

INDEPENDENT WORKING GROUP

FINAL REPORT

15 November 2019

INDEPENDENT WORKING GROUP

15 November 2019

Sent by email

Attention:

The Chairman of the Cabinet Council of the Chuvash Republic
Mr Ivan Borisovich Motorin

Subject:

Independent Working Group Report
for the Cabinet Council of the Chuvash Republic

Dear Ivan Borisovich,

The Independent Working Group established by the Cabinet Council of the Chuvash Republic Decree № 717-r dated 9 August 2019 has completed its Report of 15 November 2019 made in accordance with para.3 of the said Decree, please see it enclosed. We are grateful for the cooperation and your confidence bestowed upon.

Kindest regards,

Artem Patsev, Chair

Askhab Gadzhiev

Sergei Kondratiev

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TERMS AND DEFINITIONS

ADO	Anti-Doping Organization
ADRVID	RUSADA Anti-Doping Rule Violations Investigation Department
Code	World Anti-Doping Code developed and approved by the World Anti-Doping Agency
College	the Budgetary Professional Educational Institution of the Chuvash Republic "Cheboksary Olympic Reserve College named after I.M. Krasnov" at the Ministry of Physical Culture and Sports of the Chuvash Republic
CR	Chuvash Republic
CR Ministry of Health	The Ministry of Health of the Chuvash Republic
CR Ministry of Sports	The Ministry of Physical Culture and Sports of the Chuvash Republic
DCS	Drug Control Service (a unit within the Ministry of Interior)
Group	Independent Working Group created by Decree No. 717-r of the Cabinet Council of the Chuvash Republic dated 9 August 2019
IME	In-depth Medical Examination
International Standard	A document developed and approved by WADA as part of the World Anti-Doping Program, which regulates the technical issues of a particular area of anti-doping activities
NADO	National Anti-Doping Organization
Republican Center	Budget Institution "Republican Center of Medical Prevention, Physical Therapy and Sports Medicine" of the Ministry of Health of the Chuvash Republic
RF	Russian Federation
RUSADA	Russian Anti-Doping Agency RUSADA Association
SSOR	Sports school of Olympic Reserve
STC	the Autonomous Institution "Sports Training Center for Combined Teams of the Chuvash Republic named after A.Ignatyev" at the Ministry of Physical Culture and Sports of the Chuvash Republic
WADA	World Anti-Doping Agency

SECTION 1: SHORT OVERVIEW

1.1. Introduction

This Report is a short summary of information gathered by the Independent Working Group created by Decree No. 717-r of the Cabinet Council of the Chuvash Republic dated 9 August 2019 (hereinafter referred to as the Group), as well as a summary of the main conclusions and recommendations made by Group members based on the data collected and analyzed.

Owing to the Group's lack of authority and administration powers, its recommendations are clearly not binding; however, the Group hopes that the recommendations will encourage everyone involved in the difficult and important task of eliminating doping to study this Report carefully and impartially, along with the recommendations made and use them in their future work.

In order to avoid accusations of bias or pressure and after lengthy discussions, the Group, unlike other independent commissions that investigated allegations of systemic anti-doping rule violations, decided not to propose any sporting sanctions against athletes and their personnel. In the Group's opinion, these issues should be addressed by rule applicators in due course and on the basis of solid evidence. The Group hopes that the information presented herein will help those who really intend to fight doping in sports, as well as all those promoting the interests of clean athletes.

The evidence collected by the Group, including audio and video interviews, documents, photos, etc., for the most part contain personal data and/or medical information, and are therefore not subject to publication. In addition, a number of individuals interviewed by the Group wished to remain anonymous fearing future persecution, and the identity of those ("Confidential Witnesses") will not be disclosed by the Group either. Besides, the Group, on its own initiative, replaced the names of some athletes referred to herein by identification numbers, since they are currently subject to proceedings related to anti-doping rule violation cases, and the disclosure of their names along with the circumstances surrounding relevant cases may constitute violations of article 14 of the World Anti-Doping Code. In cases where name disclosure did not constitute a violation of the personal data protection requirements or current anti-doping rules, the Group did not hesitate to include such information herein. Moreover, all the evidence gathered (with corresponding notes regarding non-disclosure obligations) shall be transferred to the Cabinet Council of the Chuvash Republic that created the Group.

1.2. Brief information on combating doping and on the structure and powers of international anti-doping organizations

Most often, doping in sport is considered¹ to be the use of substances or methods that improve an athlete's performance (as compared to athletes who do not use such substances or methods), but at the same time pose a threat to athletes' health or are contrary to existing ethical standards.

It is no secret that many very famous and award winning athletes around the world, regardless of their nationality, used prohibited substances or methods to win competitions dishonestly. There have been cases where state authorities turned a blind eye to individual or systematic doping use, as well as cases where doping in sports was actively supported by governments.

Doping in sport has been combated with varying success over many decades, but in 1998, after the doping scandal during the Tour de France, it became obvious that the International Olympic Committee could not do this alone. The international treaties of the time (e.g., the Council of Europe Anti-Doping Convention 1989) were either declarative or semi-advisory in nature and were limited to a separate region which nullified all the efforts of those who combated doping as a universal evil. It became clear that, without states and their agencies with the relevant powers actively participating in the fight against doping, but also without mandatory and uniform rules of liability to fight prohibited substances and methods, the idea of clean and fair sports and the other ideals of Pierre de Coubertin, the founder of the Olympic Movement, would be doomed to failure.

During the World Conference on Doping in Sports convened by the IOC in early 1999 the representatives of international sports federations and various states approved the idea of the World Anti-Doping Agency (WADA), which began operating in November 1999.

During the second World Conference on Doping in Sport held in 2003, the representatives of nations and all Olympic sports approved the WADA drafted World Anti-Doping Code and the first international standards thereto².

Contrary to common belief within countries of the continental legal system (including Russia), the Code³ does not constitute a legislative act or an international treaty. It is essentially a contract, the provisions of which are strictly observed by all the parties that have voluntarily signed the Code or recognized its provisions⁴.

¹ The "classical" definition of doping contained in Article 1 of the World Anti-Doping Code "*Doping is defined as the occurrence of one or more of the anti-doping rule violations set forth in Article 2.1 through Article 2.10 of the Code*" is not used herein. The purpose of the definition given therein is to show why doping is generally prohibited.

² the Code and the International Standards, as well as the Model Rules or Guidelines issued by WADA jointly constitute the World Anti-Doping Program.

³ at the moment the Code version of 2015 is in force (as of 1 January 2015).

⁴ see par. 45 in CAS 2011/O/2422 *USOC v. IOC*.

That is why, in order to increase the role and responsibility of states in the field of the fight against doping, in October 2005, during the UNESCO General Conference in Paris, the International Convention against Doping in Sport (hereinafter referred to as the UNESCO Convention) was adopted. The Convention, the parties of which ultimately became the overwhelming majority of the world states⁵, imposed on the signatory nations the international legal obligation of participating in the fight against doping, including the obligations of complying with the Code within their territories, as well as cooperating with WADA and financing the activities of the latter, and to amend their national legislation in order to uniformly combat doping in sport, and to finance the activities of their national anti-doping organizations. By signing the Convention states, on one hand, demonstrate their commitment to the fight against doping in sport, and on the other hand, become "ultimately responsible" for ensuring the fight against doping within their territories.

The International Standards are documents containing rules and regulations developed and approved by WADA to develop and support the Code. There are currently six of them⁶: Prohibited List, Standard for Laboratories, Standard for Testing and Investigations, Standard for Therapeutic Use Exemptions, Standard for the Protection of Privacy and Personal Information, Standard for Code Compliance by Signatories. Like the Code itself, all the International Standards are binding for all parties, including the IOC, international sports federations, national anti-doping organizations and WADA itself. In addition, two International Standards (the Prohibited List and the Standard for Therapeutic Use Exemptions) are integral attachments to the UNESCO Convention and are binding for the parties thereto by virtue of international law.

Thus, both WADA and the national anti-doping organizations (NADOs) created in different countries are (directly or indirectly) vested with state powers to eradicate doping in sports. Such delegation of the relevant functions and powers by nations to the global "control center" obviously helps to increase the effectiveness of the fight against doping. At the same time, no nation can eliminate all doping and consider its obligations of combating doping on its territory fully fulfilled if it has only created NADO at home and transferred a part of its anti-doping functions thereto. It requires constant, ongoing national work to fight doping, protect athletes' health, and eradicate cheating (including in sports); these are things for which any nation continues to bear ultimate responsibility in relation to their citizens and the global community. In addition, the mere transfer of a part of a nation's functions and powers does not mean the complete transfer of such powers and the removal of the ultimate responsibility for the implementation thereof.

⁵ currently, 188 states have joined the Convention, that represents more than 99% of the world's population.
⁶<https://www.wada-ama.org/en/what-we-do/international-standards>. Two International Standards were added from 1 January 2021: for Education and for Results Management.

Due to the contractual nature of both the Code itself and the WADA powers, it is obvious that national (and even more so - international) laws take precedence over rules established within the sports community. This is also confirmed by major experts in the field of sports law⁷.

1.3. Brief information on the structure of the Russian government bodies exercising administration in the field of sports

According to our country's Constitution, Russia is a federal state. This means that some of the public administration issues only fall within the jurisdiction of the federal center, and some issues can be regulated both at the federal center level (e.g., through adopting federal laws or through issuing mandatory acts of federal ministries) and by various parts of the state (constituent entities of the Russian Federation), including the Chuvash Republic.

Based on Russia's federal structure, sports administration is exercised by the Ministry of Sports of the Russian Federation at the federal level, and by the regional executive bodies in the field of physical training and sports at the regional level (at the level of the federation constituent entities): by ministries, departments, etc., which include the Ministry of Physical Culture and Sports of the Chuvash Republic.

General state regulation matters in the field of physical culture and sport are determined by the Russian Federation in the form of federal laws, and for matters not regulated by federal laws, the Chuvash Republic state authorities may adopt regulatory acts.

State regulation in the field of sports is based on the principles of non-interference by the state in the activities of public sporting organizations (all-Russian and regional sports federations), the establishment of uniform state regulation rules in the field of sports throughout the country, compliance with international treaties of the Russian Federation (including on anti-doping issues).

The State (the Russian Federation), fulfilling its obligations of combating doping arising from the UNESCO Convention, develops and implements, in the whole territory of Russia, the state sports policy that, among other things, provides the systemic development of the anti-doping activities of all stakeholders⁸. Regional authorities are obliged to ensure the state policy implementation within the relevant region (e.g., state authorities of the Chuvash Republic in the territory of Chuvashia).

⁷ for example, the authors of the book '*Sports Law*' write: "...*Sports law, whether emanating from CAS or other sports tribunals, can in no way override national or indeed international law*". (M. Beloff, T. Kerr, M. Demetriou, R. Beloff. *Sports Law*, 2nd Ed., 2012, para.1.4, p.2).

⁸ So, in 2009 the Russian Government adopted the "Strategy of Physical Culture and Sports Development in the Russian Federation until 2020" providing a whole range of measures to develop anti-doping activities in Russia (see Section IX of the Strategy).

1.4. Brief description of the state support system for sports in Russia

Support for sport is provided by state authorities both at the federal and regional level, at the expense of the federal budget or regional budgets, respectively.

Such support is provided in various forms: by providing material and technical support to the national teams of the Russian Federation and the regional teams, training specialists in the fields of physical culture and sports (coaches, doctors, etc.), arranging and holding various sporting competitions and events, etc.

At the federal level, the development and implementation of state policy in the fields of physical training and sports, the adoption and implementation of programs for physical culture and sport development in the Russian Federation are ensured; the training of Russia's national teams in various sports is funded; the material, scientific, methodological, biomedical, medical and anti-doping support of those is provided. For example, to adequately fund the training camps of the Russian national teams, sports equipment, travels to international competitions, etc., a budget institution subordinate to the Russian Ministry of Sports has been created, namely, the Sports Training Center for Russian National teams. The same is happening in the Chuvash Republic where the regional teams of the Chuvash Republic are supported at the expense of the republican budget.

For the purpose of developing sports in the Chuvash Republic, state institutions are being created, namely sports schools for children and youth, Olympic Reserve schools and colleges, which primarily train professional and high-performance athletes. The activities of these schools and colleges are fully funded from the Republic's budget, and their top managers are appointed, on behalf of their founder (Chuvash Republic), by a specialized governing body, i.e. the Ministry of Physical Culture and Sports of the Chuvash Republic.

1.5. Russian Anti-Doping Agency RUSADA

The Russian Anti-Doping Agency RUSADA (hereinafter referred to as RUSADA) was created at the initiative of the Federal Agency for Physical Culture and Sports in 2008 on the eve of the Beijing Olympic Games to provide education and testing for the athletes who were candidates at the Games. The first founders of the organization were the State Institution of the Russian Academy of Education and the All-Russian Public Organization "League of National Health". The activities were funded by the Russian Ministry of Sports.

RUSADA is a national anti-doping organization, as per Federal Law No. 329-FZ dated 4 December 2007 "On Physical Culture and Sports in the Russian Federation" and the World Anti-Doping Code, to which RUSADA is a Signatory.

RUSADA's principal activities include the implementation of educational anti-doping programs, the implementation of all stages of doping control, except for the doping

samples' analyses, namely, test planning, whereabouts information, sample collection, review the applications for therapeutic use exemptions, results management and the arrangement of hearings.

RUSADA's activities are guided by the regulatory documents developed by the World Anti-Doping Agency (WADA), primarily the World Anti-Doping Code, the International Standards, WADA's Technical documents and recommendations, as well as the current legislation of Russia.

On 18 November 2015, as a result of the investigation of the Independent Commission created by WADA to investigate allegations made in a German channel ARD documentary, RUSADA was found to be non-compliant with the World Anti-Doping Code. The consequence of this finding was the loss of the following functions: test planning, sample collection, review of applications for therapeutic use exemptions, conduct of educational programs and investigations. Since April 2016, RUSADA's activities have been carried out under the supervision of the international experts recommended by WADA, whose task was to reform the organization and to create an effective anti-doping system in Russia. In May 2016, RUSADA was once again given the right to conduct investigations and educational programs. The right to plan the testing and collect samples was returned to RUSADA in June 2017.

On the recommendation of WADA, partner membership was changed as part of the ongoing reforms. According to the Charter amendments, the Russian Olympic Committee and the Russian Paralympic Committee became the sole partners (having all the rights and responsibilities of the founders) of RUSADA⁹.

Membership of the RUSADA Supervisory Board was updated, with the functions thereof significantly extended: the Board determines the strategic direction of RUSADA's activities, monitors the executive bodies and approves local regulatory acts, approves the policies and membership of RUSADA's committees and commissions¹⁰. At the time of publication hereof, Mr Aleksandr Ivlev chairs the Supervisory Board, and in addition to him, the Board includes six more people: Mr Vladimir Chekhonin (vice-chairman), Ms Elena Isinbaeva, Mr Sergei Khrychikov, Mr Andrey Minyaev, Mr Sergey Ryazansky, Mr Aleksandr Strokin. The Supervisory Board meets four times a year.

Also on the recommendation of WADA, RUSADA is currently funded by the Russian Ministry of Finance (and not by the Ministry of Sports, as it used to be), with a

⁹<https://rusada.ru/about/controls/>

¹⁰<https://www.forbes.ru/biznes/352803-doveritelnoe-upravlenie-kak-v-rossii-rabotaet-antidopingovaya-sistema-i-skolko-eto>

significant increase (almost 3.5 times) in funding volumes up to 566 million rubles per year¹¹.

In May 2017, a proposal by two international experts based on a similar document existing in the International Cricket Council, the Code of Ethics, Conflict of Interest and Fight Against Corruption of the RAA RUSADA Association was adopted. After some time, an external Ethics Officer was appointed, namely, Mr Hannes Lubitzsch, a lawyer at Noerr law firm. Currently, according to the RUSADA official website, the Ethics Officer is Mr Aleksandr Filatov¹².

The sole permanent governing body of the RUSADA Association is the Director General. In August 2017, after the selection stage under the supervision of two international WADA experts, Mr Yuri Ganus was appointed Director General of RUSADA¹³.

RUSADA also initiated the creation and operation of the Disciplinary Anti-Doping Committee, which, as an independent body, hears the cases of anti-doping rule violations, and makes decisions regarding the application of certain sport sanctions against violators. It is important to emphasize that the Committee does not belong to RUSADA's governing bodies. In October 2017, membership of the Committee (valid to date, with a few exceptions), which is headed by an attorney-in-law Mr Ilya Paleev¹⁴, was approved.

In September 2018, at a WADA Executive Board meeting, RUSADA was once again deemed to have complied with the World Anti-Doping Code (provided that the Russian state bodies fulfill the two “critical” criteria related to transferring the Moscow Anti-Doping Laboratory electronic database to WADA and subsequently providing WADA experts with the access to remaining doping samples for the re-examination purpose). At the same time, RUSADA received the right to review therapeutic use exemptions’ applications.

1.6. Brief information on the Cabinet Council of the Chuvash Republic

The Cabinet Council of the Chuvash Republic, in accordance with the Republic's current Constitution, is the permanent supreme state executive body in Chuvashia¹⁵. The Cabinet Council administers the ministries, state committees, and other executive bodies of the Chuvash Republic and controls their activities.

¹¹https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI698787_RUSADA_budet_poluchat_boleje_550_millionov_v_god

¹²<https://rusada.ru/about/ethics-officer/>

¹³<https://rusada.ru/about/controls/yuri-ganus/>

¹⁴<https://rusada.ru/doping-control/results-management/hearings/>

¹⁵https://constitution.garant.ru/region/cons_chuvash/

At the time of the publication hereof, the Cabinet Council consists of the Chairman (Mr Ivan Motorin), four of his deputies, and eleven other ministers and persons with equal status¹⁶.

Based on the regional legislation¹⁷, the Cabinet Council has a fairly wide range of control, oversight and coordination powers, including the right to create coordination, deliberative and other similar bodies.

In addition, based on the provisions of the regional Law “On Physical Culture and Sports”, it is the Cabinet Council that is responsible for the medical and anti-doping support of the Chuvash Republic’s regional teams, the creation and funding of regional sports training centers and other sports organizations. Chuvashia's Ministry of Physical Culture and Sports is entitled to participate in the implementation of state policy in the field of physical culture and sports.

It is hardly possible to argue that one of the main lines of the state policy in the field of physical culture and sports, both in Russia and in other states, is the fight against doping, and primarily, the prevention of banned substances and methods: in particular, establishing zero tolerance to doping, the exclusion of conditions that may contribute to violations and the implementation of educational programs for both athletes and their personnel.

The Cabinet Council, among other things, is preparing evidence for the annual public presentation of the Head of the Chuvash Republic regarding the results of an independent assessment of the quality of the regional organizations’ services (including in the field of healthcare and education), and the measures taken to improve their performance. In addition, it is the Cabinet Council that coordinates the activities of various regional authorities related to this independent assessment.

1.7. Brief information on the Ministry of Physical Culture and Sports of the Chuvash Republic

The Ministry of Physical Culture and Sports of the Chuvash Republic (CR Ministry of Sports) is an executive body of the Chuvash Republic, implementing state policy in the field of physical culture and sports in the Chuvash Republic¹⁸.

Since December 2018, Mr Mikhail Bogaratov has been the Minister of Physical Culture and Sports of the Chuvash Republic¹⁹.

In accordance with the Regulation on the CR Ministry of Sports approved by Decree No. 41 of the Cabinet Council of the Chuvash Republic dated 12 February 2014, the

¹⁶<http://km.cap.ru/about/structure>

¹⁷<http://km.cap.ru/about/status-i-polnomochiya/zakon-chuvashskoj-respubliki-o-kabinete-ministrov>

¹⁸<http://sport.cap.ru/>

¹⁹<http://sport.cap.ru/about/structure>

Ministry “develops proposals on procurement, including sports equipment provision, as well as financial, scientific, methodological, biomedical and anti-doping support for the Chuvash Republic’s regional sports teams, and ensures their preparation for inter-regional sports competitions, all-Russian sports competitions and international sports competitions and teams’ participation in such competitions”.²⁰

As with other regional state sports organizations, the Cheboksary Olympic Reserve College named after V.M.Krasnov (College), the Sports Training Center for the Regional Teams of the Chuvash Republic (STC) and other regional state sports organizations are all subordinate to the CR Ministry of Sports.

According to Russian law, the subordination of various organizations to the authorities means that, although the subordinate organizations are independent legal entities, they:

- can carry out activities only within the scope determined by the charter approved by the founder representative (for example, a ministry), and only for the purposes for which they were created;
- shall obey the founder's instructions unless those contradict the charter;
- shall report to the founder information on funds received from the latter. The financing of such organizations is strictly controlled: in other words, an organization can use the resources received from the founder (money, other property) only for the purposes defined by the charter or by government orders, i.e. the assignments of the founder;
- do not own the assets that have been provided to them.

1.7.1. Sports Training Center for Chuvash Republic Regional Teams

The Sports Training Center for the Regional Teams of the Chuvash Republic (STC) is an organizational and methodological center for training highly qualified athletes, involving the optimal number of promising athletes in the specialized (centralized) training in the core sports in the Chuvash Republic²¹.

In accordance with the STC Charter, it shall, *inter alia*, “organize the work to prevent and combat doping in sports in accordance with the Russian anti-doping rules approved by a federal executive body in the field of physical culture and sports, and the anti-doping rules approved by international anti-doping organizations, in cooperation with a Russian anti-doping organization, a federal executive body authorized to

²⁰<http://sport.cap.ru/about/info/>

²¹<http://csp.cap.ru/>

provide biomedical support for the athletes of Russian regional teams, including the anti-doping support of the Chuvash regional teams.²²

Mr Alexey Protapovich has been the Acting Director of STC since July 2019²³.

The STC Deputy Director is Mr Anatoly Grigoryev who has been responsible for the anti-doping activities in the whole region (since the end of 2018).

For more information on the STC activities, see Sections 5.6.1-5.6.2 hereof.

1.7.2. The Cheboksary Olympic Reserve College named after V.M.Krasnov

The Cheboksary Olympic Reserve College named after V.M.Krasnov (the College)²⁴ is a separate organization subordinate to the Ministry of Physical Culture and Sports of the Chuvash Republic.

The College is a sports complex educating pupils of 8 and 9 grades (usually 13 to 15 years old) adhering to the basic general education program; pupils of 10 and 11 grades (usually 15 to 17 years old) according to the secondary general education program; and students of 1 to 4 course years (usually 15 to 19 years old) are coached in "Physical Training". At the time of the publication hereof, more than 200 pupils and students are studying at the College.

The College's main tasks are to identify and select adolescents who have shown ability in sport, train them, implement year-round sports and educational activities involving the young athletes, prepare them for participation in regional, national and international competitions.

According to the College official website, "the College received the prestigious award of the Russian Olympic Committee and the Fair Play Committee for high achievements in the field of sports, for the many years of work promoting Olympic principles and ideals, and for the athletes training in a spirit of nobility and rectitude."

According to the Charter, the College implements sports training programs in the following sports: biathlon; boxing; wrestling (freestyle); mountain bike cycling; skiing; judo; skating; athletics; speedskating; swimming; sambo; gymnastics; archery; triathlon; table tennis; weightlifting; freestyle; ice hockey.

Mr Yuri Plotnikov has been the College Director since May 2011.

Find more detailed information on the College activities in Sections 5.1-5.2, 5.3.6-5.5 hereof.

²²[http://csp.cap.ru/Content2019/orgs/GovId_616/izmeneniya_v_ustav_ot_27.09.2019_g\(1\).pdf](http://csp.cap.ru/Content2019/orgs/GovId_616/izmeneniya_v_ustav_ot_27.09.2019_g(1).pdf)

²³<http://csp.cap.ru/Person.aspx?id=19172>

²⁴<http://chssuor.cap.ru>

1.8. Brief information on the Chuvash Republic Ministry of Health

The Ministry of Health of the Chuvash Republic (CR Ministry of Health) is an executive authority of the Chuvash Republic which implements state policy in the field of healthcare²⁵.

Since March 2017, the Ministry of Health of Chuvashia has been headed by Dr Vladimir Viktorov²⁶, who has also been the Deputy Chairman of the Cabinet Council of the Chuvash Republic since April 2019.

Among other functions, the CR Ministry of Health coordinates the activities of the Chuvash Republic's executive authorities and the organizations working on matters relating to the Ministry's competence, i.e. in the field of healthcare.

In accordance with Decree No. 365 of the Cabinet Council dated 14 October 2015²⁷, the Ministry of Health ensures the medical and biological support of the athletes of Chuvash regional teams.

In addition to other regional state health organizations, the Ministry of Health of the Chuvash Republic also controls the Republican Center of Medical Prevention, Physical Therapy and Sports Medicine (the Republican Center).

The definition of subordination is given above in Section 1.7 hereof.

1.8.1. Republican Center of Medical Prevention, Physical Therapy and Sports Medicine

The Republican Center of Medical Prevention, Physical Therapy and Sports Medicine subordinated to the Ministry of Health of the Chuvash Republic (hereinafter referred to as the Republican Center)²⁸ is the only state medical institution in the Republic of Chuvashia that provides medical support to athletes and the individuals involved in physical training.

The Republican Center was founded by the Republic of Chuvashia, with the regional Ministry of Health acting on behalf of the founder.

The Republican Center changed its name (it was formerly called "the Dispensary") and legal corporate forms; besides, the other regional medical organizations monitoring the athletes' medical support in Chuvashia joined it as its structural units.

Honored Doctor of the Chuvash Republic Dr Arnold Karzakov has been the Chief Doctor (Head) of the organization since August 1990. Dr. Karzakov is also the chief freelance expert in sports medicine at the Ministry of Health of the Chuvash Republic.

²⁵<http://www.medicin.cap.ru/>

²⁶<http://www.medicin.cap.ru/about/structure>

²⁷<http://www.medicin.cap.ru/about/info/polozhenie-o-ministerstve>

²⁸<http://www.rclfk.med.cap.ru/>

For more information on the Republican Center, see Section 7 hereof.

1.9. Creation and mandate of the Independent Working Group

On 17 June 2019, the results achieved by the RUSADA ADRVID (regarding the activities of “a sports college in the Chuvash Republic”)²⁹ were made public, and caused a great public outcry in the Russian media (for more details, see below in the sections 2.1-2.2 of this Report). Moreover, the majority of comments and opinions stated that such a massive case of alleged anti-doping rule violations could not be possible without the participation of the regional authorities entrusted with the monitoring of the athletes training at the regional level (teenage and youth sports) to ensure their subsequent transition to high-performance sports (at the national or international level).

Given the huge public outcry following publication in the federal media of numerous reports on a doping system allegedly created at state level to train athletes for the Chuvash Republic regional teams, and the increasingly negative perception of the Republic (at the federal and international levels), the Cabinet Council decided to conduct a comprehensive and objective verification of the work performed in this area by the republican executive bodies and the subordinate organizations thereof.

In order to avoid any interdepartmental and intraregional conflicts (for example, a zero sum game between the regional Ministry of Sports and Ministry of Health, or any attempts to shield high-ranking officials involved in the scandal at the expense of the so-called “scapegoats”, etc.), it was decided to delegate such work to independent experts.

For this purpose, on 9 August 2019, the Cabinet Council issued Decree No. 717-r³⁰, establishing the Independent Working Group (hereinafter - the Group), and determined its terms of reference, tasks and members. Thus, the Group was instructed to identify the shortcomings and omissions in the regional anti-doping operations and to report the results, together with proposals to eliminate any problems identified in order to prevent anti-doping rule violations by the republican athletes and their personnel. All regional authorities and their subordinate organizations were ordered to assist the Group.

For more information on the Group membership, tasks and mandate - see section 3 below.

SECTION 2: "DOPING SCANDAL" IN CHUVASHIA

²⁹<https://rusada.ru/news/press-releases/rusada-detected-the-facts-of-prohibited-method-use-in-the-chuvash-republic/>

³⁰<http://www.cap.ru/doc/laws/2019/08/09/disposal-717-r>

2.1. RUSADA press release on the “doping scandal” in Chuvashia

On 17 June 2019, the official RUSADA website posted a press release³¹ saying that in the period from June 2017 to June 2019, the RUSADA ADRVID identified and recorded the use of a prohibited method in one of the sports colleges of the Republic of Chuvashia. It was also reported that more than 140 people had been interviewed and over 60 cases of possible anti-doping rule violations by athletes and their personnel had been identified. There was also a list of sports played by the athletes who allegedly violated anti-doping rules, indicating the number of such athletes (for example, “cycling - 5”, “biathlon - 2”, “athletics - 17”, “boxing - 1”, etc.). It was also announced that the cases of a possible anti-doping rules violation had been initiated against these athletes, i.e. the “investigation” phase turned into the “results management” phase.

This news came as a bombshell to the Russian media. Stories about the “doping scandal” in Chuvashia were distributed to all mass media (both federal and regional), the only exception being those with a narrow specialization not related to sports.

The Russian media³² was generally of the opinion that, first and foremost, the functionaries were to blame, as it was they who first created the problem, and later tried to hide it or somehow downplay its scale. Such commentary intensified after a tweet by famous German reporter Hajo Seppelt³³, who stated that, in his opinion, the Russians had never recognized the problem or taken effective and serious measures to resolve it. So, Russian observers began saying that “... *it is the reaction that is the problem. Blanketing, hiding, using connections is typical behavior in Russia when the law is violated. We don't deal directly with issues, but try to “solve” them “creatively”. What has been revealed in Chuvashia, and what RUSADA will be proving with the help of law enforcement agencies (or in spite of them), is happening all over the country. But the problems begin when everything leaches abroad..*”³⁴, “...*The Ministry of Sports of Chuvashia is in no rush to make official comments. There is no information on this matter on the Ministry's website. However, they have always preferred to hush up scandals...*”³⁵.

³¹<https://rusada.ru/news/press-releases/rusada-detected-the-facts-of-prohibited-method-use-in-the-chuvash-republic/>

³²see, e.g., the publication on the federal news portal Vesti: <https://www.vesti.ru/doc.html?id=3158787>, online publication at Championat.Com <https://www.championat.com/other/article-3784355-rusada-vyjavilo-fakty-massovogo-narusheniya-antidopingovyh-pravil.html>, publication at Sportbox.Ru https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI1036457_RUSADA_podozrevajet_33_sport_smena_iz_Chuvashii_v_narushenii_antidopingovyh_pravil, publication at Regnum.Ru <https://regnum.ru/news/polit/2650836.html>, publication at RT <https://russian.rt.com/sport/news/641785-rusada-chuvashiya> and many others.

³³<https://twitter.com/hajoseppelt/status/1140666718005714944>

³⁴<https://www.championat.com/other/article-3784355-rusada-vyjavilo-fakty-massovogo-narusheniya-antidopingovyh-pravil.html>

³⁵<http://www.pravdapfo.ru/articles/93298-dopingovy-skandal-v-chuvashii>

2.2. Reaction (public statements) to the press release regarding the “doping scandal” in Chuvashia

News about the "doping scandal" in Chuvashia was posted on the RUSADA official website on the afternoon of Monday, 17 June 2019³⁶.

