A National Anti-Doping Organization must “vigorously pursue” all potential anti-doping rule violations within their authority and ensure proper enforcement of consequences.¹

Samples and related documentation must arrive at the Laboratory that will be conducting the analysis in proper condition to do the necessary analysis.² For example, when requiring a specific type of analysis (e.g., DNA) be conducted on a sample, the responsible Anti-Doping Organisation must clearly communicate this intention to the Laboratory.

Per the International Standard for Laboratories’ Code of Ethics, laboratory personnel are duty-bound to preserve the integrity of the World Anti-Doping Program. Moreover, laboratory staff must not engage in conduct or activities (“Detrimental Conduct”) that would cast doubt on the “integrity” of the anti-doping program.³

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¹ Per World Anti-Doping Code, Article 20.5.7.
² Per International Standard for Testing and Investigations, Article 9.1 (Transport of Samples and Documentation).
**Key Events**

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 September 2014</td>
<td>Athlete “A” (the “Athlete”), competing for Turkey, produced an Adverse Analytical Finding for Stanozolol in an in-competition (“IC”) sample collected after winning a bronze medal at a wrestling championship event. The Athlete was banned for two years.</td>
</tr>
<tr>
<td>11 August 2017</td>
<td>The Turkish Anti-Doping Commission (“TDMK”) reported a missed test against the Athlete for failing to be available for testing at the location and time specified in the Athlete’s Whereabouts filing.</td>
</tr>
<tr>
<td>29 November 2017</td>
<td>A sample (“Sample 1”) was collected from the Athlete out-of-competition (“OOC”), in Russia. The Testing Authority (“TA”) and Results Management Authority (“RMA”) was the TDMK. The Sample Collection Authority (“SCA”) was a private sample collection company. No Prohibited Substances were detected in Sample 1.</td>
</tr>
<tr>
<td>1 February 2018</td>
<td>Sample 1 was flagged suspicious for Urine Substitution by an Athlete Passport Management Unit (“APMU”). The APMU advised the TDMK to collect further samples from the Athlete and consider DNA analysis.</td>
</tr>
<tr>
<td>4 February 2018</td>
<td>A sample (“Sample 2”) was collected from the Athlete OOC, in Russia. The TDMK was the TA and RMA, while the SCA was a private sample collection company. No Prohibited Substances were detected in Sample 2.</td>
</tr>
<tr>
<td>5 March 2018</td>
<td>Sample 2 was flagged suspicious for Urine Substitution by an APMU. The APMU advised the TDMK to collect further samples from the Athlete and consider DNA analysis.</td>
</tr>
<tr>
<td>11 April 2018</td>
<td>TDMK requested a WADA-accredited Laboratory (the “Laboratory”) to conduct DNA analysis and comparison of Sample 1 and Sample 2.</td>
</tr>
<tr>
<td>5 July 2018</td>
<td>Sample 1 and Sample 2 were shipped from Turkey to the Laboratory for DNA analysis.</td>
</tr>
<tr>
<td>6 July 2018</td>
<td>Sample 1 and Sample 2 arrive at the Laboratory for DNA analysis.</td>
</tr>
</tbody>
</table>

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4 The identity of the Athlete has been withheld. 
5 The name of the Laboratory has been withheld.
9 October 2018 The DNA analysis confirmed that the urine from Sample 1 and Sample 2 originated from different donors.

28 November 2018 The Laboratory reported the DNA analysis results of Sample 1 and Sample 2 to the TDMK. The Laboratory told the TDMK that there had been a delay in finalising and reporting the DNA analysis results because of “analytical problems” and staff absence.6

9 December 2018 For the purposes of individualisation,7 the TDMK collected another sample (“Sample 3”) from the Athlete IC, in Turkey. The sample was collected by Doping Control Officers (“DCOs”) from the TDMK who knew the identity of the Athlete from a prior Sample Collection.

No Prohibited Substances were detected in Sample 3.

13 December 2018 Suspecting the urine in Sample 1 and/or Sample 2 had been substituted, the TDMK requested (via email) the Laboratory to conduct DNA analysis of Sample 3, and then compare that DNA with the DNA of Sample 1 and Sample 2. While the TDMK provided a detailed email with context and background about their request, the email did not include the sample code of Sample 3; instead, it was generically referenced as “this sample” and “the sample”.

