



2025/ADD/130 International Weightlifting Federation (IWF) v. Abubakar Ghani

DECISION

delivered by the

COURT OF ARBITRATION FOR SPORT

sitting in the following composition:

Single Judge: Ms. Carol Roberts, Arbitrator, Vancouver, Canada

in the procedure between

International Weightlifting Federation, Switzerland

Represented by the International Testing Agency, Lausanne, Switzerland

Appearing through Mr. Nicolas Zbinden and Mr. Christopher Nseka, Attorneys-at-Law, Kellerhals Carrard, Lausanne, Switzerland

Claimant

and

Abubakar Ghani, Pakistan

Respondent

I. PARTIES

1. The International Weightlifting Federation (“IWF”) is the world governing body for the sport of weightlifting.
2. As a signatory to the World Anti-Doping Code, IWF has enacted the IWF 2025 Anti-Doping Rules (“IWF ADR”). The IWF has delegated the results management and subsequent prosecution of adverse analytical findings (“AAF”) arising out of samples collected from athletes under jurisdiction of the IWF to the International Testing Agency (“ITA”).
3. Mr. Abubakar Ghani (the “Athlete”) is affiliated with the Pakistan Weightlifting Federation (“PWLF”), a member of the IWF.
4. The World Anti-Doping Agency (“WADA”), the Pakistan Weightlifting Federation (“PWLF”) and the National Anti-Doping Organization of Pakistan are entitled to attend the hearing as observers pursuant to Article 8.1.2.3 of the IWF ADR.

II. FACTUAL BACKGROUND

5. Below is a summary of the relevant facts and allegations based on the written submissions and the evidence presented on behalf of the IWF in this procedure.
6. Additional facts and allegations found in the written submissions, pleadings and evidence may be set out, where relevant, in connection with the legal discussion that follows. While the Single Judge has considered all the facts, allegations, legal arguments and evidence submitted by the parties in the present proceedings, she has only referred to the submissions and evidence necessary to explain her reasoning.
7. On 25 January 2022, following an in-Competition doping control carried out on the Athlete on 9 December 2021 during the 2021 IWF World Championships in Tashkent (Uzbekistan), the ITA notified the Athlete of an Adverse Analytical Finding (“AAF”) due to the presence of a tamoxifen metabolite in his sample.
8. Tamoxifen is a prohibited substance under section S4.2 of the 2022 WADA Prohibited List and is prohibited at all times.
9. The Athlete was informed of the AAF and invited to provide an explanation for the potential Anti-Doping Rule Violation (“ADRV”).
10. The Athlete acknowledged receipt of the Notification and confirmed his intention to “fully cooperate” with the ITA. On 25 January 2022, the Athlete accepted a provisional suspension.
11. The Athlete provided a number of different explanations for the AAF.
12. In his first email of 1 February 2022, the Athlete claimed that the AAF may have been caused by the medication prescribed by his doctor, and/or that a mandatory COVID19 vaccination might have caused the AAF. The explanations were supported by copies of two prescriptions the Athlete alleged had been issued by his doctor along with a certificate of vaccination.
13. At the same time, the Athlete also suggested that his AAF might have been caused by an inadvertent ingestion of his aunt’s cancer medication.

