Athletics Integrity Unit

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Decision of the Athletics Integrity Unit in the Case of Ms Diana Chepkorir

Introduction

1. World Athletics has established the Athletics Integrity Unit ("**AIU**") whose role is to protect the integrity of the sport of Athletics, including fulfilling World Athletics' obligations as a Signatory to the World Anti-Doping Code ('the "**Code**"). World Athletics has delegated implementation of the World Athletics Anti-Doping Rules ("**ADR**") to the AIU, including but not limited to the following activities in relation to International-Level Athletes: Testing, Investigations, Results Management, Hearings, Sanctions and Appeals.

2. Ms Diana Chepkorir ("the **Athlete**") is a 23-year-old road runner from Kenya[1].

3. This decision is issued by the AIU pursuant to Rule 8.5.6 ADR, which provides as follows:

> *"8.5.6 In the event that the Athlete or other Person either (i) admits the violation and accepts the proposed Consequences or (ii) is deemed to have admitted the violation and accepted the Consequences as per Rule 8.5.2(f), the Integrity Unit will promptly:*
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> *(a) issue a decision confirming the commission of the violation(s) and the imposition of the specified Consequences (including, if applicable, a justification for why the maximum potential sanction was not imposed);*
>
> *(b) Publicly Report that decision in accordance with Rule 14;*
>
> *(c) send a copy of the decision to the Athlete or other Person and to any other party that has a right, further to Rule 13, to appeal the decision (and any such party may, within 15 days of receipt, request a copy of the full case file pertaining to the decision)."*

Factual background

4. Between 18 May 2024 and 12 March 2025, thirteen (13) valid blood samples were collected from the Athlete in the context of the World Athletics Athlete Biological Passport ("**ABP**") programme[2].

[1] https://worldathletics.org/athletes/kenya/diana-chepkorir-14746676

[2] The ABP consists of an electronic record that compiles and collates a specific athlete's test results and other data over time and is unique to that particular athlete. The haematological module of the ABP records

5. The blood samples were analysed by World Anti-Doping Agency ("**WADA**") accredited laboratories and the results uploaded into the Anti-Doping Administration and Management System ("**ADAMS**") to constitute the Athlete's longitudinal profile of haematological values with BPID B8CJT94W (the "**Passport**").

6. The Passport generated an Atypical Passport Finding ("**ATPF**") in ADAMS[3] and was therefore submitted by the Athlete Passport Management Unit ("**APMU**")[4] for a two-step review on an anonymous basis, first by a single independent Expert[5] and then for a further review by two other independent Experts (an Expert Panel)[6] in accordance with Article C.2.2 and Article C.3 of Annex C of the ISRM.

7. Upon review[7], the Expert Panel each identified abnormalities in the Passport and confirmed their unanimous opinion of "*Likely Doping*"[8] as set out in their Joint Expert Panel Opinion dated 8 May 2025 (the "**First Joint Opinion**").

8. In the First Joint Opinion, the Expert Panel noted, in particular, that "*the sequence of samples 2, 4, 5 and 6 displays an "ON" followed by an "OFF" phase pathognomonic for situations where the red cell mass is artificially increased and the body subsequently downregulates its own red cell production (low reticulocytes, the young red blood cells) to rebalance the amount of*

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the values, in an athlete's blood samples, of haematological parameters that are known to be sensitive to changes in red blood cell production. The values collected and recorded include haemoglobin concentration ("**HGB**" or "**HB**") and the percentage of immature red blood cells viz. reticulocytes ("**RET%**"). The ratio of the HGB and the RET% values is also used to calculate a further value, known as the "OFF-score", which is sensitive to changes in erythropoiesis.

WADA describes the "fundamental principle" of the ABP as being "*to monitor selected variables (`biomarkers of doping`) over time that indirectly reveal the effect of doping, as opposed to the traditional direct detection of doping by analytical doping controls*" (cf WADA website on the Athlete Biological Passport).

[3] The marker values from the blood samples collected in the ABP programme are inputted into a statistical model, known as the "Adaptive Model". The Adaptive Model uses an algorithm that takes into account both (i) the variability of such values within the population generally (i.e. blood values reported in a large population of non-doping athletes) and (ii) factors affecting the variability of the athlete's individual values (including gender, ethnic origin, age, type of sport, and instrument-related technology).

The selected biological markers are monitored over a period of time, and a longitudinal profile is created that establishes an athlete's upper and lower limits within which the athlete's values would be expected to be found, assuming normal physiological conditions (i.e. the athlete is healthy and has not been doping).

The upper and lower limits are calculated (as per the WADA ABP Operating Guidelines) with a "specificity" of 99%. The Adaptive Model also calculates the probability of abnormality of the sequence of values in the ABP profile.

[4] The APMU is a unit of persons that is responsible for the timely management of ABP in ADAMS.

[5] As defined in the International Standard for Testing and Investigations ("**ISTI**").

[6] As defined in the International Standard for Results Management ("**ISRM**").