17 December 2018 Sample 3 was received by the Laboratory.

17 July 2019 The TDMK requested an update on the DNA analysis of Sample 3 and its comparison with the DNA of Sample 1 and Sample 2.

25 July 2019 The Laboratory told the TDMK that they were unaware of a request for DNA analysis of Sample 3 (“as far as we know we have not received a request for the DNA analysis”), and as a result Sample 3 had been discarded in accordance with the International Standard for Laboratories (“ISL”).

30 July 2019 The Russian Anti-Doping Agency (“RUSADA”) collected blood and urine samples from the Athlete, OOC, in Russia.8 The samples were collected at the behest of the TDMK as part of its attempt to correct the loss of Sample 3. To help identification, the TDMK had provided RUSADA with a picture of the Athlete.

RUSADA collected multiple urine samples from the Athlete because of low Specific Gravity levels. Of the samples collected, three were suitable for DNA analysis, namely, a blood sample (“Sample 4”) and two urine samples (“Sample 5” and “Sample 6”).

No Prohibited Substances were detected in any of the samples.

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6 The DNA analysis and reporting took approximately five-months from the time of sample receipt by the Laboratory.

7 Individualization is the process of confirming through DNA analysis that a specific sample originated from a particular donor. It is a necessary step in a Code Article 2.2 (Prohibited Method - Urine Substitution) violation. This process requires three samples (including the manipulated one) from the suspected athlete.

8 Two blood samples were also collected, one for anti-doping and DNA analysis, the other was for the Athlete’s Biological Passport.
1 August 2019  Samples 4, 5 and 6 arrive at the Laboratory for DNA analysis and comparison.

27 September 2019  The Laboratory confirmed via DNA analysis that Samples 4, 5 and 6 originated from one donor of the same sex as the Athlete. However, that donor was different to the two individuals responsible for Samples 1 and 2. In other words, Samples 1, 2, 4, 5 and 6 originate from three different donors.

17 October 2019  The Laboratory reported the DNA analysis results of Samples 4, 5 and 6, and comparison with Sample 1 and Sample 2 to the TDMK. However, the TDMK did not believe that individualization had been sufficiently established because Samples 4, 5 and 6 were OOC samples and had not been collected by a DCO they believed could recognize the Athlete. In other words, the TDMK was concerned that Samples 4, 5 and 6 could have also been provided by a person other than the Athlete.

5 December 2019  The TDMK emailed the WADA Intelligence and Investigations Department ("WADA"), provided a summary of the Athlete’s case, and stated that it would commence Results Management ("we start the necessary processes about the Athlete"). The TDMK also sought advice on what it should do in relation to the private sample collection companies ("service providers") who had collected the substituted samples from the Athlete.9

3 September 2020  Acting upon confidential information, WADA asked the TDMK for an update on the Athlete’s case.

11 September 2020  The TDMK told WADA that the Athlete’s case was not finalised because they wanted to interview the Athlete, but they could not find him.

13 October 2021  In response to a further request for a case update, the TDMK told WADA that the matter had still not been finalised because the Athlete was now living in Russia and could not be reached.

1 November 2021  Concerned by the inactivity of the TDMK in respect of the Athlete, WADA commenced Operation Ghost.

4 November 2021  Operation Ghost partnered with RUSADA to locate the Athlete.

12 November 2021  The TDMK notified (the "TDMK Notification") the Athlete via email of the potential violation of Code Article 2.5 (Tampering) (the "Tampering Violation"). The TDMK alleged this violation because the Athlete had submitted samples during various Doping

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9 In September 2019, WADA began Operation Arrow, a covert investigation into Urine Substitution (particularly in the sport of weightlifting).
Controls that “belong[ed] to different people”, and that these actions had “interfered” with the Doping Control Process.

30 November 2021  
RUSADA attempted to test the Athlete at the location and time specified in the Athlete’s Whereabouts filing. The Athlete was not present, but the Athlete’s father was. The father said the Athlete had retired from wrestling and was now a Mixed Martial Arts (“MMA”) fighter. Within hours of the attempted Sample Collection, the Athlete changed the Whereabouts filing, specifically the location nominated for testing.