14. In an email of 26 February 2022, the Athlete asserted that his doctor confirmed that the medication he was taking contained tamoxifen.
15. In a third email dated 16 March 2022, the Athlete explained that, after conducting research, he had discovered that tamoxifen is used to treat breast cancer, the condition he asserted that his aunt was suffering from.
16. In light of the Athlete's inconsistent explanations, the ITA issued a Notice of Charge ("NoC"), asserting an ADRV under Articles 2.1 and/or 2.2 of the IWF ADR. An Agreement on Consequences ("AoC") under Article 8.3.1 of the IWF ADR was enclosed with the NoC to resolve the matter.
17. On 1 September 2022, the ITA and the Athlete signed the NoC, sanctioning the Athlete with a period of ineligibility of two (2) years, commencing 1 February 2022 and ending 31 January 2024.
18. In November 2023, ITA conducted an investigation into allegations of systemic doping related to the International Weightlifting Federation in Pakistan. During that investigation, the Athlete was interviewed and admitted that the prescription he submitted relating to his ADRV had been falsified. As a result, the ITA initiated investigations into the medical evidence provided by the Athlete for the AAF for tamoxifen, including contacting the doctor whose name was on the prescriptions.
19. In May 2024, the doctor provided the ITA with a hand-written statement confirming a) that he had ceased working at the clinic referred to by the Athlete in 2019, b) that he had never met the Athlete and therefore could not have prescribed any medication to him, and c) that the certificate presented by the Athlete dated 15 November 2021 was a forged document. Due to "competing operational priorities" the ITA was unable to obtain a formal witness statement from the doctor until 20 February 2025. At that time, the doctor confirmed his earlier statement and added that a) the writing and signature on the prescription were not his, b) although the prescription is written in the English language, the doctor only wrote the names of medication in English, while everything else was written in Urdu, and c) that he had never prescribed the drug Novaldex, as it is outside the scope of his medical specialty.
20. The ITA interviewed the Athlete on 26 February 2025 regarding the possible assertion of an additional ADRV. The Athlete provided inconsistent accounts of how tamoxifen had entered his system, including a new explanation, but did not dispute that the prescription had been falsified.
21. The IWF contends that, following the receipt of the First Notification, the Athlete deliberately submitted a forged document to support his position, which constituted an ADRV under Article 2.5 of the IWF ADR.
22. On 5 March 2025, the ITA, on behalf of the IWF, notified the Athlete that it was considering asserting an ADRV in relation to his explanation of the presence of tamoxifen in his system and granted him until 19 March 2025 to provide an explanation in respect of the charge.
23. On 18 March 2025, the Athlete provided his answer to the Notification of an apparent ADRV. Following a review of the Athlete's explanations, the ITF decided to assert an ADRV and gave the Athlete a deadline of 8 June 2025 to provide an explanation in respect of the charge.

24. In responding to the asserted ADRV, the Athlete, in essence, repeated his explanations for the presence of tamoxifen and denied the charges against him. The Athlete sought an extension to 30 June 2025 to obtain legal advice and to provide further explanation.
25. On 30 June 2025, the Athlete confirmed that he would not accept the charges and requested that the case be referred to the CAS ADD.

III. PROCEEDINGS BEFORE THE COURT OF ARBITRATION FOR SPORT

26. On 24 November 2025, the IWF filed a Request for “Arbitration” with the Anti-Doping Division of the Court of Arbitration for Sport (the “ADD”) in accordance with Article A13 of the Procedural Rules of the ADD (the “ADD Rules”).
27. On 25 November 2025, the ADD notified the Athlete of the Request and informed him that pursuant to Article A14 of the ADD Rules, he was to file his Answer to the Request within 20 days of the receipt of the letter (i.e. by 15 December 2025). The letter identified the components of the Answer, including “a complete statement of the defence on the merits of the case” and “any defence of lack of jurisdiction”.
28. The Athlete did not file an Answer either by 15 December 2025 or at all.
29. In its Request for Arbitration, and in accordance with Article A16 of the ADD Rules, IWF requested that this procedure be referred to a Single Judge appointed by the President of the ADD.
30. On 5 December 2025, the CAS ADD Office, on behalf of the President of the ADD, confirmed the appointment of Ms. Carol Roberts, Arbitrator in Vancouver, Canada, as Single Judge in accordance with Articles A16 and A17 of the ADD Rules.
31. On 18 December 2025, the CAS ADD Office notified the Parties that the Athlete had not filed an Answer to the IWF’s Request for Arbitration, but invited the Parties to indicate by 9 January 2026, whether they deemed a hearing necessary in accordance with Article A19.3 of the ADD Rules.
32. On 19 December 2025, the Athlete informed the ADD that he would “attend the hearing on January 9”.
33. On 22 December 2025, the CAS ADD Office acknowledged the Athlete’s communication that he would attend a hearing should one be held and informed the Athlete that as no hearing date had been set, the CAS ADD Office was awaiting the Parties’ position on the necessity of a hearing.
34. On 28 December 2025, the Athlete informed the CAS ADD Office that he considered it necessary to attend a hearing.
35. On 6 January 2026, the IWF confirmed that they did not consider a hearing necessary.
36. On 21 January 2026, the CAS ADD Office sent the Order of Procedure to the Parties for signature. That Order specified that the Athlete did not contest the jurisdiction of the CAS ADD, and that by signing the Order, the Parties agreed that the Panel could decide the matter.

based on the Parties' written submissions. The Order further specified that by signing the Order, the Parties confirmed that their right to be heard had been respected.

