



DECISION of the FEI TRIBUNAL

dated 17 March 2017

Positive Anti-Doping Case No.: 2016/BS06

Horse: DENDROS **FEI Passport No:** 103IT53/SUI

Person Responsible/ID/NF: Matthias Klausener/10057973/SUI

Event/ID: CPEDI3* - Somma Lombardo (ITA) - 2016_CI_0306_PED_S_01

Date: 16 – 19 June 2016

Prohibited Substance: Demecolcine

I. COMPOSITION OF PANEL

Mr. Henrik Arle, one member panel

II. SUMMARY OF THE FACTS

- 1. Memorandum of case:** By Legal Department.
- 2. Summary information provided by Person Responsible (PR):**
The FEI Tribunal duly took into consideration all evidence, submissions and documents presented in the case file, as also made available by and to the PR.
- 3. Oral hearing:** none

III. DESCRIPTION OF THE CASE FROM THE LEGAL VIEWPOINT

1. Articles of the Statutes/Regulations which are applicable:

Statutes 23rd edition, effective 29 April 2014 ("**Statutes**"), Arts. 1.4, 38 and 39.

General Regulations, 23rd edition, 1 January 2009, updates effective 1 January 2016, Arts. 118, 143.1, 161, 168 and 169 ("**GRs**").

Internal Regulations of the FEI Tribunal, 2nd edition, 1 January 2012

("IRs").

FEI Equine Anti-Doping and Controlled Medication Regulations ("EADCMRs"), 2nd edition, effective 1 January 2016.

FEI Equine Anti-Doping Rules ("EAD Rules"), 2nd edition, effective 1 January 2016.

Veterinary Regulations ("VRs"), 13th edition, effective 1 January 2016, Art. 1055 and seq.

FEI Code of Conduct for the Welfare of the Horse.

2. Person Responsible: Mr. Matthias Klausener

3. Justification for sanction:

GRs Art. 143.1: "Medication Control and Anti-Doping provisions are stated in the Anti-Doping Rules for Human Athletes (ADRHA), in conjunction with the World Anti-Doping Code, and in the Equine Anti-Doping and Controlled Medication Regulations (EADCM Regulations)."

EAD Rules Art. 2.1.1: "It is each *Person Responsible's* personal duty to ensure that no *Banned Substance* is present in the *Horse's* body. *Persons Responsible* are responsible for any *Banned Substance* found to be present in their *Horse's Samples*, even though their *Support Personnel* will be considered additionally responsible under Articles 2.2 – 2.8 below where the circumstances so warrant. It is not necessary that intent, Fault, negligence or knowing *Use* be demonstrated in order to establish an *EAD Rule* violation under Article 2.1."

EAD Rules APPENDIX 1 – Definitions:

"Fault. Fault is any breach of duty or any lack of care appropriate to a particular situation. Factors to be taken into consideration in assessing an Person Responsible and/or member of the Support Personnel's degree of Fault include, for example, the Person Responsible's and/or member of the Support Personnel's experience, whether the Person Responsible and/or member of the Support Personnel is a Minor, special considerations such as impairment, the degree of risk that should have been perceived by the Person Responsible and/or member of the Support Personnel and the level of care and investigation exercised by the Person Responsible and/or member of the Support Personnel in relation to what should have been the perceived level of risk. In assessing the Person Responsible's and/or member of the Support Personnel's degree of Fault, the circumstances considered must be specific and relevant to explain the Person Responsible's and/or member of the Support Personnel's departure from the expected standard of behaviour. Thus, for example, the fact that the Person Responsible would lose the

opportunity to earn large sums of money during a period of Ineligibility, or the fact that the Person Responsible only has a short time left in his or her career, or the timing of the sporting calendar, would not be relevant factors to be considered in reducing the period of Ineligibility under Article 10.5.1 or 10.5.2.

(...)

No Fault or Negligence. The Person Responsible and/or member of the Support Personnel establishing that he or she did not know or suspect, and could not reasonably have known or suspected even with the exercise of utmost caution, that he or she had administered to the Horse, or the Horse's system otherwise contained, a Banned or Controlled Medication Substance or he or she had Used on the Horse, a Banned or Controlled Medication Method or otherwise violated an EAD or ECM Rule. Except in the case of a Minor, for any violation of Article 2.1, the Athlete must also establish how the Prohibited Substance entered his or her system.