[7] See Articles C.3 and C.4 of the ISRM.

[8] Under Article C.2.2.5.1 ISRM: "*For a "Likely doping" opinion, the Expert shall come to the conclusion that the likelihood that the Passport is the result of the Use of a Prohibited Substance or Prohibited Method outweighs the likelihood that the Passport is the result of a normal physiological or pathological condition.*"

red cells to their normal level". They therefore concluded that "*it is highly likely that a prohibited substance or prohibited method has been used and that it is highly unlikely that the passport is the result of any other cause*".

9. In these circumstances, the APMU declared an Adverse Passport Finding ("**APF**") against the Athlete in ADAMS and notified the AIU accordingly.

10. Following review of the ABP Documentation Package and the First Joint Opinion in accordance with Article C.5.2 ISRM, the AIU notified the Athlete of the Adverse Passport Finding on 4 June 2025 (the "**AIU Notice**") and invited her to provide a detailed written explanation for the APF by no later than 18 June 2025[9].

11. On 18 June 2025, the Athlete sent the AIU a letter (dated 11 June 2025) stating:

> "*I received your notices with utmost shock and disbelief and I wonder why it came almost the same time with my fallout with my management volaire that did not even mention of my anti doping violation in their communication*
>
> *In your notice latter you didn't attach a certified copy of the lab report that should have been from the accredited laboratory and secondly the authensity of the report from the expert which should have been also attached and be established if in deed the said panelists are nonpartisan.*
>
> *Anything scientific is beyond all who are not expert on the said field and on the other hand, things happening in a human body can also be beyond scientific knowledge.*
>
> *For fairness, transparency and accountability the burden of proof stand with the accuser who should prove their case beyond any reasonable doubt.*
>
> *In this regard, I disapprove any involvement in any anti-doping violation with the regard with your letter of communication.*
>
> ***TAKE NOTICE** that I shall take this matter to the High Court of the Republic Kenya where this matter will be interrogated 360% and justice will be delivered*."

12. On the same day, 18 June 2025, the AIU responded to the Athlete and provided several clarifications regarding the APF, the Expert Panel and the process to be followed in her case including that:

    12.1. the AIU Notice was issued following declaration of an APF by the APMU in relation to the Passport and in accordance with Annex C of the ISRM;

[9] The Athlete was provided, as enclosures to the AIU Notice, with (i) copies of the Doping Control Forms ("**DCFs**"), (ii) the ABP Documentation Package dated 11 April 2025, (iii) Certificates of Analysis ("**CAs**") and Laboratory Documentation Packages ("**LDPs**") and (iv) the First Joint Opinion.

12.2. the Expert Panel which declared the APF is independent from World Athletics and the AIU (see the ABP Operating Guidelines[10] and the WADA Technical Document TD2023APMU[11]). Furthermore, as the AIU explained in the AIU Notice, in accordance with the referenced Guidelines and Technical Document, the Expert Panel consisted of three Experts with knowledge in one or more of the fields of clinical and Laboratory haematology, sports medicine or exercise physiology, as they apply to blood doping[12];

12.3. the AIU had provided the Athlete with all the enclosures to the AIU Notice, including CAs/LDPs for all valid blood Samples and the First Joint Opinion on 4 June 2025;

12.4. if the Athlete was ultimately charged with an Anti-Doping Rule Violation, she would be given the opportunity to request a hearing before the World Athletics Disciplinary Tribunal, with any appeal from the Disciplinary Tribunal to be heard by the Court of Arbitration for Sport ("**CAS**"); and

12.5. although the Athlete's reply confirmed that she denied that she had committed an Anti-Doping Rule Violation, it did not provide any explanation in relation to the specific abnormalities in the Passport identified by the Expert Panel in the First Joint Opinion. The AIU therefore extended the Athlete's deadline to provide an explanation for the abnormalities detected in the Passport until 26 June 2025.

13. On 21 June 2025, the Athlete replied to the AIU as follows:

> "*I'm not knowledgeable at all to explain your demands about my samples to have been found with a variation because it involves a vigorous biological process that is beyond my thinking capacity and might also not have a factual and a straight explanation from the expert who are relying on OPINIONS which may also differ on the same findings.*
>
> *Unless you want to capitalize on this "EXPERT OPINION" under wrong application of WADA RULE C.2.2.2.5.1 that makes me very vulnerable and strikes no fairness which is a breach of any international standard of proof to kill my athletics career.*
>
> *For purposes of trust and accountability, you also owe me an explanation why my samples collection were wrongly placed to places I have never been that are about 5 of them.*"

14. On 23 June 2025, the AIU wrote to the Athlete to confirm that the AIU relied on the First Joint Opinion[13] and asked her to clarify her reference to "*samples collection were wrongly placed to places I have never been that are about 5 of them*.".