37. On 26 January 2026, Counsel for the IWF returned a signed copy of the Order of Procedure.

38. On 31 January 2026, the Athlete returned a signed copy of the Order of Procedure.

IV. SUBMISSIONS OF THE PARTIES

39. ITA's submissions may be summarised as follows:

- The Athlete's conduct is a "text-book example" of Tampering;
- The doctor's evidence that the prescription submitted by the Athlete was falsified, is detailed, consistent and credible;
- The Athlete's conduct was intended to influence or subvert the Doping control process as it was submitted to support his explanation for his AAF;
- IWF has discharged its burden of proof to establish a Tampering ADRV within the meaning of Article 2.5 of the IWF ADR to the comfortable satisfaction of the Panel.
- Article 10.3.1 of the IWF ADR specifies a period of ineligibility of four (4) years except if the Athlete can establish exceptional circumstances. The IWF submits that the Athlete has not established any exceptional circumstances.

40. In its Request for Arbitration, the IWF requested the following relief:

- 1) *The International Weightlifting Federation's request for arbitration is admissible.*
- 2) *Mr. Abubakar Ghani is found to have committed an anti-doping rule violation of Article 2.5 of the IWF ADR.*
- 3) *Mr. Abubakar Ghani is sanctioned with a period of ineligibility of four (4) years, starting from the date of the CAS ADD Award.*
- 4) *Mr. Abubakar Ghani is sanctioned with a fine of USD 5'000.-.*
- 5) *The arbitration costs of the proceedings (if any) shall be borne by Mr. Abubakar Ghani.*
- 6) *The IWF is granted an award for its legal and other costs.*

41. The Athlete did not file an Answer to the IWF's Request for Arbitration. However, on 24 January 2026, he sent an unsolicited email to the ADD. The IWF objected to the late submission of the correspondence, noting in any event, that the contents related to the ADRV for the presence of tamoxifen rather than the asserted ADRV for Tampering.

V. JURISDICTION

42. Article A2 of the ADD Rules provides as follows:

CAS ADD shall be the first-instance authority to conduct proceedings and issue decisions when an alleged anti-doping rule violation has been filed with it and for imposition of any sanctions resulting from a finding that an anti-doping rule violation has occurred. CAS ADD has jurisdiction to rule as a first-instance authority on behalf of any sports entity which has formally delegated its powers to CAS ADD to conduct anti-doping proceedings and impose applicable sanctions.

These Rules apply whenever a case is filed with CAS ADD. Such filing may arise by reason of an arbitration clause in the Anti-Doping Rules of a sports entity, by contract or by specific agreement.

These Rules apply only to the resolution by first instance arbitration of alleged anti-doping rule violations filed with CAS ADD. They neither apply with respect to appeals against any other decision rendered by an entity referred to in this Article nor against any decision rendered by CAS ADD.

Decisions rendered by CAS ADD shall be applied and recognized in accordance with the WADC.

43. Article 8.1 of the 2025 IWF ADR, which governs the procedural aspects of this proceeding, provides that the ADD has jurisdiction to adjudicate matters concerning the assertion of ADRVs:

8.1.1 Fair, Impartial and Operationally Independent Hearing Panel

IWF has delegated its Article 8 responsibilities (first instance hearings, waiver of hearings and decisions) to the CAS ADD as an appropriate independent arbitration forum. The procedural rules of the arbitration shall be governed by the rules of the CAS ADD. CAS ADD will always ensure that the Athlete or other Person is provided with a fair hearing within a reasonable time by a fair, impartial and Operationally Independent hearing panel in compliance with the Code and the International Standard for Results Management.

44. Article 8.1.2.1 of the 2025 IWF ADR provides that

When IWF sends a notice to an Athlete or other Person notifying them of a potential anti-doping rule violation, and the Athlete or other Person does not waive a hearing in accordance with Article 8.3.1 or Article 8.3.2, then the case shall be referred to CAS ADD for hearing and adjudication, which shall be conducted in accordance with CAS ADD's procedural rules and the principles described in Articles 8 and 9 of the International Standard for Results Management.

45. After receiving the Notice of Charge on 19 May 2025, the Respondent expressly requested that the matter be referred to the CAS ADD on 30 June 2025.

46. The Single Judge therefore confirms the jurisdiction of the ADD to decide this matter.

VI. APPLICABLE LAW

47. Article A20 of the ADD Rules provides as follows:

The Panel shall decide the dispute in accordance with the WADC and with the applicable ADR or with the laws of a particular jurisdiction chosen by agreement of the parties or, in the absence of such a choice, according to Swiss law.

48. The Athlete is a member of the Pakistani Weightlifting Federation, which is in turn a member of the IWF. The IWF ADR applies, without limitation, to all athletes who are members of IWF.
49. The 2025 version of the IWF ADR was in effect at the time of the ADRV and govern the procedural aspects of this matter.
50. The substantive anti-doping rules in effect when the asserted ADRV occurred are the 2021 IWF ADR (Article 24.7.2 of the 2025 IWF ADR)
51. The Athlete did not dispute that he is bound by the IWF ADR and did not object to the application of the IWF ADR.
52. The Single Judge, therefore, confirms that the IWF ADR applies to this procedure.