(...)

No Significant Fault or Negligence. The Person Responsible and/or member of the Support Personnel establishing that his fault or negligence, when viewed in the totality of the circumstances and taking into account the criteria for No Fault or Negligence, was not significant in relationship to the EADCM Regulation violation. Except in the case of a Minor, for any violation of Article 2.1 of the EAD Rules, the Athlete must also establish how the Prohibited Substance entered his or her system."

IV. DECISION

Below is a summary of the relevant facts, allegations and arguments based on the Parties' written submissions, pleadings and evidence adduced. Additional facts and allegations found in the Parties' written submissions, pleadings and evidence may be set out, where relevant, in connection with the legal discussion that follows. Although the Tribunal has fully considered all the facts, allegations, legal arguments and evidence in the present proceedings, in its decision it only refers to the submissions and evidence it considers necessary to explain its reasoning.

1. Factual Background

- 1.1 DENDROS (the "**Horse**") participated at the CPEDI3* in Somma Lombardo, Italy, from 16 to 19 June 2016 (the "**Event**"), in the discipline of Para-Equestrian Dressage. The Horse was ridden by Mr. Matthias Klausener who is the Person Responsible in accordance with Article 118.3 of the GRs (the "**PR**").

- 1.2 The Horse was selected for sampling during the Event, on 19 June 2016.
- 1.3 Analysis of urine and blood sample no. 5545617 taken from the Horse at the Event was performed at the FEI approved laboratory, the LGC Newmarket Road Laboratory ("**LGC**") in Fordham, Cambridgeshire, United Kingdom. The analysis of the sample revealed the presence of Demecolcine in the urine.
- 1.4 The Prohibited Substance detected is Demecolcine. Demecolcine is used for Rheumatic treatment and Chemotherapy, it improves Radiotherapy results, control Leukaemia and Gout and is classified as a Banned Substance under the FEI Equine Prohibited Substances List (the "**FEI List**"). Therefore, the positive finding for Demecolcine in the Horse's sample gives rise to an Anti-Doping Rule violation under the EAD Rules.
- 1.5 Demecolcine and Colchicine are both metabolites of Colchicum. The presence of Demecolcine may indicate that the source of the positive finding is due to contamination, most likely by the ingestion of the flower Colchicum Autumnale, autumn crocus.
- 1.6 Specified Substances. The FEI has with effect from 1 January 2016, amended the EADCMRs to introduce the concept of "Specified Substances" into the EADCMRs. The introduction of the category of Specified Substances is to recognise that it is possible for certain substances to enter a Horse's system inadvertently, due to a credible non-doping explanation, and therefore to allow the FEI and/or the FEI Tribunal more flexibility when prosecuting a case or when making a sanctioning decision. Demecolcine and Colchicine have been put on the list of suggestions for substances to be designated as "Specified Substances" for 2018.

2. The Further Proceedings

- 2.1 On 27 July 2016, the FEI Legal Department officially notified the PR and the Co-Owner of the Horse through the Swiss National Federation ("**SUI-NF**") of the presence of the Prohibited Substances following the laboratory analysis, the possible rule violation and the possible consequences. The Notification Letter included notice that the PR was provisionally suspended and granted him the opportunity to be heard at a Preliminary Hearing before the Tribunal.
- 2.2 The Notification Letter further included notice, in accordance with Article 7.4 of the EAD Rules, that the Horse was provisionally suspended for a period of two (2) months, from the date of Notification, *i.e.*, 27 July 2016, until 26 September 2016. The Horse has served the entire period of Provisional Suspension.

3. The B-Sample analysis

- 3.1 Together with the Notification Letter of 27 July 2016, the PR and the Co-Owner of the Horse were also informed that they were entitled (i) to the performance of a B-Sample confirmatory analysis on the positive sample; (ii) to attend or be represented at the B-Sample analysis; and/or (iii) to request that the B-Sample be analysed in a different laboratory than the A-Sample.
- 3.2 Neither the PR nor the Co-Owner of the Horse did ask for the B-Sample to be analysed, and accepted the results of the A-Sample analysis.