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[10] https://www.wada-ama.org/sites/default/files/2023-07/guidelines_abp_v9_2023_final_eng_1.pdf

[11] https://www.wada-ama.org/sites/default/files/2022-11/td2023apmu_eng_final.pdf

[12] The curricula vitae of the members of the Expert Panel were also provided to the Athlete.

[13] The AIU further explained that, according to the First Joint Opinion, the abnormalities in her ABP had been observed in relation to samples 2, 4, 5 and 6 (collected between 25 June and 13 September 2024) and recommended that her explanation address the period from June 2024 to September 2024.

15. On 26 June 2025, the Athlete sent the following email to the AIU:

> "*As you have decided to base your case on the "EXPERT OPINION" bearing location mismatches about 5 of them that eminented from two different links including a laboratory in Kenya which is not clear if it's WADA accredited lab will definitely mean there's no goodwill over this matter at all while the other report was from undisclosed entity that wasn't certified and a collection of samples said to have been collected on 13th September 2024 that wasn't recorded in my ADAMS accounts both documents attached therein as a proof for the irregularities.*"

16. On the same day, the Athlete sent the AIU photos of (i) the AIU email dated 23 June 2025 annotated with a handwritten note stating that Sample 6 was "*not in ADAMS account*" and of (ii) a page of what appeared to be the supplementary report form for Sample 7 (collected on 3 October 2024), with an annotated handwritten note stating "*captured to be Eldoret/Iten while it's Keringet*".

17. On 27 June 2025, the AIU wrote to the Athlete and provided the following clarifications:

    17.1. all her samples were analysed at laboratories accredited by WADA[14] or approved by WADA for analysis of blood in the context of the ABP[15];

    17.2. notwithstanding that Sample 6 collected on 13 September 2024 was not visible to the Athlete through ADAMS[16], the AIU had in any event provided the Athlete with a copy of her DCF for that Sample (which she had signed) and the LDP for that Sample[17]; and

    17.3. the DCF for Sample 7 (which the Athlete had signed and provided with) clearly indicated that the Sample was collected in Keringet.

18. Considering that the Athlete had (again) failed to provide any explanation for to the specific abnormalities in the Passport, the AIU afforded her another extension until 7 July 2025 by which to do so.

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[14] The AIU specified that the Institute of Doping Analysis and Sports Biochemistry ("**IDAS**") in Kreisha which analysed Sample 5 and the Sports Medicine Research and Testing Laboratory ("**SMRTL**") in Salt Lake City which analysed Sample 12 are both WADA-accredited Laboratories, information that is publicly available on the WADA website: see https://www.wada-ama.org/en/accredited-laboratories.

[15] The AIU confirmed that the Cerba Lancet Kenya Limited Laboratory in Nairobi, which analysed Samples 1,2,3,4,6,7,8,9,10,11,13 and 14, is approved by WADA for blood analyses in support of the ABP, information that is also publicly available on the WADA website: see https://www.wada-ama.org/en/list-abp-laboratories.

[16] The AIU informed the Athlete that it could see Sample 6 in ADAMS, and it was unclear why it would not be visible to her. The AIU now understands (and has communicated as much to the Expert Panel and the Athlete) that it is because only an ABP sample was collected on that day and athletes no longer have access to ABP blood data as per WADA's policy (see: https://adams-help.wada-ama.org/hc/en-us/articles/4407838190738-Why-has-athlete-access-to-ABP-blood-data-been-removed). The Athlete was only able to see that she was tested on all other dates ABP samples were collected because they were each accompanied by a urine sample.

[17] p.14 of the corresponding LDP.

19. On 3 July 2025, the Athlete responded with the following:

> "*Whereas you insist that the samples purported to have been collected on 13th September 2024 is visible to only you in my ADAMS portal and you don't understand why I can't see it and yet the system is under your control might be a strategy to confused me about the fact.*
>
> *Secondly, if the crucial element of WHEREABOUTS that is a major component of exactly pinpointing location where samples were collected and yet in my case there's an acute mismatches of places where the samples were said to have been collected 5 of them with wrongly captured location out of the 14 largely anomalies indicating Eldoret/ Iten and something called "VARIOUS" that is none applicable in whereabouts is quite unfortunate.*
>
> *Unless you are determined to base your case on irregularities that breached the public trust and undermines your credibility is yet to be tested.*"

20. On 7 July 2025, the AIU responded to the Athlete noting that:

    20.1. it had responded to the Athlete's questions/comments and provided clarification in relation to all matters she had raised;

    20.2. the Athlete had failed to provide any explanation for the abnormalities detected in the Passport; and

    20.3. in light of the above, the Athlete was granted a final opportunity to submit her response to the AIU Notice by no later than 15 July 2025 and the AIU strongly recommended that the Athlete address in that response the specific abnormalities detected in the Passport, which would be sent to the Expert Panel for their review in accordance with Article C.6 the ISRM[18].

