

**BEFORE THE ANTI-DOPING APPEAL TRIBUNAL OF SOUTH AFRICA**

(Instituted in terms of section 17(2) (a) of Act No. 14 of 1977, as amended by Act No. 25 of 2006)

**HELD IN ROSEBANK**

**TIMOTHY ABBOTT**

**Applicant**

and

**THE SOUTH AFRICAN INSTITUTE FOR**

**DRUG-FREE SPORT**

**Respondent**

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THE FINDINGS OF THE SOUTH AFRICAN INSTITUTE FOR DRUG-FREE SPORTS' APPEAL BOARD TRIBUNAL HELD ON 2 OCTOBER 2017 at 15h00 AT THE ROSEBANK HOLIDAY INN, OXFORD ROAD, ROSEBANK JOHANNESBURG

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The Appeal Board Tribunal consisted of the following Appeal Board Members -

Mr Raymond Hack	-	Chairperson
Mr Metja Ledwaba	-	Attorney and Member
Dr Ephraim Nematswerani	-	Sports Physician and Member

Advocate Justin Bitter appeared on behalf of the Applicant, and Attorney Mr Paul Crosland of the firm Webber Wentzel represented the Applicant.

Ms Wafeekah Begg	-	SAIDS PROSECUTOR
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The Minute taker was Mr Sam Mahiya of Veritas

**COMPOSITION OF THE PANEL**

SAIDS is an independent body established under Section 2 of the South African Institute for Drug-Free Sport Act 14 of 1997 (as amended in 2006). SAIDS formally accepted the World Anti-Doping Agency ("WADA") code in 2005. In so doing, SAIDS introduced anti-doping rules and regulations to govern all sports under the jurisdiction of South African Sports Confederation and Olympic Committee ("SASCOC") as well as any national sports federation. These proceedings are governed by the 2015 SAIDS Anti-Doping Rules ("the Rules").

This SAIDS Independent Doping Hearing Panel ("the Panel") has been appointed in accordance with Article 8 of the Rules, to adjudicate and to ascertain whether or not the athlete has violated the said Rules, and if so, to determine the sanction applied.

The Chairman confirmed that the Panel was appointed in terms of Article 13.2.2.1 (a) and (b) of the SAIDS Anti-Doping Rules 2015. He further advised that the Members were in compliance with art. 13.2.2.1.2 (No Conflict of Interest) as well as obtaining assurances from both the Applicant and the Respondent that they were satisfied with the composition of the Panel.

## INTRODUCTION

1.1 The athlete, through his legal representative Mr P Crossland of Webber Wentzel, lodged a Notice of Appeal dated the 17<sup>th</sup> day March 2017 in respect of the decision handed down by the SAIDS Independent Doping Hearing Panel of 9 March 2017.

1.2 The aforesaid appeal complies with the provisions of Art. 13.7.2.

## 2. GROUNDINGS OF APPEAL

The Applicant bases his application for appeal on the undermentioned paragraphs:

1. After finding that the athlete was negligent in failing to take all necessary precautions to avoid any prohibited substances from entering his body, the Panel erred in not finding that the anti-doping rule violation was not intentional.
2. The Panel erred in finding that the date of ineligibility should be four years from the date of collection of the athlete's sample on 26 December 2015 in terms of Articles 10.2.1, 10.10.1 and 10.10.2 of the Rules.
3. In this regard, the Panel ignored the established facts that the athlete did not knowingly or deliberately consume the prohibited substance.
4. The Panel further erred in stating that the athlete had sought a reduction of the sanction period from four years to eighteen months.
5. On the contrary, the athlete submitted that the established facts indicated sufficient proof that the anti-doping rule violation was not intentional.

6. The Panel erred in finding that the athlete was unable to explain how the prohibited substance entered his body, or prove that the presence thereof did not enhance his performance.
7. In this regard, the Panel ignored the evidence of the athlete that the likely cause of the adverse analytical finding was supplements prescribed by his doctor to treat his low testosterone levels.
8. The Panel erred in taking into account a prior doping offence committed by the athlete in 1989.
9. In this regard, the Panel was not permitted to have regard to an anti-doping rule violation that took place more than ten years before the current violation which is the subject matter of the hearing.
10. The Panel erred in not placing any or sufficient weight on the fact that the athlete is an amateur veteran cyclist and as part of his general vitamin regime unintentionally ingested supplements that led to the adverse analytical finding.
11. The Panel erred in not finding that the anti-doping rule violation was not intentional.
12. The Panel erred in not finding that no significant fault or negligence could be attributed to the athlete's conduct and that at no stage did the athlete possess the requisite intent to cheat or enhance his performance.
13. The Panel erred in not finding that art. 10.2.2 or the Rules should apply, and that the period of ineligibility should be two years, subject to potential reduction or suspension.
14. The Panel erred in not finding that in the circumstances of the matter the period of ineligibility should be a period of eighteen months backdated to 26 December 2015 when the athlete's sample was collected.

