporting of corrupt conduct.
- Fraudulently failed to report breaches of the ESIC Integrity Program.

### 4.5. Otgonlkhagva “AccuracyTG” Batjargal (8 Month Ban)

- Negligently failed to report breaches of the ESIC Integrity Program.

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### 4.6. Munkhsaikhan “Zesta” Erdenebaatar (8 Month Ban)

- Negligently failed to report breaches of the ESIC Integrity Program.

### 4.7. Tuguldur “flyNN” Gansuk (3-Year Ban)

- Identified as ATOX’s **coach and effective CEO**, wielding greater oversight.
- Neglected his heightened duty of care to identify or halt known match-fixing, enabling wrongdoing to continue.

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## 5. FORMAL ENFORCEMENT ACTION (as of 5 March 2025)

All sanctioned individuals are prohibited from **participating, coaching, managing, or fulfilling any official roles** in events organised or sanctioned by ESIC Member organisations for the duration of their respective bans from the date of their suspension on 5 March 2025.

### 5.1. Lifetime Bans

1. **Gan-Erdene "dobu" Batbold**
2. **Bat-Enkh "kabal" Batbayar**
3. **Ana-Erdene "nuka" Baasantogtokh**

Throughout the course of the investigation and interview process, ESIC was able to extract admissions to the charges from the abovementioned Participants.

With respect to the Participants issued with a Lifetime Ban, details of their breaches of the ESIC Integrity Program are below:

- ***Anti-Corruption Code 2.1.1***
  *Fixing or contriving in any way or otherwise influencing improperly or being a party to any agreement or effort to fix or contrive in any way or otherwise influence improperly, the result, progress, conduct or any other aspect of any Match, including (without limitation) by deliberately underperforming therein.*

- ***Anti-Corruption Code 2.1.2***
  *Ensuring for Betting or other corrupt purposes the occurrence of a particular incident in a Match or Event.*

- ***Anti-Corruption Code 2.1.3***
  *Seeking, accepting, offering or agreeing to accept any bribe or other Reward to: (a) fix or to contrive in any way or otherwise to influence improperly the result, progress, conduct or any other aspect of any Match; or (b) ensure for Betting or other corrupt purposes the occurrence of a particular incident in a Match.*

- ***Anti-Corruption Code 2.2.1***
  *Placing, accepting, laying or otherwise entering into any Bet with any other party (whether individual, company or otherwise and including any daily fantasy games in*

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*any jurisdiction where such games are regulated by a gambling authority or considered "betting" in a legal or regulatory sense and including "in-game" betting with in game items (eg skins etc that have real value)) in relation to the result, progress, conduct or any other aspect of any Match or Event in the Game that the Participant plays professionally or is involved in any other capacity, such as manager, coach, agent etc. Any Participant that has significant involvement (in the entire discretion of the Integrity Commissioner) in a number of Games (such as a team owner or other team official) may not place or otherwise enter into any Bet on any of the Games in which he/she is involved.*

- ***Anti-Corruption Code 2.3.1***
  *Using any Inside Information for Betting purposes in relation to any Match or Event.*

- ***Anti-Corruption Code 2.3.2***
  *Disclosing Inside Information to any person where the Participant knew or should have known that such disclosure might lead to the information being used in relation to Betting in relation to any Match or Event.*

- ***Anti-Corruption Code 2.3.3***
  *Directly or indirectly soliciting, inducing, enticing, persuading, encouraging or intentionally facilitating any Participant to breach any of the foregoing provisions of this Article 2.3.*

- ***Anti-Corruption Code 2.4.4***
  *Failing to disclose to ESIC (without unnecessary delay) full details of any approaches or invitations received by the Participant to engage in Corrupt Conduct under the Anti-Corruption Code.*

- ***Anti-Corruption Code 2.4.5***
  *Failing to disclose to ESIC (without unnecessary delay) full details of any incident, fact, or matter that comes to the attention of a Participant that may evidence Corrupt Conduct under the Anti-Corruption Code by another Participant, including (without limitation) approaches or invitations that have been received by another Participant to engage in Corrupt Conduct under the Anti-Corruption Code.*

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- ***Code of Conduct 2.2.8***
  *Any attempt to manipulate a Match for inappropriate strategic or tactical reasons.*

- ***Code of Conduct 2.3.3***
  *Cheating or attempting to cheat to win a Game or Match.*

- ***Code of Conduct 2.4.4***
  *Cheating or attempting to cheat to win a Game or Match.*

## 5.2. Non-Lifetime Bans

- **Three (3) Year Ban**:
  1. **Tuguldur "flyNN" Gansuk**, recognised as **coach and effective CEO** of ATOX, carrying primary authority and therefore heightened responsibility (increased duration due to office of Participant).

- **One (1) Year Ban**:
  1. **Temuulen "MiQ" Byambadalai** (Received offers of monetary reward in exchange for silence and non-reporting of corrupt conduct, Fraudulently failed to report breaches of the ESIC Integrity Program).

- **Eight Month (8) Ban**:
  1. **Otgonlkhagva "AccuracyTG" Batjargal** (Negligently failed to report breaches of the ESIC Integrity Program).
  2. **Munkhsaikhan "Zesta" Erdenebaatar** (Negligently failed to report breaches of the ESIC Integrity Program).