VII. MERITS

A. The Anti-Doping Rule Violation

Did the Athlete commit an ADRV?

53. Article 3.1 of the IWF ADR provides that the IWF has the burden of establishing, to the comfortable satisfaction of the Panel, an ADRV. Once an ADRV has been established by IWF, the burden then shifts to the Athlete to demonstrate, on a balance of probabilities, that the ADRV was not intentional.
54. Article 2.5 of the IWF ADR provides that *Tampering or Attempted Tampering with any part of Doping Control by an Athlete or Other Person* constitutes an ADRV.
55. Tampering is defined as:

Intentional conduct which subverts the Doping Control process, but which would not otherwise be included in the definition of Prohibited Methods. Tampering shall include, without limitation (...) falsifying documents submitted to an Anti-Doping Organization or TUE committee or hearing panel, procuring false testimony from witnesses, committing any other fraudulent act upon the Anti-Doping Organization or hearing body to affect Results Management or the imposition of Consequences, and any other similar intentional interference or Attempted interference with any aspect of Doping Control. (IWF ADR Appendix 1)

56. Additionally, Article 5.8.11 of the IWF ADR provides that if an Athlete “*obstructs or delays an investigation (e.g., by providing false, misleading or incomplete information or documentation and/or by tampering or destroying any documentation...) such conduct shall be considered as an anti-doping rule violation under Article 2.5 (Tampering or Attempted Tampering).*”
57. The Doping Control process is defined as “*All steps and processes from test distribution planning through to ultimate disposition of any appeal and the enforcement of Consequences, including all steps and processes in between, including but not limited to Testing, investigations, whereabouts, TUEs, Sample*

collection and handling, laboratory analysis, Results Management and investigations or proceedings relating to violations of Article 10.14 (Status During Ineligibility or provisional Suspension)”. (IWF ADR Appendix 1)

58. In the IWF ADR comment to Tampering clarifies that *“for example, Tampering includes misconduct which occurs during the Results Management process. See Article 10.9.3.3...”*
59. The Results Management Process is defined as *“The process encompassing the timeframe between notification as per Article 5 of the International Standard for Results Management, or in certain cases...such pre-notification steps expressly provided for in Article 5 of the International Standard for Results Management, through the charge until the final resolution of the matter, including the end of the hearing process at first instance or on appeal (if an appeal was lodged).”* (IWF ADR Appendix 1)
60. The IWF submits that, according to CAS jurisprudence, Tampering is drafted to encompass a broad range of behaviour but must be assessed on a case-by-case basis. The IWF says that, according to both the jurisprudence as well as express provisions of the Code, providing fraudulent information amounts to Tampering.
61. The Single Judge finds, based on all the evidence, that the Athlete committed an anti-doping rule violation under Article 2.5 of the IWF ADR.
62. The Single Judge notes that, throughout the process of the first asserted ADRV, the Athlete submitted several explanations for his AAF. Ultimately, the ITA relied on documents submitted by the Athlete in resolving the matter, in particular, a document which purported to be a prescription from a doctor in the Athlete’s hometown.
63. During a broad investigation into systemic doping in the sport of weightlifting in Pakistan, in late 2023 the ITA re-interviewed the Athlete regarding medical prescriptions. Although the Athlete’s command of the English language appears limited, the investigator engaged an independent Urdu language interpreter to ensure the Athlete knew what was being asserted and to provide him with a full opportunity to respond.
64. The Athlete’s explanations for the first ADRV continued to be confusing and convoluted, but at no time did the Athlete deny that the prescription was fraudulently created. In fact, according to the investigator, the Athlete asserted that he had not actually been prescribed tamoxifen but acquired it himself; that the Pakistan Weightlifting Federation told him to forge or falsify a medical certificate or prescription in an attempt to legitimize his taking of tamoxifen; and that the doctor had not prescribed him tamoxifen; rather, he had written it himself into an existing prescription.
65. In light of this new information, which the Athlete later refused to include in a sworn statement, the IWF contacted the doctor represented on the prescription.
66. In May 2024, the IWF obtained written information from that doctor. That initial information was confirmed by the doctor in a sworn statement signed on 20 February 2025. The sworn statement included additional details about the reason why the prescription was fraudulent. The Single Judge finds that the doctor’s statement as to why the prescription provided by the Athlete to support his explanation for the AAF was not a prescription he had issued, was both credible and reliable.