### 3. PROCEEDINGS BEFORE THE TRIBUNAL

#### **Submissions by the Applicant**

The Applicant, through his Counsel Advocate J Bitter, highlighted and expanded upon the points raised in the Applicants notice of appeal and further amplified by his written submissions namely:

- 3.1 On 11 July 2016 SAIDS notified Abbott that he had returned an adverse analytical finding ( "AAF") following an in-competition urine sample collected at the Paarl Boxing Day track cycling event on 26 December 2015 ( "*the event*").
- 3.2 It took approximately 7 months for SAIDS to notify Abbott of the AAF. This was in clear violation of Rule 7.3.1 of the SAIDS Anti-Doping Rules ( "*the Rules*") which obliges SAIDS to promptly notify an athlete of an AAF.
- 3.3 Moreover, despite numerous requests to SAIDS the full chain of custody documents were not provided to Abbott until the bundle to be used at the hearing was delivered to his attorneys.
- 3.4. Notwithstanding the substantial prejudice to Abbott he did not raise any procedural or related objection to the AAF.
- 3.5 The analytical report received from the WADA Accredited Laboratory in Cologne confirmed the presence of 5alpha-androstane-3-alpha,17beta-diol (5alphaAdiol) and 5beta-androstane-3alpha,17beta-diol (5betaAdiol) ( "*the prohibited substance*")<sup>3</sup> in Abbott's system.
- 3.6 Abbott does not dispute that the prohibited substance was found in his system and that the presence thereof, albeit inadvertently, amounts to an anti-doping rule violation in terms of the Rules.
- 3.7 Accordingly, it was only the consequences of the AAF that required determination at the hearing which was held before the SAIDS Independent Doping Hearing Panel ( "*the Panel*") on 23 February 2017.

- 3.8 A schedule 2 prohibited substance as per the WADA Anti-Doping Code 2015 Prohibited List International Standard.
- 3.9 At the end of the hearing the Panel concluded without requesting any submissions from the prosecutor as to the sanction to be imposed<sup>4</sup> and after deliberating for a mere six minutes that<sup>5</sup>: 8.1 the period of ineligibility should be four years commencing from the date the sample was collected on 26 December 2015;
- 3.10 despite the fact that Abbott had committed an anti-doping offence in 1989, well outside the ten-year period provided for in Article 10.7.5 of the Rules, the Panel nevertheless had regard to the violation in considering the sanction imposed;
- 3.11 the anti-doping violation was not deliberate and was as a result of the supplements taken by Abbott.
- 3.12 On 9 March 2017 the Panel published its written reasons (*"the Ruling"*).
- 3.13 Abbott seeks to appeal in terms of Article 13.7.2 of the Rules against the Ruling on the grounds *inter alia* that the Panel erred after finding that Abbott was negligent in failing to take all necessary precautions to avoid any prohibited substances from entering his body, that the anti-doping rule violation was intentional and/or that Abbott had failed to establish that the anti-doping rule violation was not intentional;
- 3.15 in finding that the date of ineligibility should be four years from the date of collection of Abbott's sample on 26 December 2015 in terms of Articles 10.2.1, 10.10.1 and 10.10.2 of the Rules;
- 3.16 in stating that Abbott had sought a reduction of the sanction period from four years to eighteen months;

- 3.17 in finding that Abbott was unable to explain how the prohibited substance entered his body or prove that the presence thereof did not enhance his performance;
- 3.18 in taking into account a prior doping offence committed by Abbott in 1989;
- 3.19 in not placing any or sufficient weight on the fact that the athlete is an amateur veteran cyclist and as part of his general vitamin regime unintentionally ingested supplements that led to the adverse analytical finding;
- 3.20 in not finding that the anti-doping rule violation was not intentional;
- 3.21 in not finding that no significant fault or negligence could be attributed to Abbott's conduct and that at no stage did he possess the requisite intent to cheat or enhance his performance;
- 3.22 in not finding that Article 10.2.2 of the Rules should apply, and that the period of ineligibility should be two year subject to potential reduction or suspension;
- 3.23 in not finding that the period of ineligibility should be a period of eighteen months backdated to 26 December 2015 when Abbott's sample was collected.

