



TAS / CAS

TRIBUNAL ARBITRAL DU SPORT
COURT OF ARBITRATION FOR SPORT
TRIBUNAL ARBITRAL DEL DEPORTE

COURT OF ARBITRATION FOR SPORT (CAS)
Ad hoc Division – XXth Asian Games in Aichi-Nagoya 2026

CAS AG 26/01

sitting in the following composition:

Sole Arbitrator: Mr. Steven Bainbridge, Attorney-at-law, Dubai, United Arab Emirates

ARBITRAL AWARD

in the arbitration between

1/ National Olympic Committee of the Kyrgyz Republic

2/ Yryskeldi Duisheev

..... **Applicants**

v.

Asian Mixed Martial Arts Association (AMMA)

..... **Respondent**

Olympic Council of Asia (OCA)

National Olympic Committee of Tajikistan

Mr. Behruz Khurshedzoda

Tajikistan Mixed Martial Arts Federation

..... **Interested Parties**

I. THE PARTIES

1. The First Applicant is the National Olympic Committee of the Kyrgyz Republic.
2. The Second Applicant is Mr Yryskeldi Duisheev, a Mixed Martial Arts (“MMA”) athlete from Kyrgyzstan.
3. The Respondent is the Asian Mixed Martial Arts Association (“AMMA”).
4. The Interested Parties are the Olympic Council of Asia (“OCA”), the National Olympic Committee of Tajikistan, Mr Behruz Khurshedzoda, an MMA athlete from Tajikistan, and the Tajikistan Mixed Martial Arts Federation (“TAJMMAF”).

II. FACTS

5. The elements set out below are a summary of the relevant facts and based on the Applicants’ Application and facts subsequently made available to the Sole Arbitrator through correspondence and during the hearing.
6. Messrs Duisheev and Khurshedzoda competed against each other in one of two Men's MMA 71kg Semi-Final bouts at the 20th Asian Games Aichi-Nagoya 2026, on 22 September 2026.
7. Both regulation rounds concluded without the determination of a winner and the overtime round also ended in a draw.
8. According to the applicable tie-breaking provision (AMMA Competition Rulebook 8th April 2024), the athlete with the lower pre-competition bodyweight at official weigh-in, Mr Duisheev in the present circumstances, was declared the winner.
9. The delegation of Tajikistan requested a post-competition internal AMMA arbitration to challenge the scoring of the overtime round.
10. Three judges were randomly selected by the Tajikistan official through the application *Random Number Generator*, an electronic randomized system. At that time an additional three judges were also selected by the Kyrgyzstan official through the same electronic system.
11. The three judges selected by the Tajikistan official entered into a closed technical room and conducted their review of the video footage on a single screen in the absence of representatives of Kyrgyzstan and Tajikistan. In a very short period of time the review of the original overtime period by the first arbitration panel was completed and the result was reversed, negating the need for the competition body weight tie-break, and declaring Mr Khurshedzoda the winner.

12. The relevant Kyrgyzstan representative then immediately requested an internal AMMA counter-arbitration. The three judges previously selected by the Kyrgyzstan official, minus a judge of Kazakh nationality who was removed by competition officials (subsequently explained because Kazakhstan, like Kyrgyzstan, is within the Central Asia Zone, and judges from the same designated zone are, when resources so allow, excluded) and replaced, through the same process, with another judge from the available judges pool. The three judges for the counter-arbitration entered a closed technical room and conducted their review of the video footage of the overtime period on a single screen, again in the absence of any delegation representative, concluding in a very short time.
13. After their review, the officials informed the representatives of Kyrgyzstan and Tajikistan that Mr Duisheev had lost his counter-arbitration.
14. The Kyrgyz representatives queried on what scoring criteria and factual basis the overtime had been re-scored and how the final result had been determined. Neither substantive explanations nor any additional documentation was provided at that time. The representatives of Kyrgyzstan and Tajikistan were shown a form with handwritten notes containing what appeared to be the judges' scores and scoring conclusions.