As mentioned above, in the evening of the same day, German journalist Hajo Seppelt posted the news on Twitter, together with his comment stating that doping culture in Russia had not been eliminated, and that *“trust means the ability to both determine the problem and undertake serious measures to resolve it”*.³⁷

The next day, June 18, Russian journalists immediately contacted Head of Chuvashia, Mr Mikhail Ignatiev, and his press service asking for their reaction.

In his comment to the RBC agency³⁸, Mr. Ignatiev said the following (quote from RBC):

“For now, it looks like fake news. I have not seen any materials related to what is being discussed today, we need a comprehensive assessment. The athletes of our Republic have never been dope users. Most likely, one can assume that there is no evidence. But I can’t say anything for sure until I see the materials. The presumption of innocence is the constitutional right of every person.”

In addition, according to the same RBC article, Mr. Ignatiev said that if doping violations are proven, the Republic’s authorities would be ready to suspend those who are guilty.

“When the facts are confirmed, the officials will be held accountable as has always been the case, and coaches have been and will be held responsible. Punishment is inevitable”, the Head of Chuvashia said.

Mr Ignatiev’s press secretary also added that the Republic administration had begun *“to comprehensively examine the matter. An internal audit is being conducted, the situation is specially controlled by the CR Ministry of Sports. For our part, we are ready to offer comprehensive assistance in the investigation.”*

At the same time, most of the Russian media pulled Mr. Ignatiev’s words out of context, and quoted only the phrase about “fake news” from all that was said, which subsequently led, among other things, to a rather sharp public (absentee) debate between the Republic’s Administration and RUSADA³⁹.

³⁶<https://rusada.ru/news/press-releases/rusada-detected-the-facts-of-prohibited-method-use-in-the-chuvash-republic/>

³⁷<https://twitter.com/hajoseppelt/status/1140666718005714944>

³⁸<https://sportrbc.ru/news/5d08c1159a7947b39f076dc9?ruid=UET9A1x9ISkhDzXBAYq6Ag==>

³⁹ So, for example, during his press conference on 19 June 2019, RUSADA Director Mr Yuri Ganus publicly commented on these words of the Head of Chuvashia as follows (quote from Interfax): *“The Republic’s Head said that this investigation reminds him of fake news. Let’s see what IAAF says.”* - see <http://www.interfax-russia.ru/Povoljie/main.asp?id=1039263>. See also the following statements by the RUSADA Director General in Sections 3.4 hereof.

In the middle of the day on June 18, Mr Aleksandr Egorov, the Deputy Chief Physician of the Republican Center, told reporters that his institution was interested in cooperating with RUSADA and announced a joint press conference with the Republic's Ministry of Sports⁴⁰.

Soon afterwards, the public saw a short interview with RUSADA Deputy Director General Ms Margarita Pakhnotskaya where she revealed a number of details regarding RUSADA's work on the "Chuvash case", including the fact that it was the Republican Center of Medical Prevention, Physical Therapy and Sports Medicine where the rule violations had been registered⁴¹.

On the same day, 18 June 2019, the administration of the Chuvash Ministry of Sports and the Ministry of Health held a media briefing. Questions were answered by the Minister of Sports of Chuvashia, Mr Mikhail Bogaratov, First Deputy Minister of Health of Chuvashia, Ms Irina Vinogradova, Deputy Chief Physician of the Republican Center of Medical Prevention, Physical Therapy and Sports Medicine Mr Aleksandr Egorov, Deputy Minister of Sports of Chuvashia Mr Igor Golovin, Director of the Cheboksary Olympic Reserve College named after I.M. Krasnov, Mr Yuri Plotnikov. Sports Minister Mr Mikhail Bogaratov said that "*the medical supervision of [all the Chuvash] athletes is carried out by the Republican Center of Medical Prevention, Physical Therapy and Sports Medicine*" subordinate to the Ministry of Health of Chuvashia⁴². He also said that, so far, the Ministry "*does not have any official information*" from RUSADA regarding specific athletes involved in the practice of violating anti-doping rules⁴³, but will assist in the RUSADA investigation⁴⁴. Representatives of "the doctors" reported that there was a recorded violation related to the use of the prohibited method, namely, the intravenous infusion of an excess volume of a non-prohibited drug. At the same time, according to Mr Aleksandr Egorov, the Republican Center doctors earlier "*agreed that this method is prohibited if a volume exceeding 50 ml is used within 6 hours of the competition, which led to erroneous tactics for working with athletes.*"⁴⁵

The next day, on 19 June 2019, the web-portal of the Chuvash state authorities published an article on the briefing⁴⁶, which included quotes from the speech by chief freelance expert in sports medicine of the Chuvash Ministry of Health Arnold Karzakov who

⁴⁰https://matchtv.ru/doping/matchtvnews_NI1036876_Medcentr_Chuvashii_zainteresovan_vo_vzaimo_dejstvii_s_RUSADA

⁴¹

https://matchtv.ru/doping/matchtvnews_NI1036734_Polucheny_svidetelstva_boleje_chem_150_chelovek_Koshmarnyje_itogi_rejda_RUSADA_v_Chuvashii

⁴²<https://cheb.media/2019/06/18/kommentarij-vlastej-doping/>

⁴³<https://regnum.ru/news/polit/2650159.html>

⁴⁴https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI1036873_Minsporta_Chuvashii_okazhet_s_odejstvije_RUSADA_v_rassledovanii_33_dopingovyh_del

⁴⁵<https://news-life.ru/chuvashia/204925380/>

⁴⁶<http://www.cap.ru/news/2019/06/19/news-4101309>

did not participate in the briefing⁴⁷, where he denied every accusation against the Center doctors, and also stated that they are constantly improving their qualifications and will cooperate with RUSADA in order to strictly observe the anti-doping regulations.

In addition, on the morning of 19 June 2019, the website of the Chuvash Ministry of Sports published a small note⁴⁸ presenting the briefing results. This note also expressed concern about the way the information about the “Chuvash doping scandal” was being presented in the media, including the federal media.

On 19 June 2019, during the RUSADA Administration briefing, RUSADA Director General Mr Yuri Ganus said that the number of cases against Chuvash athletes had already increased to 70 (compared with 33 cases according to the RUSADA press release issued two days before), and that “*the first case package has already been submitted for results management*”.⁴⁹ In addition, after the briefing, Mr. Ganus, in his interview, said that “[at] *the moment, cooperation is not possible, but given the scale of events, this is not a single case, so it cannot be simply closed,*” however, the conversation with the journalist revealed that “*the refusal to cooperate*” refers to the refusal of a number of medical workers to communicate with RUSADA, while the regional Ministry of Sports expressed readiness for cooperation⁵⁰. At the same time, Mr Ganus said in the same interview that, in relation to athletes, these cases are actually proven, “*the participation of doctors is yet to be confirmed*”.

On the same day, in her interview to the RussiaToday TV channel, RUSADA Deputy Director Ms Margarita Pakhnotskaya said that the doping scandal in Chuvashia had resulted from the “*inconsistency, irresponsibility and ignorance*” of certain individuals and denied the assumed existence of a “*global doping system*” in the Republic⁵¹.

In his interview with MatchTV, President of the Russian Athletics Federation, Mr Dmitry Shlyakhtin, said that “*if this [the massive use of doping against athletes] is really happening, then it is surely a backwards step.*”⁵²

⁴⁷ at the same time, Mr. Karzakov had been the Republican Center Chief Physician for almost 30 years, see Section 7 hereof for more details.

⁴⁸<http://sport.cap.ru/mobile/news/2019/06/19/rusada-obvinilo-chuvashskih-sportsmenov-v-primenenii>

⁴⁹https://www.sovsport.ru/olympic_games/news/2:907890. Apparently, an indication that the cases had been sent for review meant the end of the “investigation” phase and the beginning of the “results management” phase.

⁵⁰https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI1037496_Ganus_prokommentiroval_situaciju_s_chuvashskimi_atletami_Shlahtin_rasskazal_o_vzaimodejstvii_IAAF_i_VFLA

⁵¹<https://russian.rt.com/sport/article/642410-pahnockaya-rusada-intervyu>

⁵²some fragments of a video interview with Dmitry Shlyakhtin are integrated into a video-story at the Sportbox website, see this webpage: https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI1037496_Ganus_prokommentiroval_situaciju_s_chuvashskimi_atletami_Shlahtin_rasskazal_o_vzaimodejstvii_IAAF_i_VFLA

The federal sports officials and functionaries, except for those mentioned above, evaded the issue of the “Chuvash doping scandal” giving no comments.

However, in August⁵³ and September of 2019⁵⁴, RUSADA Director General Mr Yuri Ganus spoke about the “Chuvash doping scandal” in the media again, implying or making, e.g. in his interview with the French newspaper *L'Equipe*, direct allegations about the involvement of the regional authorities in cases of mass anti-doping rule violations and attempts to cover up the scandal itself and the persons involved.

It should be noted that, by the end of September 2019, the general intensity of RUSADA’s public pronouncements regarding this issue had slightly decreased, and such speeches were limited to mere declamations on clean sport and the application of sanctions against cheaters⁵⁵.

2.3. The regional authorities’ approach to the “doping scandal” press releases

The first statements by the regional authorities were summarized above in Section 2.2 hereof. After the initial shock had passed⁵⁶, the regional Ministry of Sports began to study the details of the situation, which, however, was very difficult due to the fact that it wasn’t possible to obtain information about the athletes’ individual cases⁵⁷.

The regional Ministry of Sports started gathering information, but after a short time, once the scandal became federal, considering possible violations by various Chuvash authorities and the subordinate organizations thereof, where RUSADA had made no

⁵³<https://tass.ru/sport/6755504>

⁵⁴ thus, in his interview to *L'Equipe* on 18 September 2019 (<https://www.lequipe.fr/Athletisme/Article/Youri-ganous-russie-la-verite-est-de-mon-cote/1060016>)

Mr. Ganus stated literally the following: «...la Tchouvachie (33 cas avérés, et même 69 en tout, de sportifs transfusés sanguins illégalement sous couvert de la région, qui seront instruits lors d'un procès en octobre à partir des conclusions d'une commission d'enquête régionale)... C'est un problème de système parce qu'il y a des preuves de l'intervention d'une autorité supérieure (fédération ou région). En cherchant à se justifier, ils ruinent notre travail. Car c'est nous qui avons conduit les investigations pour révéler ces affaires-là». An unofficial English translation is given below: “... the Chuvash matter (including 33 proven cases, and now even 69, where the athletes had undergone illegal blood transfusions covered up by the regional authorities, which will be presented during the trial after the conclusions of the regional investigation commission) ... This is a systemic problem, because there are evidence and facts of the high-level authorities’ interference (federal or regional). In an effort to justify themselves, they are trying to destroy the work we have done. Since we have investigated the matter to identify these cases.”

⁵⁵<https://rusada.ru/news/slovo-direktora/otkrytoe-pismo-generalnogo-direktora-rossiyskogo-antidopingovogo-agentstva-rusada/>

⁵⁶<https://regnum.ru/news/polit/2650159.html>

⁵⁷ According to the All-Russian Anti-Doping Rules (Art.14) and similar provisions of the World Anti-Doping Code, the national anti-doping organization shall send information on the alleged anti-doping rule violation cases investigated or referred for hearing only to the athlete him/herself, to his/her national sport federation and to WADA. According to the World Anti-Doping Code, the Ministries of Sports (both federal and regional) can obtain this confidential information only from the athlete him/herself. By the way, these rules often provoke the following anti-doping rule violation: if an athlete him/herself does not report, for example, that he/she has been provisionally suspended (for the period of results management), then some sports organizations may continue to include such an athlete into the lists of training camps or even competition participants, since they haven’t been informed about individual provisional suspensions.

suggestions regarding the actual joint investigation, the Cabinet Council of the Chuvash Republic once again got the situation under control. The goal of the Cabinet Council was to comprehensively and objectively revise the work of all the republican mechanisms responsible for the Chuvash athletes' training and medical support (for more details on further actions of the Cabinet Council, see Section 3.1 hereof).

However, according to the media, it is only the Ministry of Sports of Chuvashia that was "shocked" by the news of the cases brought against 33 Chuvash athletes. It is difficult to imagine that the Republican Center administration, and consequently, the regional Ministry of Health could have been unaware of RUSADA's visits to the Republic and of the ongoing work to prosecute (under Article 230.2 of the Criminal Code of Russia) one of the Republican Center's medical employees. The information about the initiation⁵⁸ and failure of the criminal case was made public⁵⁹.

2.4. The Criminal Case Brought in 2017

As of 3 December 2016, the Criminal Code of the Russian Federation included two new articles providing for the liability of a coach, a specialist in sports medicine, or any other specialist in the field of physical education or sports, for inducing an athlete to use substances and (or) methods prohibited for use in sports (Article 230.1), or for using such substances and methods in connection with an athlete (Article 230.2)

Article 230.1, Part 1 of the Russian Criminal Code provides for the criminal liability of a coach, a specialist in sports medicine, or any other specialist in the field of physical education or sports, for any use, in connection with an athlete, of substances and (or) methods prohibited for use in sports.

The only exception to this prohibition is the use of such substances and (or) methods in the administration of necessary medical aid in a health care institution, in a surgical procedure, or in the conduct of clinical investigations, as well as the administration by a sports medicine specialist physician of emergency medical care to the athlete to treat a life-threatening condition⁶⁰. The indicated crime is articulated in the law as an intentional act (that is, it cannot be committed via negligence). The burden of proof regarding intent to commit such a crime rests on the prosecution (the principle of "the presumption of innocence", a principle of criminal law).

In contradistinction to the Russian Criminal Code, which determines the criminality of an act, as well as the extent to which it creates liability to punishment, the Russian Code of Criminal Procedure regulates the manner in which criminal matters are investigated, as well as court procedures in relevant proceedings. It is this Code [RCCP] that governs law enforcement agencies in the conduct of their work.

⁵⁸<https://regnum.ru/news/accidents/2334715.html>

⁵⁹<https://regnum.ru/news/society/2344432.html>

⁶⁰ Paragraph 5 Decree of the Government of the Russian Federation from 28.03.2017 No 339 "On approval of the list of substances and methods, prohibited for use in sport, adhering to articles 230.1 and 230.2 of the Criminal Code of the Russian Federation".

A criminal case was brought by the police of the city of Cheboksary in June of 2017 in connection with evidence of a crime under Part 1 of Article 230.2 of the Russian Criminal Code, four days after RUSADA's visit to the Medical Office at the College (see Sections 7.10.1, 7.13.1 hereof)⁶¹.

The time period for interrogations in connection with a criminal case was repeatedly extended by the assistant prosecutor of the Lenin District of the City of Cheboksary (ultimately, for four months); in November of 2017, however, the investigator who brought the criminal case decided to close it⁶² due to a lack of evidence demonstrating an intentional wrongdoing by Dr Svetlana Lareva⁶³.

A lack of interest on the part of an investigative agency in pursuing a case is clearly evident in the chain of events connected with a decision by the Public Prosecutor's Office to rescind decisions taken by the police, as is the investigator's violation of all reasonable time periods for investigation of the case.

An analysis of these decisions⁶⁴ shows that the police repeatedly concluded that Dr Svetlana Lareva's actions did not provide evidence of a crime, as she did not have, at that time or prior thereto, the intent to use a prohibited method (specifically as a "prohibited" method, with intent to inflict harm) in connection with the athlete.

In September of 2018, the criminal case was terminated for the third (!) time on the same basis as the previous terminations.

Consequently, as the text of the summary decree on the termination of the criminal case makes clear, the [police] investigation conducted did not establish sufficient data to indicate the use by the physician, Svetlana Lareva, with respect to Athlete Z, of substances and methods prohibited for use in sports under the criminal law of the Russian Federation, or that Lareva was guilty of the commission of the indicated intentional crime, and there is nothing, in the opinion of the police, to support such an allegation, other than the application for her prosecution submitted by a RUSADA staff member.

The Public Prosecutor's office intended to appeal this termination decree in court, but after the initiation of court proceedings it withdrew that appeal.

Conclusions and recommendations of the Group, linked to this criminal case, are included below in Section 8.4 hereof.

SECTION 3: INFORMATION ON ACTIVITIES OF THE INDEPENDENT WORKING GROUP

3.1. Purpose and mandate

⁶¹ <https://regnum.ru/news/society/2334715.html>

⁶² <https://regnum.ru/news/society/2344432.html>

⁶³ Section 2, Part 1 of Article 24 of the Code of Criminal Procedure of the Russian Federation;

⁶⁴ The Group does not consider it necessary to enter into this Report a complete listing of such decisions or a detailed legal analysis thereof, as that is not part of Group's task.

We addressed above (see Sections 1.2-1.4 of this Report) the issues of the creation and authority of regional bodies in Russia in relation to the sports' regulation and, in particular, anti-doping work, as well as the issues of control & supervision and other powers of regional bodies in this area.

It is obvious that the Cabinet Council of Chuvashia, primarily interested in implementing state programs in the field of sports in the territory of Chuvashia, seeks to (ideally) prevent or reduce the number of anti-doping rule violations in the Republic. It is also indisputable that where anti-doping rule violations are detected, the Cabinet Council is primarily interested in obtaining objective and accurate information about the reasons why such a violation became possible and the conditions that contributed to the violation, in order to take measures to eliminate such conditions and prevent the commitment of such violations in the future. In other words, in case certain symptoms of the "disease" have occurred, besides the "elimination" of those, it is extremely important for any administrative body to develop "preventive measures" to prevent the recurrence of the "disease".

But what "preventive measures" need to be taken by the Cabinet Council in such a situation? Typically, it is the anti-doping organizations (including primarily the national ones) that are involved in the entire spectrum of anti-doping work, and those are responsible, first of all, for the preventive measures' implementation to prevent anti-doping rules violations (educational programs, seminars, conferences, etc.). For example, the newly IAAF-created Athletics Integrity Unit indicates education and preventive activities as the top priority tasks, while investigations and results management being only fourth and fifth positions, respectively⁶⁵. The importance of educational and preventive measures for the fight against doping is also indicated by WADA: so, this is what the incoming WADA President, Mr Witold Bańka, spoke about at the 7th UNESCO Conference in Paris on 30 October 2019⁶⁶. Moreover, RUSADA General Director Mr Yuri Ganus, in his interviews, also states that RUSADA should not be perceived as an exclusively punitive organization⁶⁷; it was created to help and promote "clean" athletes, protect sports from cheaters, and first of all, to prevent doping use in the broadest sense, including the prevention of young athletes' involvement in doping frauds. As the world sporting community agrees wholeheartedly with this position, a new mandatory International Standard for Education⁶⁸ was approved at the World Conference on Doping in Sport, convened on 5-7 November 2019 in Katowice (Poland), along with a Declaration, affirming that to foster a clean sport environment, all individuals, bodies and organizations involved in

⁶⁵<https://www.iaaf.org/news/press-release/independent-athletics-integrity-unit>

⁶⁶<https://www.wada-ama.org/en/media/news/2019-10/wada-stresses-importance-of-education-during-seventh-unesco-conference-of-parties>

⁶⁷<https://tass.ru/interviews/6905924>

⁶⁸ <https://www.wada-ama.org/en/media/news/2019-11/wadas-world-conference-on-doping-in-sport-focuses-on-strengthened-rules-benefits>

sport should have appropriate anti-doping education to preserve the spirit of sport, promote the values of sport and ultimately protect all athletes, so that an athlete's primary experience is through education rather than doping control⁶⁹.

However, to the great disappointment of the regional authorities, until June 2019, the Chuvash Republic received (if at all) only sporadic assistance from RUSADA in terms of educational and other similar programs to prevent anti-doping rule violations⁷⁰. Following the start of the Chuvash doping scandal the RUSADA management excluded Chuvashia from all cooperation, without giving any reasons (for more details see Section 3.4 of this Report).

In these circumstances, it is clear that the Cabinet Council of the Chuvash Republic as the chief governance in the region, did not have sufficient information about what the problem was and how deep-rooted it was, whether it was systemic or resulted from individual incompetence, what shortcomings appeared in the work of various authorities, individual officials or entire institutions require immediate correction, etc.

As was stated above (see Section 1.9 of this Report *et seq.*) the Group was instructed to identify the existing shortcomings and omissions in the regional anti-doping work and to report the results, together with proposals to eliminate the identified shortcomings, in order to prevent the future occurrence of the very conditions of the anti-doping rule violations by the Republic's athletes and their personnel. All regional authorities and their subordinate organizations were ordered to assist the Group.

The Independent Working Group consists of three experts: two of them have a law degree, the first one specializes in sports law, the second one has an extensive experience in investigations, and the third expert is an experienced doctor with the relevant skills and qualifications. None of the Group members has ever been connected (directly or indirectly) with the Chuvash regional authorities, which excluded the possibility of a conflict of interest for any individual member of the Group, or for the entire Group as a whole.

3.2. Summary of the Independent Working Group's methodology

Given that the Cabinet Council of the Chuvash Republic was ordered to obtain as complete, comprehensive and objective information as possible about the essence of the violations underlying the "Chuvash doping scandal", the reasons for the anti-doping rule violations, and the degree of the regional officials and sports functionaries' involvement in certain illegal actions, the Group was made up of experts in various fields of law and sports medicine.

⁶⁹ see Katowice Declaration of 7 November 2019 (https://www.wada-ama.org/sites/default/files/resources/files/katowice_declaration_-_2019_world_conference_on_doping_in_sport_-_nov._6_final.pdf)

⁷⁰ for more details see Section 3.4 of this Report.

This provided the Group with the opportunity to comprehensively evaluate the information received, and also contributed to the ability to impartially analyze and quickly confirm/refute the evidence, to interview witnesses without delay, and to build trusting relationships with witnesses who were reluctant to contact representatives of an unfamiliar discipline (for example, initially, doctors often did not want to talk with lawyers, but they agreed to be interviewed in a medical professional's presence).

As in any other investigation, the Group had to check and double-check any information obtained during its work, and that is why some witnesses had to be interviewed twice or more.

The Group also had to take into account potential conflicts of interest between different groups of witnesses and the constant problem of assessing the reliability of the data collected.

By its Decree No. 717-r⁷¹, the Cabinet Council of Chuvashia obliged all regional bodies and regional subordinate institutions to assist the Group. Such assistance usually means the willingness to communicate with the Group, the Group's ability to obtain documents and explanations thereof.

The Group members collected and analyzed a huge number of documents, including not only official orders or resolutions, but also electronic and "paper" correspondence, accounting reports and summary tables, witness testimonies, video and photo files, etc. The Group conducted a large number of audio interviews (with recordings) with witnesses and other persons who shared a large amount of valuable information on the issues the Group is interested in. Having received and analyzed the documents, and having summarized the information collected, the Group consistently restored the true sequence of events and the cause-effect relationships thereof, without which it would have been impossible to reveal the root of the problem and its subsequent evolution.

All the evidence obtained by the Group either initially existed in electronic form or has been digitalized (documents have been scanned, etc.) and are stored separately on several protected media. All the evidence, together with the copies hereof, has been transferred to the Cabinet Council of the Chuvash Republic.

Initially, the Group was asked to submit a report on the results obtained within two months after the date when Decree No. 717-r was issued (i.e., approximately by 9 October 2019), but in the course of the work it turned out that a fairly large amount of information required verification, including through conversations with the RUSADA employees who have been conducting an investigation in 2017 in Chuvashia "following a hot scent". Nevertheless, due to the categorical refusal of RUSADA

⁷¹ Decree No. 717-r dated 9 August 2019 on establishing the Group.

employees to cooperate with the Group (see Section 8.7 below for more details), the verification of the reliability of the information received took much more time than the Cabinet Council of Chuvashia had originally expected, and therefore the Report preparation also took more time than expected.

The Group used the inferences and evidence evaluation methods that were more typical for sports jurisprudence, rather than those that are familiar to the practitioners of national administrative or criminal law. For example, the Group did not use the principle of “presumption of innocence” to draw its conclusions, however when establishing facts it was mainly guided by the “comfortable satisfaction” standard, which is used to review the cases of anti-doping rule violation or the cases of ethical violations in sports. This standard is considerably higher than the mere «balance of probabilities» standard used for athletes, but lower than the «beyond reasonable doubt» standard that is similar to the presumption of innocence. Why did the Group choose this approach? The fact is that the Group’s purpose was not to investigate the cases of individual athletes determining their personal degree of fault; rather, the Group never intended and does not intend to replace the activities of the RUSADA Disciplinary Anti-Doping Committee. In addition, the Group's purpose was not to establish an individual’s fault at the level required to apply administrative or criminal sanctions, as the Group is not a state law enforcement agency and does not have the appropriate authority. As repeatedly stated above, the Group's task is to provide the Cabinet Council of Chuvashia with an objective and actual picture of the events that took place two years ago, as well as to identify the shortcomings in the operation of the regional authorities and regional institutions working with athletes that could lead to violations, in order to come up with recommendations to eliminate the very causes of the violations themselves. Accordingly, in a number of cases the Group came to conclusions that (given the existing amount of evidence) were deemed appropriate or necessary on the basis of the chosen standard of proof (“comfortable satisfaction”).

Therefore, the conclusions and recommendations made publicly available herein are solely and exclusively owned by the Group. Such conclusions and recommendations cannot surely be binding, and, without any decisions taken by the competent authorities on the basis of the Group's recommendations, cannot *per se* entail specific legal consequences, including the application of sanctions.

3.3. Information sources

Of course, as in any investigation, the main information source for the Group were real people. One way or another, even documents and various reports are drawn up by people who can provide valuable information about the actual situation. It is not a secret that the documents prepared inside state institutions sometimes have postscripts, inaccuracies, and often use intentionally changed information or a

changed way of its presentation⁷². Therefore, it is the testimonies of the specific people interviewed by the Group to which the Group gives priority in terms of evidentiary significance.

At the first stage, the Group determined exactly where the work would start. It was necessary to answer the following questions: *“who and how made certain charges”, “what exactly is the subject of the charge/s”, “who and when committed the acts on which the charges are based”, “what is the real scale of the alleged violations”*. Only after receiving the indicated amount of information, one could proceed, namely, to begin to find out *“why some actions had been taken”*, or, on the contrary, *“why some actions had not been taken by those who could and should have taken them to prevent violations”*.

Accordingly, the Group publicly invited⁷³ the Chuvash athletes who received notifications from RUSADA regarding the alleged individual violations, to contact the Group and share the available information.

In addition, Group members immediately arrived in the capital of Chuvashia, the city of Cheboksary, where all the events had taken place two years before, and began to interview the athletes who had contacted the Group and the staff of the Cheboksary Olympic Reserve College named after I.M. Krasnov (the College), as well as coaches in various sport disciplines, doctors and other staff of the Medical Office at the College (a structural unit of the Republican Center), gradually rising higher along the “power ladder”. Thus, the Group members also interviewed (with audio recordings) the senior management of regional ministries, namely, the CR Ministry of Sports and the CR Ministry of Health. By the way, the Group gratefully notes the readiness of the vast majority of officials and sports functionaries to be interviewed by the Group and provide documents requested by the Group during such interviews in order to confirm or refute the information received by the Group.

In addition to interviews with “regular” witnesses, the Group also interviewed/talked to those witnesses who, for some reason, were afraid to reveal their identity and did not want their names to be publicly announced as information sources (“Confidential Witnesses”, see Section 1.1, 3.5 hereof). There were few such witnesses, but they all reported very valuable information that was later verified as generally truthful. Nevertheless, the Group had to check and double-check the information received from the witnesses, since often (especially for the events of two years ago) it is difficult to

⁷² It is no secret that placing public orders in a public space, one can try to evade the law requirements without affecting the offer itself, but only changing the way one presents the information about the product planned to be purchased (for example, replacing the specific name of the purchased drug - “Aminoplasmal” - with the description of the drug essence and properties: “liquid amino acid complex”, or replacing an international name with a national generic, etc.).

⁷³ in particular, Chair of the Group, Mr Artem Patsev, posted this invitation on his Facebook page in the same message, where he spoke about the start of the Group’s operation (<https://www.facebook.com/artem.patsev/posts/2387747764652391>).

separate a witness's personal position, which is a subjective assessment of past events and which he/she is ready to share, with objective information, which includes facts and circumstances he/she may have witnessed without such subjective distortions.

After each series of interviews, the Group conducted a verification of the witnesses' testimonies, comparing such testimonies with existing documents, with newly obtained documents, with other witnesses' testimonies, and also (importantly) with the testimony of the same witness, if he/she had been previously interviewed by the Group.

3.4. Reaction to the Independent Working Group creation (public statements)

As mentioned above, the Decree of the Cabinet Council of the Chuvash Republic to create the Group was signed and published on the official information portal of the Chuvash Republic on the evening of Friday, 9 August 2019.

The first reaction to the Group's creation and empowerment was made public the next working day, i.e. Monday, 12 August. Surprisingly, a rather negative reaction to the Group creation was expressed by RUSADA Director Mr Yuri Ganus. In his interview with TASS, Mr. Ganus said that the Group creation could *"cause certain alarm not only in the Russian Anti-Doping Agency and the world anti-doping community, but also in the Russian Government."* Mr Ganus also recalled *"McLaren's reports accusing the Russian state of participation in doping violations"*, and then continued: *"What if the Group's work actually results in an attempt to destroy RUSADA's cases, as happened earlier? In this case, everything will prove that one of the territorial bodies of the Russian Federation created a group, the activities of which impede the Russian Anti-Doping Agency's objective investigation of the numerous anti-doping rule violations, some of them involving minor athletes, within the constituent entity of the Russian Federation"* (quotes from TASS)⁷⁴.

Unfortunately, Mr Ganus did not specify what kind of "RUSADA's objective investigation" in Chuvashia he was referring to, because, as he earlier said himself, the investigation related to the Chuvash athletes had been completed, and the results management stage had begun. As of 9 August 2019, there have been no signs of the start of any new RUSADA "investigations", which could be facilitated by the state authorities of Chuvashia.

Perhaps this reaction was caused by the fact that, prior to answering a journalist's question, Mr Ganus had simply not been able to read the Cabinet Council's Decree regarding the Group creation, and did not have complete information.

However, in any case, given the long-established position of the global anti-doping community that encourages such investigations by state authorities (which Mr Ganus, as the RUSADA Director, must have been aware of), such a reaction seems somewhat

⁷⁴<https://tass.ru/sport/6755504>

premature. Moreover, it is likely that, the RUSADA Director had been too hasty in expressing his position, and was subsequently forced to maintain a similar line in his later public statements, as well as when giving certain instructions to his employees. In other words, the RUSADA Director (followed by his employees) was tied by such a reaction, having limited himself by bias and actually predetermined the future behavior of RUSADA, both in relation to the “Chuvash doping scandal” investigation and the cooperation with the regional authorities of Chuvashia. So, the Minister of Sports of Chuvashia, Mr. Bogaratov, in his interview with the Group, said that the draft of the Cooperation Agreement with RUSADA⁷⁵ signed by him on behalf of the Chuvash Republic had been sent to RUSADA in early June 2019 (i.e., even before the information about the “Chuvash doping scandal» became public) via one of the RUSADA’s employees. According to Mr Bogaratov, in late June 2019, RUSADA requested this draft document to be also sent by e-mail, along with an official cover letter, which was done immediately by the CR Ministry of Sports. However, to date, such an agreement has not been signed by RUSADA. At the same time, Mr Bogaratov said that he had personally talked with Mr Ganus in Nizhny Novgorod during the “Russia - Country of Sports” forum in October 2019, and had asked him when RUSADA would sign the agreement. According to Mr Bogaratov, Mr Ganus answered that he was aware that RUSADA had been reluctant to sign the cooperation agreement with the Republic of Chuvashia, however, this issue would be dealt with after the “Chuvash case” is resolved, without specifying the connection between the two events.