***The uncontested evidence of Abbott at the hearing***

- 3.24 Abbott is a 56 year old male residing in Kyalami.
- 3.25 He is a qualified Porsche Master Craftsman and owns his own business, which focuses on the restoration and recreation of various Porsche vehicles.
- 3.26 Abbott is not a professional cyclist and does not generate a living from the sport. However, he has been involved in cycling since the age of 15 and has been a dedicated servant to South African cycling.

- 3.27 Abbott has competed in the event on several occasions and took part in the open veterans category. Following the event he was subjected to a doping control test.
- 3.28 Thereafter Abbott continued with his usual training regime and continued to take part in races.
- 3.29 On 11 July 2016 Abbott was notified of the AAF.
- 3.30 Believing that there was an error in the testing Abbott immediately requested the testing of his B-sample.
- 3.31 On 19 August 2016 SAIDS notified Abbott in writing that the testing of his B-sample had confirmed the presence of the prohibited substance.
- 3.32 Following confirmation of the AAF and in order to ascertain the possible source of the AAF Abbott embarked on a process of trying to understand all possible causes for the finding.
- 3.33 This was not an easy task given that Abbott did not intentionally consume any prohibited substance or engage in any activity to enhance his performance. The lapse of several months since the doping control test was conducted further complicated the process.
- 3.34 Notwithstanding this, Abbott was able to ascertain that the likely cause of the AAF was supplements prescribed by his doctor to treat his low testosterone levels.
- 3.35 In this regard, Abbott had been suffering from extreme fatigue for a prolonged period of time which caused him to consult with Dr Mark Oliver, who has been his general practitioner for approximately 30 years, in September 2015.

- 3.36 Dr Oliver ordered a series of blood tests which revealed that Abbott suffered from abnormally low testosterone levels. On the basis of the test results Dr Oliver prescribed supplements (inclusive of Staminogro, USN ZMA sport and Vitamin D) which are all over the counter products. Specifically, he did not prescribe Abbott any medication for his condition.
- 3.37 As is evident from the note provided by Dr Oliver while certain of the vitamins or supplements taken by Abbott have the effect of raising testosterone levels *"the nutritional supplement assists in creating an optimum physiological environment for his chosen sport"*.
- 3.38 Abbott's stance towards doping in general and cycling in particular is clear and unwavering. He is a staunch advocate of drug free sport.
- 3.39 Abbott has been subjected to numerous doping control tests over the years and has never committed a doping violation under the Rules.
- 3.40 Abbott did not knowingly or deliberately consume the prohibited substance.

### ***Consequences of the AAF***

- 3.41 The Rules express the clear intention of upholding the spirit of the sport and that any form of cheating or doping is clearly contrary to that spirit.
- 3.42 It was demonstrated at the hearing that Abbott has not conducted himself in any manner that has brought his sport into disrepute or threatened the spirit of the sport. He is not a cheat and has not taken any prohibited substances intentionally to enhance his performance or 'beat the system'.
- 3.43 On the contrary, Abbott is an amateur veteran cyclist and as part of his general vitamin regime unintentionally ingested supplements that have led to the AAF.
- 3.44 Intention is critical to ultimate culpability. While Abbott on reflection accepts that responsibility in relation to the supplements he ingests lies with him, he is



not a professional cyclist and although highly competitive he ultimately partakes in events for the love of the sport.

- 3.45 In the circumstances, and for the reasons articulated above, it is submitted that the established facts indicate sufficient proof that the anti-doping rule violation was not intentional<sup>29</sup> and accordingly Article 10.2.1 of the Rules does not apply.
- 3.46 It is submitted that Article 10.2.2 of the Rules should apply and that the period of ineligibility should be two year subject to potential reduction or suspension.
- 3.47 In this regard, the significant delay in notifying Abbott of the AAF and his timeous and frank engagement with SAIDS once notified, are factors that weigh in favour of a reduction of the prescribed period of ineligibility.
- 3.48 Upon a consideration of the established uncontested facts and the clear lack of intention on the part of Abbott, it is submitted that a significant reduction in the period of ineligibility from the maximum period is fair and justifiable.
- 3.49 Moreover, such period of ineligibility should be backdated to the date on which the sample was collected on 26 December 2015.