III. PROCEEDINGS BEFORE THE COURT OF ARBITRATION FOR SPORT

15. On 22 September 2026 at 13:17 (Nagoya time) and in view of the upcoming final which was scheduled for the same day, the Applicants filed a "*Request for Arbitration and Application for Extremely Urgent Provisional Measures*". In their request they designated the AMMA, the OCA, the National Olympic Committee of Tajikistan and Mr Behruz Khurshedzoda as Interested Parties. They further submitted a request for the production of numerous items of additional information and documentation.
16. They submitted the following request for provisional relief:

"As a matter of immediate provisional relief

- 1. Order the immediate suspension or postponement of the Men's MMA 71kg Final at the 20th Asian Games Aichi-Nagoya 2026 until the present dispute has been determined;*
- 2. Order AMMA, OCA and the relevant Games competition authorities not to take any step that would render the Applicants' requested relief ineffective pending determination of this Application;*
- 3. Order the immediate preservation of all documents, electronic records, draw logs, scorecards, video footage and arbitration records relating to the disputed semi-final".*

17. On the same day, at 02:43 (Nagoya time), the CAS Ad hoc Division acknowledged receipt of the Application, notified it to the Respondent and to the Interested Parties and provided all Parties with a copy of the CAS Arbitration Rules for the XXth Asian Games (the “CAS Ad hoc Rules”).
18. In view of the extreme urgency of the case (the Men's MMA 71kg Final was scheduled at 16:04 (Nagoya time) on the same day) and pursuant to Article 14 of the Arbitration Rules for the Asian Games, Ms Corinne Schmidhauser, President of the CAS Ad hoc Division (the “President”), issued the operative part of the Order on Application for Extremely Urgent Provisional Measures (the “Order”) on 22 September 2026 at 15:23 (Nagoya time), denying the Applicants' first and second requests for immediate relief and granting the third.
19. The competition proceeded, Mr Khurshedzoda advanced to the competition Final, ultimately being awarded a silver medal, while Mr Duisheev's loss in the Semi-Final bout stood, resulting in the award of one of the two bronze medals issued for the competition.
20. On 24 September 2026, pursuant to Article 11 of the CAS Ad hoc Rules, the President appointed Mr Steven Bainbridge (United Arab Emirates) as sole arbitrator to hear the present dispute.
21. On the same day, the Sole Arbitrator invited the Respondent to state its position on the Applicants' production request and invited the National Olympic Committee of Tajikistan to confirm that Mr Khurshedzoda, who was notified via his National Olympic Committee, was duly informed about the present case.
22. The grounds of the Order were issued on 25 September 2026. With respect to the third requested relief, *id est* to “*Order the immediate preservation of all documents, electronic records, draw logs, scorecards, video footage and arbitration records relating to the disputed semi-final*”, the President determined that such relief did not jeopardise any interest of the Respondent or of the other persons or entities involved in the Asian Games. She therefore determined that such provisional relief be granted without prejudice to any future decision or assessment to be made by the Sole Arbitrator in due course on the Applicants' evidentiary requests, on CAS jurisdiction or on the merits of the case.
23. Pursuant to Article 15 of the Ad hoc Rules, the Sole Arbitrator issued a request for production of certain documentation from the Respondent and initiated communications through the CAS Ad hoc Court of Office to coordinate a hearing at the earliest convenience of the Parties and to ensure proper communication. The Respondent and the Interested Parties were granted the opportunity to submit a reply and *amicus curiae* briefs, respectively, but none of them chose to do so.

24. The Respondent confirmed applicable competition rules and provided: (i) official video footage of the bout including the overtime round; (ii) a copy of the “Arbitration Form,” an amalgamated scoring sheet for the arbitration and counter-arbitration; (iii) list of AMMA judges for the competition; (iv) slide deck from the Asian Games MMA Technical Meeting; (v) MMA Sport Technical Handbook for the Asian Games; and (vi) Notes from the AMMA Referee Committee Meeting from August 2026.
25. On 27 September 2026, further to a request from the NOC of Tajikistan that the case documentation be communicated to the TAJMAAF and to an email from this federation, the Court of Office of the CAS Ad hoc Division informed the Parties, on behalf of the Sole Arbitrator, that TAJMAAF was also an Interested Party.
26. After consultation with the Parties and all Parties having been duly informed and invited, a hearing was held on 30 September 2026 at 13:00 (Nagoya Time) by Webex video conference. In addition to the Sole Arbitrator and to Ms Pauline Pellaux, Counsel to the CAS, the following persons attended the hearing:

For the Applicants:

Kantoro Tokushev, Secretary General of the NOC of the Kyrgyz Republic

For the Respondent

Mr Galastein Tan (Director General)

Mr Lock Wai Han (Chair, Ethics Committee)

Mr Jiang Longyun (Technical Delegate for Asian Games – MMA)

Mr Logan Zhao (Deputy Director General)

Ms Zenn Huang (Deputy Director General)

Mr Damien Chan (Manager - AMMA Secretariat)

For the Interested Parties

Mr Farrukh Halimov (TAJMAAF General Secretary)

Mr Behruz Khurshedzoda (athlete).