6 December 2021  
RUSADA attempted to test the Athlete at the new location and time specified in the Athlete’s Whereabouts filing. The occupant of the residence told the DCOs that the Athlete did not live at the address. The DCOs then attempted to call the Athlete. The Athlete did not answer but rang back. The DCO then notified the Athlete on the telephone that the Athlete was the subject of a Testing Mission and was required to provide a current location for the DCO to effect Sample Collection. The Athlete refused, told the DCO they had retired from wrestling and ended the call.

Within an hour of speaking to the DCO, the Athlete updated their Whereabouts filing to falsely appears as if they were in Thailand and have been since the previous day (5 December 2021).

December 2021  
Operation Ghost engaged the Anti-Doping Organization of Thailand (“Thai-NADO”) and confirmed that the Thai address indicated by the Athlete was false and incomplete. Moreover, Thai immigration confirmed that the Athlete had not entered Thailand since March 2017.

3 January 2022  
Having received no reply from the Athlete, the TDMK referred the Tampering Violation to the Disciplinary Committee of the Turkish Wrestling Federation (the “TWF Disciplinary Committee”).

15 February 2022  
Because it was the Athlete’s second violation, the TWF Disciplinary Committee imposed an eight-year period of ineligibility for the Tampering Violation. The Disciplinary Committee did not report this decision to the TDMK until 17 March 2022.

2 March 2022  
RUSADA notified the Athlete of a potential violation of World Anti-Doping Code (“Code”) Article 2.3 (the “Refusal Violation”) for the refusal to submit to Sample Collection on 6 December 2021. RUSADA reported this notification to the TDMK.

RUSADA advised Operation Ghost of its intention to commence future proceedings against the Athlete for a potential violation of Code Article 2.5 (Tampering) because of the false Whereabouts filing that the Athlete was in Thailand (the “Thailand Violation”).

10 March 2022  
The TDMK advised RUSADA via letter that it had pursued the Tampering Violation against the Athlete and was awaiting the decision of the TWF Disciplinary Committee.

17 March 2022  
The TWF Disciplinary Committee reported its decision on the Tampering Violation to the TDMK.
<table>
<thead>
<tr>
<th>Date</th>
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</tr>
</thead>
<tbody>
<tr>
<td>30 May 2022</td>
<td>RUSADA notified the Athlete of the Thailand Violation.</td>
</tr>
<tr>
<td>3 June 2022</td>
<td>RUSADA received a letter from the Athlete stating that they had never taken Prohibited Substances or &quot;hid&quot; from testing. The Athlete said they had left the sport of wrestling forever, had stopped making Whereabouts filings and were at a different location in Russia when RUSADA had attempted to test them – the Athlete did not specify which attempted test they were referencing.</td>
</tr>
<tr>
<td>13 July 2022</td>
<td>The RUSADA Disciplinary Anti-Doping Committee found the Athlete committed the Refusal Violation and the Thailand Violation and imposed a life-time ban on the Athlete.</td>
</tr>
</tbody>
</table>
Investigation Summary

Background

On 2 September 2020, WADA received confidential information that the TDMK were not progressing a case of sample (urine) substitution (“Urine Substitution”) involving the Turkish wrestler, Athlete “A” (viz. the “Athlete”). The evidence implicating the Athlete included DNA confirmation that samples collected on 29 November 2017 (“Sample 1”) and 4 February 2018 (“Sample 2”) originated from different donors.

On 11 September 2020, in response to a request, the TDMK told WADA that the Athlete’s case had stalled because the Athlete could not be found. The TDMK provided assurance, however, that it would continue to pursue the Athlete.

On 13 October 2021, 13 months after the initial enquiry, WADA sought a further update from the TDMK. The reply revealed the Athlete’s case remained stalled.

On 1 November 2021, concerned by the inactivity of the TDMK, WADA told the TDMK that it had commenced an investigation into TDMK’s handling of the Athlete’s alleged Urine Substitution. WADA codenamed this investigation Operation Ghost.