### ***Conclusion***

- 3.50 It is clear that far from attempting to compete unfairly Abbott has unintentionally consumed supplements as part of his vitamin intake and in consultation with his doctor that have ultimately led to the AAF.
- 3.51 No significant fault or negligence can be attributed to Abbott's conduct. At no stage did Abbott possess the requisite intent to cheat or enhance his performance in any manner.
- 3.52 In the circumstances, it is submitted that the sanction imposed by the Panel should be set aside in its entirety and replaced with a new sanction rendering

Abbott ineligible to compete for a period of 18 months backdated to 26 December 2015.

Counsel raised the defence of no intent as set out in Art. 3.1 of the Rules, and further relied upon the provisions of the Gordon Gilbert case.

Members of the Panel then posed certain questions to Mr Bitter in the absence of Mr Abbott, specifically in regard to how the substance had entered the athlete's system and whether the athlete had consulted any specialised Sports Physician other than Dr. Mark Oliver, alternatively whether the athlete had sought to try and identify any supplement which could have produced the adverse analytical finding.

### **3. Submissions by the Respondent**

- 3.1 The Respondent argued that the provisions of the Gordon Gilbert case did not apply in this particular matter, and further presented argument that the Applicant could not explain as to how the substance came into his body, but that any medication that he had taken, he had taken on the advice of Dr. Mark Oliver.
- 3.2 The Respondent further argued that the finding of the SAIDS Independent Doping Panel of 9 March 2017 was in fact correct, and that the ineligibility period of four years, effective from 26 December 2015 ending on 25 December 2019, should remain.

### **4. THE APPROPRIATE RULES**

The Panel considered the following:

- 4.1 Article 2.1 provides the following:

*2.1 Presence of a prohibited substance or its metabolites or Markers in an Athlete's sample*

*2.1.1 it is each athlete's personal duty to ensure that no Prohibited Substance enters his or her body. Athletes are responsible for any Prohibited Substance or its metabolites or Markers found to be present in their Samples. Accordingly, it is not necessary that intent, fault, negligence or knowing use on the athlete's part be demonstrated in order to establish an anti-doping rule violation under Art. 2.1.*

*2.1.2 Sufficient proof of an anti-doping rule violation under Art. 2.1 is established by any of the following:-*

*Presence of a prohibited substance or its metabolites or markers in the athlete's A sample...*

*2.1.3 Excepting those substances for which a quantitative threshold is specifically identified in the prohibited list, the presence of any quantity of a prohibited substance or its metabolites or markers in an athlete's sample shall constitute an anti-doping rule violation.*

*2.1.4 As an exception to the general rule of Art. 2.1, the Prohibited List or International Standards may establish special criteria for the evaluation of Prohibited Substances that can also be produced endogenously”.*

4.2 Article 3 reads as follows:

*"3.1 Burdens and Standards of Proof*

*SAIDS shall have the burden of establishing that an anti-doping rule violation has occurred. The standard of proof shall be whether SAIDS has established an anti-doping rule violation to the comfortable satisfaction of the hearing panel, bearing in mind the seriousness of the allegation, which is made.*

*This standard of proof in all cases is greater than a mere balance of probability but less than proof beyond a reasonable doubt. Where these Anti-Doping Rules place the burden of proof upon the athlete or other person alleged to have committed an anti-doping rule violation to rebut a presumption or establish specified facts or circumstances, the standard of proof shall be by a balance of probability.*

4.1 *Methods of Establishing Facts and Presumptions*

*Facts related to anti-doping rule violations may be established by any reliable means, including admissions. The following rules of proof shall be applicable in doping cases:*

*3.2.1 Analytical methods or decision limits approved by WADA after consultation within the relevant scientific community and which have been the subjects of peer review are presumed to be scientifically valid. Any Athlete or other Person seeking to rebut this presumption of scientific validity shall, as a condition precedent to any such challenge, first notify WADA of the challenge and the basis of the challenge. CAS on its own initiative may also inform WADA of any such challenge. At WADA's request, the CAS panel shall appoint an*

*appropriate scientific expert to assist the panel in its evaluation of the challenge. Within ten (10) days of WADA's receipt of such notice, and WADA's receipt of the CAS file, WADA shall also have the right to intervene as a party, appear amicus curiae, or otherwise provide evidence in such proceeding.*