The next day, 13 August 2019, the CR Ministry of Sports posted⁷⁶ on its website the publication of *Sovetskaya Chuvashia* newspaper regarding the Group creation⁷⁷. It should be noted that, in the Group’s opinion, this publication also contained an attempt to influence public opinion regarding the “Chuvash doping scandal” (by repeating some statements made by Minister of Sports Mr Bogaratov at a press conference in June 2019), but the news of the Group creation itself wasn’t commented on by the CR Ministry of Sports or its officials.

However, a few comments on this subject were given in an interview by Deputy Minister of Sports of Chuvashia Mr Igor Golovin with the said *Sovetskaya Chuvashia* newspaper⁷⁸. The official briefly explained the reasons for the Group’s creation, and also expressed his hope that the Group would understand what had happened and objectively assess the situation.

⁷⁵ The model draft of the Cooperation Agreement between RUSADA and a constituent entity of the Russian Federation was prepared by RUSADA and, in late April 2019, it was sent to the constituent entities of the Russian Federation, which at that time did not have a valid cooperation agreement with RUSADA.

⁷⁶<http://sport.cap.ru/mobile/news/2019/08/13/v-chuvashii-sozdana-nezavisimaya-antidopingovaya-raboch>

⁷⁷<http://sovch.chuvashia.com/?p=212433>

⁷⁸<http://sovch.chuvashia.com/?p=214166>

Other authorities (both at the federal and regional levels) did not comment on the Group's creation.

3.5. Disposal of the information received by the Independent Working Group

Among other tasks, the Group needed to protect those who, in the course of cooperation with the Group, provided some important information, but were afraid of possible consequences arising from sharing this information. To this end, the Group decided not to disclose such witnesses' names and not to publicly disclose information that could facilitate the identification of them. Such witnesses, when it comes to the information they have provided, are designated in this Report as "Confidential Witnesses".

In addition, a number of documents received by the Group were not directly related to the Group's authority. However, given the importance of the information provided therein, the Group decided to forward these documents for proper investigation in the relevant body (for example, WADA or the Cabinet Council of the Chuvash Republic).

All the evidence collected by the Group was transferred to the Cabinet Council of the Chuvash Republic (taking into account small adjustments made to several audio files containing the interviews of the "Confidential Witnesses" to exclude the possibility of their identification). At the same time, all unedited (initial) audio files are securely stored in protected places known to the Group members.

3.6. Work progress, assistance and interference in objective information collection

As stated above herein, the Group's task was to collect and receive exclusively objective and confirmed information, in order to subsequently make justified conclusions and offer reasonable recommendations.

For these reasons, the Group needed to double-check any information received. This was especially necessary in case the information was extremely important (for the purposes hereof), for example, the actual number of anti-doping rule violations, the athletes, coaches and doctors' awareness of the actual anti-doping rules, etc.

From the very beginning, the Group had been receiving diverse and often extremely conflicting information. For example, doctors and athletes accused RUSADA of numerous violations, while coaches suspected the doctors of being dishonest; the doctors accused the coaches of being incompetent and secretive, etc. Even in relation to the same facts (whether an event or a series of events took place) the Group received two, or even three completely different points of view.

Above herein, the Group has already briefly described the methods for evaluating the information received, which surely included the verification of statements by

comparing them with the statements of other people, with objective data (e-mail messages, photo and video evidence, documents, etc.).

During the course of its work, the Group encountered a number of problems related to obtaining information or double-checking the information received. The Group could in no way draw hasty conclusions based on unverified information, and due to the need for thorough verification of all the evidence, the Group's deadline was significantly extended.⁷⁹

So, for example, at the very beginning of the Group's operation, Dr Svetlana Lareva (see more detail below in Section 7.10 hereof) refused to talk with the Group in case her voice being recorded. Moreover, Svetlana Lareva, who had provided the Group with copies of the decisions not to initiate criminal proceedings against her, nevertheless vehemently refused to provide the Group with access to the other materials of this criminal case.

A few more employees of the Republican Center were also very reluctant to talk with the Group, limiting the time devoted to such interviews by referring to various (most often personal) circumstances.

Some people who had been interviewed by the Group and gave their testimonies to the Group again, completely (or almost completely) changed their initial position. Moreover, such respondents refused to report who or what had caused such significant changes in their position. The Group believes that this is a manifestation of the attempted systemic control over the situation by those who were actually responsible for the shortcomings in their work.

Besides, on the day, when the Group's representatives were in Cheboksary and were ready to conduct an interview with some person, the Group sometimes discovered that the person was "on vacation". For example, Deputy Chief Physician of the Republican Center Ms Elena Naumova who was at her workplace, sent a message via her colleagues that her presence at work was merely accidental, since her vacation had already begun, although Ms Naumova had three more days left before her official vacation was due to start.

In addition, the Group was extremely disappointed with RUSADA's refusal to cooperate (for more details see Section 8.7 hereof). The Group believes that this is a consequence of the initial negative reaction of the RUSADA Director to the Group's creation (for more details see Section 3.4 above). Moreover, there is little doubt that had the Group received assistance from RUSADA employees, then the collation of information and all other work would have taken much less time.

⁷⁹ it was originally planned to complete the work within about 2 months (i.e., by mid-October 2019), but later the deadline for this Report was extended by one month, i.e. until mid-November 2019.

However, the foregoing does not imply that everyone affected by the “Chuvash doping scandal” in one way or another impeded the gathering of objective information by the Group. This surely is not true, and there are many positive examples of cooperation with the Group. In this context, the Group would like to note that both the College administration and the Republican ministries, namely, the Ministry of Sports and the Ministry of Health, were fully ready to cooperate. The Group would also like to express its special gratitude to Deputy Chief Physician of the Republican Center Mr Aleksandr Egorov, for the prompt and high-quality assistance in the Group’s activities.

SECTION 4: ANTI-DOPING RULE VIOLATIONS - GENERAL DESCRIPTION

4.1. Prohibited Substances

In accordance with the World Anti-Doping Code, doping is a violation of one or more of the 10 rules:

- 1) presence of a prohibited substance in the athlete’s sample,
- 2) use of a prohibited substance or a prohibited method,
- 3) evading, refusing or failing to submit to sample collection,
- 4) whereabouts failures,
- 5) tampering with any part of doping control,
- 6) possession of a prohibited substance or a prohibited method,
- 7) trafficking in any prohibited substance or a prohibited method,
- 8) administration of a prohibited substance or a prohibited method,
- 9) complicity,
- 10) prohibited association.

WADA annually updates the list of prohibited substances and methods. This List is published by October 1 of each year and comes into force on January 1 of the next calendar year.

The entire List is divided into three large sections: (1) the substances prohibited at any time, i.e. regardless of whether or not a competition is taking place (2) the substances prohibited only during competition period, and (3) the substances prohibited only in certain sports. In addition, all substances are divided into two classes: the so-called "specified" and "non-specified" substances. This classification exists to determine the degree of an athlete's fault in an anti-doping rules violation and to determine the subsequent sanction.

4.2. Prohibited Methods

In addition to Prohibited Substances, the Prohibited List also includes the so-called Prohibited Methods, which are divided into three groups:

- manipulations with blood and its components (including blood transfusions),
- chemical and physical manipulations,
- gene doping.

Chemical and physical manipulations, in particular, include intravenous infusions and/or injections in a volume of more than 100 ml within any 12-hour period, with the exception of inpatient treatment, surgical procedures or during clinical diagnostics.

This part of the Prohibited List was amended in 2018. The previous versions of the Prohibited List, in particular the one valid in 2017, prohibited the use of intravenous infusions and/or injections in a volume of more than 50 ml within a 6-hour period.

All Prohibited Methods are prohibited in both during competition and out-of-competition periods, and they are deemed equal to “non-special” substances.

4.3. Other anti-doping rules violations

The vast majority of the confirmed anti-doping rule violations are related to the first violation type (“Presence of a prohibited substance, or metabolites thereof, or markers in a sample taken from an athlete”). In accordance with the principle of “strict liability” established by the World Anti-Doping Code, if a prohibited substance or metabolites thereof are found in an athlete’s sample that had been analyzed by a WADA-accredited laboratory, the burden to prove the fact that the violation did not occur is borne by the athlete. Thus, in such a case, the main, and sometimes the only, but very convincing evidence of the violation is the accredited laboratory's report on the analysis outcome. In all nine other cases, the accusing anti-doping organization is required to prove that there has been a violation of the anti-doping rules.

Due to the fact that the burden of proof established by the Code is much more significant for anti-doping organizations than for athletes, it is much more difficult to prove such “other violations” (with the exception of the aforementioned case of detecting a prohibited substance in a sample), and they require from the anti-doping organization a lot of effort and often a lot of time. An example is the recent “Salazar case” where, despite a long-standing USADA investigation against the well-known coach Mr Alberto Salazar, two of the five charges against him were found unproven by the AAA panel of arbitrators⁸⁰.

4.4. Fight against doping at the global and national levels

⁸⁰ see para.521 here: <https://www.usada.org/wp-content/uploads/Salazar-AAA-Decision.pdf>

A prerequisite to build an effective anti-doping system is the application of efforts simultaneously at several levels.

As described above, after the Tour de France scandal in 1998, the sports community realized that, in order to ensure the athletes' right to participate in doping-free competitions, it is necessary to create a separate global organization responsible for developing a global anti-doping system and harmonizing the efforts of various stakeholders, as well as for coordinating the efforts to combat doping in the world. So, in 1999, the World Anti-Doping Agency was created.

WADA coordinates the anti-doping aspects of the activities of international sports federations and national anti-doping organizations, i.e. the Signatories.

International sports federations are the Signatories of the World Anti-Doping Code. They implement anti-doping programs in relevant sports among athletes participating in international competitions. These programs, first of all, include the maintenance of a registered athletes' pool for out-of-competition testing, testing during international competitions and during the out-of-competition period, and the implementation of educational activities.

National Anti-Doping Organizations (NADOs), which include RUSADA, implement anti-doping work within a particular state. The NADO jurisdiction covers all athletes of various levels, from the lowest to the international one, as well as the athletes' personnel, namely coaches, sports doctors/physicians, masseurs, administrators, etc. In a number of countries, according to the provisions of their national legislation, NADO powers have been extended to even cover the individuals doing sports in fitness clubs⁸¹.

4.5. Tasks and powers of national anti-doping organizations

As already mentioned in Section 1.2 hereof, both the NADO existence and its powers stem from the powers and functions of the state to eradicate doping and other types of fraud in sports. It is precisely by virtue of their obligations (in the form of signing or joining anti-doping international conventions) that states, including Russia, ensure the creation of NADOs and the operation thereof on their territory within the framework of national legislation, including the obligations to fund the activities of such organizations.

NADO is an organization independent of state and sports organizations defined as such by the respective state. The main NADO objectives are the development and

⁸¹for example, such powers are assigned to the anti-doping agencies of Belgium, Sweden, Denmark and Norway (see <http://theconversation.com/doping-controls-in-gyms-ineffective-costly-and-more-common-than-you-think-68797>, as well as <https://www.sciencedirect.com/science/article/pii/S2211266912000205> and <https://www.antidoping.no/english/news-and-social-media/q-a-doping-outside-of-sports>)

implementation of anti-doping rules (to be applied in the territory of this state), the sample collection, the results management in regard of possible anti-doping rule violations and hearings at the national level, the implementation of anti-doping educational programs.

The anti-doping rules developed by a NADO shall be recognized by WADA as complying with the World Anti-Doping Code. This is the main condition for the implementation of the relevant NADO activities.

The World Anti-Doping Code explicitly provides for the obligation of a NADO to prosecute all possible anti-doping rule violations, investigating (in each case!) whether the athlete's personnel or other persons were involved in the anti-doping rule violation, as well as the obligation to monitor the strict compliance with the sanctions.

In addition, NADOs shall automatically investigate the athlete's personnel if an anti-doping rule violation was committed by a minor athlete or by several athletes of the same coach/doctor.

The NADO's activities at any stage (and their conduct of investigations) are either regulated by WADA through adopting mandatory International Standards, or WADA gives NADOs recommendations and provides assistance, including practical assistance, by developing and publishing Guidelines/instructions of various kinds, Technical documents, etc. This is done to harmonize the efforts of anti-doping organizations around the world, as well as increase the efficiency of their activities.

Thus, a NADO bears a huge responsibility in the field of combating doping in the territory of a particular state, and, first of all, for the implementation of educational and other programs aimed at preventing doping use and creating zero-tolerance towards cheaters (both to cheaters in sports in the narrow sense and to cheaters in the broadest sense). Any deviations from fulfilling a NADO's obligations arising from the World Anti-Doping Code and International Standards and violations committed by a NADO during the course of its operation sharply reduce the effectiveness of the World Anti-Doping Program and also undermine athletes' and coaches' trust in both NADO itself and the anti-doping community as a whole.

4.6. Tests and investigations carried out by anti-doping organizations

In order to prevent the violation of anti-doping rules, a NADO tests athletes during competitions, as well as between competitions, during the so-called out-of-competition period. Tests are planned and carried out in accordance with the

approved (and periodically updated) WADA International Standard for Testing and Investigations⁸².

At the request of WADA, the share of out-of-competition testing should account for at least 65% of all the samples taken by the anti-doping organization. In addition, the anti-doping organization should focus on targeted testing, i.e. the athlete testing according to the previously provided plan, and not as the competition winner or as determined by draw.

Each anti-doping organization develops its own test distribution plan, taking into account the assessment of the prohibited substances' or methods' application risks. To help anti-doping organizations, WADA has developed documents with mandatory requirements for certain types of analyses (for example, for erythropoietin, for human growth hormone, etc.).

An anti-doping organization may either take samples on its own or hire specialized commercial firms.

However, traditional testing is not a very effective tool, given the cost of sample collection and sample analysis and the percentage of detected positive samples. In this regard, WADA requests anti-doping organizations to develop areas such as the Athlete's Biological Passport and investigations.

The task of the investigations is both to identify the possible violations of the anti-doping rules by athletes and their personnel, and to increase the effectiveness of the athletes' testing. In recent years, special investigation departments have been being established within anti-doping organizations. Most often, for such activities former law enforcement officials are involved, as they are most aware of the work specifics.

However, it should be noted that the tool set of the anti-doping organizations' investigation departments is actually limited by open information sources and the testimonies of the athletes themselves or their personnel, as investigation departments do not have the authority to conduct operational investigative or other similar detective measures that the law enforcement agencies are entitled to⁸³. Moreover, in Russia, the investigation departments' activities are not considered "detective activities", which also deprives anti-doping investigators of the tools available to private detectives. In such circumstances, the key to conducting successful

⁸² currently, the binding International Standard for Testing and Investigations 2019 is in force (valid from March 2019): <https://www.wada-ama.org/en/resources/world-anti-doping-program/international-standard-for-testing-and-investigations-isti>. At the same time, the section "Documents. International Standards" of the RUSADA website, even at the time of the publication hereof, contains the International Standard for Testing and Investigations 2015 (see <https://rusada.ru/documents/international-standards/>), although it ceased to exist in 2017 having been replaced by a new 2017 Standard.

⁸³ This problem is not unique to Russia. Thus, in its practice, the Court of Arbitration for Sports repeatedly emphasized that the any evidence obtained by anti-doping organizations cannot be assessed from the criminal law perspective (based on "presumption of innocence"), since «... [ADOs] lack coercive powers of the kind enjoyed by public authorities, in particular the police, over parties, potential witnesses and documents».

investigations include the investigators' impressive skill set and excellent awareness of not only the relationships in the sports world and the athletes and coaches' psychology, but also the documents governing the conduct of investigations. Otherwise, even obvious rule violators can go unpunished, and the causes of violations will not be addressed.

No doubt that, if skillfully carried out, investigations are, on the one hand, a fairly effective method of combating the anti-doping rule violations committed or planned (special prevention), and preventing the commitment of similar violations in the future (general prevention). On the other hand, in the course of investigations, an anti-doping organization may invade athletes and other people's private lives involving very sensitive aspects of everyday life and creating a risk of constitutional and fundamental human rights violation, and therefore such activity should rest on a firm legal basis.

That is why the anti-doping organizations' functions related to conducting investigations, firstly, are rather strictly regulated by the aforementioned binding International Standard for Testing and Investigations, and secondly, in order to avoid abuse, the investigation activities of anti-doping organizations are strictly controlled by external parties at any investigation stage (similarly to the prosecutor's control over criminal case investigations). This ensures the proper balance between the public interests aimed at eradicating doping in sport and the private interests of the individuals whose activities are the subject of the investigation. An excellent example of such best practices introduced in sports may be the activities of the Athletics Integrity Unit (AIU) initiated by IAAF. According to the current rules, any decisions or actions of AIU employees in the course of any investigation are subject to challenge in an independent body, namely, the Disciplinary Tribunal.

SECTION 5: MAIN SPORTING ORGANIZATIONS OF THE CHUVASH REPUBLIC

5.1. General information on Cheboksary College of Olympic Reserve

Budgetary Professional Educational Institution of the Chuvash Republic, Cheboksary Olympic Reserve College n.a.V.M. Krasnov (hereinafter - the College) is a non-commercial professional educational organization created to deliver services and undertake work in the areas of education, physical culture and sport). The college was created on the site of the Cheboksary Boarding School for Secondary School Athletes⁸⁴, which, in turn, was created at the site of Secondary School No. 32⁸⁵.

The College's founder is the Ministry of Physical Culture and Sport of the Chuvash Republic, with the College's educational activities managed by the Ministry of

⁸⁴ Decree No. 158 'On transforming the Cheboksary Boarding School for Secondary School Athletes into the Cheboksary School of Olympic Reserve' of the Council of Ministers of the Chuvash ASSR of 23 July 1989.

⁸⁵ Order No. 445 'On opening of a sports boarding school in Cheboksary' of the Ministry of Education of the Chuvash ASSR of 26 August 1983.

Education and Youth Policy of the Chuvash Republic, and use of the College property is managed by the Ministry of Property and Land Matters of the Chuvash Republic. The College's educational activity is conducted in accordance with a perpetual license⁸⁶, and entails a preprofessional and sports training program, in addition to the general secondary education and professional secondary education.

The Group would like to note that the sports training program is independently developed by the College, based on the federal educational standard.

As per the Charter, the College implements sports training programs in accordance with the federal standards for the following types of sport: biathlon; boxing; freestyle wrestling; cycling and mountain biking; alpine skiing; judo; speed skating; athletics; cross country skiing; swimming; sambo; artistic gymnastics; archery; triathlon; table tennis; weightlifting; freestyle skiing; ice hockey⁸⁷.

In 2016, the College was restructured and renamed the Cheboksary College of Olympic Reserve n.a. V.M. Kransov, and combined with the Budgetary Professional Educational Institution, Novocheboksarsk College of Olympic Reserve⁸⁸.

5.2. Information on study regime and living conditions for students at the College's boarding house

Admission to the college for professional secondary school study is on a competitive basis.

The College building is intended to fit 240 students and includes a sports hall designed for cycling, freestyle wrestling and overall physical training, a college canteen, which is serviced by a team of 12 staff and designed to provide three daily meals, and a boarding house for 226 students, joined with the education building into one complex, thus providing direct access from the education building to the boarding house.

The College's boarding house is intended for students who are not residents of Cheboksary, as well as international students. Students who win a scholarship to the college live at the boarding house for free.

The Group would like to note that the boarding house does not have a separate entrance to the College's entrance and internal guard post, therefore, the only way to get into the latter is through the College entrance. Consequently, entrance checks for the boarding house should extend to the College entrance.

The Group would also like to note that the Medical Office for the students is located on the ground floor of the boarding house. Since only some of the College students live in the boarding house and possess the appropriate access card to get inside, the other students, due to the guard post and the way that rules of conduct in the boarding house were followed, would not have had access to medical services. Therefore, the

⁸⁶ License No. 992 dated 13 March 2017.

⁸⁷ para.2.10 of the Charter.

⁸⁸ Decree of the Cabinet Council of the Chuvash Republic of 24 August 2016 No. 356 "On restructuring and renaming the Budgetary Professional Educational Institution of the Chuvash Republic, Cheboksary College of Olympic Reserve of the Ministry of Physical Culture and Sport of the Chuvash Republic".

location of the Medical Office inside the boarding house basically excludes the possibility of establishing entrance checks and complying with the abovementioned rules.

5.3. Coaches and teaching staff

Being a coach is a big responsibility since the young athletes see their coach not only as a teacher of sport, but also a strong leader and mentor. Many athletes trust their coaches much more than they trust their parents. This is especially true for athletes at the College, since a relatively large number of the students live at the boarding house, so they are in contact with their coaches more than with any other adults.

The income of the coaches, like in other parts of Russia, depends to a large extent on the success of their athletes, particularly in the "here-and-now" rather than future achievements. Therefore, coaches are extremely interested in their trainees rapidly achieving substantial results (acquiring sports titles, winning Russian national competitions, etc.), at the expense of a long-term strategy for preparing elite-level athletes. This is the reason why the coaching staff often engage in various tricks, from directly tampering with results at competitions to apparently harmless enhanced athlete training while ignoring doctors' orders about reducing the training regime on young bodies.

Teachers at the College undertake strictly academic activities – as in any other educational institution.

5.3.1. Coach Vyacheslav Georgiev

During an interview with the Group, Mr. Georgiev explained that he was responsible for training the cyclists. He is not a permanent staff member at the College as he is a full-time coach at Sports School of Olympic Reserve No. 7.

When invited by the Group to describe the circumstances under which he found out about his athlete being in the Medical Office when the Russian Anti-Doping Agency (RUSADA) and the Drug Control Service staff entered it, the coach stated the following:

- athlete Z is one of his leading athletes;
- after intensive training sessions, and also before and after competitions, he would send his leading athletes to the Medical Office at the College to assess their health and recovery status;
- on 8 June 2017, athlete Z was supposed to go the College for study after training. He did not know that Z was planning to undergo an intravenous infusion on 8 June 2017, at the Medical Office;
- someone else at the College told him about the events involving athlete Z in the Medical Office, saying that the incident is linked to RUSADA visit;
- when he arrived at the Medical Office, he found three men in civilian clothing, two of whom introduced themselves as RUSADA employees (one of them had

the surname 'Efimov'); the third man was a law enforcement officer, a major, as far as he can remember;

- the law enforcement officer told him that as part of a criminal investigation (he doesn't remember the case number), they are investigating a violation of anti-doping rules by athlete (Z), specifically relating to the prohibited use of intravenous infusions greater than 50 ml in volume;
- unlike the police officer, the RUSADA employees behaved extremely aggressively: they tried to prevent the coach from leaving the Medical Office, even though there were children waiting for him at the next training session, and they did not give any reasons whatsoever for barring him from leaving.

Mr Georgiev also stated that in June or July of 2017, the RUSADA employees invited him to the College to provide a statement about what he knew regarding the circumstances surrounding the abovementioned incident.

Mr Efimov, as well as another RUSADA employee, applied undue pressure on him when providing a statement, trying to make him admit that he forced his athletes to receive infusions at the Medical Office at the College.

Furthermore, at the time of providing the statement, the coach was aware that his other athletes had been summoned and questioned, as well as the methods used by RUSADA employees to obtain the necessary statements from athletes. He spoke out against such methods, especially in relation to one of his youngest athletes, with whom it was hard to establish psychological contact due to puberty and who had withdrawn into his shell after the pointless psychological pressure exerted on him by RUSADA employees. They replied that the presence of an instructor from the College at the interrogation *per se* guarantees their full immunity from such accusations.

The coach also confirmed to the Group that he was familiar with the anti-doping rules in terms of prohibited substances, however, he had not heard of prohibited methods before and first learned about them from the police officer, who explained to him the reasons for the events that occurred on 8 June 2017 at the Medical Office.

5.3.2. Coach Olimpiada Ivanova

Ms Ivanova told the Group that she trained the athletes in race walking for various distances. She is not a permanent staff member at the College as she is a full-time coach at Sports School of Olympic Reserve No. 8, as well as the Sports Training Center.

When invited by the Group to describe the circumstances under which she found out about the events relating to the "Chuvash doping scandal", the coach stated the following:

- she found out about the events relating to RUSADA uncovering a banned method in the College's Medical Office on 8 June 2017, only 2 years later, when her athletes began receiving notifications from RUSADA regarding possible anti-doping rule violations;

- she knew about Dr Svetlana Lareva prescribing intravenous infusions since she referred athletes to doctors herself after competitions and high-altitude training, in order to assist their recovery;
- at the same time, she did not know that doctors were prescribing infusions of more than 50 ml, and she believes that the athletes did not know about this either. She was sure that the sports physicians were keeping track of changes to anti-doping rules, so she has never had any concerns about this;
- she believes that there are no qualified sport physicians in Chuvashia, while doctors like Svetlana Lareva get their position through cronyism, irrespective of their professional level;
- she had heard from the athletes that they were given medications to take back with them, since it was easier for them [the athletes]. She had never heard of athletes being given infusion systems to take back with them.

5.3.3. Coach Mikhail Kuznetsov

Mr Kuznetsov was interviewed by the Group and explained that he trained the track and field athletes. He is not a member of staff at the College as he is a full-time coach at Sports School of Olympic Reserve No. 3.

When invited by the Group to describe the circumstances under which he found out about the events relating to the "Chuvash doping scandal", the coach stated the following:

- he visits the College very rarely, about 10 times per year;
- he believes that the College has an indirect bearing on what happens in the Medical Office;
- he knew that doctors at the Medical Office were giving medications into the hands of the athletes. He once told one of his female athletes that instead of taking the medications, she should give them to her parents;
- he believes that the lists of athletes, who received highly active substances like Neoton, were compiled by head coaches of the various sports teams;
- he suspects that prior to the athletes being summoned for questioning by RUSADA, Dr Svetlana Lareva pressured them to change their statements, specifically to omit the fact that they were given medications to take away, but instead to say that the medications were administered and used in the Medical Office as intended ;
- he knows that the athletes had to be checked up by the doctors to be able to participate in competitions as well as for the IME purposes. Because of this, athletes had to see the physicians not because they required medical help *per se*, but because they needed medical permissions. The doctors then prescribed unnecessary medications during these visits;

- prior to the events of 2017, he did not know about the banned infusion dosages; He only found out about this in 2018, when RUSADA conducted the relevant education events;
- the coach is angry that RUSADA took no action against the doctors of the Medical Office for two years, starting from 8 June 2017.

5.3.4. Coach Anatoly Petrov

In response to the Group's questions, Mr Petrov explained that he was not a staff member at the College since he worked part-time and was permanently employed as a coach at Sports School of Olympic Reserve No. 1.

When invited by the Group to describe the circumstances under which he found out about the events relating to the "Chuvash doping scandal", the coach stated as follows:

- his athletes did receive notifications from RUSADA about possible anti-doping rule violations;
- he is aware that to be allowed to participate in competitions and for passing the in-depth medical examinations, all athletes had to visit the sport physicians at the Medical Office, where various measures were prescribed, from reducing the training intensity to recovery therapy in the form of intravenous infusions;
- he does not know in which cases the doctors preferred to reduce the training intensity and in which cases to administer infusions, since he assumed that they were sufficiently competent in such matters and did not require additional monitoring by coaches.

5.3.5. Mr Nikolay Panfilov, Head Coach of the Regional Track and Field Team of the Chuvash Republic

When questioned by the Group, Mr Panfilov explained that he had not actually been doing any coaching since 2002 due to his administrative workload as well as to avoid any bias. He also holds the position of President of the Regional Track and Field Federation. He considers the main responsibilities of the Head Coach of the Chuvash Republic Regional Team to be as follows: assembling the regional teams of Chuvashia for championships and other competitions, conducting sports competitions, ensuring individual plans and medical examinations are performed in a timely manner.

Regarding the events relating to the "Chuvash doping scandal", the Head Coach stated the following:

- he has little knowledge of the events surrounding the "Chuvash doping scandal" except for the fact that in June 2017, RUSADA recorded a single violation of anti-doping rules at the College;
- he is aware that the Republican Center sent a list of athletes to the Head of the Medical Office at the College, in which the Chief Doctor Arnold Karzakov asked Dr Svetlana Lareva, as the person responsible for the track and field athletes, to

- pay "*special attention due to insufficient medications*" to these athletes. This list also included athletes who were representing other regions of Russia alongside Chuvashia;
- he does not exclude that athletes representing other regions alongside Chuvashia could have received double medications from the other regions they were representing;
 - he has no information about the quality and properties of the recovery procedures conducted at the Medical Office, but he is aware of coaches' complaints about a lack of a recovery-promoting drug called Neoton;
 - regarding the interaction between coaches and the doctors at the Medical Office, he distinguishes between those with a "good relationship" and those unlikely to be able to "persuade" the doctors to administer drugs like Neoton to their athletes;
 - he is familiar with anti-doping rules and prohibited methods, including the active ban on infusions larger than 50 ml within a 6-hour period. In his opinion, all the leading coaches also knew about this, at least in 2017. In particular, the following coaches should have known about this: Ms Olimpiada Ivanova, Mr Mikhail Kuznetsov, Mr Valentin Davalov, Mr Valery Grigoryev, Mr Sergey Smirnov, Mr Aleksey Prokopyev, Mr Anatoly Petrov.

5.3.6. College Principal Yuri Plotnikov

The Group conducted two conversations with the College Director Mr Yuri Plotnikov. Mr Plotnikov explained that he has a degree and has been the College Principal since 2011, providing overall management and coordinating staff activities.

Only 2 freestyle wrestling coaches are permanently employed by the College (Mr Denis Egorov and Ms Olga Smirnova), as well as 7 part-time coaches. Out of about 250 students, 43 are involved in the sports training programs at the College and the rest are being trained at sports schools.

When describing the financial component of the interaction between the College and the coaches, the Principal noted that a salary is paid by the College only to the coaches (including the part-time ones) who trained Russian championship medalists. This principle also assumes that part-time staff meeting the above criteria receive a salary only from the College and do not receive it at their main place of work. This approach allows sports colleges to use their budget in a more flexible manner given the limited funding, by directing the payroll budget of an absent staff coach (part-time coach) as bonuses to other permanent employees.

Moreover, based on the bonus payment internal regulation developed by the College, incentive payments are provided to coaches whose athletes were selected for the Russian national teams.

In response to the Group's questions about the nature of interaction between the coaches and the doctors employed at the Medical Office at the College, the Principal explained that he did not possess such information.

In response to the Group's question regarding a possible link between the use of recovery infusion therapy and a lack of food provided by the canteen, thus excluding such medical recommendations as a high-calorie diet, the Principal explained that the College strictly follows the recommended requirements for the caloric value of food. However, the Director noted that there is indeed insufficient funding for nutritional needs.

In response to the Group's question about how access to the College is organized and controlled, the Principal reported that entry is controlled using a turnstile, with the security guard providing admittance. The security guard also has to note down the document details of persons entering the College in a special notebook, excluding staff and students. The internal public areas of the College are also under video surveillance.