On 12 November 2021, the TDMK notified the Athlete via email of a potential violation of Code Article 2.5 (Tampering) (the “Tampering Violation”) and the commencement of a Results Management Process. The evidence relied upon for the Tampering Violation was predominantly the Urine Substitutions.

On 3 January 2022, having not heard from the Athlete, the TDMK referred the Tampering Violation to the Disciplinary Committee of the Turkish Wrestling Federation. On 15 February 2022, the Athlete was found to have committed the violation, and an eight-year period of ineligibility imposed.10

Operation Ghost

Operation Ghost has established that the TDMK was diligent in its investigation of the Athlete up until the collection and delivery of a sample (“Sample 3”) to the Laboratory for DNA analysis. TDMK had collected Sample 3 from the Athlete on 9 December 2018 for the purposes of individualization.

However, because of an administrative oversight, the TDMK did not document the request for DNA analysis on the associated chain-of-custody (“COC”) form sent to the Laboratory. Additionally, the TDMK did not include the sample code of Sample 3 in any of its pre-analysis email correspondence with the Laboratory about Sample 3. As a result, the Laboratory had no way of knowing, on the documents it had received from the TDMK, that DNA analysis was required for Sample 3.

From the perspective of the Laboratory, because the COC did not include a request for DNA analysis, Sample 3 was treated as a routine anti-doping sample and following the negative anti-doping analytical result, it was discarded after three months.11

Because the TDMK did not enquire about Sample 3 until seven months after its delivery to the Laboratory, the TDMK had no chance of discovering or amending their error before the Laboratory discarded the sample. The TDMK said it had waited so long before enquiring about Sample 3 because in its experience it took a long time to receive DNA analysis results – as evidenced by the nearly five-month wait for the DNA results of Samples 1 and 2.

The Laboratory said the delay in DNA analysis of Samples 1 and 2 was an anomaly – caused by analytical and staff issues – and that ordinarily DNA analysis should take between three and four weeks.

The TDMK has admitted its administrative failings and acknowledged they played a material role in the disposal of Sample 3 without DNA analysis. The TDMK reported that they had now implemented procedural changes to ensure that such circumstances would not be repeated. More specifically, the TDMK has implemented better inter-departmental collaboration and NADO-Laboratory communication to ensure these issues do not repeat. The TDMK also now conducts a monthly review of all outstanding analysis requests, and this review includes speaking directly with the responsible laboratory.

There is no evidence that the Laboratory contravened the International Standard for Laboratories (“ISL”) in

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10 This being the Athlete’s second violation in 10 years. More specifically, in 2014 an Adverse Analytical Finding for Stanozolol was reported in a sample from the Athlete.

11 Per Article 5.3.11.1 of the International Standard for Laboratories
respect to Sample 3. However, during its investigation Operation Ghost discovered four other, unrelated samples received from the TDMK which the Laboratory had discarded without completing the requested (IRMS)\textsuperscript{12} analyses (see ‘The IRMS Samples’, below).

To correct the loss of Sample 3, the TDMK undertook a further Sample Collection on the Athlete with the help of RUSADA. On 30 July 2019, RUSADA collected blood and urine from the Athlete. However, despite providing RUSADA with a picture of the Athlete prior to testing, and stressing the vital importance of correct identification, the TDMK were not satisfied that individualization could be established because the sample had not been collected by one of its own DCOs (who could recognise the Athlete).

Rather than dismissing RUSADA’s identification of the Athlete, the TDMK should have, as Operation Ghost did, obtained a statement from the responsible (RUSADA) DCO as to the issue of identification. Had it done so, the TDMK would have discovered that in addition to the picture provided by the TDMK, the DCO also researched the Athlete on the internet prior to Sample Collection and was certain that a correct identification had been made. Had the TDMK obtained and been satisfied by this evidence, the allegations of Urine Substitution could have been resolved in late 2019. However, the TDMK’s desire to put the issue of individualization beyond all reasonable doubt – by having the sample collected by one of its own DCOs – was not pragmatic and ultimately led to a significant delay in the resolution of the case.

The IRMS Samples

In February 2019, the TDMK requested the Laboratory to conduct IRMS analysis on four samples (the “IRMS Samples”) unrelated to the Athlete. The request was via email and the Laboratory was provided with the respective sample codes.