*3.2.2 WADA accredited laboratories, and other laboratories approved by WADA, are presumed to have conducted sample analysis and custodial procedures in accordance with the international standard for laboratories.*

*The athlete or other person may rebut this presumption by establishing that a departure from the International Standard for Laboratories occurred, which could reasonably have caused the Adverse Analytical Finding. If the athlete or other person rebuts the preceding presumption by showing that a departure from the International Standard for laboratories occurred, which could reasonably have caused the adverse analytical finding, then SAIDS shall have the burden to establish that such departure did not cause the adverse analytical finding.*

*3.2.3 Departures from any other International Standard or other anti-doping rule or policy set forth in the Code or these Anti-Doping Rules, which did not cause an Adverse Analytical finding or other anti-doping rule violation, shall not invalidate such evidence or result.*

*If the Athlete or other Person establishes a departure from another International Standard or anti-doping rule or policy which could reasonably have caused an anti-doping rule violation based on Adverse Analytical Finding or other anti-doping rule violation, then SAIDS shall have the burden to establish that such departure did not cause the Adverse Analytical Finding or the factual basis for the anti-doping rule violation.*

*3.2.4 The facts established by a decision of a court or professional disciplinary tribunal of competent jurisdiction which is not the subject of a pending appeal shall be irrefutable evidence against the Athlete or other Person to whom the decision pertained of those facts unless the Athlete or other Person establishes that the decision violated principles of natural justice.*

*3.2.5 The hearing panel in a hearing on an anti-doping rule violation may draw an inference adverse to the athlete or other person who is asserted to have committed an anti-doping rule violation based on the athlete's or other person's refusal, after a request made in a reasonable time in advance of the hearing, to appear at the hearing (either in person or telephonically as directed by the hearing panel)*

*and to answer questions from the hearing panel or SAIDS. (The emphasis is added)."*

4.3 Applicable provisions of Art. 10 of the Rules read as follows:-

*"10.2.1 The period of ineligibility shall be four (4) years where –*

*10.2.1.1 the anti-doping rule violation does not involve a specified substance, unless the athlete or other person can establish that the anti-doping rule violation was not intentional.*

*10.2.2 If Art. 10.2.1 does not apply, the period of ineligibility shall be two (2) years.*

*10.2.3 As set out in Art. 10.2.3 of the Anti-Doping Rules 2015, the term "intentional" is meant to identify those athletes who cheat. The term, therefore, requires that the athlete or other person engaged in conduct which he or she knew constituted an anti-doping rule violation, or knew that there was a significant risk that the conduct might constitute or result in an anti-doping rule violation, and manifestly disregarded that risk;*

*10.4 Elimination of Period of Ineligibility where there is No Fault or Negligence*

*If an Athlete or other person establishes in an individual case that he or she bears no significant fault or negligence, then the otherwise applicable period of ineligibility shall be eliminated.*

*10.5.1 Reduction of Sanctions for Specified Substances of Contaminated Products for Violations or Articles 2.1, 2.1 or 2.6*

*10.5.1.1 Specified Substances*

*Where the anti-doping rule violation involves a Specified Substance, and the athlete or other person can establish No Significant Fault or Negligence, then the period of ineligibility shall be, at a minimum, a reprimand, and no period of ineligibility, and at a maximum of 2 (two) years ineligibility depending on the athlete's or other person's degree of fault.*

*10.7 Multiple Violations*

*10.7.1 For an Athlete or other Person's second anti-doping rule violation, the period of ineligibility shall be greater of: (a) six (6) months; (b) one(1) half of the period if ineligibility imposed for the first anti-doping rule violation without taking into account any reduction under Article 10.6; or (c) twice the period of ineligibility otherwise applicable to the second*

*anti-doping rule violation treated as if it were a first violation, without taking into account any reduction under Article 10.6. The period of ineligibility established above may then be further reduced by the application of Article 10.6.*

*10.7.2 A third anti-doping rule violation will always result in a lifetime period of ineligibility, except if the third violation fulfils the condition for elimination reduction of the period of ineligibility under Article 10.4 or 10.5, or involves a violation of Article 2.4. In these particular cases, the period of ineligibility shall be from eight (8) years to lifetime ineligibility.*

*10.7.3 An anti-doping rule violation of which an Athlete or other Person has established No Fault or Negligence shall not be considered a prior violation for purposes of this Article.*