The Second Applicant as well as the First and Second Interested Parties did not attend the hearing.

27. The Parties were invited to raise any objection regarding CAS jurisdiction or the composition of the Panel. No objection was raised and, before the hearing was concluded, the Parties confirmed that their right to be heard had been respected and had the opportunity to present their case.

IV. PARTIES' REQUESTS FOR RELIEF

28. Setting aside the request for urgent relief, which was dealt with through the Order, the Sole Arbitrator notes that the remaining substance of the "Request for Arbitration" is the request for preservation and production of materials and documentation, as an evidentiary measure to support the Applicants' following requests for relief:

"On the merits

4. Order the Respondent to produce the complete competition, arbitration and counterarbitration record identified in this Application;

5. Determine whether the judge-selection procedures used during the arbitration and counterarbitration complied with the applicable rules;

6. Determine the legal and factual basis for the exclusion of the judge from Kazakhstan selected during the counter-arbitration draw and the subsequent replacement selection;

7. Determine whether the safeguards required to ensure independent scoring and the prohibition on communication between the reviewing judges were properly implemented;

8. Determine whether the final result following counter-arbitration was calculated in accordance with the prescribed methodology involving the original judges, arbitration judges and counter-arbitration judges;

9. Determine the proper interpretation and application of the overtime tie-break provision in conjunction with the post-competition arbitration procedure;

10. If a material procedural or regulatory violation is established, annul the decision reversing Mr. Duisheev's victory;

11. Restore the sporting position existing before the defective post-competition procedure, including Mr. Duisheev's qualification for the Men's MMA 71kg Final;

12. Alternatively, grant such other sporting relief as the Panel considers appropriate to protect the rights of Mr. Duisheev and the integrity of the competition;

and

13. Grant any other relief the Panel considers just and appropriate”.

29. The Respondent maintains that the “Request for Arbitration” should be dismissed in its entirety, on the assertion that the post competition arbitration and counter arbitration were conducted in accordance with the applicable Competition Rules.
30. The Interested Parties, except for the first one, which did not participate in the present proceedings, made clear during the hearing that they are aligned with the Respondent in respect of the disposition of the Application.

V. JURISDICTION, SCOPE OF REVIEW AND ADMISSIBILITY

31. As a preliminary matter, the Sole Arbitrator notes that these proceedings are governed by the CAS Arbitration Rules for the Asian Games. They are further governed by Chapter 12 of the Swiss Private International Law Act of 18 December 1987 (“PIL Act”). The PIL Act applies to this arbitration as a result of the location of the seat of the CAS Ad hoc Division being in Lausanne, Switzerland, pursuant to Article 7 of the CAS Ad hoc Rules.
32. Neither the Applicants nor the Respondent contested the jurisdiction of the CAS Ad hoc Division for the XXth Asian Games or the CAS Ad hoc Rules as applicable to decide the dispute between the Applicants and the Respondent.
33. During the hearing the Applicants and Respondent affirmed their acceptance of such jurisdiction and no objection to CAS jurisdiction or to the admissibility of the “*Request for Arbitration*” was raised by any of the parties.
34. Accordingly, the Sole Arbitrator has jurisdiction to issue the present award.
35. The “Request for arbitration” further complied with the formal requirement provided for Article 10 of the CAS Ad hoc Rules and is therefore admissible.
36. According to Article 16 of the CAS Ad hoc Rules, the Panel has “*full power to review and establish the facts on which the application is based*”, the scope of such power might however still be limited by the field of play doctrine.
37. While the field of play doctrine does not restrict CAS jurisdiction, this doctrine affects the Panel’s scope of review of the merits of the case (cf. CAS OG/010 & 20/011, para. 41). According to CAS consistent jurisprudence, “*for a CAS Panel to overturn a field of play decision, there must be direct evidence that establishes, to a ‘high hurdle’, bad faith or bias (CAS OG 00/013; CAS OG 16/028), or, for example, that the decision was made as a consequence of corruption (CAS OG 00/013) or arbitrarily (CAS OG 12/010)*” (CAS OG/010 & 20/011, para. 45).