21. On 12 July 2025, the Athlete wrote to the AIU stating that she had not received satisfactory responses regarding two (2) issues:

> "*1) That under what circumstances made my samples to have been collected on the rightfully place only to reflect elsewhere in my ADAMS account yet the WHEREABOUTS plays a critical role in an ANTI DOPING VIOLATION?*
>
> *2) One of the captured date 13th September 2024 said to have been part of the tested samples that led to variations in my APB and yet it's not found in my ADAMS accounts, so the question is how can a sample not reflecting in an ADAMS accounts can be used as a sample relied upon to victimized me on a ANTI DOPING violation?*

[18] The Athlete was also reminded that, if, based on information in her Passport and any explanation she provided, the Expert Panel maintained its unanimous opinion in her case, she would be charged with an Anti-Doping Rule Violation.

3) If the authenticity of a critical process like this one is raising serious DOUBTS, how then can anyone believes in the integrity of your institution?

Please let be serious about a serious business."

22. On 14 July 2025, the Athlete wrote to the AIU stating that she could not be "*pushed*" to explain the abnormalities in her profile considering the many "*irregularities*" she had identified.

23. The Athlete's responses to the AIU[19] were sent to the APMU for forwarding to the Expert Panel for review in accordance with Article C.6.1 ISRM[20].

24. On 13 August 2025, following a review of the Athlete's responses in accordance with Article C.6.1 ISRM, the Expert Panel reasserted its unanimous opinion of "*Likely doping*" that it had previously set out in the First Joint Opinion; in other words, notwithstanding the Athlete's responses, all members of the Expert Panel remained of the opinion that that the likelihood that the Passport is the result of the Use of a Prohibited Substance or Prohibited Method outweighed the likelihood that the Passport is the result of a normal physiological or pathological condition ("the **Second Joint Opinion**").

25. However, the AIU noted that the Expert Panel had commented in the Second Joint Opinion that it did not have sufficient information regarding the issues raised by the Athlete in her responses to be able to respond to them.

26. Therefore, the AIU decided to provide the Expert Panel (via the APMU) with additional information concerning the matters raised in the Athlete's responses to address the comment made by the Expert Panel in the Second Joint Opinion and so that the Expert Panel had all information necessary to be able to address all the points raised by the Athlete in her responses.

27. The AIU provided the APMU with further information in relation to (i) the samples for which the Athlete claimed the location of the sample collection had been wrongly recorded[21] and (ii) WADA's decision taken in 2021 to remove athletes' access to their ABP data in ADAMS[22], to be forwarded to the Expert Panel.

28. Following review of the additional information provided by the AIU, the Expert Panel issued a further joint expert opinion dated 5 September 2025 ("the **Third Joint Opinion**") and confirmed that it maintained its initial opinion that it was highly likely that a Prohibited

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[19] The Athlete's emails of 12 July 2025 and 14 July 2025.

[20] The AIU also provided a summary of the previous exchanges between the Athlete and the AIU to the APMU.

[21] The Expert Panel was informed that the AIU had checked the locations recorded on the corresponding DCFs and they match the location provided in the Athlete's Whereabouts information, which was provided to the Expert Panel as part of the Athlete Biological Passport Documentation Package.

[22] See https://adams-help.wada-ama.org/hc/en-us/articles/4407838190738-Why-has-athlete-access-to-ABP-blood-data-been-removed

Substance or Prohibited Method had been Used and that it was highly unlikely that the Passport was the result of any other cause.

29. Therefore, on 15 September 2025, the AIU issued the Athlete with a Notice of Charge in accordance with Rule 8.5.1 ADR and Article 7.1 ISRM, which confirmed that she was being charged with Anti-Doping Rule Violations under Rule 2.2 ADR ("the **Charge**"), imposed a Provisional Suspsension with immediate effect and invited her to confirm how she would like to proceed with the Charge (from options set out therein) by no later than 29 September 2025.

30. The AIU clarified that the Athlete's DCFs each reflected the location (city or town) in which the sample was collected from the Athlete, and each DCF was signed by her at the time as containing correct information. The AIU also confirmed that the chain of custody for each of the blood samples was fully intact and that the sample code for each sample is traceable to the analytical result on which the AIU relies. There could therefore be no suggestion that they were not the Athlete's samples. For the avoidance of doubt, the AIU confirmed its position that the blood samples in the Passport were the Athlete's samples and that the incorrect location recorded in ADAMS for samples 1,3,7,9, 11 and 14 did not impact the Athlete's case[23], (and that the Expert Panel had confirmed that this had no impact on their assessment in terms in the Third Joint Opinion).