4. Written submission by and on behalf of the PR

- 4.1 On 15 August 2016, the PR submitted his explanations with regard to the positive finding. The PR explained that he is an amateur rider competing in Para-Equestrian Dressage on an international level. That the Horse was stabled in the Jura high plateau with a lot of eco meadows and biodiversity. He further explained that he bought bio hay from a neighbour in spring (2016) that contained some autumn crocus, which was removed immediately as the plant was poisonous for horses. That later on he realised that some hay bales still contained some traces of autumn crocus. He had kept a bale of it, and samples could be taken for testing. Moreover, the PR stated that the hygienic conditions at the Event were very bad, the stables contained old hay and straw, and there was no supervision of horses. Finally, the PR stated that the only explanation he had for the positive finding of Demecolcine was contaminated animal feed, *i.e.*, the bio hay purchased having been contaminated with autumn crocus.
- 4.2 Together with his explanations, the PR provided a statement by Mr. Martin Hauser, who confirmed that he had delivered hay to the PR on numerous occasions, and that the hay coming from his fields would naturally contain autumn crocus (*Colchicum autumnale*). Furthermore, the PR provided a statement by Dr. Nina Märki, veterinarian. Dr. Märki stated that she had been the Horse's veterinarian for a number of years. That the Horse was healthy and did not suffer from Rheumatism or any cancerous illness. Furthermore, that she never prescribed any Demecolcine to the Horse or any other horses in the PR's stables.

5. Provisional Suspension

- 5.1 On 4 October 2016, the PR requested the lifting of the Provisional Suspension imposed on him. Furthermore, the PR also requested the lifting of the Provisional Suspension of the Horse. Together with his request the PR provided laboratory results from the FEI approved laboratory Laboratoire des Courses Hippiques, (the "LCH") in France. The laboratory results confirm that the hay sample analysed from 29 August 2016 to 23 September 2016 tested positive for Colchicine and

Demecolcine. The testing of the hay has been organised in collaboration with the FEI.

- 5.2 On 4 October 2016, the FEI explained that, given the circumstances in the case at hand, the FEI did not oppose to the lifting of the Provisional Suspension of the PR.
- 5.3 On 6 October 2016, the FEI Tribunal Chair decided to lift the Provisional Suspension of the PR with immediate effect, *i.e.*, as of 6 October 2016 midnight CET.
- 5.4 The FEI Tribunal Chair found that it was possible that the PR's explanations might be the cause of the positive finding. As a result, and depending on the further evidence and explanations provided throughout the proceedings, the FEI Tribunal Chair could therefore not exclude that the period of Ineligibility otherwise imposed, might be either reduced or completely eliminated. The FEI Tribunal Chair took note that the PR had been provisionally suspended for over two (2) months, *i.e.*, from 27 July 2016. Given that there might be a possibility that the Provisional Suspension, if maintained, could result in a longer duration than the Final Suspension imposed by the FEI Tribunal, the FEI Tribunal Chair decided to lift the Provisional Suspension of the PR.
- 5.5 Regarding the Horse, since it had (only) been provisionally suspended for two (2) months, *i.e.*, from 27 July 2016 until 26 September 2016, it was thus no longer suspended on 4 October 2016, *i.e.*, at the time of the request by the PR for the lifting of the Provisional Suspension of the Horse.

6. Response by the FEI

- 6.1 On 1 February 2017, the FEI provided its Answer to the explanations submitted by and on behalf of the PR.
- 6.2 To start with, the FEI provided a scientific background regarding the Prohibited Substance Demecolcine. The FEI explained as follows:

“Demecolcine and Colchicine are both metabolites of Colchicum and classified as Banned Substances on the FEI Prohibited List. Demecolcine and Colchicine are therefore both metabolites of the flower Colchicum autumnale - autumn crocus. Demecolcine is also an alkaloid being one of the active substances in the autumn crocus. Demecolcine is not a pharmaceutical, but in human medicine the substance is used for tumor therapy. There is no know use for Demecolcine in veterinary medicine. The alkaloids of the autumn crocus all are very toxic, wherefore it is unlikely that any horse would be treated with such a toxic substance.”
- 6.3 Furthermore, the FEI provided several scientific articles explaining the complicated situation in relation to hay production in areas where the autumn crocus grows. The scientific articles provided explain as follows:

"Colchicum autumnale (Colchicaceae) is a geophyte native to Central Europe. Its English name "autumn crocus" refers to its flowering time in autumn, whereas the leaves and capsules appear above the ground surface in the following April. The plant remains underground during the winter (November until March) and summer (July) dormancy periods. C. autumnale has to allocate and store photoassimilates during a short period from April to June, which have to support it for the rest of the year. It is able to reproduce generatively by seeds, and clonally by building an additional corm. Seed ripening takes place in June; therefore hay production facilitates the seed dispersal as the hay is repeatedly turned over. The main toxic substances of C. autumnale are the alkaloids Colchicine and Colchicein, which inhibit cell division, act as a strong capillary toxin and paralyse peripheral nerve endings. All plant parts are toxic, the highest concentrations though can be found in the seeds and flowers. C. autumnale is declining at its geographical distribution limits in Belgium and Ireland but has recently reached critical population densities in parts of Austrian and German grasslands. Cases of intoxication of cattle and horses were reported from Austria, Germany and Switzerland. As the toxic components persist in hay and silage, the continuation of the management of these grasslands is endangered."

"High densities of Colchicum autumnale may endanger grassland management in Austria. As the toxic components persist in hay and silage, the continuation of the management of these grasslands, which are often characterised by a high biodiversity, is uncertain... Among farmers who sold hay, 48% considered it as problematic. The field survey showed that C. autumnale covers up to 73% of grasslands."

- 6.4 The FEI submitted that it therefore recognised the *Colchicum autumnale* - autumn crocus - as a possible source of contamination in relation to Demecolcine and Colchicine.
- 6.5 In essence, regarding the Rule violation of the PR, the FEI submitted that:
- a) Article 3.1 of the EAD Rules made it the FEI's burden to establish all of the elements of the EAD Rule violation charged, to the comfortable satisfaction of the Tribunal. The elements of an Article 2.1 violation were straightforward. *"It is not necessary that intent, fault, negligence or knowing Use be demonstrated in order to establish an EAD Rule violation under Article 2.1"*. Instead it was a "strict liability" offence, established simply by proof that a Banned Substance was present in the Horse's sample. The results of the analysis of the A-Sample taken from the Horse at the Event confirmed the presence of Demecolcine which constituted "sufficient proof" of the violation of Article 2.1 of the EAD Rules. The PR did not dispute the presence of the Prohibited Substance in the Horse's sample. Accordingly, the FEI has discharged its burden of establishing that the PR has violated Article 2.1 of the EAD Rules.
 - b) Where a Banned Substance was found in a horse's sample, a clear and unequivocal presumption arose under the EAD Rules that it was

administered to the horse deliberately, in an illicit attempt to enhance its performance. As a result of this presumption of fault, Article 10.2 of the EAD Rules provided that a Person Responsible with no previous doping offences who violated Article 2.1 of the EAD Rules was subject to a period of Ineligibility of two (2) years, unless he was able to rebut the presumption of fault. And that to do this the rules specified that he must establish to the satisfaction of the Tribunal (it being his burden of proof, on a balance of probability) (i) How the Prohibited Substances entered the Horse's system; and (ii) that he bore No Fault or Negligence for that occurrence; or alternatively (iii) that he bore No Significant Fault or Negligence for that occurrence. If the PR failed to discharge this burden, the presumption of intentional administration and performance stood.

- c) Regarding how the Prohibited Substances entered the Horse's system, the FEI submitted that, due to the test of the hay sample which showed the presence of both Demecolcine and Colchicine, the FEI was of the opinion that the only explanation of the positive sample was contamination of autumn crocus in the hay. The FEI was further aware of several positive cases on a national level for Demecolcine, where autumn crocus grew, *i.e.*, the region of the Alps. The FEI was therefore of the opinion that the PR had fulfilled the threshold requirements of how the substance entered the Horse's system.
- d) With regard to Fault or Negligence, the FEI was of the opinion that the degree of risk that should have been perceived by the PR when giving bio hay containing autumn crocus to his horses, including the Horse, was overruled by the level of care he took when he removed the flowers immediately from the hay. In the view of the FEI, the PR could not have been expected to take any further measures in order to prevent the Demecolcine from entering the body of the Horse, since it could not be expected from him to find all traces of the flower in the hay. Considering the complex situation of the autumn crocus, the FEI found that the PR was at No Fault or Negligence for the Rule violation.
- e) That in this respect the PR has been aware of the meadows containing autumn crocus and the risk of the horses ingesting it and had immediately removed the flowers from the hay. That he was also aware that the autumn crocus was very toxic and poisonous for horses. The FEI further submitted that, as it had been proven in the scientific articles, it was very difficult to remove all traces of autumn crocus from the hay, especially since in the early harvest season of the hay there were only seeds of the flower, and the flowers bloomed later in the autumn. Further, that since Demecolcine was very toxic, it was no pharmaceutical, and it had no veterinary use, it was highly unlikely that the Horse had been treated with the substance.
- f) Pursuant to Article 9 of the EAD Rules, the result of the PR and Horse combination obtained in the Competition had to be disqualified with all resulting Consequences, including forfeiture of any related medals,