In response to the Group's comment that all its members freely entered the College without showing any documents, despite being neither staff nor students, the Principal explained that the Group's visit coincided with the lunch break, when the canteen is used not only by the staff and students, but also by the employees of nearby organizations.

During the interview, the Principal was also asked questions regarding the order of events which took place in the Medical Office on 8 June 2017. In response, he explained that he found out about the actual event after 2:00 pm, when the security guard informed him that two men had entered the College, passing by her without stopping or showing any documents. She immediately followed them, however, only managed to stop them in the corridor on the way to the boarding house (the turnstile at the entrance had not yet been installed at that time). They showed her their RUSADA identity documents and headed into the Medical Office.

On that day, he waited for the Chief Doctor of the Republican Center, Dr Arnold Karzakov, meeting him in the Medical Office at the College. The two men whom the caretaker had pointed out were present there, who introduced themselves as RUSADA employees but did not show any documents. The Head Sport Physician of the Medical Office, Dr Svetlana Lareva, was therein, and she appeared to be in shock. He did not see any law enforcement officers in the room. Once he had made sure that there were no questions relating to the College itself, he returned to his duties.

Over the following six months, RUSADA employees regularly came to the College to interrogate students. They requested that a room is provided for them each time, as well as an educator to question the junior athletes. Therefore, during various days in June-November 2017, the Principal would ask Ms Anna Chukmarova and Ms Elvira Fedorova senior instructors from the College's Sports Department, to be present when underage athletes were being interrogated, which prevented teachers from being taken away from their classes.

At the conclusion of the interview, the Principal made the following statements:

- the case involving RUSADA uncovering the use of a prohibited method at the College has no relation to the College and its employees, since the office is used by the Republican Center and its employees were the ones who carried out this violation;
- the College operates under the principles of openness and close collaboration with the students' parents, who participate in quarterly College meetings, where various matters are discussed, from everyday issues to organizing the educational process and sports events;
- in 2016, teachers at the College developed and implemented a further education program to study the anti-doping rules, the list of prohibited substances and prohibited methods, as well as the athletes' liabilities for violating these rules;
- the College never interfered in the work of the Medical Office and never supervised its activities since this is the jurisdiction of the Republican Center;
- he does not know anything about medications from the Medical Office being given to athletes to take away with them by the Medical Office and cannot clarify anything relating to this.

5.3.7. Instructor Olga Golovanova

Ms Golovanova told the Group that from 2008 to 2017, she was an instructor at the Novocheboksarsk School, but after the latter was combined with this College (in February 2017), she became an employee of the new institution while retaining the same role.

She received her university degree from the Chuvash State Pedagogical University n.a. I.Ya. Yakovlev, and retrained in physical education in 2017. Her duties as an instructor included assisting the teachers, developing local documents, preparing documents for the State Final Examination, supervision of students, and other general activities.

She does not remember the event when RUSADA uncovered the use of a prohibited method in the Medical Office on 8 June 2017, since she does not exclude the possibility that she might have been at the Novocheboksarsk Campus on the day specified above. Moreover, she still does not know where the Medical Office is located in the College.

In September 2017, she was approached by Ms Anna Chukmarova, senior instructor at the College, with a request to substitute her, because she was busy, at the RUSADA interrogation of underage athletes. Ms Chukmarova did not tell her anything about the reasons for this interrogation.

On the specified day, Ms Golovanova met with two RUSADA employees, whose names she does not remember. A female athlete, dressed in the uniform of the Russian National Team, soon arrived, and the RUSADA employee proceeded to question her. He spoke quietly and so did the child, and for this reason, since she was sitting several rows behind them (the questioning took place in a classroom), she only heard fragments and cannot explain what the conversation was about.

She remembers that the child answered in monosyllables and consequently the RUSADA employee spoke to her in an insistent manner, repeating, "*You definitely can't remember? Maybe you will remember?*" or "*Perhaps it was like this?*" Having established something in this manner, he personally entered the information onto the interrogation form.

During her interview with the Group, Ms Golovanova clarified that the RUSADA employees did not explain to her the rights and obligations of a person present at the interrogation of an underage individual, and did not ask her whether she had a teacher training degree. Her surname was written down the way she said it because she did not have any identity documents with her. When she had agreed to Ms Chukmarova's request, she thought that the presence of an adult during such questioning was a formal requirement, so she did not feel in any way responsible for what was happening in front of her. She agreed that she did not perform any real function during the interrogation of the child and did not understand the purpose of her presence there.

In response to the Group's question about whether the RUSADA employees explained to the child that the latter's testimony may amount to disqualification, she replied that she could not remember. She also cannot remember reading the text written by the RUSADA employees, because she would have remembered this moment if it had occurred.

Ms Golovanova also confirmed her signature on the first page of the underage athlete's testimony presented to her.

Except for this case, she did not participate in any other interrogations conducted by RUSADA.

5.3.8. Senior Supervisory Instructor Anna Chukmarova

Ms Chukmarova explained to the Group that she has been working at the College since 2010. From 2014 to 2017, she was on maternity leave to take care of her child, but since the middle of June, 2017, she had been back at work.

She received her college degree in 2013, having completed a distance education course at the I.V. Yakovlev Chuvash Republic State Pedagogical University in physical education instruction. She works in the Sports department of the College and her official duties include, *inter alia*, handling documentation, aiding coaches, and analyzing the competitive activities of the athletes, as well as other more general duties.

With regard to the incident in connection with which the RUSADA staff, on 8 June 2017, established the use of a prohibited method in the Medical Office at the College, she knows nothing and, consequently, remembers nothing.

She does not know the exact reason for which she was selected to participate in the interrogations of minors, but she supposes that it was due to the other teachers being otherwise occupied and the agreement between the College Principal and the RUSADA staff.

In her interview with the Group, Ms Chukmarova explained that the RUSADA staff did not explain to her the rights and obligations of a person present at the interrogation of a minor. Nor did they establish that she had a college degree. They relied on her words in taking down her last name. She supposes that the presence of an adult at this kind of interrogation is a formal requirement meant to avert acts of aggression on the part of the interrogator towards a minor being interrogated.

She was present at the interrogations on more than ten occasions, in the course of which two members of the RUSADA staff (the last name of one of whom was 'Efimov') first talked with athletes in an informal manner, and then filled out interrogation forms – sometimes by hand, sometimes having the children fill it out by themselves.

Prior to the filling out of the forms, the RUSADA staff members told the children that they were conducting an investigation into the activities of the doctors at the College and that they [the doctors] were supposed to render them [the RUSADA staff members] aid in establishing certain specific circumstances.

She recalls that the children, during their dialogue with the RUSADA staff members, often said *"I don't remember"* or *"I don't know"*, which prompted the RUSADA representatives to pose a host of leading questions in order to convince the child to see the sequence of events in a particular light. To convince them [the children] of that, they [the RUSADA staff members] produced copies of certain pages from the logs of controlled substances, which [pages] probably contained information regarding the names of a medicine and of a date it was given to a child. Presenting these pages, they would tell the child: *"See, you received this medicine – that means the doctors used it."* The children, recognizing their signatures, agreed with the conclusions of the RUSADA staff members, and the latter went back to entering their testimony in an interrogation form.

To the Group's question as to whether the RUSADA staff members explained to the children that their testimony could become a basis for disqualifying them, she answered that she was certain that no such explanation had been given. She also confirmed her signature on a number of copies of interrogation forms presented to her by the Group.

5.4. The Extent of Knowledge of Antidoping Rules for Students

In 2016 the Teacher's Committee⁸⁹ and the Principal⁹⁰ approved to use, in the College's educational activities, the programs developed by the College's teachers within the bounds of federal state educational standards for intermediate vocational education in the field of "Physical Education", in particular:

- "Bases of Control by Physicians", including a planned 99 hours of study, of which two academic hours are devoted to the topic of "Doping-Control in Providing Medical Services at Sporting Competitions".

⁸⁹ Protocol № 13 of the Meeting of the Teachers' Committee of 29 June 2016.

⁹⁰ Order № 82-o of the Director, issued as of 12 August 2016.

- “Establishing Legal Principles for Professional Activities” including a planned 54 hours of study, of which two academic hours are devoted to the topics of “General Provisions of Antidoping Policies in Modern Sports” and “Doping Control”.

The “Bases of Control by Physicians” program was recommended for use in the education of students beginning in the third year of study, while the “Establishing Legal Principles for Professional Activities” program was to begin in the second year of study.

The topic of “Doping–Control in Providing Medical Services at Sporting Competitions” lays out the effects of performance-enhancing drugs (doping) on the [human] system and describes the development and organization of doping control, as well as the procedure for taking samples in the course of doping control and the procedure for [their] analysis in the laboratory, and also analyses classes of prohibited substances and prohibited methods, with a separate consideration of fines for violations.

The “General Provisions of Antidoping Policies in Modern Sports” topic covers the general provisions of antidoping policies, the World Anti-Doping Agency and the Russian Anti-Doping Agency (WADA and RUSADA), and also the Prohibited List and classes of prohibited substances, and also prohibited methods and the side effects of the use of doping.

In the “Doping Control” topic, students study the list of substances prohibited by WADA and the consequences of use thereof.

Among the course of general vocational subjects at the College, three interrelated subjects were chosen: “Bases of Control by Physicians”, “Doping Control in Sports,” and “Sports Medicine.” Grades in these subjects form the basis for evaluating the knowledge of the students, with the exception of “Doping Control in Sports,” which ends with a “pass-or-fail” test.

An analysis of the educational programs described above showed that they were made part of the course of study only on 1 September 2016, and also that they were recommended for study only in or after the second and third year – in point of fact, first-year students (who entered the College on 1 September 2016) were deprived of the opportunity to obtain basic knowledge in the area of antidoping, in circumstances when that category of athletes comprises active participants in junior sports events.

In addition, the Group does not fully understand the process of appointing teachers for those courses, and the method for evaluating the extent of their own knowledge in the field of antidoping.

5.5. Medical Office at the College

In accordance with the Charter⁹¹, the College, in the context of sports training, conducts medical monitoring of the health of students and people undergoing sports training; it is responsible for safeguarding their life and health, ensuring restoration and

⁹¹ para.3.37. of the Charter.

rehabilitation measures; and it provides pharmacological, anti-doping, and psychological support.

Such forms of medical control, according to the Charter, include: medical examination at the dispensary; additional medical examinations before participating in competitions, after illness or injury, as well as monitoring the use of pharmacological products.

For these purposes, the College has the right to create offices for sports medicine, physical therapy, massage, and other treatment rooms necessary for sports training at an appropriate level and restoring students' sporting abilities.

Pursuant to the requirements of the Federal Law "On Education in the Russian Federation", the executive authorities in the field of health care are responsible for the organization of primary health care for students, and the educational organization is obliged to provide premises, free of charge, to the medical organization that meet the conditions and requirements for implementation of medical activities⁹².

In order to perform the statutory tasks, on 8 May 2013, an agreement was concluded between the College, with the consent of the Ministry of Property and Land of the Chuvash Republic, and the Republican Center on the transfer of non-residential premises on the first floor of the College dormitory, for use free of charge. These rooms housed the consulting rooms and offices of sport physicians, the department head, the treatment room, rooms for storage of medicines, physical therapy, etc.

The Medical Office is provided with the necessary equipment, supplies, and medicines, at the expense of the Republican Center.

Doctors and mid-level and junior medical staff are employed in the Medical Office of the Republican Center.

An analysis of the relationship that has formed between the College and the Republican Center indicates that medical care in the educational institution is not provided by the educational institution itself, but by employees of the Republican Center, for whom the College created all the necessary conditions for this, including providing premises that meet the necessary requirements for providing medical assistance.

5.6. General Information about the Sports Training Center

General information regarding the STC is provided above, in Section 1.7.1 of this Report.

5.6.1. STC Acting Director Aleksei Protapovich

Mr Protapovich, during an interview with the Group, explained that he had been acting director of the STC since 31 July 2019. Before that, he was deputy director of the STC's Ice Palace.

The following are the key statements made by Mr Protapovich during the interview with the Group.

⁹² see Article 41 part 3 of the Federal Law of 29 December 2012 No. 273-FZ "On Education in the Russian Federation".

The Director's main task is to coordinate the activities of the STC staff in order to fulfill the statutory tasks: formation of regional teams of the Chuvash Republic and arranging their performance both on the all-Russian and international levels, as well as ensuring their performances.

The lists of athletes on the level of regional teams are compiled by regional federations of the relevant sport. Such lists upon their approval are uploaded onto the official STC website and are available to the public.

The activities of the STC focus on athletes at the level of regional teams, which are a part of the staff, and whose financial support comes from the STC. The list of who will be a part of STC staff of for the following year is usually determined by the STC's commission, which meets in December of each year.

STC does not employ coaches or head coaches in sport.

Medical services for athletes employed by the STC are provided by the Republican Center. There are no separate medical offices in the STC facilities.

When asked by the Group about anti-doping events, Mr Protapovich replied that such events are held regularly with athletes, and STC Deputy Director Mr Anatoly Grigoryev, who was trained by RUSADA specialists, is responsible for this. Information on anti-doping topics is also publicly available on the STC website, including guidance on requests for the therapeutic use exemptions in regard of substances and methods that are banned in sport.

Furthermore, on 15 October 2019, the STC arranged a meeting with the leaders of regional sports federations (under the auspices of the CR Ministry of Sports), on the study of anti-doping rules and the Prohibited List.

Information provided by Mr Protapovich (as part of the anti-doping work undertaken by the Sports Training Center), was also confirmed by Deputy Minister of Physical Culture and Sport of the Chuvash Republic Mr Igor Golovin who was interviewed by the Group.

5.6.2. STC Deputy Director for Sports Anatoly Grigoryev

Mr. Grigoryev, who was interviewed by the Group, explained that, in addition to his duties as deputy director of the STC, he was responsible for anti-doping support for all athletes in the CR, including holding informational seminars, meetings with athletes, coaches, and the heads of sports federations.

His assignment since April 2019 of responsibility for anti-doping support throughout the region was enshrined in an order of the CR Ministry of Sports.

Since April 2019, Mr Grigoryev has conducted more than 10 seminars among coaches of various regional federations for different sports, to which employees of medical sports institutions were not invited.

He knew that RUSADA revealed the use of the prohibited method in the College only in June 2019 and cannot provide any details thereon.

He notes a lack of desire among the coaches to use modern technologies, including the "Check Medicine" online service on the RUSADA website or a mobile application that has similar functionality.

In reply to the Group's questions about how to create awareness among athletes who are minors, of their personal responsibility for what sport physicians prescribe to them or what coaches recommend, Mr Grigoryev explained that doctors should be more responsible for that category of athletes, since their competence definitely includes analysis of the substances/methods prescribed by them. Coaches, in Mr Grigoryev's opinion, should be held responsible for deliberately using their authority to impose on minors the use of a particular substance/method that is on the Prohibited List. He also believes that anti-doping culture should be instilled in young athletes as early as possible, and their parents should be involved too.

5.7. Conclusions and recommendations

For the Group it was indeed surprising to find out that experienced and distinguished coaches, whose trainees were administered with a prohibited method, didn't know that such methods were prohibited, or that this prohibited method was being applied by the Medical Office at the College.

In the view of the Group this seems highly unlikely for the following reasons:

- a coach and his/her athlete are, as a rule, in close touch every day;
- coaches follow all aspects of an athlete's life very closely, in particular the younger ones, and give the athletes regular instructions;
- coaches, especially those whose trainees have attained a senior position within the sport, cannot be unaware of the anti-doping rules;
- many coaches themselves have been visiting the College's Medical Office for conversations with sport physicians;
- the door to the Medical Office (where the intravenous infusions took place) was always open as a general rule and at any given moment three couches were visible fitted with poles for a medicine dropper. In addition, there was a nameboard on the door itself with the heading 'Procedures for intravenous injections', which left no doubt as to its meaning.

At the same time, the Group received no objective and reliable evidence showing coaches' intention to use a prohibited method on any athlete.

Certainly the Group noticed how uninformed the athletes were about the core essence and objective of the anti-doping rules. An independent development of a certain 'anti-doping' component in an educational course, in the view of the Group, is more like self-medication for a serious illness. It is unlikely that this approach, when such a component is included into the educational course without the assistance of a person responsible for anti-doping in the region or without the assistance of a NADO, may be deemed correct.

The Group was also very surprised that the College's instructors, who are supposed to be well-educated, do not properly understand the role of a teacher during an interrogation of minors; nor do they understand the purpose of a teacher's presence during an interrogation.

Considering the above, the Group has come up with the following recommendations:

With respect to the College:

THAT the College's buildings and boarding houses be provided with vivid and easily accessible anti-doping materials describing the essence and meaning of anti-doping rules;

THAT content of the 'anti-doping' module in the College's educational program be reviewed together with the person responsible for anti-doping work in the Chuvash Republic;

THAT an appropriate access control system to the College be introduced, limiting access to those who work or study in the College (following the model of other educational institutions). In addition, THAT a separate level of access to the boarding house be created where minors live, in order to limit such access to outsiders.

With respect to the Ministry of Physical Culture and Sport of the Chuvash Republic and regional sports federations:

THAT coaches' knowledge of anti-doping rules and other issues of preventing doping in sport be tested, so that coaches start actively following the rules of preventing anti-doping rule violations by athletes (according to labor agreements and/or part 4 of article 348.2 of the Labor Code of the Russian Federation). In cases of failure to meet the necessary requirements THAT dismissal measures be taken, on the basis of point 3, part 1 of article 81 of the Labor Code of the Russian Federation.

With respect to the Ministry of Education and Youth Policy of the Chuvash Republic:

THAT additional training be undertaken (with effective knowledge control) of Chuvashia's educational institutions' teaching staff regarding the rights, responsibilities and duties of teachers requested to be present during a minor's interrogation.

SECTION 6: ATHLETES ALLEGEDLY AFFECTED BY THE "DOPING SCANDAL" IN CHUVASHIA

6.1. Establishment by the Independent Working Group of a list of athletes included on the list of alleged violators of anti-doping rules

As was stated above in Section 2.3 of this Report, the complete list of athletes accused by RUSADA of violating anti-doping rules was kept in secret from the regional authorities – and, in particular, from the CR Ministry of Sport. This information only became known when a certain athlete opened his email, saw the message from

RUSADA, and decided to share the information with the regional Ministry via his coach. The problem is that neither the athletes nor the coaches had any anti-doping training and didn't know what 'a provisional suspension' meant. In the overwhelming majority of cases, the athletes were completely ignorant of the accusations and did not know what to do with them.

Following on from the above, at the beginning of the investigation the Group publicly offered⁹³ those athletes who had received a personal notice of charge from RUSADA to get in contact with the Group and share such information.

Many athletes replied and the Group managed to speak to them (the Group met most of them in Cheboksary and one in Moscow).

6.2. Interviews with athletes

The Group conducted numerous interviews with athletes who studied at different times at the Cheboksary Olympic Reserve College named after Krasnov. At the same time, some of the athletes lived in the boarding house, and others never lived there residing with their relatives in Cheboksary. In addition, almost all of the athletes interviewed by the Group are of completely different ages and engage in different sports without seeing each other even during training.

Many of the athletes interviewed by the Group were very worried about their future careers, but the Group got the impression many had already lost hope of justice and did not believe that their testimonies would change anything, perceiving RUSADA as a corrupt body.

The Group has every reason to trust the interviewed athletes. Firstly, as mentioned above, the interviewed athletes were engaged in completely different sports and were of different ages, they lived either in the college boarding house or at home with their relatives, and the vast majority of the interviewed athletes were not even familiar with each other. Secondly, all these completely different and unrelated people confidently say the same things. Thirdly, with very few exceptions, they seemed to the Group to be open and honest people, even if their honesty sometimes runs high. Thanks to the information provided by the athletes, the Group received an important evidence base, including the most serious evidence regarding the unacceptable methods of RUSADA, for subsequent analysis.

The mere fact that completely different people who were not connected with each other at all and did not even know each other, testify almost the same about how they were treated by the RUSADA ADRVID officers, is a solid basis for formulating the Group's conclusions.

⁹³ in particular, Chair of the Group, Mr Artem Patsev, posted this invitation on his Facebook page in the same message, where he spoke about the start of the Group's operation (<https://www.facebook.com/artem.patsev/posts/2387747764652391>)

6.2.1. Athlete A1

Discussion of the Group with Athlete A1 took place in August 2019 in Cheboksary.

Athlete A1 presented to the Group the package of evidence collected against him by RUSADA, including:

- the explanation of the Athlete himself;
- copies of controlled substances, containing, in addition to his signature, an indication of the Athlete's ranking, his coach, and the name and dosage of the medicine he received;
- the explanation given to RUSADA by procedural nurse Elza Markova (now Grigorieva);
- the explanation given to RUSADA by senior nurse Ms Danilova;
- the explanation given to RUSADA by the Head of the Medical Office at the College, Dr Svetlana Lareva.

The following is a summary of his statements:

- he had reached adulthood by the time of his questioning by RUSADA officials;
- he never received any anti-doping education and has only a general idea that "doping is bad";
- the interaction of Athlete A1 and sport physicians which led to the prescription of intravenous infusions, was as follows:
 - the Athlete visited the medical office either in connection with admission to the competition, or once every six months, because of the need to undergo a mandatory in-depth medical examination (IME);
 - considering the results of the examination, the Head of the Medical Office, sport physician Dr Svetlana Lareva, sent Athlete A1 to the Republican Center for analyses, and to a cardiologist;
 - based on the results of tests and a cardiogram given to Athlete A1, Dr. Svetlana Lareva prescribed a course of rehabilitation therapy, with the intravenous infusion of the drugs named in the logs of controlled substances⁹⁴, in accordance with the procedure sheet drawn up by her;

⁹⁴ The form, conditions of storage, and procedure for filling out the log of controlled substances were approved by Order of the Ministry of Health of the Russian Federation of 17 June 2013, No. 378n, "On approval of the rules for registering operations related to the circulation of medicines for medical use, included in the list of medicines for medical use, subject to registration in special logs for controlled substances, for operations related to the circulation of medicines for medical use, and the rules for maintaining and storing special logs related to the handling of drugs for medical use" (registered in the Ministry of Justice of Russia on 15 August 2013, No. 29404).

- the procedure sheet containing the name of the drug, its dosage, and the number of procedures, was handed to Athlete A1 for transfer to the senior nurse at the Medical Office responsible for the handling and disposal of drugs;
 - Athlete A1 signed the logs of controlled substances for receipt of the drugs given by the senior nurse (the quantity of the entire course of medication) and infusion systems;
 - Athlete A1 gave these drugs and infusion systems to the treatment nurse of the Medical Office, who placed them in the treatment room, signing them for identification purposes with the Athlete's surname, and directly administered the doctor's prescription for intravenous infusions;
- his explanations, provided in 2017 for RUSADA, only partially correspond to the actual circumstances, namely:
- Athlete A1 confirmed that the explanation he gave was written by him personally;
 - Athlete A1 confirmed the authenticity of his signatures in the logs of controlled substances, copies of the pages of which were shown to him by RUSADA employees;
 - Athlete A1 confirmed the fact of the intravenous infusions, refuting their correspondence to the number of units of the medicine and infusion systems, actually received by him in the Medical Room (and confirmed by his signatures in the log of controlled substances). In other words, Athlete A1 was handed a larger quantity of drugs and infusion systems than what he was subsequently administered with;
 - Athlete A1 confirmed that the infusion therapy prescribed by Dr. Svetlana Lareva was partially administered, categorically rejecting the statement contained in the explanation about the full administration of the procedures. At the same time, Athlete A1 indicated that various objective reasons prevented the actual delivery of the infusions, thus making it impossible for him to have been present in the Medical Office at the time of the procedures (from morning to 14:00) on the appointed days.
- among the reasons that influenced his giving false testimony, the Athlete indicated the following:
- the RUSADA employees who questioned him were not satisfied with the answer *"I don't remember"*, so that Athlete A1 was shown copies of the log sheets of controlled substances (which indicated the amount of drugs he had received), and the RUSADA employees insisted that he should have

used all the drugs he received, which should have been reflected in his explanation;

- the RUSADA employees told him before the start of the questioning that they were completely uninterested in Athlete A1 himself, and there were not, could not and would not be any allegations of anti-doping violations targeted at him. The RUSADA employees informed him that they were only interested in the evidence against the doctors of the Medical Office;
- being assured that there was no danger to him, and the information transmitted (or its (in)accuracy) would not have any consequences for him personally, Athlete A1 agreed to write explanations by hand, but as directed by the RUSADA employees who conducted the questioning.

When asked by the Group about whether RUSADA employees had warned him about the possible use of his testimony against him, Athlete A1 answered in the negative.

6.2.2. Athlete A2

The Group interviewed the Athlete in September 2019 in Cheboksary. The following are some of the statements made by Athlete A2 regarding the circumstances investigated by the Group regarding the use in the Chuvash Republic of a method prohibited by anti-doping rules:

- the interaction between Athlete A2 and sport physicians, which lead to the prescription of intravenous infusions, took a very similar pattern to that described by Athlete A1;
- in order to receive the pharmaceutical products and have them medically administered, Athlete A2 signed three different logs of controlled substances, for example: one for "Aminoplasmal"; another for "Cytoflavin" and saline and a third for infusions.
- he noted that he did not see any method of directly recording the procedures, with the exception of reducing the number of medicines signed for under Athlete A2's name in the Medical Office, and did not sign anywhere for the fact they were carried out;
- Athlete A2 informed his coach about intravenous infusion prescriptions, the coach refrained from taking any action and giving any warning, assuming that the prescriptions given by the sport physicians were in line with their competence and were obligatory;
- the doctor did not associate the prescribed intravenous medicines (Cytoflavin and Aminoplasmal) with competition admission rules. The prescriptions based on the results of tests and an ECG given at the Republican Center were made by:

the Head of the Medical Office at the College, sport physician Dr Svetlana Lareva, as well as sport physician Dr Yana Bakhtina, who saw him at the Medical Office at the College;

- the procedural nurse Elza Markova administered the infusions prescribed by the aforementioned sport physicians;

Athlete A2 presented the Group with a package of evidence collected against him by RUSADA regarding allegations of the possible use of a method prohibited by the anti-doping rules: overall, it was identical to the package submitted by Athlete A1, with the exception of additional copies of the individual pages of Athlete A2's regular medical check-up and control card.

When asked by the Group about the possibility of trusting the information given by Athlete A2 in the explanatory declaration given by him to the RUSADA officials, Athlete A2 declared that it was partially incompatible with the actual circumstances, and in particular:

- Athlete A2 confirmed that his explanatory declaration had been written by him personally;
- Athlete A2 confirmed the authenticity of his signatures in the logs of controlled substances, copies of the pages of which were presented to him by RUSADA officials;
- Athlete A2 confirmed that the intravenous infusions were carried out but refuted the tally of their number against the number of units of the medical product (infusions) indicated in the log/s of controlled substances;
- Athlete A2 confirmed the fact that the courses of infusion therapy prescribed by both Dr Svetlana Lareva and Dr Yana Bakhtina had been partially completed, while refuting the statement contained in the explanatory declaration that the courses had been fully completed on the same grounds as Athlete A1, as well as due to his participation in competitions;
- Athlete A2 noted separately that the RUSADA officials had the original of his regular medical check-up and control card, although he had never provided them with it.

When asked by the Group about the circumstances surrounding his provision of explanatory declarations to the RUSADA officials, Athlete A2 reported the following:

- at the request of a person (who he does not remember), he arrived one day in September 2017 at an appointed time at the College to meet with the RUSADA officials;

- waiting for him were Mr Efimov and Mr Stetsyuk the investigators with RUSADA ADRVID;
- without explaining the reasons for his being called, one of them handed the athlete a blank explanatory declaration form, indicating that the questionnaire part needed to be filled out;
- after it was filled out, the same person began to dictate the text of the explanatory declaration, checking it against the information in the copies of the log of controlled substances;
- at the time, Athlete A2 did not object to writing down his own testimony from the words dictated by a RUSADA official because not only did he not remember the dates of the infusions, but also did not know the medical names of the drugs administered (such as “Aminoplasmal E15” or “0,9% NaCl solution”) as well as the size of the doses, which were recorded in the explanatory declaration.
- the RUSADA officers did not warn him of the possibility of the evidence being used against him and his possible disqualification.

When asked by the Group about his knowledge of anti-doping rules and prohibited methods of taking them, as well as the source of this knowledge, Athlete A2 informed us that in 2017, he knew that a pharmaceutical product could be checked for compliance with the rules via Internet, however, he did not know that there were prohibited methods of administering products that are not prohibited themselves.

6.2.3. Athlete A3

The Group interviewed Athlete A3 in September 2019 in Cheboksary. Below are some of the statements made by Athlete A3 regarding the circumstances under investigation related to the use in the Chuvash Republic of a method prohibited by the anti-doping rules:

- the interaction between Athlete A3 and the sport physicians, which led to the prescription of intravenous infusions, took a very similar pattern to that described by Athlete A1 with the only difference being that the initial examination of the athlete was performed by sport physicians from the Republican Center itself, with him consequently being sent for infusion therapy to the Medical Office at the College;
- in order to receive the pharmaceutical products and have them medically administered, Athlete A2 made signatures in the log of controlled substances;
- he did not inform the coach about the administration of the intravenous infusions, who assumed that this circumstance was of no significance;

- at the Medical Office at the College, following the results of the test analyses provided by him and the ECG, the intravenous medicines “Cytoflavin” and “Neoton” were prescribed. They were prescribed by the Head of the department, sport physician Dr Svetlana Lareva, who saw him at the Medical Office at the College;
- the procedural nurse Elza Markova administered the infusion systems for the prescriptions given by the aforementioned sport physician;

Athlete A3 presented the Group with a package of evidence collected against him by RUSADA regarding allegations of the possible use of a method prohibited by the anti-doping rules: in the whole, it was identical to the package submitted by Athlete A1, with the exception of additional copies of the individual pages of Athlete A3’s regular medical check-up and control card.

When asked by the Group about the possibility of trusting the information given by Athlete A3 in the explanatory declaration given by him to RUSADA officials, Athlete A3 declared that it was partially incompatible with the actual circumstances, and in particular:

- Athlete A3 confirmed that his explanatory declaration had been written by him personally;
- Athlete A3 confirmed the authenticity of his signatures in the logs of controlled substances, copies of the pages of which were presented to him by RUSADA officials;
- Athlete A3 confirmed that the intravenous infusions took place but refuted the tally of their number against the number of units of the medical product (infusions) indicated in the logs of controlled substances;
- Athlete A3 confirmed the fact that the course of infusion therapy prescribed by Dr Svetlana Lareva had been partially completed, while refuting the statement contained in the explanatory declaration regarding the full completion of the course of procedures, because “Cytoflavin” had been stopped since it had had a negative effect on Athlete A3;
- Athlete A3 confirmed that he had personally handed over his regular medical check-up and control card to the RUSADA officials who had called him for interview, when they asked for it without informing him of the purpose of their interest in it.