31. On 28 September 2025, the Athlete sent the AIU a letter, reproduced below:

> "*The provision suspension against me is an act of terrorism having failed to sufficiently tackled my correspondence based on facts I presented to you and instead you chose to inflict a severe mental torture to me so that I can loosely panic and gave in in line with your strong determination of ensuring I am framed with an anti doping charge and after contemplating for about two months and now emerging again having re-strategizing on how best this can be executed without fail.*
>
> *Your routine and cultural practices is under immense pleasure after I posted a great challenge considering almost all athletes are clueless on how to defend themselves when targeted by the rogue officials operating within the Anti-Doping institutions spearheading vested interests,*
>
> *(A). **THE BURDEN OF PROOF***
>
> *(i) The standard of proof is a universal principal set out in rule 3.1 of WADA Anti-Doping framework that is subjected to serious scrutiny and not for symbolic purposes heard before a qualified, none-partisan and competent person or persons for the real actual verdict.*

[23] For the sake of clarity, the AIU understands that the locations of samples 1,3,7,9, 11 and 14 were recorded in their respective ADAMS DCFs on the basis of the information entered in the corresponding ADAMS Mission order, which is indicative only.

(ii) The processes that led to the arrival to effectively application of rule 2.1.1 is as good as the end result and the contents presented must be transparent, authentic, verifiable and free from any form of witch-hunt and malice.

(iii) In law, the terms "OPINION" is a grey area that opens a window for uncertainty unless the forensic analysis kicks in which is a reliable source of information that is short of this charge.

*(B). **PRESUMPTION OF INNOCENCE UNTIL PROVEN GUILTY.***

(i) Your suspension is in breach of my fundamental rights of presumption of innocence until proven guilty that is safeguarded under HUMAN RIGHT CHATTER therefore the provision suspension is vehemently challenged based that grounds

(ii) Athletics Integrity Unit is a plaintiff in this charge and equally having the suspension keys that should have been mandated a different neutral body like DISCIPLINARY TRIBUNAL or COURT OF ARBITRATION as an element of good practice and ultimate fairness is a far fetched in this matter.

*(C). **CONFIDENTIALITY***

(i) The element of confidentiality should apply both ways in every party engaging in this matter and by effecting rule 7.41 is a breach of confidentiality aspect and I shall also reciprocate by leaking all materials in this engagement to investigative journalists local and international and the public at large since I have nothing to lose anymore.

*(D). **IRREGULARITIES DETECTED***

(i) Having acknowledged the irregularities that I raised in my communication dated 12th July 2025 and captured in your statement 1.17 and you deliberately opted to push it under the carpet and only picked what you believed will fix me with the anti doping violation of which I shall fight it to the bitter end.

(ii) In paragraph 22 in the last sentence was deliberately cut off in order to conceal your admission over the misplacement of locations something I raised.

*(E) **THE "EXPERT OPINION"***

(i) That the so called "EXPERT OPINION" is just a way of looking at a situation that might probably differ with another same group of experts and can NEVER be used to disadvantaged an individual as a matter of fact unless its a forensic analysis.

(ii) At no point in time did you ever mentioned about a "forensic analysis" which is a concrete scientific proof of analyzing a result that can be used in any conviction which my conversant representative should have been accorded an opportunity to be part of the process as my witness over the outcome of the results which again isn't the case.

(Iii) Despite my collected samples sealed with my email contact I didn't received the result analysis from the accredited lab and I can authoritatively say the results were fabricated by bad people within the system to kill my athletics career.

(F). A HIGH COURT PETITION IN NAKURU

(i) On your statement indicated as 1.15 acknowledges the existence of a petition filed in a Nakuru High Court and not in a Law court as alleged in your statement having received through a "THIRD PARTY" and the details of the individual is disclosed in paragraph 18 as a licensed court process server and you opted to revenge by suspending me.

(ii) In the event you appointment a lawyer to represent you in the petition here in Nakuru which your appointed attorney raised a jurisdiction matter that yet to be determined by the Honorable Judge while simultaneously imposing a charge against me is an act of bad faith with full impunity.

(iii) if indeed you were honest and have nothing to fear you could have presented your evidence in the HIGH COURT sitting in Nakuru to prove your case in a high profile judicial system.

(iv) Having vehemently try to dodge a vibrant and a competent institution like the high court is an indication of you fearing your malpractices being exposed which will eventually occur.

(G). YOUR PARTNER ANTI-DOPING AGENCY OF KENYA IS A NONE COMPLIANT AS DECLAIRED BY WADA

(i) It's embarrassing and very disturbing for an institution like Athletics Integrity Unit to still part with Anti doping of Kenya even after being pronounced by WADA as a NONE COMPLIANT that raises serious concerns globally over the integrity of this institution said to be an anti doping watchdogs.

(ii) By sharing this matter with a none compliant agency makes me loose faith in your ethical standards prompting a vote of no confidence in everything that you are doing as a institution that is supposed to have been upholding integrity to the brim.

(H) CONCLUSION

(i) It's now upon you to implement your punitive rules and apply it to anywhere that you feel it hurts most as a result of killing my career as an innocent youngster.

(ii) This is a syndicate that is yet to burst into public domain and individual involved will have their heads roll and be ashamed publicly because crucial evidences are gathered on daily basis."