67. The IWF provided the Athlete with several opportunities to respond to the assertion that he had submitted a fraudulent prescription. His responses included yet different explanations for the AAF for tamoxifen. He also agreed that he used tamoxifen of his own free will and confirmed that he had been encouraged to falsify a medical certificate.
68. Although the Athlete did not respond to the Request for Arbitration within the time prescribed by the CAS ADD Office, on 24 January 2026 he sent an unsolicited mail to the ADD which referred to the ADRV and the 1 September 2022 Agreement on Consequences, suggesting that he had “served his sentence.”
69. In the 24 January 2026 email, the Athlete also suggested that the doctor who provided a written statement practises at a different clinic, and that the ITA should have trusted the Athlete rather than a “random doctor.”
70. The IWF objected to the late submission, noting that much of the communication was in relation to a matter that has since been resolved.
71. The Single Judge has considered the submission given that the Athlete is not represented by counsel. However, the Single Judge finds it of no assistance to him. Not only does much of the submission relate to matters that are not before the Single Judge, but she also finds that the Athlete has a difficult relationship with the truth and that little, if any, reliance can be placed on his uncorroborated evidence.
72. The Athlete contends that the ITA should have trusted his assertions over that of a “random doctor.” The doctor is not “random.” His name was on the prescriptions submitted by the Athlete to support his assertion that the tamoxifen entered his system by way of medication prescribed to him. Furthermore, based on the Athlete’s inconsistent explanations and statements made to the investigator in 2023, there is no basis to prefer his assertions over the credible and reliable statements of the doctor.
73. The Single Judge is satisfied, on all the evidence, that the Athlete intentionally falsified prescriptions and provided the false documentation to the ITA in order to affect the investigation of his AAF and the consequences for an ADRV.
74. The Single Judge find that the Athlete committed an ADRV, that of Tampering, contrary to Article 2.5 of the IWF ADR.

B. The Applicable Sanction

75. Under Article 10.3.1 of the IWF ADR, the period of ineligibility imposed for a Tampering ADRV for a specified substance is four years, unless the Athlete can establish exceptional circumstances that justify a reduction in the period of ineligibility.
76. IWF asserts, and the Single Judge agrees, that the Athlete has not established any exceptional circumstances to justify a reduction to the four-year period of ineligibility.
77. In CAS 2021/A/7983 and 8059, the Panel determined that exceptional circumstances must be interpreted restrictively.
78. The Athlete has not provided any evidence of exceptional circumstances. He failed to submit an Answer in response to the IWF’s Request for Arbitration. Although he provided a number

of explanations and excuses for the AAF during this process, the Single Judges finds that none of those excuses constitute exceptional circumstances to the Tampering ADRV.

79. Article 10.9.3.3 provides that:

if the IWF establishes that an Athlete... committed a violation of Article 2.5 in connection with the Doping Control process for an underlying asserted anti-doping rule violation, the violation of Article 2.5 shall be treated as a stand-alone first violation and the period of ineligibility for such violation shall be served consecutively, rather than concurrently, with the period of ineligibility, if any, imposed for the underlying anti-doping rule violation.

80. The Athlete's period of ineligibility with respect to the 2.1/2.2 ADRV ended on 31 January 2024.

81. The Single Judge finds that the Athlete's period of ineligibility for the violation of Article 2.5 of the IWF ADR is four (4) years, without any reduction.

82. The period of ineligibility is to commence on the date of notification of this Decision.

VIII. COSTS

(...)

IX. APPEAL

89. Pursuant to Article A21 of the ADD Rules, this award may be appealed to the CAS Appeals Arbitration Division within 21 days from receipt of the notification of the final award with reasons in accordance with Articles R47 *et seq.* of the Code of Sports-Related Arbitration, applicable to appeals procedures.

ON THESE GROUNDS

The Court of Arbitration for Sport rules that:

1. The Request for Arbitration filed by the International Testing Agency on behalf of the International Weightlifting Federation on 24 November 2025 against Abubakar Ghani is upheld.
2. Abubakar Ghani committed an anti-doping rule violation in accordance with Article 2.5 of the International Weightlifting Federation Anti-Doping Rules.
3. Abubakar Ghani is sanctioned with a period of ineligibility of four (4) years starting from the notification of this Decision.
4. (...).
5. (...).
6. All other motions or prayers for relief are dismissed.

Seat of arbitration: Lausanne, Switzerland
Date: 6 March 2026

**THE ANTI-DOPING DIVISION OF THE COURT OF
ARBITRATION FOR SPORT**

Carol Roberts
Single Judge