When asked by the Group about the circumstances surrounding the provision of the explanatory declarations to the RUSADA officials, Athlete A3 reported the following:

- at the request of a person (who he does not remember), he arrived one day in February 2018 at an appointed time at the College to meet with the RUSADA officials;
- waiting for him were Mr Efimov and Mr Stetsyuk, the RUSADA ADRVID officials;
- without explaining the reasons for his being called, one of them handed Athlete A3 a blank explanatory declaration form, indicating that the questionnaire part needed to be filled out;
- after completing it, the same person began to ask Athlete A3 questions regarding the circumstances surrounding the prescription and administration of the infusion therapy, after which he herself provided the wording for a text that Athlete A3 was required to write down in his own name;
- at the time Athlete A3 did not object to writing down his own testimony from the words dictated by a RUSADA official because he did not remember the dates of the infusions and the dosages of the drug administered which were recorded in the explanatory declaration;
- the RUSADA officials did not warn him of the possibility of the evidence being used against him and his possible disqualification.

When asked by the Group about his knowledge of anti-doping rules and prohibited methods, as well as the source of this knowledge, Athlete A3 informed them that in 2017, he knew that pharmaceutical products could be checked for compliance with the rules in Internet, as a result of which he checked the pharmaceutical product “Neoton” for such a match, however, he did not know that there are prohibited methods of administering pharmaceutical products that were not prohibited for use.

6.2.4. Athlete A4

The Group interviewed Athlete A4 in October 2019 in Moscow.

Athlete A4 was underage both at the time of receiving the infusion therapy and at the time of his interview by RUSADA officials.

The following are some of the statements made by Athlete A4 regarding the circumstances investigated by the Group regarding the use in the Chuvash Republic of a method prohibited by anti-doping rules:

- the interaction between Athlete A4 and the sport physician, which led to the prescription of intravenous infusions, took a very similar pattern to that described by Athlete A1;

- in order to receive the pharmaceutical products and have them medically administered, Athlete A4 made signatures in the logs of controlled substances;
- due to a weak immune system, Athlete A4 had been recovering for a long time after suffering illnesses, which reduced the effectiveness of his training and led to a number of unscheduled visits to the sport physicians, at the insistence of his coach;
- Athlete A4 informed his coach about the intravenous infusion prescriptions, who deemed that the prescriptions given by the sport physicians were in line with their competence;
- the prescriptions based on the results of tests given at the Republican Center were made by the Head of the Medical Office at the College, sport physician Dr Svetlana Lareva, as well as sport physician Dr Yana Bakhtina, who saw him at the Medical Office at the College;
- the procedural nurse Elsa Markova administered the infusions prescribed by the aforementioned sport physicians;
- he noted that many of the students used to call in at the Medical Office as a way to avoid classes they didn't like.

Athlete A4 presented the Group with a package of evidence collected against him by RUSADA regarding allegations of the possible use of a method prohibited by the anti-doping rules: in the whole, it was identical to the package submitted by Athlete A1.

When asked by the Group about the possibility of trusting the information given by Athlete A4 in the explanatory declaration given by him to RUSADA employees, Athlete A4 declared that it was partially incompatible with the actual circumstances, and in particular:

- Athlete A4 confirmed that his explanatory declaration had been written by him personally;
- Athlete A4 admitted (taking into account age-related changes) the authenticity of his signatures of his signatures in the logs of controlled substances, copies of the pages of which were presented to him by RUSADA officials;
- Athlete A4 confirmed that the intravenous infusions took place but refuted the tally of their number against the number of units of the medical product (infusions) indicated in the logs of controlled substances;
- Athlete A4 confirmed the fact that the courses of infusion therapy prescribed by Drs Svetlana Lareva and Yana Bakhtina had only been partially completed, while refuting the statement contained in the explanatory declaration that the courses had been fully completed - due to a clash between his study timetable and the

working hours of the Medical Office, and likewise because of his frequent departures for competitions and training camps;

- Athlete A4 denied that the duration of each separate procedure was “30-40 minutes” as indicated in the explanatory declaration, because he stated that intravenous infusions had been limited to a 15-minute period measured by a 15-minute hourglass, which was in the Medical Office, because at the time Athlete A4 was a minor, with a comparative low body weight.

When asked by the Group about the circumstances of providing explanatory declarations to the RUSADA officials, Athlete A4 reported the following:

- at the request of his coach, on one day in September 2017, Athlete A4 arrived at an appointed time at office 201 in the College for a meeting with RUSADA officials;
- waiting for him were Mr Efimov and Mr Stetsyuk the RUSADA ADRVID officials, as well as a woman whom Athlete A4 mistook for another RUSADA official;
- explaining the reason for his invitation to the meeting, one of them pointed to the inspection report of the actions of the sport physicians, who, in his words, did not have the right to provide medical services on the premises of the College;
- the same RUSADA employee handed Athlete A4 a blank explanatory declaration form, indicating that the questionnaire part needed to be filled out;
- after the questionnaire part was filled out, the same person began to dictate to Athlete A4 the text of the explanatory declaration, checking it against the information in the copies of the logs of controlled substances;
- at the time, Athlete A4 did not object to writing down his own testimony from the words dictated by a RUSADA official because he did not remember the dates of the infusions and the doses administered and assumed the information communicated to him was true;
- during the entire 45 minutes it took to fill out the explanatory declaration form, the woman who was present in the room with him did not say a word. He later found out that this woman was the College's instructor, invited by RUSADA to participate in his interview and to protect his rights as a minor;
- the RUSADA officials did not tell Athlete A4 that he could inform his parents (legal representatives) about the interview being conducted;
- the RUSADA officials did not warn him of the possibility of the evidence given being used against him and his possible disqualification.

When asked by the Group about his knowledge of anti-doping rules and prohibited methods, as well as the source of this knowledge, Athlete A4 informed them that in 2017, he did not know anything about such things. It is only in the 3rd year at the College that students are taught the basics of doping test system, the course for this is completed upon successfully passing a test.

6.2.5. Athlete A5

The Group interviewed Athlete A5 in September 2019 at the College, in Cheboksary. The following are some of the statements made by Athlete A5 regarding the circumstances investigated by the Group related to the use of a method prohibited by anti-doping rules in the Chuvash Republic:

- the interaction between Athlete A5 and sport physicians, which led to the prescription of intravenous infusions, took a very similar pattern to that described by Athlete A1;
- In order to receive the pharmaceutical products and have them medically administered, Athlete A5 made his signatures in the logs of controlled substances;
- Athlete A5 did not undergo the infusion procedures at all, due to a clash between the work schedule of procedural nurse (Elza Markova) and the academic timetable, moreover all the drugs issued to him were taken home by Athlete A5 and given to his parents;
- Athlete A5's coach was not involved in the rehabilitation therapy, he only visited the Medical Office at the College in order to obtain documents for admission to competitions, and his only part in the athlete's recovery was to reduce the level of his training;
- the prescriptions based on the results of tests and the ECG given at the Republican Center were made by: the Head of the Medical Office at the College, sport physician Dr Svetlana Lareva, as well as sport physician Dr Yana Bakhtina, who saw him at the Medical Office at the College;
- the sport physicians warned Athlete A5 not to tell any other people that they had given him the drugs and infusion systems;
- he noted the existence of a "list" of athletes involved in athletics, which the sport physicians had used as the basis for the prescription and delivery of highly effective drugs to athletes, although Athlete A5 himself never saw it.

Athlete A5 presented the Group with a package of evidence collected against him by RUSADA regarding allegations of the possible use of a method prohibited by the anti-doping rules: in the whole, it was identical to the package submitted by Athlete A1.

When asked by the Group about the possibility of trusting the information given by Athlete A5 in the explanatory declaration given by him to RUSADA employees, Athlete A5 declared that it was partially incompatible with the actual circumstances, and in particular:

- Athlete A5 confirmed that his explanatory declaration had been written by him personally;
- Athlete A5 confirmed the authenticity of his signatures in the logs of controlled substances, copies of the pages of which were presented to him by RUSADA officials;
- Athlete A5 denied that the courses of infusion therapy prescribed by sport physicians Drs Lareva and Bakhtina had been completed, he also refuted the statement contained in the explanatory declaration regarding the completion of the corresponding courses and procedures.

When asked by the Group about the circumstances surrounding the provision of explanatory declarations to the RUSADA officials, Athlete A5 reported the following:

- at the request of his coach, he arrived in July 2017 at an appointed time at the College to meet with RUSADA officials;
- waiting for him were Mr Efimov and Mr Kovalev;
- one of the RUSADA officials explained to him that he had been invited due to circumstances being investigated by them with regards the actions of the sport physicians and the need to establish violations using testimony given by Athlete A5;
- Athlete A5 announced his intention to refuse to give any testimony, however, this same person stated that the consequences of taking such a step would be extremely negative for Athlete A5 (leading to his disqualification), thus forcing him to testify;
- Athlete A5 wrote down his testimony from the words dictated by a RUSADA official who has been contradicting the entries of the logs of controlled substances regarding the infusions themselves, thus in various ways forcing Athlete A5 to admit infusion procedures that had not actually taken place;
- the RUSADA officials did not warn him of the possibility of the evidence being used against him and his possible disqualification, only threatening to use the latter should he refuse to give an explanatory declaration.

Athlete A5 noted that after receiving notice of charge from RUSADA in June 2019 regarding a possible violation of the anti-doping rules, he independently took steps to obtain explanatory declarations from the head nurse Ms Lyudmila Danilova and the

procedural nurse Ms Elza Grigorieva (Markova) that they had never given infusion procedures to him by sending copies of these explanatory declarations to RUSADA.

When asked by the Group about his knowledge of the prohibited methods, Athlete A5 informed them that in 2017, he did not know anything about such things.

6.2.6. Athlete A6

The Group interviewed Athlete A6 in September 2019 in the College. The following are some of the statements made by Athlete A6 regarding the circumstances investigated by the Group regarding the use of a method prohibited by anti-doping rules in the Chuvash Republic:

- the interaction between Athlete A6 and the sport physicians, which led to the prescription of intravenous infusions, took a very similar pattern to that described by Athlete A1;
- in order to receive pharmaceutical products, including in 2016: “Cytoflavin” 10 ml No. 10, “Asparcam” 10 ml No. 10, Glucose 250 ml No. 20 (in 2016), and in 2017 “Aminoplasma” 500 ml No. 4, “Cytoflavin” 10 ml No. 5, Sodium chloride 250 ml No. 5, “Piracetam” 5 ml No. 10, Piracetam tablets No. 60 and “Supradin” No. 10, Athlete A6 made his signatures in the logs of controlled substances;
- on receiving the pharmaceutical products, Athlete A6 did not undergo any procedures, but took them himself to the College’s boarding house;
- his coach was informed about the doctors’ prescriptions and he evaluated them positively, assuming the doctors’ competence and professionalism;
- the prescriptions based on the results of tests and an ECG provided at the Republican Center were made by: the Head of the Medical Office at the College, sport physician Dr Svetlana Lareva, as well as sport physician Dr Yana Bakhtina, who saw him at the Medical Office at the College;
- the sport physicians warned Athlete A6 not to tell any other people that they had given him the drugs and infusion systems.

Athlete A6 presented the Group with a package of evidence collected against him by RUSADA regarding allegations of the possible use of a method prohibited by the anti-doping rules: overall, it was identical to the package submitted by Athlete A1.

When asked by the Group about the possibility of trusting the information given by Athlete A6 in the explanatory declaration given by him to RUSADA officials, Athlete A6 declared that it was partially incompatible with the actual circumstances, and in particular:

- Athlete A6 confirmed that his explanatory declaration had been written by him personally;
- Athlete A6 confirmed the authenticity of his signatures in the logs of controlled substances, copies of the pages of which were presented to him by RUSADA employees;
- Athlete A6 denied that the courses of infusion therapy prescribed by sport physicians Drs Lareva and Bakhtina had been completed, he refuted the statement contained in the explanatory declaration regarding the completion of the corresponding courses and procedures.

When asked by the Group about the circumstances of providing explanatory declarations to the RUSADA officials, Athlete A6 reported the following:

- he arrived in July 2017 at the time appointed by RUSADA at the College to meet with RUSADA officials;
- waiting for him were Mr Efimov and Mr Stetsyuk the RUSADA ADRVID; one of the RUSADA officials explained to him that he had been invited due to circumstances being investigated by them with regards the actions of the sport physicians;
- Athlete A6 wrote down his testimony from the words dictated by a RUSADA official which contradicted the entries in the logs of controlled substances regarding the infusions themselves, thus in various ways forcing Athlete A6 to admit the use of these infusion procedures;
- the RUSADA officials did not warn him of the possibility of the evidence being used against him as grounds for his possible disqualification, only threatening to use disqualification against him should he refuse to provide an explanatory declaration.

Athlete A6 noted that after receiving notification from RUSADA of a possible violation of the anti-doping rules, he independently took steps in July 2019 to obtain explanatory declarations from procedural nurse Elza Grigorieva (Markova) that they had never given infusion procedures to him.

When asked by the Group about his knowledge of anti-doping rules and prohibited methods, as well as the source of this knowledge, Athlete A6 informed them that in 2017, he did not know anything about such things.

6.2.7. Athlete A7

The Group interviewed Athlete A7 in August 2019 in the College. The following are some of the statements made by the Athlete regarding the circumstances investigated by the

Group regarding the use of a method prohibited by anti-doping rules in the Chuvash Republic:

- the interaction between Athlete A7 and the sport physicians took a very similar pattern to that described by Athlete A1;
- in order to receive the pharmaceutical products (only in tablet form and vitamin “B” intramuscular injections) Athlete A7 made signatures in the logs of controlled substances;
- he did not receive any treatment in the form of intravenous infusions, although he heard from other persons that they were being conducted at the Medical Office at the College. He informed his coach about the Vitamin B intramuscular injections, but the coach did not take any action or give any warnings, assuming that the prescriptions of the sport physicians were in line with their competence and were obligatory;
- the coach only supervised the athlete’s health after training by measuring his pulse rate and reducing his training load if he didn't like something, moreover he never sent him to the Medical Office;
- the doctors did not associate the prescribed Vitamin B injections with competition admission rules. The prescriptions based on the results of tests and the ECG given at the Republican Center were made by: the Head of the Medical Office at the College, sports physician Dr Svetlana Lareva, as well as sports physician Dr Yana Bakhtina, who saw him at the Medical Office at the College;
- the procedural nurse Elza Markova administered the injections prescribed by the aforementioned sport physicians.

Athlete A7 was not called upon to make an explanatory declaration for RUSADA.

When asked by the Group about his knowledge of anti-doping rules and prohibited methods, as well as the source of this knowledge, the athlete informed them that in 2017, he knew that a pharmaceutical product could be checked for compliance with the rules in Internet at RUSADA’s site, however, he did not know that there were prohibited methods of administering pharmaceutical products that, in turn, were not prohibited for use.

6.2.8. Athlete A8

The Group interviewed Athlete A8 in August 2019 at the Sports Training Centre. The following are some of the statements made by the athlete regarding the circumstances investigated by the Group regarding the use of a method prohibited by anti-doping rules in the Chuvash Republic:

- the interaction between Athlete A8 and sport physicians, which led to the prescription of intravenous infusions, took a very similar pattern to that described by Athlete A1;
- in order to receive the pharmaceutical products and have them medically administered, Athlete A8 made his signatures in the logs of controlled substances;
- Athlete A8 informed the coach who had sent him to the doctor for treatment about the intravenous infusion prescriptions; his coach refrained from taking any action, assuming that the prescriptions of the sport physicians were obligatory and in line with their competence;
- the doctor did not associate the prescribed intravenous medicines (Cytoflavin and Aminoplasmal) with competition admission rules. The prescriptions based on the results of tests and the ECG given at the Republican Center were made by: the Head of the Medical Office at the College, sport physician Dr Svetlana Lareva, who saw him at the Medical Office at the College;
- the procedural nurse Elza Markova administered the infusions according to the prescriptions given by the aforementioned sport physician;

Athlete A8 presented the Group with a package of evidence collected against him by RUSADA regarding allegations of the possible use of a method prohibited by the anti-doping rules: in the whole, it was identical to the package submitted by Athlete A1.

When asked by the Group about the possibility of trusting the information given by Athlete A8 in the explanatory declaration given by him to RUSADA officials, Athlete A8 declared that it was partially incompatible with the actual circumstances, and in particular:

- Athlete A8 confirmed that his explanatory declaration had been written by him personally;
- Athlete A8 confirmed the authenticity of his signatures in the logs of controlled substances, copies of the pages of which were presented to him by RUSADA officials;
- Athlete A8 confirmed that the intravenous infusions took place but refuted the total number against the number of units of the medical product (infusions) indicated in the logs of controlled substances;
- Athlete A8 confirmed the fact that the courses of infusion therapy prescribed by both Svetlana Lareva and Yana Bakhtina had only been partially completed, while refuting the statement contained in the explanatory declaration that the courses and procedures had been fully completed on the same grounds as Athlete A1, and also due to his participation in competitions.

When asked by the Group about the circumstances of providing explanatory declarations to the RUSADA officials, Athlete A8 reported the following:

- at the request of a person (who he does not remember), he arrived one day in July 2017 at an appointed time the ROC premises to meet with the RUSADA officials;
- waiting for him were RUSADA ADRVID officials, Mr Efimov and Mr Stetsyuk;
- without explaining the reasons for his being called, one of them handed the athlete a blank explanatory declaration form, indicating that the questionnaire part needed to be filled out;
- after filling it out, the same person began to dictate the text of the explanatory declaration to Athlete A8, checking it against the information in the copies of the logs of controlled substances;
- At the time Athlete A8 did not object to writing down his own testimony from the words dictated by the RUSADA official because not only did he not remember the dates of the infusions, but also did not know the medical names of the drugs administered (for example “Aminoplasmal E15” and others) as well as the size of the dosages;
- the RUSADA officials did not warn him of the possibility of the evidence being used against him as grounds for his disqualification.

Athlete A8 noted separately that due to the fact that he had interrupted the course of infusions, he still had the following unused medicines that he had received from the treatment room: 7 units of 250 ml 0.9% sodium chloride solution for infusions, as well as a corresponding quantity of Asparcam-L solution 10 ml.

When asked by the Group about his knowledge of anti-doping rules and prohibited methods, as well as their sources, Athlete A8 informed us that in 2017, he knew that a pharmaceutical product could be checked for compliance with the rules of the Internet, however, he did not know that there were prohibited methods of administering pharmaceutical products that were not prohibited for use.

6.3. Conclusions and recommendations

Those who study at the College have almost no anti-doping education. Moreover, students are very unaware of their rights and responsibilities, and very few hold an independent position of their own or are ready to fight for their rights.

The recommendations of the Group concerning the athletes are covered in different parts of this Report – in a more appropriate place.

SECTION 7. REPUBLICAN CENTER OF MEDICAL PREVENTION, PHYSICAL THERAPY AND SPORTS MEDICINE UNDER THE MINISTRY OF HEALTH OF THE CHUVASH REPUBLIC

7.1. General information about the Center

The Republican Center of Medical Prevention, Physical Therapy and Sports Medicine at the Ministry of Health of the Chuvash Republic (hereinafter referred to as the Republican Center)⁹⁵ is the only state medical institution in the Republic of Chuvashia that provides medical support to athletes and the individuals involved in physical training.

The Republican Center was founded by the Republic of Chuvashia, the regional Ministry of Health acting on behalf of the founder.

The key Republican Center's activities in the field of sports medicine are as follows:

- arranging and implementing the regular medical supervision of everyone involved in physical training and sports;
- conducting in-depth medical examinations (IME) of athletes;
- developing and implementing the prevention and treatment of conditions where health deviations have been detected;
- drawing up programs for rehabilitation and/or training process improvement;
- preventing sports injuries;
- assessing the conformity of the venues for physical training and sports events with sanitary and hygienic standards;
- providing medical support during field sports events;
- if necessary, advising athletes on filling out the therapeutic use exemption requests for substances and/or methods prohibited in sport in accordance with the WADA International Standard;
- preventing and combating violations of international and All-Russian anti-doping rules.

7.2. The Center structural units

After a number of regional medical institutions had joined it in order to optimize the management system, the Republican Center consists of the following structural units:

1. the Republican Center of Medical Prevention, Physical Therapy and Sports Medicine (Cheboksary, pr. Lenina 32a)

⁹⁵ official website - <http://www.rclfk.med.cap.ru/>

Departments:

- Medical Supervision No. 1
 - Information
 - Physical Therapy
 - Medical Prevention
 - Functional and Laboratory Diagnostics
 - Dental
 - Sports Medicine.
2. Sports Medicine Office at the Cheboksary Olympic Reserve College named after V.M.Krasnov at: Cheboksary, ul. Chapaeva 14/1, Shkolny pr. \3 (hereinafter referred to as the Medical Office).
 3. Medical Supervision Office No. 2 (Novocheboksarsk, ul. Kommunisticheskaya 27/4)
 4. Medical Supervision Office No. 3 (Kanash, ul. K. Marksa, 9A)
 5. Medical Supervision Office No. 4 (Alatyr, ul. Lenina 130)

In addition, there are medical offices at:

- Autonomous Institution "Sambo and Judo Olympic Reserve School No. 10" (Cheboksary, ul. Leningradskaya 32);
- Budgetary Institution "Olympic Reserve Sports School No. 1 named after Olympic Champion V. Egorova" (Cheboksary, ul. Shevchenko 2a);
- Budgetary Institution "Olympic Reserve Sports School No. 2" (Cheboksary, ul. Pristantsionnaya 10A);
- Budgetary Institution "Olympic Reserve Sports School No. 5 named after V.N. Kochkova" (Cheboksary, ul. Sotsialisticheskaya 2a);
- Budgetary Institution "Olympic Reserve Sports School No. 6" (Cheboksary, ul. T. Krivova 13a);
- Budgetary Institution "Olympic Reserve Swimming School No. 9" (Cheboksary, ul. Chapaeva 15).

7.3. Normative documents regulating the activities of the Republican Center's sport physicians

The activities of the Republican Center, which, as mentioned above, is a regional subordinate institution, are regulated by the Russian legislation, namely, federal laws,

decrees of the Russian Government, orders of the Russian Ministry of Health, as well as orders of the Ministry of Health of the Chuvash Republic.

Among the federal laws regulating the Republican Center activities are, for example, the Federal Law "On the Principles of Citizen Health Protection in the Russian Federation", the Federal Law "On Physical Culture and Sport in the Russian Federation", etc.

Based on what was said by Dr Irina Vinogradova, 1st Deputy Minister of Health of the Chuvash Republic, one of the main regulatory acts governing the Republican Center employees' daily work is Order No. 134n⁹⁶ of the Ministry of Health of the Russian Federation dated 1 March 2016 "On the Procedure of Providing Medical Assistance to Persons Involved in Physical Culture and Sport (including the Preparation and Conduct of Physical Training and Sports Events), including the medical examination of those wishing to receive sports training, engage in physical culture and sport within organizations and (or) fulfill the test standards of the All-Russian Physical Training and Sports Complex "Ready for Labor and Defense, RLD"⁹⁷. In other words, this is the main document regulating the activities of sport physicians in Russia.

In accordance with the specified Order, to comply with anti-doping rules a sport physician shall:

- provide medical assistance to persons involved in sports in accordance with the All-Russian anti-doping rules, and the anti-doping rules and standards approved by international anti-doping organizations (hereinafter - the anti-doping rules) (see para.22 of the Order);
- if it is necessary to use prohibited substances and/or prohibited methods included in the Lists of the substances and (or) methods prohibited for the use in sports in accordance with the All-Russian anti-doping rules and the anti-doping rules approved by international anti-doping organizations, when providing medical assistance to athletes, it is necessary to follow the therapeutic use exemption procedure in accordance with the WADA's International Standard for Therapeutic Use Exemptions (see para.23 of the Order).

Appendix 5 to the specified Order of the Ministry of Health contains the Regulation on the Organization of Sport Physicians' Activities.

According to this document, a sport physician, among other things, shall perform the following functions:

- perform medical examinations and observations;

⁹⁶ upon the adoption of Order No. 134n dated 1 March 2016, the previously effective Order No. 613n of the Ministry of Health dated 9 August 2010 "On the Approval of the Procedure of the Medical Assistance Provision during Physical Training and Sports Events" became invalid.

⁹⁷ the text can be found here: <https://www.garant.ru/products/ipo/prime/doc/71327708/>

- study and analyze deviations in the athletes' health, the frequency and causes of diseases and sports injuries;
- arrange and conduct the preventive measures to restore and improve sports performance and rehabilitation after diseases and injuries;
- prevent the use of doping in sports and fight against it;
- assess and arrange rational nutrition during training and sports competitions in accordance with the level of physical activity and sports;
- analyze the examination results in order to draw up rehabilitation programs or make corrections to the training process;
- counteract the use of the prohibited substances and/or methods included in the Lists of substances and (or) methods prohibited for use in sports in accordance with the All-Russian anti-doping rules approved by a federal executive body in the field of physical culture and sports and the anti-doping rules approved by international anti-doping organizations;
- handling formalities related to the requests for the therapeutic use of the substances and/or methods prohibited in sport in accordance with the International Standard approved by the World Anti-Doping Agency (WADA);
- support athletes during the doping control procedure;
- use modern medicines, nutritional supplements, special medical food products, and medical devices;
- maintain accounting and reporting documentation;
- comply with the ethical standards and rules the doctor should follow when making decisions regarding the organization and provision of medical care.

The regulation of medical activities in the Russian Federation is not limited to the above acts of the Ministry of Health, however, the Group considers it necessary to limit the scope of the normative aspect examination to what it considers sufficient to evaluate the actions of the Republican Center medical personnel in relation to the examined aspects of its activities.

7.4. Purchase of medicines and other medical products for the Republican Center needs

The medicines used in the Republican Center day-to-day operations are acquired through purchasing them from various suppliers; particular medicines, the quantity (volume) of those are not selected by the person responsible for the purchase.

The list of the necessary medicines and medical consumables, and the purchase volume were determined by the Formulary Committee established by internal order No. 62/1-

OSN of the Republican Center dated 1 December 2014. The appendix thereto approves the Regulation regarding the Formulary Committee and its personnel: the Committee Chairman is Ms Elena Naumova, the Deputy Chief Physician for Medical Matters; the Deputy Chairman is Head of the Clinic Ms Tatyana Moiseeva.

The Medicine Formulary approved by the Formulary Commission does not contain any substances included in the WADA Prohibited List. The only exception is the emergency first-aid kit, which is purchased separately and only once the first-aid kit purchased earlier has expired.

The purchases are financed with the budget funds of the Ministry of Health of the Chuvash Republic, and the funds of the Territorial Compulsory Medical Insurance Fund (TCMIF).

7.5. Republican Center doctors' qualifications, training and advanced training procedures

National legislation governing the conditions and procedure for admission to perform medical activities, in addition to specialized education (secondary special or higher education), that a medical employee shall have, oblige such persons to improve (certify) their qualifications at certain time intervals to ensure the compliance of their special skills with current national standards and global trends.

All the Republican Center doctors have the necessary state certificates confirming their qualifications. The Chief Doctor of the Republican Center has 2 certificates: "Physical therapy and sports medicine" and "Public health."

The advanced doctors' training in sports medicine was provided by the Federal State Budgetary Educational Institution of Higher Education "Privolzhsky Research Medical University" at the Russian Ministry of Health. The training course was organized by the Limited Liability Company Professional Competence Center (OOO "Tsentr Professionalnoi Kompetentsii"), with which the Republican Center has repeatedly signed contracts to run training events. This information is confirmed by all the doctors interviewed, as well as by the submitted copies of contracts.

According to an extract from the "Physical therapy and Sports Medicine" advanced professional training program, received at the Group's request from the Privolzhsky Research Medical University, the training takes 144 academic hours. The Group noted that the program lacks anti-doping education section/s. According to sport physicians, the "anti-doping" components were nevertheless discussed by the lecturers during the advanced training course, but only superficially and only in terms of the basic aspects known to the general public.

7.6. Internal meetings at the Republican Center

According to Republican Center staff, meetings were held periodically, usually once a week, to jointly discuss urgent medical, administrative and anti-doping issues (the so-called “five-minute meetings”). During the same meetings, the doctors who had attended seminars, conferences, symposiums, and advanced training courses shared new knowledge with their colleagues. According to doctors, at such meetings held in the spring of 2017, the prohibited methods issue was discussed⁹⁸, in particular, in terms of interpreting Clause 2 of Section M2 of the WADA Prohibited List 2017 regarding the prohibition of intravenous infusions in the volume exceeding 50 ml during a 6-hour period (see Section 4.2 hereof).

According to all the sport physicians interviewed by the Group, including Chief Doctor of the Republican Center Arnold Karzakov⁹⁹, they came to a “common opinion” that the “6-hour period” referred to in the Prohibited List means “6 hours before the competition”, and at any other time, the application of this method is not limited: neither in terms of volume, nor in terms of administration periods.

Despite all efforts made, the Group could not establish who had suggested this strange idea, and why it was supported by other sport physicians. None of the doctors was able to explain why it was the competition start that had been chosen as a reference point for measuring the 6-hour period, and not, for example, a meal, a night sleep, etc. Head of the Republican Center Clinic Tatyana Moiseeva informed the Group that the Republican Center doctors had contacted RUSADA by e-mail for clarifications, but had not received a response, however, Ms Moiseeva could not specify who, when and from what e-mail address has sent such a request to RUSADA. The Republican Center doctors even explained the “mass insanity” related to the misinterpretation of clause 2 of Section M2 of the Prohibited List by such strange assumptions as, for example, “poor knowledge of the Russian language” by doctors whose native language was Chuvash. At the same time, the Group did not notice a single case of insufficient knowledge of Russian by any of the employees, when communicating with the Republican Center doctors, and none of the doctors could explain what exactly constitutes the ambiguity (in Russian) of the wording given in the Prohibited List.

7.7. Chief Doctor Arnold Karzakov

⁹⁸ The Group believes that the Republican Center doctors became interested in this issue in the spring of 2017, because it is during this period that the Republican Center received information from the Russian Ministry of Health regarding the inclusion of Article 230.2 in the Criminal Code of Russia, which criminalized the administration of prohibited substances or methods to athletes. On 3 December 2016 the conditions for criminal liability were extended to cover sports physicians. Previously, sport physicians only risked disqualification from sports (and if they were, they could still work in a regular medical institution and continue their medical practice), however, by the end of 2016, if they deliberately violated anti-doping rules, they could become subject to a much more serious sanction, namely a large fine, a complete ban on performing medical activities and even imprisonment.

⁹⁹ He (Mr Arnold Karzakov) is also the chief freelance expert in sports medicine at the Ministry of Health of the Chuvash Republic (Order No. 1341 on the chief freelance experts at the Ministry of Health of Chuvashia dated 12 October 2018 and previous similar orders).

Chief Doctor of the Republican Center Mr Arnold Karzakov, in his interview with the Group, said that he had been the Head (Chief Doctor) of the Republican Center since 1 August 1990. The Center mainly treats athletes of different levels. All professional athletes in the Chuvash Republic are examined only in the Republican Center.

Mr Karzakov has always had a valid certificate confirming his qualification as a sports physician. However, like all the other Republican Center sport physicians, he could not tell the Group what procedure he was to follow as a sport physician when an athlete, for example, asked him whether a certain medication was prohibited by the anti-doping rules or not.