points and prizes. This rule applied even if the period of Ineligibility was reduced or eliminated under Article 10 of the EAD Rules, *e.g.*, on the basis of No (or No Significant) Fault or Negligence. Further, since this was a case with a Banned Substance, occurring during or in connection with an Event, in order to safeguard the level playing field, the FEI may disqualify all of the Person Responsible's individual results obtained in that Event, with any and all Horses with which the Person Responsible competed, with all consequences, including forfeiture of all medals, points and prizes, in accordance with Article 10.1.2 of the EAD Rules.

- g) The FEI therefore submitted that the otherwise applicable period of Ineligibility, *i.e.*, two (2) years, should be eliminated and no other sanctions (other than the Disqualification of the Horse's results at the Event in accordance with Article 9 and Article 10.1.2 of the EAD Rules) should apply.
- h) Further, that in accordance with Article 10.8.3 of the EAD Rules, the present violation of the EAD Rules should not be considered a prior violation for the purpose of Article 10.8 (Multiple Violations) of the EAD Rules.
- i) Since the PR was not at fault fairness did dictate that no fine be levied in the case at hand, and the FEI duly requested that no fine be imposed on the PR, and that each party bore their own legal costs.

7. Jurisdiction

The Tribunal has jurisdiction over this matter pursuant to the Statutes, GRs and EAD Rules.

8. The Person Responsible

The PR is the Person Responsible for the Horse, in accordance with Article 118.3 of the GRs, as he was the rider of the Horse at the Event.

9. The Decision

- 9.1 As stated in Article 2.1.2 of the EAD Rules, sufficient proof of an EAD Rule violation is established by the presence of a Banned Substance in the Horse's A-Sample where the PR waives analysis of the B-Sample and the B-Sample is not analysed. The Tribunal is satisfied that the laboratory reports relating to the A-Sample reflect that the analytical tests were performed in an acceptable manner and that the findings of the LGC are accurate. The Tribunal is satisfied that the test results evidence the presence of Demecolcine in the sample taken from the Horse at the Event. The PR did not contest the accuracy of the test

results or the positive finding.

- 9.2 The FEI has therefore established an Adverse Analytical Finding for a Banned Substance, and has sufficiently proven the objective elements of an offence in accordance with Articles 2.1 of the EAD Rules.
- 9.3 In cases brought under Article 2.1 of the EADCMRs, the so-called strict liability principle, as described in Article 2.1.1 of the EAD Rules, applies. This means that once a positive finding of a Prohibited Substance has been established, an EAD Rule violation has been established by the FEI, and it is not necessary that intent, fault, negligence or knowing Use on the part of the PR be demonstrated in order to establish an EAD Rule violation. Rather the PR has the burden of proving that he bears "No Fault or Negligence" for the positive finding as set forth in Article 10.4 of the EAD Rules, or "No Significant Fault or Negligence," as set forth in Article 10.5 of the EAD Rules. Pursuant to the Definition of No Fault or Negligence (Appendix I of the EADCMRs) the PR must also establish how the Prohibited Substance entered the Horse's system.
- 9.4 To start with Tribunal takes note of the PR's explanation of how the Prohibited Substance entered or came to be present in the Horse's system, namely through with autumn crocus contaminated hay bought from his neighbour and fed to the Horse. In this respect, the Tribunal takes note that the PR has provided test results of hay samples which show that the hay contained both Demecolcine and Colchicine. As a result, the Tribunal finds that it has therefore been established – by a balance of probability, as required under the EAD Rules - how the Demecolcine entered the Horse's system.
- 9.5 In a second step the Tribunal has to evaluate the PR's degree of Fault or Negligence for the rule violation. Pursuant to the Definition of No Fault or Negligence (Appendix 1 of the EADCMRs) the PR has to establish that he did not know or suspect, and could not reasonably have known or suspected even with the exercise of utmost caution, that he had administered to the Horse, or the Horse's system otherwise contained, a Banned or Controlled Medication Substance.
- 9.6 The Tribunal is satisfied that the PR has demonstrated that he bore No Fault or Negligence for the rule violation in so far as he could not reasonably have been expected to take any further measures that would have prevented the Banned Substance from entering the Horse's system, since it could not be expected from him to find all traces of the flower in the hay. In this respect the Tribunal also takes into consideration that – as outlined in the scientific articles – it would be very difficult to remove all traces of autumn crocus from the hay, especially since in the early harvest season of the hay there were only seeds of the flower, and the flowers bloom later in the autumn. Furthermore, the Tribunal takes note that the PR seems to have removed autumn crocus from the hay, but that the hay still seemed to have contained traces of autumn crocus thereafter. Moreover, the Tribunal also takes into consideration all circumstances in the case at hand, including that autumn crocus might grow in the area where the