32. On 30 September 2025, the AIU responded to the Athlete noting that the disciplinary proceedings had been initiated and carried out strictly in accordance with the requirements of the ADR and the ISRM. The AIU strongly rejected the Athlete's allegations of impropriety as entirely unfounded, noting that:

32.1. the imposition of a Provisional Suspension in the Athlete's case was mandatory under the ADR[24] and did not constitute a breach of the principle of presumption of innocence or an act of "*revenge*". As it was unclear whether her response to the Charge constituted a written submission to lift the Provisional Suspension under Rule 7.4.4 of the ADR, the Athlete was given until 2 October 2025 to confirm her position in that regard[25];

32.2. the Notice of Charge had been issued based on the Expert Panel's joint opinions and in accordance with Article C.6.2 of the ISRM[26];

32.3. there had been no breach of confidentiality – the AIU explained in the Notice of Charge that it would Publicly Disclose the details of the Athlete's Provisional Suspension by way of notice on the AIU website, pursuant to Rule 14.3.1 ADR, and in accordance with Rule 14.1.5 ADR;

32.4. contrary to the Athlete's claim, the last sentence of footnote 22 of the Notice of Charge was not "*deliberately cut off*" - the rest of the sentence of that footnote was to be found in the footnote section of the next page;

32.5. per Rule 8.2(a) of the ADR, it is the Disciplinary Tribunal of World Athletics that has jurisdiction to hear and determine all matters in which "*an anti-doping rule violation or other breach of these Anti-Doping Rules is asserted and/or Consequences or sanctions are sought by the Integrity Unit against an International-Level Athlete or other Person in accordance with the Anti-Doping Rules*";

32.6. as a member of the International Registered Testing Pool, the Athlete is an International-level Athlete under the ADR and is bound by and required to comply with them. Furthermore, in signing DCFs, the Athlete had repeatedly agreed that any charges were to be resolved in accordance with the ADR;

32.7. ADAK's alleged non-compliance with the World Anti-Doping Code was irrelevant to the Athlete's case and did not prevent the AIU from complying with its obligation to notify ADAK pursuant to Rule 8.5.3 ADR;

32.8. the AIU had already responded to the Athlete's claims of "*irregularities*" and refered her to its previous answers and the Charge.

33. The AIU decided to exceptionally grant the Athlete an extension to her deadline to request a hearing until no later than 5 October 2025 since her position in that regard was unclear. The Athlete was also reminded that if she returned a completed Admission of Anti-Doping Rule

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[24] As per Rule 7.4.1, "*When […] an Adverse Passport Finding is reported (upon completion of the Adverse Passport Finding review process), the Integrity Unit shall promptly impose a Provisional Suspension*".

[25] The Athlete was informed that if she did not confirm her position by that date, then the AIU would consider that she did not challenge the Provisional Suspension that had been imposed upon her.

[26] The Athlete was reminded that she had been provided with all the analytical documentation (CAs and LDPs) on which the Expert Panel relied upon in that regard.

Violations and Acceptance of Consequences form by no later than 5 October 2025, then she would be able to benefit from a 1-year reduction in the period of Ineligibility according to Rule 10.8.1 ADR (i.e. accepting a 3-year ban).

34. The AIU confirmed that alternatively, if the Athlete did not request a hearing or return the completed Admission of Anti-Doping Rule Violations and Acceptance of Consequences form signed by 5 October 2025, then the AIU would proceed by issuing a decision imposing a 4-year period of Ineligibility (as set out in the Charge).

35. On 1 October 2025, the Athlete wrote to the AIU the following:

> "*I also acknowledged receipt for your communication dated 29th September 2025 and having perused it to the best of my knowledge, I realized that you still vehemently push aside what I raised about misplacement over the exact place where my samples were collected that forms the basis of my mistrust over your entire process of operations.*
>
> *Being an an integral institution and fails to record an accuracy in a simple exercise like capturing the exact place of samples collection is just a total disaster and a disgrace to the entire institution and you expect me to dance around with your act of incompetency at this modern age? No way!*
>
> *My suspension violates my fundamental rights of presumption of innocence until proven guilty which is a human right principal that is universal but instead you chose to breach it because athletes are considered lesser humans in your punitive rules and should be pushed to the gallery by all means and executed.*
>
> *Rules can not be of any use if it is weaponized and lacks transparency, accountability and those enforcing it being dishonest, corrupt and holding vested interests. Imperialism and impunity has no room at this modern society where the globe has become a village.*
>
> *What you have just general done is to revisit the earlier engagement after you muted and resurfaced with a suspension instead of addressing irregularities that were found in my ADAMS account for you to instead dodge by saying that all my raised listed queries were satisfactory addressed and I want to asked how?*
>
> *Again, you wanted me to affirm whether I challenged the suspension or not under rule 7.4.4 of the ADN again downplaying what I stated in my article (B) i of my response that bears a deadline of 29th September 2025 among other items highlighted listed as (A,B,C,D,E, F,G,H) ONCE again ignored!*
>
> *You may come up with all tricks to lure me into your trap that entices me to drive me your way but i am not boarding having in mind that this matter is already predetermined and there's no way I can ever get a fair trials in your hands no matter what.*
>
> *TAKE NOTICE that being an international athlete who is adhered to all existing rules does open an entry point for an injustice against me by whatever means.*
>
> *Lastly, the system is yours, the sports of athletics is yours, the rules are also yours, therefore you can do what you want with my fate. Thank you.*"

36. The Athlete failed in her response to request a hearing (or to return the Admission of Anti-Doping Rule Volations and Acceptance of Consequences form signed) by 5 October 2025 or at all. In accordance with its email dated 30 September 2025, the AIU therefore issues the current decision in her case.