He also informed the Group that, until 2018, there had not been any additional anti-doping sessions for the Republican Center personnel, however, he claimed that all the employees were familiar with Order No. 134n of the Ministry of Health of the Russian Federation dated 1 March 2016, including the part regarding the observance of the All-Russian Anti-Doping Rules. All the same, there is no order familiarization sheet, since, according to Mr Karzakov, the Republican Center policies do not provide such sheets in these cases.

The Group is critical of these affirmations, as in his interview in August 2017, Mr Karzakov provided completely different information. He stated that the doctors of the Republican Center headed by him *“draw up an anti-doping program to increase athletes' performance, and also “use medicines in accordance with the anti-doping program”*. Moreover, in his interview, Mr. Karzakov made an attempt to debunk the myth of *“the methods that increase the athlete's performance and endurance,”* saying that this myth is most likely linked to an extensive list of prohibited substances what encourages the sports world to constantly look for a “legal and effective solution”¹⁰⁰.

Mr Karzakov also told the Group that the sport physicians had annually received various information regarding anti-doping support from the Ministry of Health of the Chuvash Republic in the form of methodological handouts, including the WADA Prohibited List (in Russian). He also confirmed that the doctors discussed the interpretation of the term “6-hour period” at internal meetings, but all of them came to the joint conclusion that the Prohibited List creators meant the 6-hour period before the start of the competition. However, just like all the other doctors, Mr Karzakov was unable to explain who had suggested this strange interpretation and why all the other doctors had agreed with it.

When the Chief Doctor was asked how and which procedures had been applied by the Republican Center medical personnel in relation to athletes at the Medical Office at the College, he could not answer the question.

¹⁰⁰ <http://sport-medicina.med.cap.ru/intervjyu-s-glavnim-specialistom/arnoljd-karzakov-v-pobedah-chempionov-estj-trud-i>

He also experienced significant difficulties when answering the Group's questions about the way the medicines and other products purchase for the Republican Center's needs was financed; the members of the Republican Center Formulary Committee; the procedures according to which medicines were included in the Formulary List; the procedures according to which medical services provided by the Republican Center specialists were financed (with budget funds or funds of the Territorial Compulsory Medical Insurance Fund), etc.

As a result, the Group has formed the opinion that Mr Karzakov, at least at the present time is either not aware of a sport physician's functions and the general functions of the Republican Center he leads, or, for some reason, tries to avoid answering questions directly, preferring to profess ignorance rather than answering them.

The Group also notes that Mr Karzakov actually withdrew from the investigation into numerous anti-doping rule violations by his employees in 2017, delegating the task of cooperating with the Group to Deputy Chief Doctor for Medical Matters of the Republican Center, Mr Aleksandr Egorov¹⁰¹. Mr Egorov, in turn, could not give detailed answers to the Group's questions due to the fact that he didn't start working at the Republican Center until the end of 2018 and, for obvious reasons, did not have any information about the events of two years ago which the Group is interested in.

The Group also talked with Confidential Witness No 1, an employee of the Republican Center, who confirmed many of the above impressions and conclusions that the Group had reached.

7.8. Deputy Chief Physician for Medical Prevention Elena Naumova

During her conversation with the Group, Ms Naumova said that she had been the Republican Center Deputy Chief Doctor until the autumn of 2017. According to Ms Naumova, each sport physician's office is provided with medicines and other products according to Order No. 134n of the Ministry of Health of Russia dated 1 March 2016, and the amount of drugs is meant to last for six additional months due to the difficulty of predicting the consumption and the availability of drugs on the market. A medicine for the pharmacological support or rehabilitation of an athlete shall be chosen by a sport physician using knowledge obtained from books on sports medicine and his/her own professional experience.

As for intravenous infusions and the "6-hour period" supposedly discussed at the Republican Center meetings, Ms Naumova explained that this aspect had been actually addressed at internal "five-minute meetings". However, she, as a teaching doctor (not having a sport physician certificate), did not feel qualified to intervene in

¹⁰¹ As already mentioned above in Section 2.2 hereof, the same actually happened on 18 June 2019, when Mr Egorov had to attend a press conference on behalf of the Republican Center, and Chief Doctor of the Republican Center Mr Karzakov just sent one of the media organizations a letter signed by him as the chief freelance expert in sports medicine at the Ministry of Health of Chuvashia.

the specialists' discussions. However, in general, she agreed with the interpretation proposed by other doctors, according to which intravenous infusions were prohibited only within 6 hours before competition.

Ms Naumova also shared with the Group her thoughts on the current situation. She believes that the College Medical Office doctors were performing their duties using available means to ensure a quick recovery of College's athletes after hard training sessions. Moreover, according to Ms Naumova, a doctor's opinion and the rehabilitation therapy prescribed shall obviously prevail over the anti-doping rules which she personally considers to be unfair and incorrect.

7.9. Clinic Head Tatyana Moiseeva

On the day when the Group representatives arrived at the Republican Center to interview its employees, Ms Moiseeva immediately reported that she was working at the Republican Center for the last day, as she had decided to resign. At the same time, she made it clear that such a decision had been extremely difficult for her, although she vehemently denied that this decision had been influenced by any of the Republican Center managers or by artificially created conditions or circumstances.

Ms Moiseeva confirmed that, to discuss prohibited methods, "business meetings" were held, including in May 2017, and those were attended by the Republican Center doctors and managers. She herself did not treat patients and did not prescribe anything to them.

Together with some colleagues, she took part in the anti-doping training in the autumn of 2017 (after the violations had already been detected by RUSADA officials), the webinars on "Anti-Doping Standards in Sports" were conducted by representatives of the Federal State Budgetary Institution "Federal Research Center of All-Russian Scientific and Research Institute of Physical Culture and Sports" and the Federal State Budgetary Institution "Federal Research Center of Physical Culture and Sports". However, according to the notes made on the program schedule in Ms Moiseeva's handwriting, not all the sport physicians (from the list of registered participants) listened to this short training in full. For example, College Medical Office Head Svetlana Lareva attended only one webinar, and Chief Doctor of the Republican Center Arnold Karzakov did not attend any at all. Based on the training results, all the doctors who attended the course were asked to take the test, however, Ms Moiseeva said that she was not aware of the results the doctors had shown. At the same time, as far as the Group understood Ms Moiseeva, all the doctors registered as the webinar participants (including Mr Karzakov) received certificates confirming their successful completion of the training course.

7.10. Head of the Medical Office at the College Svetlana Lareva

From the very beginning, Ms. Lareva has attracted the Group's special attention, because:

- it is she whom athletes referred most often to as a physician that had prescribed intravenous infusions;
- it is she who was the Head of the Medical Office at the College for several years, including in 2017, namely during the period that the Group is interested in;
- it was the written testimony she gave to RUSADA in June 2017 that formed the basis for almost all incriminating evidence in cases initiated by RUSADA against certain athletes (for more details see Sections 6.2.x hereof). At the same time, in her written testimony, she confirmed that she had repeatedly prescribed intravenous infusions to athletes, with a single-infusion volume exceeding 50 ml, however, she informed the RUSADA staff that she had been sincerely errant, like the other Republican Center doctors, in relation to the correct interpretation of clause 2 of Section M2 of the Prohibited List;
- it is she who was subject to the criminal case under Article 230.2 of the Criminal Code of Russia initiated and then terminated in 2017 (see Section 2.4 of this Report);
- despite the obvious evidence (including confessions) of the anti-doping rule violations, Ms Lareva continued to manage the College Medical Office (with the right to treat patients as a sport physician) until mid-summer 2019;
- it is Ms Lareva who, after the RUSADA officials visited the College in June 2017, was subject to a backdated decision to dismiss a sport physician, although Ms Lareva herself categorically denies this fact¹⁰².

In the Group's opinion, Ms Lareva herself should have been interested in the maximum cooperation with the Group in order to try to explain her point/s to the Group. However, the Group was extremely surprised, when Ms Lareva acted in a completely different way: she did not only refuse to talk with the Group if the audio record was taken, but also refused to assist the Group in obtaining the documents, the access to which depended only on her personal decision (for example, the full set of the materials related to the criminal case that had been initiated against her).

Nevertheless, at first without an audio recording, and then, during the second conversation, with an audio recording, Ms Lareva talked to the Group and presented a number of valuable documents and explanations.

¹⁰² The Group, nevertheless, believes that the dismissal was indeed backdated, as Ms Lareva's handwritten resignation statement is dated 12 May 2017, while the order of the Republican Center Chief Doctor regarding her dismissal is dated 11 May 2017 and contains a reference to her resignation statement. The Group also notes that the practice of retroactive/backdating dismissal is widespread and very typical for the cases where employers try to avoid responsibility for certain actions of their employees.

Upon joining the Republican Center in 2011, she was immediately sent to study at the Privolzhsky Research Medical University (in Nizhny Novgorod) to improve her skills and obtain a sport physician certificate. In the autumn of 2016, after the previously issued certificate had expired, she was sent to take another advanced training cycle, which included a short course on the prohibition of use of substances defined as doping. The training was conducted by specialists from Nizhny Novgorod, whose names she cannot recall. During the training course, she gained knowledge about the inadmissibility of using drugs included in the WADA Prohibited List in sports medicine, but she could not even name the groups of such substances when interviewed by the Group. However, Ms Lareva remembers exactly that blood transfusion, for example, was listed as a prohibited method.

She did not deny that the infusion medications (Reamberin, Aminoplasmal, Cytoflavin, saline, glucose solution, etc.)¹⁰³ had been prescribed and explained that the Republican Center employees had a common understanding of this prohibition in the WADA Prohibited List 2017 as “no more than 50 ml within 6 hours before competition”. In addition, she refers to the “National Guidelines for Sports Medicine” 2012¹⁰⁴, where Reamberin is recommended for treatment and rehabilitation procedures, with no volume restrictions.

According to Ms Lareva, the treatment was prescribed to athletes after an examination that was conducted either as a result of athletes’ health complaints, or due to injuries, or as part of mandatory IMEs. She denied any pressure or influence of the coaches on the patients’ treatment, but recalled cases where coaches asked to check an athlete’s health and to “prepare” him/her for the competition, if necessary. If it was necessary to prescribe infusions, the patient was given a prescription, and he/she took it to the warehouse¹⁰⁵, where the Medical Office senior nurse gave him/her the medicines and intravenous infusion systems, for the entire therapy course, after which the patient took them to the treatment room where the treatment nurse performed the appropriate procedures. Athletes left the unused drugs and infusion systems to be stored in the treatment room, a nurse labeled them, indicating the athlete’s name, to ensure that they could be used next time. No one checked whether the athlete had received the full course of the drugs prescribed, so patients could miss an appointment or never come back at all. Ms Lareva could not explain to the Group, what happened in such cases to the drug residues, referring to the fact that this issue was not within her scope of responsibility. Almost always athletes came to a doctor and underwent the procedures in the morning, before lunch, as it was the time between the morning training and the classes at the College. However, almost all the athletes who were

¹⁰³ for more information on these drugs, see Section 7.15 of this Report.

¹⁰⁴ “National Guidelines for Sports Medicine” («Национальное руководство по спортивной медицине») edited by S.P. Mironov, B.A. Polyayev, G.A. Makarova. Moscow, 2012, p. 583.

¹⁰⁵ the warehouse was located in the room adjacent to the same Medical Office, see Section 5.5 hereof for more details.

masters of sports or of a higher level were residing outside the College boarding house, and, saying that it was more convenient for them to undergo the procedures at home or somewhere else, they simply took the drugs and infusion systems with them.

7.10.1. Svetlana Lareva's view of the events that took place on 8 June 2017

The events that took place on 8 June 2017, when RUSADA employees, accompanied by police officers, registered the fact of an intravenous infusion given to one of the College's athletes, practically divided Svetlana Lareva's life into two parts. That is why the Group believes that her version of the events should be regarded separately.

According to Ms Lareva, on 8 June 2017, she was at her workplace at the College, when at about 1:30-2:00 p.m. athlete Z came to her complaining about feeling unwell and asked for a Reamberin infusion to improve his condition. Lareva did not want to give such a prescription and asked him to come for tests in the morning, but, according to Ms Lareva, the athlete was persistent, and she did him a favor prescribing 250 ml of Reamberin solution for intravenous infusions.

Then, according to Ms Lareva, from about 2-00 to 3-00 p.m. RUSADA officers, together with the police (the Drug Control Service), in total about 6 people, broke into her office and the office of treatment nurse Elza Markova, immediately starting to search the premises. In the course of such actions, a video was taken, conversations with Medical Office employees were recorded, documents and drugs were taken out of cabinets and seized. Ms Lareva called Chief Doctor of the Republican Center Mr Arnold Karzakov and informed him about RUSADA's visit. He came immediately and made sure that the visitors were indeed RUSADA employees, then gave instructions to give them all the documents they requested and to assist them in every possible way, including giving testimony. According to Ms Lareva, they talked with her very rudely, intimidated her, threatened her, called her a criminal. Ms Lareva was not allowed to leave the office, she was only escorted to the toilet (all of the employees were men), and she was not allowed to communicate with her colleagues at the Medical Office (nurses Markova and Danilova). Most of all, as Ms Lareva recalls, she was threatened by a RUSADA employee named "Ivanov". However, according to Ms Lareva, she never denied that she had prescribed the infusions, but the person who introduced himself as "Ivanov" told her that he was not a doctor or a lawyer, but a "hunter" by education.

As a result of all these actions, she felt unwell and called an ambulance, which arrived at 5:00 p.m., measured her blood pressure that was 260/100, and diagnosed a hypertensive crisis. Ms Lareva was offered hospitalization, however, seeing RUSADA employees' provocative behaviour and rudeness towards treatment nurse Elza Markova, she decided to refuse medical care and stay in the premises of the College Medical Office. According to Lareva, after the ambulance had arrived, the behavior of RUSADA employees changed: they began to act more calmly and respectfully.

According to her, she did not see RUSADA employees take drugs from the cabinets in the treatment room to photograph and list them, but she heard them talk in a raised voice and rather rudely to nurses Grigorieva and Danilova. She did not see athlete Z after she had prescribed him the infusion.

Around 7.00 p.m. on the same day, RUSADA employees invited her to give explanations that she wrote down herself, but, according to her, the RUSADA officer, who introduced himself as "Ivanov," made oral corrections to the text and recommendations on its contents.

7.11. Sport physicians: Yana Bakhtina, Tatyana Kozhevnikova

Ms Yana Bakhtina has worked as a sport physician in the Sports Medicine Department since 11 October 2016, and was reporting to the Head of the Medical Office at the College, Dr Svetlana Lareva. She received no additional anti-doping training, except for the information received during certification in the specialty "Sport Physician and Physical Therapy Doctor". At first, she was given practical help by the Medical Office Head, Svetlana Lareva.

At the same time, Ms Bakhtina said that she often sympathized with young athletes (since her own children were also athletes trying to become professionals) and sincerely wanted to help them overcome the obvious difficulties associated with the hard daily training. Thus, at the request of the athletes who were already very tired or ill¹⁰⁶ (in a way that was evident to a doctor), Ms. Bakhtina issued medical notes to excuse them from training. However, Mrs. Bakhtina often witnessed herself that the athletes' theatrically tore up the prescriptions issued by her in front of other athletes and ordered the young athletes to start training. This brought Ms. Bakhtina to a state of despair, hurt her pride as a person and as a doctor, however, she could not change the training system that had existed for a long time. Ms. Bakhtina believes, that it was precisely her position that made the majority of coaches come to the other sport physicians of the Medical Office, and not to her.

Tatyana Kozhevnikova has been a sport physician at the Center since September 2006, and was the Head of the Medical Office at the College before Dr Svetlana Lareva came to work for the Republican Center. Ms Kozhevnikova informed the Group that during her work at the Medical Office, no intravenous infusions had been prescribed (or they had been prescribed in some extremely rare cases). However, after she had been transferred to work in the Center main building as a doctor, she was informed that the prescription and administration of intravenous infusions there became more common.

After analyzing medical documentation, the Group revealed the fact that Kozhevnikova had once prescribed a forbidden volume of the drug "Citoflavin" together with saline

¹⁰⁶ for example, in case there were obvious signs of a respiratory disease onset, including a not especially high temperature, cough, running nose, etc.

(200 ml) in 2016, as she already worked in Sports Medicine in the main building of the Republican Center. According to Mrs. Kozhevnikova, Head of the Clinic Tatyana Moiseeva was persistently asking her to admit this patient and prescribe him this drug.

At the same time, Ms. Kozhevnikova honestly told the Group that until June 2017 when the RUSADA employees came to the College Medical Office, she had not known that intravenous infusions (in the volume exceeding 50 ml) were prohibited. However, she always assisted young athletes' rehabilitation and, like Ms Bakhtina, considered the best methods to be a decrease in training intensity and an improvement in the quality of nutrition.

In general, explanations regarding the Republican Center activities that Ms Bakhtina and Ms Kozhevnikova gave to the Group are not internally conflicting, they comply with other employees' words and other materials collected by the Group, which is why the Group considers the testimonies of these witnesses reliable and true.

7.12. Chief Nurse Vera Suslova

Ms Suslova has worked in the Republican Center as the chief nurse since June 2003, and is responsible for controlling the drugs circulation throughout the institution.

In her conversations with the Group, she noted that unused or expiring drugs that needed to be disposed of were left in the Republican Center in extremely rare cases. She does not control the consumption of medicines and supplies, after they have been handed out to the Republican Center departments, she only controls the total amounts and shelf life of the drugs in stock. She is also unaware of the procedure applied to distribute drugs and consumables within the department after they are handed out to a patient.

It seemed strange to the Group, that Ms Suslova did not know how the Republican Center nurses determine which drug prescription book (the budget financing book or the compulsory medical insurance book) should be used to record a certain drug or infusion system handed out to athletes. Moreover, Ms Suslova herself had no idea about this either. In addition, it also seemed very strange to the Group, that Ms Suslova immediately refused to admit that the nurses handed over the completed drug prescription books to her to keep them, and that it was she who supervised the activities of the Republican Center nurses, including their actions/inaction. Ms Suslova's statements directly contradicted her job description.

According to Ms Suslova, after the RUSADA officials' visit in the summer of 2017, almost all infusion medications were transferred to third-party organizations during the same year, as was agreed by the Ministry of Health of the Chuvash Republic. This statement correlates with documents received by the Group that confirm such a transfer.

7.13. Nurse Elza Grigorieva

Ms Grigorieva (formerly Markova) interviewed by the Group has worked as a treatment nurse at the College Medical Office since March 2010. She herself did not hand out drugs to athletes, as they received them according to a doctor's prescription from the chief nurse in the warehouse, for the entire treatment course at once, and then took the medicines, syringes, infusion systems and the treatment sheet to Grigorieva in the treatment room, where she gave patients intramuscular or intravenous injections (as prescribed by the doctor) and made an entry of the procedure completion. Grigorieva made such an entry in a "treatment log"¹⁰⁷ herself; the athlete's signature was never required. The remaining drugs to be used for ongoing procedures according to the treatment course were stored directly in the treatment room and were labeled with the names of the patients. Athletes had the right to terminate the intravenous administration prematurely, referring to the deterioration of their condition or without a particular reason (including patients being "bored with lying down"). However, these facts were not recorded anywhere, neither was the drug dosage actually received by an athlete. When Elza Grigorieva was asked about the failure to provide medical treatment according to the doctor's prescriptions, she referred to "the patient's desire", however, she had still made an entry in the treatment log indicating the fulfillment of the doctor's prescriptions.

Often, coaches came directly to the treatment room and checked the appointments and procedures completed by their athlete. They were not prevented from familiarizing themselves with the prescription sheets and controlling the athletes' visits. If necessary, they themselves brought athletes to doctors for examination, but, according to Grigorieva, they did not intervene in the process itself.

The interview revealed that medicines, including two-component infusion drugs, had been repeatedly given to athletes, so those could give them to their relatives and friends or resell them.

In the same way, the remaining medicines prescribed to an athlete were allowed to be taken away to training camps or sporting events. The procedures were allegedly carried out only by medical teams on duty who accompanied athletes during such offsite events. The Republican Center staff, including Ms Grigorieva, did not answer the question of whether such infusions had been accounted for and whether the relevant information had been harmonized with the athlete's medical record stored in the Medical Office, and gave no comments regarding this issue.

Ms Grigorieva also explained that she had not known that such intravenous infusions were prohibited by anti-doping rules, and therefore had never concealed her activities. On the contrary, the door to the treatment room, where three couches with drip stand were installed, was almost always open. Ms Grigorieva also recalled that she had repeatedly approached the athletes she met in the College halls and reminded them

¹⁰⁷ some athletes also referred to it as "procedures' log" or "injection log".

that they had had to complete the infusion course prescribed by the doctor. Moreover, doctors had never told her that the infusions appointment and administration should have been concealed in any way.

Within two months, Grigorieva was repeatedly interviewed by the Group, and each time she made new statements that often contradicted the previous ones¹⁰⁸. The degree of the Group's trust in Grigorieva's words is extremely low. The Group has to conclude that Ms Grigorieva is very likely to have received instructions on what she had to do or what she had to answer to the Group's questions, and, perhaps, she was threatened by someone in the background.

The Group prioritizes the statements she made during her first interviews when she was not influenced by any shadow parties, as well as the statements that were confirmed by the words of other Republican Center employees or by the documents examined by the Group.

7.13.1. Elza Grigorieva's view of the events that took place on 8 June 2017

According to Ms Grigorieva, on 8 June 2017, Athlete Z arrived at the College Medical Office at around 2:00-2:15 p.m. complained about feeling unwell and asked her to put him on a Reamberin drip. She (Grigorieva) didn't want to do it, despite the doctor's prescription, because these procedures are usually performed before 2:00 p.m. due to the fact that from 2-00 to 3-00 p.m. the treatment room undergoes wet cleaning and quartz treatment, and at 3-00 p.m. the treatment room closes. But the athlete insisted asking for "at least a half" of the drip flask. According to Grigorieva, no one had ever been so persistent before. Grigorieva agreed to perform the procedure, the athlete laid down on the couch, and she put him on a Reamberin drip. According to Grigorieva, during the infusion, at about 2:30 p.m., 5 or 6 people ran into the treatment room shouting "*Here she is!*", and, without introducing themselves, they started taking pictures and filming the scene with a video camera. They were talking rudely in raised voices, and did not allow her to leave the office or talk on the phone for the whole time, she was only allowed to go to the toilet, and even there they did not let her to lock the door. They did not let her stop the Reamberin infusion saying: "*Let it drip dry*". She was kept in the treatment room together with Chief Nurse Danilova for several hours. Later, 2 people, who introduced themselves as RUSADA employees, took Grigorieva to the HR office and began questioning her. Grigorieva's testimony was written down, and she was released around 7:00 p.m. She does not remember these people's names and positions. The treatment logs (i.e. the logs she used to record the procedures performed) were allegedly taken for copying, and she didn't see them again, and does not know if those have been returned or not.

¹⁰⁸ most often based on the previous conversation with the Group.

She was unfamiliar with the anti-doping rules until the autumn of 2017, when the Center doctors themselves began to inform the Republican Center nursing staff about this topic at “five-minute meetings”.

7.14. Nurse Lyudmila Danilova

Lyudmila Danilova has been working at the Republican Center since February 2014, and has been the College Medical Office Chief Nurse since November 2014. In general, she confirms Svetlana Lareva and Elza Grigorieva's testimonies regarding the athletes medical treatment, procedure prescription and administration, and the list of medical drugs. She also confirms that both medicines and infusion systems had been handed out to athletes, including for the purposes of administering the intravenous infusions of “Aminoplasmal” 500 ml, “Reamberin” 250 ml, “Cytoflavin” with saline 200 ml, “Glucose 5%” 200 ml.

At the same time, Ms Danilova was thoroughly confused when she had to tell the Group why the evident corrections had been made to the logs of controlled substances, and why she had made the duplicate (similar) entries regarding the drugs distribution to the same athlete on the same day in the logs [of controlled substances] for different funding sources. She also tried to explain the log entries made in reverse chronological order by “usual errors”. All of the above makes the Group conclude that Ms Danilova either kept her own secret logs of controlled substances that she subsequently copied to the official logs, or, for some unclear reasons, she adapted the log entries to the actual amount of drugs she had in stock.

Information regarding the visit of RUSADA and DCS staff matches the evidence received from Svetlana Lareva and Elza Grigorieva. The logs of controlled substances and treatment logs were seized by RUSADA under the pretext of copying, and she cannot say for sure whether those have been returned or not. She wrote down her explanations under the supervision of a RUSADA employee, whose name she does not recall.

For these reasons, the Group regards Ms Danilova's testimony as a general reference point only.

7.15. Brief information about the drugs used for the prohibited method

7.15.1. Reamberin¹⁰⁹. The drug belongs to blood acid-base balance and hydro-electrolytic balance regulators. It is used as an antihypoxic and detoxifying agent. It is administered intravenously, by drop infusion. Adults: 400 to 800 ml a day at a rate of up to 90 drops a minute (1 to 4.5 ml a minute). The drug administration rate and dosage shall be determined in accordance with the patient's disease

¹⁰⁹ see also additional information on “meglumine sodium succinate”, incl. on the manufacturer’s website: https://www.polysan.ru/produktsiya/ream_instruktsiya.htm.

severity. If administered intravenously, the drug is utilized quickly and does not accumulate in the body. The Republican Center purchased the drug in 250 ml (mainly) or 500 ml polymer containers.

7.15.2. Aminoplasmal E¹¹⁰. The drug is prescribed to compensate the deficiency of amino acids and electrolytes (20 amino acids and electrolytes), in case of various diseases and injuries. It is administered intravenously, by drop infusion. The infusion rate is up to 1 ml per kg an hour. The dosage shall be determined individually, depending on the patient's condition.

The drug is produced in several forms (E5, E10 and E15), differing in concentration (5, 10 and 15%, respectively). The Republican Center purchased and used all the three forms in a volume of 500 ml.

7.15.3. Cytoflavin¹¹¹. Metabolic agent, vitamins. It is prescribed to treat the aftereffects of a blood stroke, neurasthenia, severe emotional and physical fatigue. It is produced in the form of pills and 10 ml solution to be diluted in 100 to 200 ml of 5 to 10% glucose solution or 0.9% sodium chloride solution. The Republican Center used the intravenous form with 200 ml of glucose solution or saline solution.

7.15.4. Asparcam-L¹¹². It contains calcium and magnesium. It is taken to overcome calcium and magnesium deficiency, to counter blood diseases of the heart, including acute myocardial, chronic shortage of blood supply, and an arrhythmic heart. The medicine is taken 1-2 times a day every 24 hours, adding 1-2 ampoules or flasks (10ml) to a 100-200 ml mixture or 5% mixture of glyucose. In the Republican Center they added 10ml to 250 ml of liquid.

Other drugs used for intravenous administration are usual saline (NaCl) and glucose solutions.

The Group did not discover any cases where the doctors had administered or the athletes had used any substances included into the WADA Prohibited List.

7.16 Conclusions and recommendations

The conclusions are based not only on the facts shared in the course of the interview by the Republican Center staff, but also on other data obtained as part of the Group's work, including information from anonymous sources, submitted documents and summary reports.

¹¹⁰ a proprietary drug manufactured by B. Braun (Germany), find more details at <https://www.bbraun.ru/ru/products/b/aminoplasmal-b-braun5e.html>

¹¹¹ for more information, please visit the drug manufacturer's website: <https://www.polysan.ru/produktsiya/tsitoflavin.htm>

¹¹² for more information, please visit the drug manufacturer's website: <http://biosintez.com/catalog/product/192>

After analyzing the storage logs, prescription logs, patients' medical records and other documents, the Group has all reasons to believe that many drugs were prescribed more often as it came closer to the expiration date thereof or to the end of the reporting period, in order to use 100% of the drugs in stock.

There was a drug and consumable accounting system that attracted the Group's attention. For instance, after a one-month course of infusion drugs including 10 procedures had been prescribed, an athlete was given 10 packages of the drug and 10 infusion systems, thus, this operation economically resulted in writing off the products from stock (and the Republican Center's balance sheet) and actually transferring them to the athlete's disposal. At the same time, the athlete would stop visiting the treatment room after the first infusion, and the unused stock (9 drug packages and 9 infusion systems) continued to be stored in the treatment room of the Medical Office. Thus, the unclaimed drugs stock was constantly accumulating in the treatment room. The Group has not been able to get clear answers to the question of why medicines were written off before they were actually used, and why they were not transferred to the treatment room and remained on the Republican Center's balance sheet until they were actually used.

The Group has also obtained comprehensive evidence of the distribution of infusion drugs and systems to athletes, the feasibility of which the Group is not authorized to assess.

In the Group's opinion, the medical treatment scope, as well as the list of medicines prescribed for treatment and rehabilitation, was often inappropriate and excessive.

The medical personnel are poorly qualified. They did not attend any seminars or advanced education courses, besides those needed to obtain their specialist certificates. In addition, the vast majority of the Republican Center employees did not have any anti-doping knowledge, which is extremely surprising at an institution that has been specializing in sports medicine for many years.

The training program for the sport physicians' certification does not present clear instructions for anti-doping education, as a result of which the educational institution can ignore the doping control issues when educating sport physicians and can prepare a program based on its own intentions and capabilities. In particular, the curriculum of the 144-hour professional advanced education program "Physical Therapy and Sports Medicine" in the specialty "Physical Therapy and Sports Medicine", which is used by the Privolzhsky Research Medical University at the Ministry of Health of Russia, does not include a single anti-doping section.

The treatment course prescribed by doctors was often not carried out in full (the course was not completed), and sometimes they were not carried out at all, because athletes took the medicines and infusion systems received out of the Medical Office at the College to hand those to third parties for a fee or free of charge, or for other purposes.

The use of the transferred medicines and systems by athletes was not actually monitored by medical personnel.

To the great surprise and disappointment of the Group, the sport physicians who had used prohibited methods in their work continued to work in the same institution, and, just over 2 years later, RUSADA did not do anything to dismiss them, although this is the first thing to do once an anti-doping rule violation has been detected.

On the basis of evidence presented the Group has the following recommendations:

With respect to the Republican Center

THAT an exam be arranged ASAP for all sport physicians to test their knowledge of anti-doping rules and other measures on the prevention of doping in sport and the fight against it, based on the Regulation on the sport physician's activity (Appendix No 5 on the Order of the Ministry of Health of Russia of 1 March 2016 № 134). In case of non-compliance with the requirements, measures be taken to dismiss those non-compliant in accordance with paragraph 3 of part 1 of article 81 of the Labor Code of Russia;

THAT a Medical information system (MIS) be introduced with the goal of regulating the flow of documents, as well as financial and administrative information, electronic medical records, and data on medical examinations in digital form. In the technical development area, the introduction of algorithms to automatically warn of the possibility of administering a prohibited substance or method be put in place;

THAT a special labelling system (with stickers, etc.) be introduced at the stage of receipt of medications, that visibly warns of the presence of substances included in the WADA Prohibited List or equipment that could be used for prohibited methods;

THAT medical supplies and other materials (like infusion systems) are no longer given directly to patients even in extreme cases, thereby complying with the legislation of the Russian Federation;

THAT a common area of the Republican Centre be equipped with clear and easily understood written materials about the nature and essence of anti-doping regulations);

THAT RUSADA's assistance be sought to gain educational services on anti-doping rules, corresponding distribution of materials, and an improvement in the qualification of doctors of the Republican Center and other medical personnel;

THAT sport physicians be provided with RUSADA's contact details (telephone numbers, addresses and email addresses) for possible consultancy services on doping in sport;

THAT a system of regular anti-doping educational events be introduced for medical and administrative personnel with an effective, cheat-free testing mechanism.