Horse was stabled, *i.e.*, the Jura high Plateau, and that cases of intoxication of cattle and horses have been reported in Switzerland.

- 9.7 The Tribunal therefore agrees with the FEI that the degree of risk that should have been perceived by the PR when giving bio hay containing autumn crocus to his horses, including the Horse, was overruled by the level of care he took when he removed the flowers immediately from the hay.
- 9.8 Finally, the Tribunal finds that, after having decided that the PR established that he bore No Fault or Negligence for the rule violation, that the otherwise applicable sanction, *i.e.*, a two (2) year period of Ineligibility, is eliminated. In this regard, the Tribunal takes note that the PR was provisionally suspended from 27 July 2016 to 6 October 2016, *i.e.*, for over two (2) months.
- 9.9 Furthermore, in accordance with Article 10.8 of the EAD Rules, the Tribunal finds that the EAD Rule violation in the case at hand is not to be considered a violation for the limited purpose of determining the period of Ineligibility for multiple violations under Article 10.8 of the EAD Rules. Finally, the Tribunal decides not to impose any fine on the PR.

10. Disqualification

For the reasons set forth above, the Tribunal disqualifies the Horse and the PR combination from the Competition and all medals, points and prize money won must be forfeited, in accordance with Article 9 of the EAD Rules. Since the Horse had been fed with contaminated hay containing autumn crocus, the Tribunal believes that the Demecolcine was present in the Horse's system during the entire Event, *i.e.*, also during the competitions prior to the sampling of 19 June 2016. The Tribunal therefore finds that the results in those competitions were likely to have been also affected by the PR's EAD Rule violation. Therefore, in accordance with Article 10.1.2 of the EAD Rules, the Tribunal is also disqualifying the results (if any) of these competitions.

11. Sanctions

- 11.1 As a result of the foregoing, an EAD Rule violation (Article 2.1 of the EAD Rules) has been established. However, the otherwise applicable period of Ineligibility for the EAD Rule violation is eliminated pursuant to Article 10.4 (No Fault or Negligence) of the EAD Rules. The PR has been provisionally suspended from 27 July 2016 to 6 October 2016, *i.e.*, for over two (2) months.
- 11.2 The Tribunal disqualifies the Horse and PR combination from the entire Event in accordance with Articles 9 and 10.1.2 of the EAD Rules.

- 11.3 The Tribunal imposes no (further) sanctions - neither a period of Ineligibility or a fine - on the PR.
- 11.4 The Tribunal finds that the EAD Rule violation in the case at hand is not to be considered a violation for the limited purpose of determining the period of Ineligibility for multiple violations under Article 10.8 of the EAD Rules.
- 11.5 The Parties shall bear their own costs and expenses.
- 11.6 According to Article 168 of the GRs, the present decision is effective from the day of written notification to the persons and bodies concerned.
- 11.7 In accordance with Article 12 of the EAD Rules the Parties may appeal against this decision by lodging an appeal with the Court of Arbitration for Sport (CAS) within twenty-one (21) days of receipt hereof.

V. DECISION TO BE FORWARDED TO:

- a. The person sanctioned: Yes**
- b. The President of the NF of the person sanctioned: Yes**
- c. The President of the Organising Committee of the Event through his NF: Yes**
- d. Any other: No**

FOR THE PANEL

A handwritten signature in black ink, appearing to read 'Henrik Arle', is written over a light blue horizontal line.

Mr. Henrik Arle, one member panel