The Anti-Doping Rule Violation

37. This is the Athlete's first Anti-Doping Rule Violation.

38. Rule 2 ADR sets out that the following shall constitute an Anti-Doping Rule Violation:

> "*2.2 Use or Attempted Use by an Athlete of a Prohibited Substance or a Prohibited Method*
>
> *2.2.1 It is the Athlete's personal duty to ensure that no Prohibited Substance enters their body and that no Prohibited Method is Used. Accordingly, it is not necessary to demonstrate intent, Fault, Negligence or knowing Use on the Athlete's part in order to establish an anti-doping rule violation for Use of a Prohibited Substance or a Prohibited Method.*
>
> *[Comment to Rule 2.2: It has always been the case that Use or Attempted Use of a Prohibited Substance or Prohibited Method may be established by any reliable means. As noted in the Comment to Rule 3.2, unlike the proof required to establish an anti-doping rule violation under Rule 2.1, Use or Attempted Use may also be established by other reliable means such as admissions by the Athlete, witness statements, documentary evidence, conclusions drawn from longitudinal profiling, including data collected as part of the Athlete Biological Passport, or other analytical information that does not otherwise satisfy all the requirements to establish the presence of a Prohibited Substance under Rule 2.1. For example, Use may be established based upon reliable analytical data from the analysis of an A Sample (without confirmation from an analysis of a B Sample) or from the analysis of a B Sample alone where the Anti-Doping Organisation provides a satisfactory explanation for the lack of confirmation in the other Sample.]*
>
> *2.2.2 The success or failure of the Use of a Prohibited Substance or Prohibited Method is not material. It is sufficient that the Prohibited Substance or Prohibited Method was Used or Attempted to be Used for an anti-doping rule violation to be committed.*
>
> *[...]*"

39. Rule 2.2.1 of the ADR provides that it is each athlete's personal duty to ensure that no prohibited substance or prohibited method is used. Athletes are strictly responsible for any

prohibited substance or method used and it is not necessary that intent, Fault, negligence or knowing Use on the Athlete's part be demonstrated to establish an anti-doping rule violation.

40. An Anti-Doping Rule Violation under Rule 2.2 ADR may, according to Rule 3.2 ADR, be established by "*any reliable means [...]*". According to the comment of Article 3.2 of the 2021 WADA Code, this includes "*conclusions drawn from the profile of a series of the Athlete's blood or urine Samples, such as data from the Athlete Biological Passport*"[27]. Furthermore, it is well established that the ABP model is a "reliable means" of establishing Anti-Doping Rule Violations[28].

41. Based on the joint expert opinons of the Expert Panel, and considering that the Athlete has failed to explain the haematological abnormalities in the Passport, World Athletics' position is that the Passport constitutes clear evidence that the Athlete has committed an Anti-Doping Rule Violation in breach of Rule 2.2 ADR due, in particular, to the abnormalities in the Passport, specifically in Samples 2, 4, 5 and 6.

42. Consequently, the AIU is comfortably satisfied that the Athlete has committed an Anti-Doping Rule Violation in accordance with Rule 2.2 ADR.

Consequences

43. Rule 10.2 ADR specifies that the period of Ineligibility for an Anti-Doping Rule Violation under Rule 2.2 shall be as follows:

> *"10.2.1 Save where Rule 10.2.4 applies, the period of Ineligibility will be four years where:*

[27] This comment is included as well as the 2021 ADR (and subsequent ADR).