*10.7.4 Additional Rules for Certain Potential Multiple Violations.*

*10.7.4.1 For purposes of imposing sanctions under Article 10.7, an anti-doping rule violation will only be considered a second violation if SAIDS can establish that Athlete or other Person committed the second anti-doping rule violation after the athlete or other Person received notice pursuant to Article 7, or after SAIDS made reasonable efforts to give notice, of the first anti-doping rule violation. If SAIDS cannot establish this, the violations shall be considered together as one single first violation, and the sanction imposed shall be based on the violation that carried the more severe sanction.*

*10.7.4.2 If, after the imposition of a sanction for a first anti-doping rule violation, SAIDS discovers facts involving an anti-doping rule violation by the athlete or other Person which occurred prior to notification regarding the first violation, then SAIDS shall impose an additional sanction based on the sanction that could have been imposed if the two (2) violations had been adjudicated at the same time. Results in all Competitions dating back to the earlier anti-doping rule violation will be Disqualified as provided in Article 10.8.*

*10.7.5 Multiple Anti-Doping Rule Violations during Ten (10) Year Period.*

*For purposes of Article 10.7, each anti-doping rule violation must take place within the same ten (10) year period in order to be considered multiple violations.*

*10.10.1 Delays Not Attributable to the athlete or other Person*

*Where there have been substantial delays in the hearing process or other aspects of Doping Control not attributable to the athlete or other*

*Person, SAIDS may start the period of ineligibility at an earlier date commencing as early as the date of Sample collection or the date on which another anti-doping rule violation last occurred. All competitive results achieved during the period of ineligibility, including retroactive ineligibility, shall be Disqualified.*

**10.10.2 Timely Admission**

*Where an Athlete or other Person promptly (which, in all events, for an Athlete means before the athlete competes again) admits that anti-doping rule violation after confronted with the anti-doping rule violation by SAIDS, the period of ineligibility may start as early as the date of Sample collection or the date on which another anti-doping rule violation occurred...*

**10.10.3.1 Credit for Provisional Suspension or Period of Ineligibility**

*If a Provisional Suspension is imposed and respected by the athlete or other Person, then the athlete or other Person **shall** receive a credit for such period of Provisional Suspension against any period of ineligibility, which may ultimately be imposed..."*

**5. ISSUES**

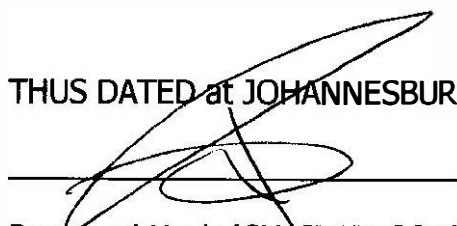
After deliberation, the Panel were unable to find any reasonable explanation as submitted by the Applicant as to how the substance had entered the Applicant's system, and were further unable to find any intent on behalf of the Applicant or that the provisions of "fault" should be interpreted differently to that of the original ruling given on the 9<sup>th</sup> March 2017.

**6. SANCTION:**

6.1 The Panel finds that the original sanction of four years, effective from the 26 December 2015 (having taken into account the provisions of Art. 10.2.1, 10.10.1, and 10.10.2) and ending on the 25 December 2019, was correctly interpreted, and the Applicant's leave to appeal is denied.

The athlete's sanction will be published in terms of Rule 14.3.


THUS DATED at JOHANNESBURG on this the 2 day of OCTOBER 2017

  
Raymond Hack (CHAIRPERSON)

THUS DATED at JOHANNESBURG on this the 30 day of OCTOBER 2017

  
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Mr Metja Ledwaba

THUS DATED at  on this the \_\_\_\_\_ day of OCTOBER 2017

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Dr. Ephraim Nematswerani



6.1 The Panel finds that the original sanction of four years, effective from the 26 December 2015 (having taken into account the provisions of Art. 10.2.1, 10.10.1, and 10.10.2) and ending on the 25 December 2019, was correctly interpreted, and the Applicant's leave to appeal is denied.

The athlete's sanction will be published in terms of Rule 14.3.

THUS DATED at JOHANNESBURG on this the 2 day of OCTOBER 2017

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Raymond Hack (CHAIRPERSON)

THUS DATED at JOHANNESBURG on this the day of OCTOBER 2017

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Mr Metja Ledwaba

THUS DATED at ~~Johannesburg~~ on this the 22 day of OCTOBER 2017



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Dr. Ephraim Nematswerani