Anti-doping analyses were conducted on the IRMS Samples and following negative results they were later discarded as per the ISL. However, the samples were discarded without having been subjected to the requested IRMS analyses.

The Laboratory told Operation Ghost that the IRMS Samples were prematurely discarded because of a “communication error” within the Laboratory. More specifically, an employee from the Laboratory who had received the email (from the TDMK) in which IRMS analysis was requested, forgot to forward the email to the sample Reception Department. In other words, the error was caused by an internal administrative oversight.

Upon discovering its error, the Laboratory took corrective steps and recommended to the TDMK that it split the “B” sample of each of the four samples which were housed at another WADA-accredited laboratory.\textsuperscript{13} By splitting the “B” samples the IRMS analysis could be conducted while also retaining sufficient sample for any potential Confirmation Procedure. The TDMK did not pursue this remedy.

To prevent such errors from reoccurring, the Laboratory reported that it has now introduced a procedure whereby all information (e.g., emails) received in respect of a sample is shared with its Sample Reception Department. To date,\textsuperscript{14} the Laboratory reports that no further errors have been repeated.

Further Violations

Operation Ghost established that the Athlete now lived in Russia. Through RUSADA, contact with the Athlete was ultimately made; however, the Athlete refused to meet with investigators or disclose their true address.

That said, because of the Athlete’s actions when dealing with RUSADA as part of Operation Ghost, the Athlete was subject of a Results Management process by RUSADA for the alleged violation of Code Articles 2.3 (Refusal to Submit to Sample Collection) and 2.5 (Tampering with the Doping Control process). The Article 2.3 violation was because the Athlete failed to submit to Sample Collection by RUSADA on 6 December 2021, and the Article 2.5 violation was because the Athlete falsely reported being in Thailand in a Whereabouts filing.\textsuperscript{15}

\textsuperscript{12} Isotope Ration Mass Spectrometry.

\textsuperscript{13} A Testing Authority may in certain circumstances authorize the splitting of a sample container where, once done, the “first fraction of the split sample” becomes the “A” sample and can be used for the Initial Testing Procedures (“ITP”) or the “A” Confirmation Procedure if the ITP procedure has already been completed. The “second fraction of the split sample” is then considered the “B” sample and is resealed, frozen and stored for any “B” sample Confirmation Procedure analysis.

\textsuperscript{14} As at the date of this report, 8 August 2022.

\textsuperscript{15} The Article 2.3 violation proceedings commenced on 2 March 2022. The Article 2.5 violation proceedings commenced on 30 May 2022.
On 13 July 2022, the Athlete was found to have committed both violations and a life-time ban was imposed.¹⁶

RUSADA provided important assistance to Operation Ghost and was diligent in its efforts to locate and prosecute the Athlete.

Case Finalisation Meeting

In accordance with the Intelligence and Investigation Department’s investigative practice, the TDMK and the Laboratory were offered an opportunity to respond to the findings of Operation Ghost. Both accepted the invitation.

The meeting with the TDMK occurred on 13 June 2022, and the meeting with the Laboratory occurred on 20 July 2022. The meetings were productive, and the findings of this investigation were accepted by both parties.

Recommendations

Operation Ghost recommends the following:

1. A copy of this report be provided to the WADA Director General and President for their respective information.

2. A copy of this report be provided to the WADA Senior Associate Director of Laboratories, Science and Medicine Department, for his information.

3. Relevant extracts of this report regarding the conduct of the Laboratory be provided to the WADA Laboratory Expert Advisory Group, for its information.

4. A copy of this report be provided to the WADA Compliance Taskforce, and the WADA Compliance, Rules, and Standards Department for their respective information.

5. A copy of this report be provided to the Director of WADA NADO/RADO Relations, for his information regarding the diligent contributions of RUSADA.

6. The International Mixed Martial Arts Federation ("IMMAF") be advised of the Athlete’s sanction. This will ensure the Athlete cannot continue to participate in this sport.

¹⁶ The Athlete neither replied to the RUSADA’s Notification of the alleged ADRVs nor took part in the hearing.