[28] It is well settled in cases heard by CAS that the ABP model is a reliable means of establishing blood doping, i.e., the use of a Prohibited Substance or Prohibited Method. See for example paragraph 13 of *Kokkinariou: "Systems which make use of these longitudinal profiles have evolved to become widespread and highly effective means of detecting EPO doping"*. Furthermore, in the case of CAS 2014/A/3614 & 3561 IAAF & WADA v/ RFEA & Ms. Marta Dominguez ("*Dominguez*"), the Panel stated that it was "*convinced that the ABP Model is a reliable and a valid mean of establishing an ADRV*." The Panel also noted that "*numerous peer-reviewed applications have confirmed the ABP's reliability*" (see paras. 278 and 279). Even more recently, the reliability of the ABP has been confirmed by the CAS in the following cases *inter alia*: IAAF v/ ARAF & Sharmina CAS 2016/O/4464; IAAF v/ ARAF & Ugarova CAS 2016/O/4463; IAAF v/ ARAF & Chernova CAS 2016/O/4469; IAAF v/ ARAF & Savinova-Farnosova CAS 2016/O/4481; IAAF v/ RUSAF & Kirdyapkina CAS 2017/O/5398 & El Mahjoub Dazza v/ World Athletics CAS 2020/A/7377. See also CAS 2018/O/5822 IAAF v. RUSAF & Mariya Ponomareva, paragraph 86 *"In a preliminary finding, the Sole Arbitrator accepts that the ABP is a reliable and accepted means of evidence to assist in establishing an anti-doping rule violation and feels comforted in this conclusion by CAS jurisprudence (see CAS 2010/A/2174, para. 9.8)"*. The Disciplinary Tribunal of World Athletics has also consistently upheld the principle that the ABP is reliable. See notably: IAAF v/ Sergey Bakulin, decision dated 14 August 2019; IAAF v/ Sarah Chepchirchir, decision dated 28 November 2019; World Athletics v/ Hassan Chani, decision dated 10 September 2020; World Athletics v/ Daniel Kinyua Wanjiru, decision dated 8 October 2020.

(a) The anti-doping rule violation does not involve a Specified Substance or a Specified Method, unless the Athlete or other Person can establish that the anti-doping rule violation was not intentional.

(b) The anti-doping rule violation involves a Specified Substance or a Specified Method and the Integrity Unit can establish that the anti-doping rule violation was intentional.

10.2.2 If Rule 10.2.1 does not apply, then (subject to Rule 10.2.4(a)) the period of Ineligibility will be two years."

44. There are three widely known substances or methods used for blood doping, namely: (i) administering recombinant human erythropoietin ("**EPO**")[29]; (ii) synthetic oxygen carriers[30]; and (iii) blood transfusions[31].

45. EPO is a Prohibited Substance, which is included in class "*S2. Peptide hormones, growth factors, related substances, and mimetics*" of the 2024 WADA Prohibited List. Synthetic oxygen carriers and blood transfusions are Prohibited Methods under class "*M1. Manipulation of Blood and Blood Components*" of the 2024 WADA Prohibited List. The referenced Substance and Method are categorized as non-Specified and are prohibited at all times.

46. The period of ineligibility shall therefore be four years in circumstances where the Anti-Doping Rule Violation is intentional and constitutes an athlete's first violation of the Rules.

47. The Athlete has failed to meet her burden to establish that her Anti-Doping Rule Violation was not intentional and shall therefore be subject to the mandatory period of Ineligibility of four (4) years.[32]

Decision

48. On the basis that the Athlete is deemed to have admitted the Anti-Doping Rule Violation pursuant to Rule 2.2 ADR and accepted the Consequences specified by the AIU in the Charge, in accordance with Rule 10.2.1 ADR, the AIU confirms by this decision the following Consequences for a first Anti-Doping Rule Violation:

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[29] EPO is administered by injection to trigger erythropoiesis, the stimulation of the production of red blood cells;

[30] i.e. infusing blood substitutes such as a haemoglobin-based oxygen carrier ("**HBOC**") or perfluorocarbons to increase haemoglobin well above normal levels.

[31] i.e. infusing a matching donor's or the athlete's own (previously extracted) red blood cells to increase the haemoglobin value well above normal.

[32] In any event, it is the AIU's position, supported by jurisprudence, that any form of blood manipulation is necessarily intentional. In paragraph 94 of CAS 2020/A/7377 El Mahjoub Dazza v/ World Athletics, the Panel concluded that since "*the use of erythropoietic stimulant (rEPO) or a blood transfusion can exclusively be done by injections, the ADRV at hand has, in the Panel's view, to be considered as having been committed intentionally*".

48.1. a period of Ineligibility of four (4) years commencing on 15 September 2025 (the date of Provisional Suspension[33]); and

48.2. disqualification of the Athlete's results since 25 June 2024[34], with all resulting Consequences, including the forfeiture of any titles, awards, medals, points, prizes and appearance money.

Publication

49. In accordance with Rule 8.5.6(b) ADR, the AIU shall publicly report this decision on the AIU's website.

Rights of Appeal

50. This decision constitutes the final decision of the AIU pursuant to Rule 8.5.6 ADR.

51. Further to Rule 13.2.3 ADR, the Athlete, WADA and the Anti-Doping Agency of Kenya ("**ADAK**") have a right of appeal against this decision to the Court of Arbitration for Sport in Lausanne, Switzerland, in accordance with the procedure set out at Rule 13.6.1 ADR.

52. If an appeal is filed against this decision by WADA or ADAK, the Athlete will be entitled to exercise her right of cross-appeal in accordance with Rule 13.2.4 ADR.

Monaco, 13 October 2025

[33] Pursuant to Rule 10.13.2(a) ADR

[34] This corresponds to the first evidence of an Anti-Doping Rule Violation in the Passport (i.e, Sample 2, collected on 25 June 2024).