With respect to RUSADA:

THAT due procedures be opened targeting Republican Center's doctors who violated the anti-doping rules with the aim of disqualifying them from sport;

THAT online service 'Check Medication', recommended on the official RUSADA website, be checked to make sure that the service warns about possible use of non-prohibited medication by way of prohibited method (for instance, Cytoflavin).

With respect to the Ministry of Health of the Chuvash Republic

THAT the Republican Center's Chief Doctor Arnold Karzakov be dismissed in connection with his insufficient knowledge of the anti-doping measures needed to effectively operate the specialized medical institution, and also curtail his powers as chief freelance expert in sports medicine of the Ministry of Health of the Chuvash Republic.

With respect to the Territorial Federal Service Body for the supervision in the health in the Chuvash Republic

THAT a careful check be taken of the storage facilities and accounts of the Republican Center's medical supplies.

With respect to the Minister of Health and Ministry of Education of the Russian Federation

THAT a mandatory anti-doping module be developed and introduced in programs for certifying sport physicians.

With respect to the Ministry of Health of the Russian Federation, together with the Federal medical-biological agencies in the Russian association of sporting medicine and rehabilitation of sick and disabled people (RASMIRBI)

THAT Clinical recommendations be developed in sport medicine, taking into consideration the scope of applicable anti-doping regulations, and THAT relevant corrections, if necessary, be introduced in the National Manual of sport medicine.

SECTION 8. RUSADA'S ROLE IN THE "DOPING SCANDAL" IN CHUVASHIA

8.1. General public information about RUSADA's investigation of anti-doping rule violations in Chuvashia in 2017-2018

The issue of the "Chuvash doping scandal", its emergence and development have already been discussed above herein, in sufficient details (see Section 2 hereof). Therefore, in this Section, the Group will only briefly summarize the information related to RUSADA's investigation and results thereof, that are in the public domain.

So, in June 2019, the general public became aware¹¹³¹¹⁴¹¹⁵¹¹⁶ that:

- about 33 cases of possible anti-doping rule violations by athletes (representing various sports) and their personnel were registered, investigated and transferred for results management,
- all necessary explanations and testimonies of more than one and a half hundred people have been received, and a similar transfer of cases for results management is planned in the near future for another 30 individuals;
- among the suspects are athletes of various levels, including several members of the Russian national team and the regional team of Chuvashia (in various sports);
- at least a third of the athletes at the time of the discovery of the use of the prohibited method (June 2017) were minors;
- the Prohibited List Section M2 violations included the intravenous infusions of over 100 milliliters (within 12 hours) of various medications, including the amino acid solution for parenteral nutrition "Aminoplasmal" and the drug "Reamberin";
- such infusions were administered at the Medical Office of the Budget Institution "Republican Center of Medical Prevention, Physical Therapy and Sports Medicine" under the Ministry of Health of Chuvashia, located in the premises of the Cheboksary Sports College;
- back in June 2017, RUSADA transferred evidence from the doctor responsible for the infusions prescription to the law enforcement authorities, but after a series of initiations and terminations, the criminal case under Article 230.2 of the Criminal Code was finally terminated.

8.2. RUSADA's objectives in the fight against doping in sports, including the prevention of anti-doping rule violations

The main goal of the anti-doping program, which is being implemented by RUSADA as well, is provided in the World Anti-Doping Code, namely *"to protect the Athletes' fundamental right to participate in doping-free sport and thus promote health, fairness and equality for athletes worldwide"*¹¹⁷.

¹¹³ <https://rusada.ru/news/press-releases/rusada-detected-the-facts-of-prohibited-method-use-in-the-chuvash-republic/>

¹¹⁴ https://matchtv.ru/doping/matchtvnews_NI1036734_Polucheny_svidetelstva_boleje_chem_150_chelovek_Koshmarnyje_itogi_rejda_RUSADA_v_Chuvashii

¹¹⁵ https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI1037496_Ganus_prokomentiroval_situaciju_s_chuvashskimi_atletami_Shlahtin_rasskazal_o_vzaimodejstvii_IAAF_i_VFLA

¹¹⁶ <https://cheb.media/2019/06/18/kommentarij-vlastej-doping/>

¹¹⁷ see the Section "Purpose, Scope and Organization of the World Anti-Doping Program and the Code" (https://www.wada-ama.org/sites/default/files/resources/files/wada_anti-

The primary task of any anti-doping organization is educational activities, and first of all this applies to the national anti-doping organizations that have access to young athletes and beginner athletes.

The World Anti-Doping Code requires each anti-doping organization to develop and implement education and prevention programs for athletes, including youth, and athlete support personnel (coaches, doctors, etc.)¹¹⁸. Athletes and their personnel are obliged to know what constitutes an anti-doping rule violation, what exactly is prohibited and what consequences are provided for a rule violation. It is the preventive and educational activities that, according to WADA¹¹⁹, are the starting point of the work of any anti-doping organization, including RUSADA. Such activities are especially necessary in Russia, where the sheer size of the country and the remoteness of many regions from the center deprive athletes and their personnel of equal access to RUSADA and the all-Russian federations' educational materials in the relevant sport.

An anti-doping organization's punitive function, namely, that of conducting investigations, testing and imposing sanctions, is without a doubt secondary to education and prevention activities. Punishment is not - and cannot be - a goal in itself for an anti-doping organization created to protect the athletes' interests. This is just an additional way to ensure compliance with the anti-doping rules, since, like any other punishment, it performs the general prevention function, in addition to the purpose of special prevention.

This is why the Katowice Declaration of 7 November 2019 affirmed that “...to foster a clean sport environment, all individuals, bodies, and organizations involved in sport should have appropriate anti-doping education to preserve the spirit of sport, promote the values of sport and ultimately protect all athletes, so that an athlete's first experience is through education rather than doping control”¹²⁰. In effect over the course of this World Conference on Doping in Sport of 5-7 November 2019 a new - seventh - International Standard for Education was adopted. Recognizing a document on educational events as an International Standard once again emphasizes its importance and value, in so far as such documents are mandatory and their non-observance can lead to an assertion of non-compliance of an ADO.

[doping_code_2019_english_final_revised_v1_linked.pdf](#)- see page 11 in the specified official text of the Code).

¹¹⁸see the Section “Fundamental Rationale for The World Anti-Doping Code” (https://www.wada-ama.org/sites/default/files/resources/files/wada_anti-doping_code_2019_english_final_revised_v1_linked.pdf)- see page 14 in the specified official text of the Code).

¹¹⁹<https://www.wada-ama.org/en/media/news/2019-10/wada-stresses-importance-of-education-during-seventh-unesco-conference-of-parties>

¹²⁰ https://www.wada-ama.org/sites/default/files/resources/files/katowice_declaration_-_2019_world_conference_on_doping_in_sport_-_nov._6_final.pdf

RUSADA Deputy Director General, Ms Margarita Pakhnotskaya, immediately reacted with a colorful statement in support of the Katowice Declaration, emphasizing that punitive measures without previously conducted educational events are a “stone age” approach¹²¹.

8.3. WADA's investigation requirements

In 2015, WADA, paying particular attention to the investigation, introduced a separate section on data collection and investigation into the International Standard for Testing. Accordingly, the new standard version was named the "International Standard for Testing and Investigations".

This International Standard has two main goals: 1) to plan for intelligent and effective testing, and 2) to establish mandatory standards for the efficient and effective gathering, assessment and use of anti-doping intelligence and for the efficient and effective conduct of investigations into possible anti-doping rule violations.

As with the World Anti-Doping Code, the International Standard for Testing and Investigations is based on the principles of a respect for human rights, proportionality¹²², and other applicable legal principles.

Article 12 of this Standard¹²³ lists the specific requirements for the effective and efficient development of investigative activities by anti-doping organizations.

Article 12.3 describes the principles of investigating other “non-analytical” anti-doping rule violations, which are not revealed by adverse analytical findings:

- anti-doping organizations shall ensure that they are able to investigate confidentially and effectively any other analytical or non-analytical information or intelligence that indicates there is reasonable cause to suspect that an anti-doping rule violation may have been committed;
- anti-doping organizations shall notify WADA of the ongoing investigations;
- an anti-doping organization shall gather and record all relevant information and documentation as soon as possible, in order to develop that information and

¹²¹ <https://rsport.ria.ru/20191107/1560655843.html>

¹²² what the principle of proportionality is was clearly and plainly explained by the CAS Panel in *Mariano Puerta v. ITF* (see para.88, text available here: <http://jurisprudence.tas-cas.org/Shared%20Documents/1025.pdf>): «...It is argued by some that this is an inevitable result of the need to wage a remorseless war against doping in sport, and that in any war there will be the occasional innocent victim. There may be innocent victims in wars where bullets fly, but the Panel is not persuaded that the analogy is appropriate nor that it is necessary for there to be undeserving victims in the war against doping. It is a hard war, and to fight it requires eternal vigilance, but no matter how hard the war, it is incumbent on those who wage it to avoid, so far as is possible, exacting unjust and disproportionate retribution».

¹²³ International Standard for Testing and Investigations 2019: <https://www.wada-ama.org/en/resources/world-anti-doping-program/international-standard-for-testing-and-investigations-isti>

documentation into admissible and reliable evidence in relation to the possible anti-doping rule violation;

- an anti-doping organization shall ensure that investigations are conducted fairly, objectively and impartially at all times, assuming that the violation could have occurred or could not have occurred;
- an anti-doping organization should make use of all investigative resources reasonably available to it to conduct its investigation, including obtaining information and assistance from law enforcement and other relevant authorities, including other regulators, as well as its own internal resources;
- athletes and athletes' personnel are required to cooperate with investigations conducted by anti-doping organizations.

An anti-doping organization shall come to a decision efficiently and without undue delay as to whether proceedings should be brought against the athlete or other person asserting commission of an anti-doping rule violation.

8.4. Balance of powers of national anti-doping organizations and state law enforcement and supervisory bodies

RUSADA is a non-profit public organization. It is not a law enforcement agency, and thus, as mentioned above in Section 1.5, 4.5-4.6 hereof, it does not have the state bodies' powers to conduct inquiry and preliminary investigation, so it cannot perform law enforcement intelligence operations, investigate administrative offenses and criminal cases, etc.

As already noted in Section 4.6 hereof, as part of their investigations anti-doping organizations can examine and analyze information obtained from open sources (social media accounts of athletes, coaches, doctors, fans, etc.), interviews in various mass media, information coming from other athletes or other persons, as well as from anonymous sources. In addition, an anti-doping organization has a lot of data, which, if properly analyzed, can help the investigation department obtain the necessary information: for example, the location data provided by athletes, Athlete Biological Passport (ABP) data, doping control protocols specifying the medications taken, doping control officers' reports indicating the special aspects of sample collection, etc.

However, this is often not enough to properly prove an anti-doping rule violation. In this regard, the Russian legislative bodies introduced, with amendments made in 2019, the "doping articles" into the Code of Administrative Offenses (Art. 6.18) in 2011 and into the Criminal Code (Art. 230.1 and Art. 230.2) in 2016. This allowed law enforcement agencies investigating possible anti-doping rule violations to use the tools that are available to them in accordance with the current Russian procedural law (law enforcement intelligence operations, interrogations, seizures, searches, face-to-face confrontations, etc.).

Thus, the RUSADA investigation can establish the fact of an anti-doping rule violation by athletes or other persons, so they can be subject to the sanction provided for by the All-Russian Anti-Doping Rules. Since the All-Russian Anti-Doping Rules are mandatory, this sanction is recognized by Russian sports federations and other organizations acting in the sporting sphere. However, such a sanction refers to the field of sports and does not have weight and significance outside sport, with the exception of cases expressly provided for by law¹²⁴.

Accordingly, if the investigation reveals a violation of the Code of Administrative Offenses or the Criminal Code, the collected materials shall be transferred to the law enforcement bodies to hold the guilty persons accountable for either an administrative or a criminal violation, with all the relevant consequences.

That is why WADA is persistently asking all anti-doping organizations to expand and strengthen their cooperation with state and interstate bodies and organizations regarding the conduct of investigations and the exchange of information. For example, WADA itself is actively collaborating with Interpol (as the investigation may affect citizens of several states) or with national law enforcement and other bodies to exchange relevant information, considering it a “vital” aspect of any investigation¹²⁵. Besides, the recently adopted Katowice Declaration¹²⁶ called upon all the Signatories of the Code and Governments “to reinforce their efforts to strengthen their cooperation in every possible way; to present a unified front to strive to eradicate doping in sport; to increase resources dedicated to protecting clean sport; and to bring all perpetrators to account.”

Having studied, based on the documents obtained by the Group, the grounds and reasons for initiating criminal proceedings (see Section 2.4 of this Report), the Group has concluded there was no distinct plan of action in this case: what exact procedural actions (apart from interrogation) and in what sequence they should be produced, searching for and deciding what evidence should be dealt with as a matter of priority, including in order to identify possible criminal offenses.

The absence of appropriate investigation methods for this category of cases effectively led to an excessive use of force by local law enforcement organs, and excessive funds spent on investigating the criminal case.

¹²⁴ for example, Clause 1 of Article 348.11 of the Labor Code of Russia establishes an extra basis for the early termination of an employment contract with an athlete by an employer if the athlete is suspended from sports for a period of more than 6 months, as well as for a single violation of the anti-doping rules.

¹²⁵ see, e.g., David P., *A Guide to the World Anti-Doping Code*, 3rd Ed., 2017, p.67.

¹²⁶ approved by the Fifth World Conference on Doping in Sport in Katowice, Poland, on 7 November 2019, see the text here: https://www.wada-ama.org/sites/default/files/resources/files/katowice_declaration_-_2019_world_conference_on_doping_in_sport_-_nov._6_final.pdf

The reaction of the prosecutor's office to the repeated delays in decision making on the case, although it acted competently as a supervising body, did not exclude the possibility of delays in investigating the criminal case.

The Group is sympathetic to the fact that RUSADA ADRVID officials were operating under difficult conditions to obtain the necessary evidence for their investigation. At the same time the Group believes that the 'vague' joint activities of RUSADA and law enforcement bodies contradict widely accepted principles, from which International Standard for Testing and Investigations has emerged¹²⁷. Secondly, such 'vague' interplay places into doubt the results of future investigations into criminal cases, which by the very fact of their existence arouses suspicion that they were initiated not by a desire for the truth and bringing the cheaters to justice, but in order to service the interests of RUSADA to obtain this or that bit of evidence for their own only.

8.5. RUSADA collaboration with other entities fighting against doping in sport

A national anti-doping organization is not strong enough to fight doping. As already specified above, in Sections 4.5-4.6 hereof, anti-doping organizations do not have the capabilities that, for example, law enforcement agencies or other organizations have (e.g., the body responsible for sports medicine). In this regard, WADA strongly recommends that all anti-doping organizations closely cooperate with the government agencies whose functions are somehow related to the fight against doping.

So, Article 11.4.2 of the mandatory International Standard for Testing and Investigations provides that *"Anti-Doping Organizations should also develop and implement policies and procedures for the sharing of intelligence with other Anti-Doping Organizations and/or law enforcement and/or other relevant regulatory or disciplinary authorities"*.

Article 12.3.4 of the Standard ensures that an anti-doping organization shall use during its investigation all possible resources, including the information and assistance of law enforcement bodies or other government agencies, including other regulatory organizations.

Moreover, back in 2011, based on experience gained up to that point, WADA even developed a document "Coordinating Investigations and Sharing Anti-Doping Information and Evidence" as a recommendation for anti-doping organizations¹²⁸. This document provides recommendations on how to build effective and efficient relationships with law enforcement and other government agencies in order to facilitate the exchange of anti-doping data and information, as well as the coordination of investigations.

¹²⁷ see, in particular, Section 1.0 of the International Standard for Testing and Investigations (https://www.wada-ama.org/sites/default/files/resources/files/isti_2019_en_new.pdf)

¹²⁸ <https://www.wada-ama.org/en/resources/world-anti-doping-program/coordinating-investigations-and-sharing-anti-doping-information>

In the said document, WADA recognizes that the national anti-doping organization (which is often either a state body structural unit or carries out state functions in this area) is responsible for creating communication channels with the relevant state bodies in order to build a successful anti-doping system.

WADA itself actively collaborates with the law enforcement agencies of various states and with interstate bodies in order to reveal complex schemes and channels for prohibited substances' and methods' distribution. The latest example of such collaboration was the Viribus Operation, which combined the efforts of WADA itself, as well as of Europol, the law enforcement agencies of 33 countries, Interpol, the Joint Research Center and the European Bureau to Combat Fraud, which in 2019 led to the confiscation of over 24 tons of raw materials for manufacturing the substances prohibited in sports and counterfeit medicines¹²⁹.

Summarizing all of the above, not only does WADA not impede the anti-doping organizations' cooperation with other bodies that perform functions related to fight against doping, but, on the contrary, it always welcomes such cooperation and fully encourages it¹³⁰.

8.6. Information obtained by the Independent Working Group regarding RUSADA ADRVID officials during the investigation of anti-doping rule violations in Chuvashia in 2017-2018

Sections 6.2 and 7.10-7.14 hereof above describe the testimonies given to the Group by various persons who encountered the RUSADA ADRVID officials.

Thus, athletes informed the Group that RUSADA officials:

- did not warn athletes about the actual sense and meaning of interviews and written testimonies they were making;
- did not warn athletes that any of their testimonies could be used against them, including for the purpose of initiating anti-doping rule violation cases against them;
- on the contrary, they deliberately provided the athletes with false information stating that they were only collecting information to initiate cases against doctors, and that the athletes themselves were not in danger, and no one would impose any sanctions on them;
- did not inform minor athletes that they had the right to inform their parents (or other legal representatives) about the expected questioning by RUSADA officials and that they had the right to seek for a legal advice;

¹²⁹ <https://www.wada-ama.org/en/media/news/2019-07/wada-statement-on-operation-viribus>

¹³⁰ see also the Katowice Declaration of 7 November 2019 mentioned above.

- they did not inform the athletes on the content of Article 51 of the Constitution of the Russian Federation, which, following the Universal Declaration of Human Rights, established the right of any person to refuse to give any testimony against themselves and their close relatives;
- obliged athletes, including minors, to attend such questionings and bring their medical records containing confidential medical information, and studied such medical records, taking advantage of the unawareness of the athletes who had no idea about the confidentiality of such information and, accordingly, could not independently form their own position in relation to the provision of such sensitive and confidential information to RUSADA officials;
- did not inform minor athletes that a teacher was present during their interrogations, and did not inform the teachers present or the athletes themselves about their rights and obligations in the course of such questionings, what made the teacher's presence during the questioning completely senseless, and turned such presence into an unnecessary formality;
- threatened and cajoled athletes to persuade them that their testimonies should contain information about circumstances that have never occurred, despite athletes' objections, while RUSADA officials themselves formulated the texts and simply dictated to the athletes what it is they had to write down as their testimonies;
- threatened athletes with immediate and automatic disqualification in case of failure to comply with the oral instructions of RUSADA officials, including in case of a refusal to give written testimony and refusal to write down the testimony dictated by RUSADA officials;
- periodically told the interviewees that they "represent WADA in Russia."

This information seemed to the Group so shocking and non-credible, that, as part of the work to prepare this Report, the Group made a lot of efforts to verify these allegations. Indeed, if such accusations are confirmed, this will not only question the quality of the work of the entire RUSADA ADRVID, but also probably completely undermine any trust the Russian sports community already has in both RUSADA and the anti-doping system as a whole.

In this regard, the Group not only repeatedly checked and double-checked such allegations, but also turned to RUSADA to verify the information received. Unfortunately, RUSADA has categorically refused to cooperate with the Group, thereby did not only confirm the allegations made, but also showed its blatant ignorance in the field of fundamental principles of the national anti-doping organizations' interaction with other bodies and organizations (for more details see Sections 4.4-4.6, 8.3-8.5 of this Report).

Based on the analysis made, the Group considers the athletes' testimonies regarding the absolutely unscrupulous methods used by RUSADA ADRVID officials (and, in particular, Mr Efimov and Mr Stetsyuk, whose names were most often heard during the interviews conducted by the Group) to be absolutely reliable and trustworthy, for the following reasons:

- many respondents interviewed by the Group had never met each other (for example, athletes of completely different ages engaged in various sports who studied at the College at different times and are now living in different regions), which practically excluded the possibility of testimony collaboration, all the more so given they were accurate and consistent in detail;
- the athletes interviewed by the Group do not have and have never had any conflicts of interest with specific RUSADA officials. Moreover, many athletes did not remember the names of the RUSADA officials who interviewed them, and could only describe the appearance of such officials (in detail), which also confirmed that the Group's respondents had never collaborated;
- the information provided by the athletes questioned by RUSADA officials has also been confirmed by College teachers who were formally present during such questionings (see Sections 5.3.7-5.3.8 hereof);
- according to the burden of proof, RUSADA's refusal to cooperate and communicate with the Group will result in some adverse conclusions not in favor of a *mala fide* party, i.e. not in favor of RUSADA.

The Group believes that in this case, RUSADA ADRVID staff wanted to collect as many anti-doping rules violation "facts" as possible. In other words, they needed to "magnify" the recorded violations quantitative indicators in any way (including one obviously illegal and unfair) presenting such information to the RUSADA management as: (a) their achievements; and (b) evidence of their effectiveness¹³¹. Given that the information contained in the written testimony is almost impossible to verify without directly communicating with each interviewee, the RUSADA management was most likely forced to blindly trust the "investigators".

¹³¹ And again, this resembles the notorious system, which existed and still actually exists in the Russian police. The essence of this system is that performance in the law enforcement agencies is assessed by quantitative indicators, and each crime or crime episode that has been declared as solved just "ticks the box". The main thing is to tick as many boxes as possible, in order to increase the indicator of the unit performance. Each police officer or department, or regional unit should tick a certain number of boxes within a certain period of time, in various categories (find more details at <https://takiedela.ru/2017/05/takaya-rossiya-pravookhruniteli/>). Accordingly, the RUSADA management should not expect the ADRVID employees to apply a different approach to assessing their own performance, since they used to work for the law enforcement agencies and surely inherited their internal policies, although the latter have been criticized for many years at all levels, but are still being used. In other words, if someone had been using a knife and fork for the entire life, it would be extremely difficult for such a person to switch effortlessly to chopsticks.

In addition, the complete inaction of RUSADA ADRVID regarding the sports disqualification of Dr Svetlana Lareva is just inexplicable. It is worth remembering that it is Svetlana Lareva who gave RUSADA written testimony in June 2017 fully recognizing that she had many times prescribed to athletes intravenous infusions in a volume exceeding the value allowed at that time (50 ml within 6 hours). Surprisingly, except for “transferring the materials to law enforcement agencies” in June 2017, RUSADA did nothing to suspend Dr Lareva from treating athletes: despite ample evidence, no anti-doping rule violation case was initiated against her, and no materials were transferred for results management which could have led to sport sanctions. The Group was really surprised by the fact that, even in the summer of 2019 (i.e., more than 2 years after RUSADA had visited the Medical Office at the College in June 2017), sport physician Dr Lareva was still treating athletes at the same Medical Office. The Group believes that such inaction can only be attributed to one thing: RUSADA ADRVID officials who have visited the College many times since June 2017, hoped that Lareva would resume the inappropriate practice of administering intravenous infusions to athletes and, accordingly, the number of anti-doping rule violation cases would be formally increased. The Group simply cannot see any other plausible explanation for RUSADA’s strange lack-of-action in relation to an obvious violator of anti-doping rules.

8.6.1. Confidential Witness No. 2.

Confidential Witness No. 2 is a RUSADA employee who worked for RUSADA both during the period reviewed by the Group (2017) and during the “Chuvash doping scandal” emergence and development, which is why the Group considered his testimony a very valuable information source.

Confidential Witness No. 2 contacted the Group members himself and asked for a meeting to be held in Moscow, however, he only agreed to talk with the Group’s members (with an audio record taken) if his confidentiality was guaranteed, in connection with which his voice in the audio file transmitted to the Cabinet Council of Chuvashia as evidence collected by the Group was changed and the identity information was deleted. However, the original (unedited) audio record is stored on several independent digital media in places protected from external influence.

This RUSADA employee’s request alone shows that the environment within the organization is unhealthy, which has been confirmed by information subsequently shared by Confidential Witness No. 2.

Thus, Confidential Witness No. 2 said that, contrary to RUSADA's vigorous statements, the environment within RUSADA is quite tense and full of general mutual suspicion

and distrust. RUSADA employees are afraid of being fired¹³², and this fear creates an unhealthy environment, which destroys creativity and constructive criticism, but encourages conciliation, servility, and toadyism.

The information provided by Confidential Witness No. 2 could not be objectively verified by the Group (again, due to RUSADA's categorical refusal to cooperate). However, despite the lack of direct evidence confirming the statements of Confidential Witness No. 2, the Group is extremely concerned about these statements and believes that information received from Confidential Witness No. 2 should be thoroughly investigated by a body independent of RUSADA, in the interests of the integrity of Russian sports and of RUSADA itself, with anonymity and, if necessary, protection of all RUSADA employees during such investigation.

8.7. RUSADA's refusal to cooperate with the Independent Working Group

As mentioned above in Sections 1.2, 4.4-4.6, 8.3-8.5 of this Report, the goal of RUSADA, as of any other anti-doping organization, is to effectively fight and prevent the use of doping, to achieve what WADA encourages with harmonized and coordinated actions, including the implementation of educational programs, and NADO's active participation in the investigations conducted by other parties, and the full cooperation with state law enforcement and other bodies.

In the course of its work, after receiving information from athletes and doctors, the Group tried to contact, through RUSADA's management, the officials of the RUSADA ADRVID who were named by the interviewed witnesses in relation to the "Chuvash doping scandal". There were two goals in mind: 1) to verify certain facts reported by the witnesses already interviewed by the Group; 2) to verify the validity of quite serious allegations made by the witnesses interviewed by the Group against some RUSADA officials and related to the procedure of the investigation conducted by those officials in 2017 or early 2018.

Such a request was e-mailed to RUSADA on 19 September 2019, and the receipt thereof was confirmed by a RUSADA representative early next day, on 20 September 2019. However, for quite a long time, there was no reaction (reply by e-mail, phone calls, etc.) to the Group's request, which is why the Group decided to phone the RUSADA ADRVID employees they were interested in directly, including Department Head Mr Leonid Ivanov and Department employee Mr Aleksandr Efimov.

The above persons' refusal to meet with the Group representatives was a huge disappointment to the Group. Both Mr Ivanov and Mr Efimov blamed this on

¹³² due to the limited specificity (with the possible exception of Accounting, HR and the Administrative Office) and the actual monopolistic nature of the organization's activities, working for RUSADA is a unique experience, which, however, does not interest other employers in the labor market. Thus, the longer a RUSADA employee is working at a very specific position, the less likely he/she is able to quickly find a new well-paid job if dismissed from RUSADA.

RUSADA's top management, while Aleksandr Efimov confirmed that he would not meet without the approval of his immediate supervisor (Leonid Ivanov), who, in his turn, referred to his superior and said that "RUSADA will soon send a written response to the request". At the same time, the Group had to contact Leonid Ivanov twice, because the response preparation time was so slow. Such short telephone conversations alone raised serious doubts regarding the willingness of the RUSADA ADRVID officials to act openly and sincerely, and even at that time the Group tended to believe that these RUSADA employees were apparently ordered by the RUSADA management not to respond to the interview requests of the Group.

Lack of transparency always creates a feeling of either administrative incompetence or some kind of intentional non-disclosure. This, in fact, is the position of the RUSADA management: in an interview with Sportbox.Ru on the 19 June 2019 RUSADA's Director General Mr Yuri Ganus said the following (quote on Sportbox): "We understand many think that escape and evasion give additional advantages. It's better not to do it, because one always has to give some kind of explanation. There is a completely different logic in the anti-doping field. There were certain circumstances which could cause a lot of concerns and work. To refuse to cooperate is a very bad sign"¹³³.

To the Group members' extreme surprise and disappointment, almost a month after receiving the Group's request, on 16 October 2019, RUSADA sent the Group a response consisting of RUSADA's emphatic refusal to communicate with the Group in any way. This answer contained language so strange and devoid of any logic, and contradicted both the public statements of RUSADA Director General Mr Ganus about RUSADA's openness and transparency¹³⁴ and the WADA regulatory documents and position¹³⁵ so much, that the Group members had no grounds to believe that this response reflects the actual position of the RUSADA management. These doubts only intensified after the Group members saw that the response was signed not by Director General Mr Yuri Ganus, but by his deputy Ms Margarita Pakhnotskaya, while the text itself was prepared by ADRVID Head Mr Leonid Ivanov. The very practice of preparing responses to certain requests by those same individuals, the analysis of whose actions is mentioned in such requests, is rooted in the most vicious practices that existed during Soviet era. Unfortunately RUSADA, which was talking about its complete "renewal" and the use of exclusively progressive methods as part of its activities during media appearances, is still in fact committed to the worst practices of national realities.

¹³³

https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI1037496_Ganus_prokomentiroval_situaciju_s_chuvashskimi_atletami_Shlahtin_rasskazal_o_vzaimodejstvii_IAAF_i_VFLA

¹³⁴ see, for example, https://news.sportbox.ru/Vidy_sporta/doping/spbnews_NI799582_Jurij_Ganus_RUSADA_otvechajet_vsem_principam_nezavisimosti_i_prozrachnosti?page_offset=30&page_size=30

¹³⁵ <https://www.sport-express.ru/doping/news/otkrytoe-pismo-generalnogo-direktora-rusada-1592846/>

As for RUSADA's response dated 16 October 2019, the Group considers it a waste of time to comment and discuss this text, designed to "explain the unexplainable" desire of RUSADA to evade cooperation with the Group. Considering the policy of openness, which is (at least in theory) exercised by RUSADA management, and avoiding various rumors and awkward justification attempts, the Group decided to publish in full, without exceptions, both its request to RUSADA and the response received from RUSADA (see the Attachments hereto).

The RUSADA response obviously indicates only one thing: RUSADA ADRVID strongly opposes any form of any independent analysis of their activities, perceiving this as interference in their activities. Moreover, the Group must state again that we don't know RUSADA Director, Mr Yuri Ganus's, position is in this matter. At the same time, other information received by the Group (as well as the publicly available information regarding the grounds of the conflict between the Russian Olympic Committee and the RUSADA management¹³⁶, and the testimony of Confidential Witness No. 2, see Section 8.6.1 of this Report) makes us conclude that RUSADA's policy of complete closedness aimed at avoiding any forms of independent external control¹³⁷ is a consistent policy of the RUSADA management. This cannot but arouse extreme concerns, because, as mentioned above, RUSADA is not just one of the dozens of thousands of public organizations in Russia. RUSADA, as the Russian national anti-doping organization, bears a huge responsibility for individual athletes' fates and for the fate of Russian sports in general. Thus, RUSADA itself must constantly and daily set good examples to the Russian sports community, in every aspect of its activity, and only then will it have the moral right to demand athletes and coaches' compliance with very strict anti-doping rules. This approach to the sports organizations' activities was formulated by CAS back in 1994, as follows:

*The fight against doping is arduous, and it may require strict rules. But the rule-makers and the rule-appliers must begin by being strict with themselves...*¹³⁸

By the way, such views on the sports organizations' activities are also shared, at least in theory, by RUSADA Director General Mr Yuri Ganus: "Our sport is worthy of full membership in the international sporting family, but first unacceptable approaches and methods need to be removed..."¹³⁹.