With respect to the non-lifetime ban Participants, details of their breaches of the ESIC Integrity Program are below:

1. ***Code of Conduct 2.5.3***
   *Failing to disclose to ESIC (without unnecessary delay) (a) any Corrupt Conduct, or (b) any conduct that could bring the Participant, Esport, the Game, Event, ESIC,*

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*Event/Tournament Host, Tournament Organizer, or Tournament Sponsor into disrepute.*

2. ***Code of Conduct 2.5.4***
   *Failing to disclose to ESIC (without unnecessary delay) all gifts (whether monetary or otherwise), hospitality, and/or other non-contractual benefits offered to a Participant that have a value of US$500.00 or more, whether or not the circumstances set out in Article 2.5.2 are present, save that there shall be no obligation to disclose any (i) personal gifts, hospitality, and/or other non-contractual benefits offered by or on behalf of any relative of the Participant, (ii) any food or beverage gifts, or (iii) Event hospitality gifts in connection with Matches/Events the Participant is participating in.*

3. ***Code of Conduct 2.5.4***
   *Failing to disclose to ESIC (without unnecessary delay) full details of any approaches or invitations received by the Participant to engage in Corrupt Conduct.*

4. ***Code of Conduct 2.5.5***
   *Failing to disclose to ESIC (without unnecessary delay) full details of any incident, fact, or matter that comes to the attention of a Participant that may evidence Corrupt Conduct by another Participant, including (without limitation) approaches or invitations that have been received by another Participant to engage in Corrupt Conduct.*

5. ***Code of Conduct 2.5.6***
   *Participants shall refrain from any activity or behavior that might give rise to the appearance or suspicion of improper conduct.*

6. ***Anti-Corruption Code 2.1.4***
   *Directly or indirectly soliciting, inducing, enticing, instructing, persuading, encouraging or intentionally facilitating any Participant to breach any of the foregoing provisions of this Article 2.1.*

7. ***Anti-Corruption Code 2.2.2***

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*Directly or indirectly soliciting, inducing, enticing, instructing, persuading, encouraging, intentionally facilitating or authorising any other party to enter into a Bet in relation to the result, progress, conduct or any other aspect of any Match.*

8. ***Anti-Corruption Code 2.4.2***

   *Failing to disclose to ESIC (without unnecessary delay) the receipt of any gift, payment, hospitality or other benefit, (a) that the Participant knew or should have known was given to him/her to procure (directly or indirectly) any breach of the Anti-Corruption Code, or (b) that was made or given in circumstances that could bring the Participant or Esport or the Game or Event into disrepute.*

9. ***Anti-Corruption Code 2.4.3***

   *Failing to disclose to ESIC (without unnecessary delay) all gifts (whether monetary or otherwise), hospitality and/or other non-contractual benefits offered to a Participant that have a value of US$500.00 or more, whether or not the circumstances set out in Article 2.4.2 are present, save that there shall be no obligation to disclose any (i) personal gifts, hospitality and/or other non-contractual benefits offered by or on behalf of any relative of the Participant, (ii) any food or beverage gifts or (iii) Event hospitality gifts in connection with Matches/Events the Participant is participating in.*

10. ***Anti-Corruption Code 2.4.4***

    *Failing to disclose to ESIC (without unnecessary delay) full details of any approaches or invitations received by the Participant to engage in Corrupt Conduct under the Anti-Corruption Code.*

11. ***Anti-Corruption Code 2.4.5***

    *Failing to disclose to ESIC (without unnecessary delay) full details of any incident, fact, or matter that comes to the attention of a Participant that may evidence Corrupt Conduct under the Anti-Corruption Code by another Participant, including (without limitation) approaches or invitations that have been received by another Participant to engage in Corrupt Conduct under the Anti-Corruption Code.*

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## 6. RELATED PARTICIPANTS UNDER INVESTIGATION

Ordinarily, ESIC does not comment on live investigations. However, the close connection between this matter and a separate, ongoing inquiry makes limited disclosure both necessary and in the public interest.

ESIC can confirm that the following individuals are the focus of the Related Participant Investigation:

- **Song "xiaosaGe" Peng**
- **Tuvshintugs "ANNIHILATION" Nyamdorj**
- **Yalalt "yAmi" Oyunbileg**

These participants were **not** included in the provisional suspensions issued on 5 March 2025 because, at that time, the available evidence did not satisfy ESIC's suspension threshold. Subsequent investigative steps have produced additional information that is now being assessed.

ESIC will release the full findings—together with any resulting enforcement actions—once the Related-Participant Investigation is complete.

## 7. CLOSING REMARKS

ESIC is committed to protecting the integrity of esports competitions. ESIC took quick and decisive action as soon as the evidence met the standard required on **5 March 2025**, suspending all ATOX members under investigation from competition. However, further investigation uncovered a broader network of manipulative practices which have resulted in the sanctions disclosed in this report. The extended timeline from **Late 2024 to May 2025** highlights the complexity and scale of the ATOX matter and the importance of due process.

**Any and all knowledge of or involvement in corrupt betting** must be reported immediately to ESIC to prevent further harm to the competitive ecosystem. Failure to report is not excusable.
**Contact ESIC** at info@esic.gg or via https://esic.gg/report-cheating-match-fixing/ to disclose any suspicious or illicit conduct.

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