Thus, after RUSADA refused to cooperate with the Group, acting contrary to RUSADA's status and mandate, the Group had no choice but to consider the allegations brought

¹³⁶ <https://www.sport-express.ru/olympics/reviews/slova-ganusa-ne-imeyut-otnosheniya-k-realnomu-polozheniyu-del-1589080/>.

¹³⁷ truly independent auditors, truly independent bodies, e.g., the Disciplinary Anti-Doping Committee, the Athletes' Commission, the Ombudsman, and other similar institutions may be given as examples of such "independent external control".

¹³⁸ CAS 94/129 *USA Shooting & Quigley vs. UIT*, para.34.

¹³⁹ <https://rusada.ru/news/slovo-direktora/otkrytoe-pismo-generalnogo-direktora-rossiyskogo-antidopingovogo-agentstva-rusada/>.

against RUSADA's officials by a number of unrelated persons (see, e.g., Sections 6.2.1-6.2.8, 7.10.1, 7.13.1 above) that were not refuted by anyone, and, therefore, confirmed at an acceptable level. And if these violations which many people who were not in contact with each other accused RUSADA officials of committing did occur, the only reasonable outcome is that these officials be banished from Russia's sporting community.

Here it is worth continuing and finishing the RUSADA Director General's quote cited in the paragraph above: *"Our sport is worthy of full membership in the international sporting family, but first unacceptable approaches and methods need to be removed, as well as those who have brought it to a dead-lock and discredited it in the eyes of the global community."*

And the Group has every reason to agree with this position.

8.8. Attempts to discredit the work of the Independent Working Group

As mentioned in Section 2.2 above, after news of the "Chuvash doping scandal" had been announced and initially reacted to by regional authorities, the RUSADA management began to occasionally make rather tough insinuations, if not to say "attacks" against the authorities of Chuvashia, and, among other things, attempted to question the legitimacy of the regional authorities' efforts to understand the real causes and true scale of the "Chuvash doping scandal". In particular, the following was publicly announced: *"One shouldn't try to conceal or sabotage cases, but should actively assist the RUSADA national anti-doping agency and the competent law enforcement agencies in conducting investigations"*, quoted from TASS¹⁴⁰; *"I wouldn't want to be the government of Chuvashia, it would be better if they hadn't done it, this is a real story, not just fake news. One should draw the right conclusions"* - quoted from TASS¹⁴¹). It is obvious that the RUSADA Director's public statements regarding the alleged involvement of the Chuvash regional authorities in massive anti-doping rule violations carried a clearly expressed political connotation, but were in no way an invitation to cooperate more effectively in order to achieve anti-doping goals. At the same time, until the investigation of the causes and conditions of such violations (by RUSADA or by someone else) is completed, one can expect a Head of the national anti-doping organization to give more moderate comments. That is all the more true if we take into account the obvious connection between sports and politics, which is already axiomatic¹⁴².

In addition, the above statements by RUSADA management show a clearly antagonistic attitude towards the Group's very existence. Moreover, the meaning of these

¹⁴⁰<https://tass.ru/sport/6755504>

¹⁴¹<https://tass.ru/sport/6909314>

¹⁴² see, e.g., Sections 5.4.-5.5., 7.5 of the WADA Independent Commission's (chaired by Richard Pound) Report (published on 9 November 2015).

statements was to cast doubt on the independence and impartiality of Group members and the objectivity of future conclusions, without any proof.

Meanwhile, other RUSADA officials, clearly obstructive and reluctant to cooperate with the Group (see Section 8.7 above), also made strange attempts to pass themselves off as members of the Group without any obvious reason. So, in late August of 2019, a response to an additional request sent by a Republican Center official to confirm Mr Aleksandr Efimov's credentials was received; it was sent from RUSADA ADRVID employee (Mr Efimov's) email address, with a reference to Decree No. 717-r of the Cabinet Council of the Chuvash Republic dated 9 August 2019 establishing the Group and outlining its mission and mandate.

It is highly unlikely that once information regarding the Group's creation had been made public and was commented on by RUSADA's Director General, Mr Aleksandr Efimov was unable to differentiate himself between a RUSADA ADRVID employee and a member of the Group created by the Cabinet Council of Chuvashia.

The Group concluded that the main purpose of RUSADA's harsh public statements (see Sections 2.2 and 3.4 above) was to draw attention to the "Chuvash case" and create a suitably scandalous halo, as well as to appear self-confident by constantly asserting that RUSADA has always been and will always be at the forefront of the anti-doping fight in Russia. At the same time, attempts had been made to discredit the Group's operation, but these attempts had practically no effect on the Group's operation, except perhaps for the verbal instructions received by all RUSADA employees not to cooperate with the Group. However, the RUSADA management's premature speeches about "state support" for doping use and alleged regional level "resistance" to RUSADA alone can strengthen public opinion, which will weaken RUSADA's own observance of the Code and International Standards. In other words, a certain public expectation will be created, and RUSADA itself will be forced to act strictly within this "accusatory" paradigm, unable to think and act outside the paradigm it created. In addition, as Confidential Witness No 2 explained to the Group, the current management system within RUSADA strongly discourages nonconformity and is based on fear: everyone is obliged to toe the Director General's line, and any deviation from this line, even if expressed at internal meetings or in a proposal, is seen as betrayal, with the "traitor" experiencing "scathing rebukes" and ostracism.

8.9. Other information obtained by the Independent Working Group regarding the RUSADA employees' activities in the course of investigations

As mentioned in Sections 3.3, 6.1 of this Report, the Group used social media accounts and the media to urge the athletes who were somehow affected by the "Chuvash doping scandal" to contact the Group and take part in an interview. It turned out that the Group's expectation that this information (about the possibility to contact the Group) would be transferred from one athlete to another was correct.

Meanwhile, in addition to the athletes affected by the “Chuvash doping scandal”, the Group received a message (with evidence attached) regarding alleged violations committed by RUSADA investigators while working on another case of alleged “mass” use of prohibited substances in one of the Russian sports clubs. The informer not only submitted a pile of evidence and allegations of numerous violations of the principles of objectivity, fairness and impartiality established by the International Standard for Testing and Investigations in the course of the investigation, but also claimed that the case itself was instigated by a RUSADA ADRVID official who continued to advise and inform his “customer”, i.e. the violator, over the course of the formal investigation. In other words, according to the informer, the one who was supposed to fight doping was creating doping cases himself and even helped the wrongdoers to avoid punishment for their intentional violations. Such allegations, particularly supported by evidence (according to the informer), are certainly worthy of thorough analysis and verification. Indeed, if such accusations are confirmed, then it is not only necessary to take prompt measures to dismiss the RUSADA ADRVID officials involved without any right to be reinstated, but maybe also open administrative or criminal cases, since this is not only about incompetence, but about malicious actions in order to unfairly discredit the athletes. If such allegations are proven this will be an unprecedented case of investigator fraud directly contradicting the basic legal principles and fundamental principles of a clean and fair sport. In addition, if such allegations are confirmed, then this will once again prove RUSADA ADRVID’s total non-compliance with the provisions of the Code and International Standards.

Given that the Group's mandate is clearly defined by a Decree of the Cabinet Council of the Chuvash Republic, the Group does not have the power to investigate these circumstances and the serious allegations made by the informer. However, given the significance of the information received and the need for its thorough verification, as well as the fact that the informer’s evidence (according to the informer) was ignored by RUSADA management, the Group decided to transfer all the information received, including the informer’s documents and contacts, to WADA for further examination. The Group hopes that WADA will promptly conduct its own full and thorough investigation of such allegations and make the results public.

8.10. Conclusions and recommendations

In the course of the work, the Group found plenty of evidence proving that the actions of RUSADA ADRVID contradicted the declared absolute commitment to comply with the principles of the Code and the obligations assumed. On the contrary, there was an incompliance with ethical and other principles, as well as a conspiracy to increase the number of “revealed violations” and subsequently hide the facts of evidence falsification, including against minor athletes.

The interviews with athletes and other individuals, as well as the Group's further steps to verify the data accuracy and RUSADA's reaction to such steps showed that RUSADA ADRVID had absorbed the worst practices of the Russian law enforcement system.

The methods of outright deceit and unacceptable speculation used as ways to maximize the number of "revealed violations" by RUSADA ADRVID speak for themselves. Moreover, the Group emphasizes that this is not only a disbalance of interests, where, for example, an overly zealous investigator is forced to violate some strict procedural requirements in order to nevertheless convict a mobster who has been successfully evading a fair sentence using an army of hired lawyers. This is not the case. The picture here is fundamentally different: the experienced manipulators who had acquired these "skills" while working for the Russian police, not only directly deceived the interviewed athletes misleading them in regard of the nature and meaning of those conversations, not only used their complete unawareness and misunderstanding of both anti-doping rules and generally accepted procedural rules, but also directly forced athletes, including minors, to testify against themselves making them write down testimonies which had little basis in reality. This is just awful and completely unacceptable in the modern world, and particularly, in sport. It is one thing not to know (and not to want to learn) the provisions of both the Code and International Standard for Testing and Investigations and make unintentional mistakes as a result of such ignorance, and quite another - to intentionally and consciously make those being interrogated (even minors!) change their evidence to further the investigators' own interests.

In this regard, it is extremely clear why RUSADA officials categorically refused to meet and talk with Group members: they had something to hide. And this "something" appears really shocking and terrifying. Moreover, the "investigators" who were speaking on behalf of RUSADA whom the athletes directly associated with RUSADA, thereby completely destroying athletes' trust in both the national anti-doping organization and the global anti-doping system in action, since at times they presented themselves as "*subordinate to WADA only*". In fact, now that it has encountered an anti-doping organization in practice, and not in theory, the entire young generation of a large sports region of Russia does not trust the anti-doping system at all. And trust is something that is extremely difficult to gain, but very easy to lose.

It turned out that RUSADA management's statements about a young and ambitious team of like-minded people committed to the fight for clean sport are nothing but empty words. To the great regret and disappointment of the Group's members, over the course of the Group's operation the opposite proved true. Considering that the Group was focusing only on the episode of the "Chuvash doping scandal", and it was comfortably satisfied that most of the RUSADA ADRVID staff had been involved in

such manipulation of evidence, it is very likely that such violations have taken place in other cases that RUSADA investigated or is currently investigating.

Therefore, RUSADA's representatives are very likely to deny the obvious and engage again in lengthy general discussions about "pressure" and "the fight for clean sports." At the same time, the Group hopes that the RUSADA management will have the strength and courage to acknowledge the mistakes made and, after properly assessing those using the name of RUSADA, to remove the "wolves in sheep's clothing" from their organization. Both Russian and international sports communities need to be sure that the identified violations have been properly dealt with and will never happen again.

In addition, it is necessary to restore the level of athletes and coaches' trust in RUSADA, without which it will be impossible to fight doping in Russia in reality (and not just on paper).

The Group also notes that such facts can have a negative impact on the honest and conscientious employees of RUSADA who nevertheless make up the majority. The Group does not want to demonize such people at all, and hopes that the sports community's trust in RUSADA will soon be restored, namely, through the efforts of those RUSADA employees who faithfully adhere to the principles of honesty and justice.

The athletes and other people who believe that their rights may be violated now have virtually nowhere to turn to for protection: the RUSADA Ethics Officer can be contacted only through the apparatus of RUSADA itself; RUSADA has no equivalent of a supervisory body monitoring the ADRVID (which is usually the prosecutor's office or the court). It would be at best naïve to think that the Supervisory Board meeting 4 times a year can effectively and efficiently perform the daily monitoring of the investigation activities. In addition, there is still no athletes' representative body (for example, an Athletes' Commission) within RUSADA.

For the purposes of this Section hereof, the Group would recommend the following:

With respect to RUSADA:

THAT investigators of the ADRVID who falsified evidence in the Chuvash case, and/or conspired to hide facts in this case, be dismissed without the right to be reinstated and with no further working rights in the sport;

THAT by means of an independent external organization (as directed by WADA), a full monitoring of all the actions of RUSADA be conducted in relation to investigations of "non-analytical" anti-doping rule violations during the period from 2017 to the present time, focusing on verifying the accuracy of the information specified in written

testimonies, especially those of minors (by contacting people who allegedly gave such testimonies), and THAT such findings be published;

THAT a mechanism for the effective independent monitoring of the RUSADA investigation activities (for example, following the model of the IAAF Disciplinary Tribunal that monitors the Athletics Integrity Unit's activities) be developed and introduced;

THAT the RUSADA Ethics Officer can always be contacted directly for those who need his help (for example, by posting his direct contact details or email on the official RUSADA website), without an 'intermediary' such as RUSADA itself;

THAT free and fair elections be held among Russian athletes of various levels to immediately create an effective and really active RUSADA Athletes' Commission endowed with real powers according to the best management practices;

THAT a Cooperation Agreement be signed as soon as possible with the Ministry of Physical Culture and Sport of the Chuvash Republic to fight doping in sport, and immediately put into effect, especially in the sphere of education and prevention programs;

THAT any legal uncertainty in cooperation between RUSADA and law enforcement bodies in joint areas of activity (to identify and address anti-doping rules violations) be eliminated and cooperation fostered ensuring that resources are spent appropriately and investigations are conducted more efficiently. Clear new rules and procedures should be established for similar cases in cooperation with the Ministry of Interior Affairs – for example, the Methodological recommendations.

With respect to WADA:

THAT an independent organization be identified capable of impartially, promptly and efficiently verifying all the actions of RUSADA ADRVID to investigate "non-analytical" anti-doping rule violations from 2017 to the present time (focusing on verifying the accuracy of written testimonies, especially those of minors), and give mandatory instructions to RUSADA to ensure the work of such an organization;

THAT a series of educational programs be undertaken for RUSADA officials to check RUSADA's compliance with the Code and the other documents of the World Anti-Doping Program related to investigations and the cooperation with state bodies and implementing educational programs and doping prevention programs in the Russian regions;

THAT a comprehensive and thorough investigation (without RUSADA's participation) be undertaken into accusations contained in the document package submitted to WADA on violations allegedly committed by RUSADA officials in 2018 that concerned a group of athletes of one of the Russian sport clubs.

SECTION 9: SUMMARY OF THE INDEPENDENT WORKING GROUP'S FINDINGS AND RECOMMENDATIONS

9.1. General findings

The conclusions and recommendations herein are based on mutually confirming witness testimonies, documents, analytical work, etc.

The Group believes that within the framework of the Cheboksary Olympic Reserve College named after I.M. Krasnov, where the Republican Center's Medical Office was operating, "inconsistency, irresponsibility and ignorance", according to the accurate remark of RUSADA Deputy Director General Ms Margarita Pakhnotskaya, indeed took place in 2017. And it was this blatant ignorance wrapped up in sometimes inexplicable financial decisions that made the Republican Center doctors jeopardize athletes' professional careers by frequently prescribing them intravenous infusions of various non-prohibited substances for recovery purposes in volumes that were prohibited in 2017. Thus, the doctors violated anti-doping rules themselves, and created anti-doping rule violations for athletes out of nowhere. No young athletes expected certified sport physicians to be so incompetent.

However, the Group did not find any conclusive and objective evidence of the athletes' or regional authorities' involvement in such practices. Moreover, in general, with the exception of a few individual cases specified above, both athletes and regional officials readily responded to the Group's call for cooperation and provided comprehensive information upon the Group's first request. The Group would like to express special thanks to Deputy Chief Physician of the Republican Center Mr Aleksandr Egorov, who did everything possible to get the requested materials without delay and proved to be an honest and open person, able to admit his own and other people's mistakes, and work to correct them. It seems that it is Mr Aleksandr Egorov, with the assistance of Deputy Director of the Regional Sports Training Center Mr Anatoly Grigoryev, who is responsible for anti-doping work in Chuvashia, is able to pull the Republic's sports medicine out of the crisis caused by the inefficient and incompetent actions of the previous Republican Center management.

As mentioned above, the Group sent some of the information which the Group became aware of but which is not within the scope of its mandate, to WADA to carry out an objective investigation and make an appropriate decision, given the circumstances.

At the same time, the Group admires the courage of Confidential Witnesses (including the RUSADA employees) and all the other witnesses who gave honest, truthful and consistent explanations, regardless of the consequences they potentially faced. The Group also hopes that the Cabinet Council of the Chuvash Republic will do everything to protect such witnesses so that they do not suffer as a result of their honesty.

9.2 Key recommendations

In this final section of the Report, the Group has assembled all of the recommendations.

With respect to the Republican Center

THAT an exam be arranged ASAP for all sport physicians to test their knowledge of anti-doping rules and other measures on the prevention of doping in sport and the fight against it, based on the Regulation on the sport physician's activity (Appendix No 5 on the Order of the Ministry of Health of Russia of 1st March 2016 No 134). In case of non-compliance with the requirements, measures be taken to dismiss those non-compliant in accordance with paragraph 3 of part 1 of article 81 of the Labor Code of Russia (see Section 7.16 of this Report);

THAT a Medical information system (MIS) be introduced with the goal of regulating the flow of documents, as well as financial and administrative information, electronic medical records, and data on medical examinations in digital form. In the technical development area, the introduction of algorithms to automatically warn of the possibility of administrating a prohibited substance or method be put in place (see Section 7.16 of this Report);

THAT a special labelling system (with stickers, etc.) be introduced at the stage of receipt of medications, that visibly warns of the presence of substances included in the WADA Prohibited List or equipment that could be used for prohibited methods (see Section 7.16 of this Report);

THAT medical supplies and other materials (like infusion systems) are no longer given directly to patients even in extreme cases, thereby complying with the legislation of the Russian Federation (see Section 7.16 of this Report);

THAT a common area of the Republican Center be equipped with clear and easily understood written materials about the nature and essence of anti-doping regulations (see Section 7.16 of this Report);

THAT RUSADA's assistance be sought to gain educational services on anti-doping rules, corresponding distribution of materials, and an improvement in the qualification of doctors of the Republican Center and other medical personnel (see Section 7.16 of this Report);

THAT sport physicians be provided with RUSADA's contact details (telephone numbers, addresses and email addresses) for the possible consultancy services on doping in sport (see Section 7.16 of this Report);

THAT a system of regular anti-doping educational events be introduced for medical and administrative personnel with an effective, cheat-free testing mechanism (see Section 7.16 of this Report).

With respect to the Ministry of Health of the Chuvash Republic

THAT the Republican Center's Chief Doctor Arnold Karzakov be dismissed in connection with his insufficient knowledge of the anti-doping measures needed to effectively operate the specialized medical institution, and also curtail his powers as chief freelance expert in sports medicine of the Ministry of Health of the Chuvash Republic (see Section 7.16 of this Report).

With respect to the Territorial Federal Service Body for the Supervision in the Health in the Chuvash Republic

THAT a careful check be taken of the storage facilities and accounts of the Republican Center's medical supplies (see Section 7.16 of this Report).

With respect to the Minister of Health and Ministry of Education of the Russian Federation

THAT a mandatory anti-doping module be developed and introduced in programs for certifying sport physicians (see Section 7.16 of this Report).

With respect to the College:

THAT the College's buildings and boarding houses be provided with vivid and easily accessible anti-doping materials describing the essence and meaning of anti-doping rules (see Section 5.7 of this Report);

THAT content of the 'anti-doping' module in the College's educational program be reviewed together with the person responsible for anti-doping work in the Chuvash Republic (see Section 5.7 of this Report);

THAT an appropriate access control system to the College be introduced, limiting access to those who work or study in the College (following the model of other educational institutions). In addition, THAT a separate level of access to the boarding house be created where minors live, in order to limit such access to outsiders (see Section 5.7 of this Report).

With respect to the Ministry of Physical Culture and Sport of the Chuvash Republic and regional sports federation:

THAT coaches' knowledge of anti-doping rules and other issues of preventing doping in sport be tested, so that coaches start actively following the rules of preventing anti-doping rule violations by athletes (according to labor agreements and/or part 4 of article 348.2 of the Labor Code of the Russian Federation). In cases of failure to meet the necessary requirements THAT dismissal measures be taken, on the basis of point 3, part 1 of article 81 of the Labor Code of the Russian Federation (see Section 5.7 of this Report).

With respect to the Ministry of Education and Youth Policy of the Chuvash Republic:

THAT additional training be undertaken (with effective knowledge control) of Chuvashia's educational institutions' teaching staff regarding the rights, responsibilities and duties of teachers requested to be present during a minor's interrogation (see Section 5.7 of this Report).

With respect to the Ministry of Labor and Social Development of the Russian Federation, together with the Ministry of Sport of the Russian Federation and the Ministry of Health of the Russian Federation

THAT article 348.3 of the Labor Code of the Russian Federation (relating to the importance of athletes carrying out medical recommendations) be harmonized with the All-Russian Anti-Doping Rules and World Anti-Doping Code which hold athletes responsible for violating anti-doping rules (see Sections 5.7, 6.3 of this Report).

With respect to the Ministry of Health of the Russian Federation, together with the Federal medical-biological agency of Russia and the Russian Association of Sport Medicine and Rehabilitation of the Patients and the Disabled (RASMIRBI)

THAT Clinical recommendations be developed in sport medicine, taking into consideration the scope of applicable anti-doping regulations, and THAT relevant corrections, if necessary, be introduced in the National Manual of sport medicine (see Section 7.16 of this Report).

With respect to RUSADA:

THAT due procedures be opened targeting Republican Center's doctors who violated the anti-doping rules with the aim of disqualifying them from sport (see Section 7.16 of this Report);

THAT investigators of the ADRVID who falsified evidence in the Chuvash case, and/or conspired to hide facts in this case, be dismissed without the right to be reinstated and with no further working rights in the sport (see Section 8.10 of this Report);

THAT by means of an independent external organization (as directed by WADA), a full monitoring of all the actions of RUSADA be conducted in relation to investigations of "non-analytical" anti-doping rule violations during the period from 2017 to the present time, focusing on verifying the accuracy of the information specified in written testimonies, especially those of minors (by contacting people who allegedly gave such testimonies), and THAT such findings be published (see Section 8.10 of this Report);

THAT a mechanism for the effective independent monitoring of the RUSADA investigation activities (for example, following the model of the IAAF Disciplinary Tribunal that monitors the Athletics Integrity Unit's activities) be developed and introduced (see Section 8.10 of this Report);

THAT the RUSADA Ethics Officer can always be contacted directly for those who need his help (for example, by posting his direct contact details or email on the official RUSADA website), without an ‘intermediary’ such as RUSADA itself (see Section 8.10 of this Report);

THAT free and fair elections be held among Russian athletes of various levels to immediately create an effective and really active RUSADA Athletes’ Commission endowed with real powers according to the best management practices (see Section 8.10 of this Report);

THAT a Cooperation Agreement be signed as soon as possible with the Ministry of Physical Culture and Sport of the Chuvash Republic to fight doping in sport, and immediately put into effect, especially in the sphere of education and prevention programs (see Section 8.10 of this Report);

THAT online service ‘Check Medication’, recommended on the official RUSADA website, be checked to make sure that the service warns about possible use of non-prohibited medication by way of prohibited method (for instance, Cytoflavin) (see Section 7.16 of this Report).

With respect to RUSADA, together with the Ministry of Interior of the Russian Federation:

THAT any legal uncertainty in cooperation between RUSADA and law enforcement bodies in joint areas of activity (to identify and address anti-doping rules violations) be eliminated and cooperation fostered ensuring that resources are spent appropriately and investigations are conducted more efficiently. Clear new rules and procedures should be established for similar cases in cooperation with the Ministry of Interior Affairs – for example, the Methodological recommendations (see Section 8.10 of this Report).

With respect to WADA:

THAT an independent organization be identified capable of impartially, promptly and efficiently verifying all the actions of RUSADA ADRVID to investigate “non-analytical” anti-doping rule violations from 2017 to the present time (focusing on verifying the accuracy of written testimonies, especially those of minors), and give mandatory instructions to RUSADA to ensure the work of such an organization (see Section 8.10 of this Report);

THAT a series of educational programs be undertaken for RUSADA officials to check RUSADA's compliance with the Code and the other documents of the World Anti-Doping Program related to investigations and the cooperation with state bodies and implementing educational programs and doping prevention programs in the Russian regions (see Section 8.10 of this Report);

THAT a comprehensive and thorough investigation (without RUSADA's participation) be undertaken into accusations contained in the document package submitted to WADA on violations allegedly committed by RUSADA officials in 2018 that concerned a group of athletes of one of the Russian sport clubs (see Sections 8.9, 8.10 of this Report).

INDEPENDENT WORKING GROUP

Moscow, 15 November 2019

[signed]

Artem Patsev,

Chair

[signed]

Askhab Gadzhiev

[signed]

Sergei Kondratiev

Attachment 1

**CABINET COUNCIL
OF THE CHUVASH REPUBLIC**

Decree No. 717-r dated 09.08.2019

**INDEPENDENT WORKING
GROUP**

iwg@cleversports.ru

dated 19.09.2019 № 19/09/19-1

To Director General
of the RAA Association RUSADA
Mr. Yu.A. Ganus

rusada@rusada.ru

Dear Yuri,

As you know, by Decree No. 717-r of the Cabinet Council of the Chuvash Republic dated 09.08.2019, the Independent Working Group (hereinafter referred to as IWG) was established. It was asked to study the circumstances and conditions of possible anti-doping rule violations by Chuvash athletes and/or their personnel in 2017, in order to come up with recommendations regarding the inadmissibility of the future recurrence of such violations.

Over the course of the IWG's work, numerous interviews with athletes, officials and employees of Chuvash medical institutions have already been conducted, and copies of documents and electronic data have been received.

However, to ensure the proper operation of the IWG, and to obtain the most objective and reliable information and to check the information already available to IWG (for objectivity purposes), it would be extremely useful to meet with those RUSADA employees who were in Chuvashia in 2017 and 2018 and observed the violations, namely, **L.L. Ivanov, A.N. Efimov, Ya.V. Stetsyuk, A.V. Kovalyov**, in order to **interview them**.

I would like to emphasize straight away that the interviews with the above RUSADA employees will be aimed specifically at clarifying the circumstances and conditions of possible anti-doping rule violations, including those, in relation to which L.L. Ivanov was interrogated as a witness under criminal case No. 11701970038100468, so there is no "overlap of responsibilities" of the IWG and RUSADA itself, which is working on individual cases of doping rules violations committed by specific athletes.

Given that IWG plans to complete its work by the beginning of October 2019 (including the preparation and publication of a report based on the results, which will also be sent to ROC, IOC, WADA, IAAF and other international sports federations), and taking into account your repeated public statements regarding RUSADA's openness and readiness to cooperate with any persons/entities to fight doping and eradicate the causes thereof, **I would kindly ask you to arrange an interview with all the listed RUSADA employees (L.L. Ivanov, A.N. Efimov, Ya.V. Stetsyuk, A.V. Kovalyov) in Moscow at your earliest convenience**. If they refuse or evade interview, it will greatly disappoint the IWG and will be included in the final report.

In order to best coordinate the exact time and venue for the interview, please contact the IWG by email (iwg@cleversports.ru) or the IWG Chair (A.A. Patsev) by mobile phone +7.926.222.92.71.

Faithfully Yours,

Chair of
the Independent Working Group

[signature]

A.A. Patsev



**Russian Anti-Doping Agency
RUSADA
Association**

(RAA RUSADA)

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Independent Working Group
established by Decree No. 717-r
of the Cabinet Council
of the Chuvash Republic
dated 09.08.2019

To Chair
A.A. Patsev

16.10.2019 № MA-3864

Re: № _____ dated _____

Dear Artyom,

RAA RUSADA reviewed your request ref. No. 19/09/19-1 dated 19.09.2019 and would like to report the following:

1. RAA RUSADA is not aware of the legal status of the Independent Working Group (hereinafter referred to as the "IWG") that you chair. Moreover we are unable to determine the mandate of the IWG and the purpose of its creation from Decree No. 717-r of the Cabinet Council of the Chuvash Republic dated 09.08.2019, other than to make recommendations regarding the inadmissibility of the future recurrence of such violations.
2. Please note that, in accordance with current All-Russian Anti-Doping Rules, the World Anti-Doping Code and the International Standard for the Protection of Privacy and Personal Information, all the information received by RAA RUSADA in connection with its activities is confidential and shall not be transferred to third parties until it is made public. Information about a violation shall be provided exclusively to the person who has violated the anti-doping rules, the relevant All-Russian Sports Federation, the International Sports Federation and the World Anti-Doping Agency. This information can also be sent to law enforcement agencies and supervisory authorities of the Russian Federation, if there are legal grounds.
3. According to current All-Russian Anti-Doping Rules, all necessary information about a violation shall be provided to the person who has violated the anti-doping rules, as well as the All-Russian Sports Federation, the International Sports Federation and the World Anti-Doping Agency. Information about possible anti-doping rule violations can be also sent to law enforcement agencies and supervisory authorities of the Russian Federation, if there are legal grounds.
4. The activities of RAA RUSADA Investigation Department do not involve the participation of its employees in giving any explanations other than those specified in the WADA Code, the All-Russian Anti-Doping Rules, and within the framework determined by Russian law;
5. Given that your letter contains information about L.L. Ivanov's participation in the interrogation as a witness in criminal case No. 11701970038100468, I would ask you to inform me on what basis the IWG members were provided access to the materials of this criminal case;
6. According to your letter, if the staff of RAA RUSADA Investigation Department refuse to be interviewed, it "will greatly disappoint the IWG and will be included in the final report". Besides, IWG employee S.A. Kondratiev attempted to independently invite RAA

RUSADA employee A.N. Efimov for an interview, bypassing official channels. We regard these actions as an attempt to exert pressure on RAA RUSADA employees, who conducted and still are conducting an investigation regarding the Chuvash athletes and their personnel;

7. It should be noted that if you have questions regarding the activities of RAA RUSADA, including within the framework of questions posed to the IWG by the Cabinet Council of the Chuvash Republic, you can officially request any information you need. Such a request will be reviewed by RAA RUSADA, and the response will be sent to your address.

RAA RUSADA welcomes the decision to make recommendations for taking clear and effective measures to prevent the future occurrence of the situations the IWG is dealing with.

At the same time, it should be noted that a proposal to the IWG members to determine the anti-doping rule violation facts in the cases opened by RAA RUSADA is surprising, since the IWG is not an anti-doping organization or a law enforcement agency. And we regard the desire of IWG members and the Cabinet Council of the Chuvash Republic to receive information about the possible anti-doping rule violations by the Chuvash athletes and their personnel before the official hearing of these cases by the Disciplinary Anti-Doping Committee of RAA RUSADA as an attempt to intervene in the RAA RUSADA activities.

Faithfully Yours,

Deputy Director General

[signature]

M.A. Pakhnotskaya