38. The Sole Arbitrator notes that, in the present case, the members of the arbitration and counter-arbitration committees were all accredited referees and functioned as such in their respective reviews.
39. He further notes that Article 12 of the XXth Asian Games Aichi-Nagoya 2026 Sport Technical Handbook Mixed Martial Arts (the “THB”) further expressly allows an appeal to the CAS *“in the event that the athlete/NOC believes there has been a violation of AMMA rules or OCA Constitution, as long as the appeal is not related to reversing the decision of the referee or the result”*. However, the applicability of this provision need not be addressed *in casu* as all Parties have consented to CAS jurisdiction.
40. The Applicants, in their initial “Request for Arbitration”, asserted that they were not seeking the review of a field-of-play decision and directed their application towards a claim that the Respondents breached applicable procedures of the Competition Rules.
41. Whether any procedural violation, as argued by the Applicants, should generally be excluded from the scope of the field of play doctrine is an issue that need not be addressed in the present case in view of the outcome of the Sole Arbitrator’s analysis of the application on its merits.

VI. APPLICABLE LAW

42. Under Article 17 of the CAS Ad hoc Rules, the Panel must decide a dispute *“pursuant to the Constitution of the Olympic Council of Asia, the applicable regulations, the general principles of law and the rules of law whose application the Panel deems appropriate.”*
43. *In casu*, the Parties exclusively refer, with respect to the merits of the case, to the AMMA Competition Rules of April 2024 (the “Competition Rules”) as well as to the THB, which are the regulations applicable to assess the merits of the present case.

VII. DISCUSSION

44. Having regard to the arguments advanced by the Applicants, the submissions made by the Respondent and the evidence upon which each of the Parties relies, the procedures give rise to the following issues for determination:
 1. *Have the Applicants demonstrated that the Respondent materially breached the Competition Rules?*
 2. *If so, does such breach(es) call for the provision of relief for the Applicants?*
 3. *If so, what relief is appropriate in consideration of the circumstances?*

45. The Applicants, in their original Application, did not allege a violation of any of the Competition Rules but rather (i) requested substantiation and proof that the rules had in fact been followed, and (ii) raised a number of queries as to how the Competition Rules were applied to the arbitration and counter-arbitration procedure, presumably to be able to assess the possible existence of and elicit evidence in support of establishing any violation.
46. The Sole Arbitrator is mindful that the expeditious nature of proceedings before the CAS Ad hoc Division, as well as the lack of detailed and more fulsome written submissions in advance of the hearing mean that parties may be somewhat disadvantaged in exhaustively developing certain elements which may have greater evidential support in the ordinary course. However, the Applicants have been provided with the relevant documentation in advance of the hearing and an understanding that evidence adduced at hearing may support one or more arguments underpinning a claim cannot be a substitute for an addressable assertion of an identifiable breach.
47. At the hearing, the Applicants had developed their claim beyond the original “Request for arbitration”, to specify that the Respondents had directly breached Article 19(b) of the Competition Rules which, *inter alia*, specify post-competition arbitration procedures.
48. More specifically, the Applicants allege several breaches of Article 19 (b) ii., which reads as follows:

“(ii) Arbitration Process

- *Team delegate and/or the coach submits the arbitration application and pays an arbitration fee of USD 1000.*
- *The arbitration committee will cross-check the scorecards of the judges to confirm if there are any errors or incorrect penalties. If there are mistakes, the arbitration committee will address them, and*
- *no counter-arbitration will be accepted. If there are no errors by the judges, the arbitration process continues.*
- *If the match score remains unchanged, the arbitration applicant draws lots to randomly select three (3) judges. The arbitration committee will organize the judges to rescore the bout. Rescoring will occur independently based on video footage of the bout and no communication between the three (3) judges will be allowed.*

- *If rescoring does not change the results of the bout, the post-competition arbitration is deemed to have failed, and any further requests for arbitration of the bout will not be accepted.*
- *If rescoring changes the results of the bout, the athlete's opponent can apply for counter-arbitration without needing to pay the arbitration fee.*
- *If counter-arbitration is accepted, the counter-applicant will select three (3) judges randomly by draw. The arbitration committee will organize the judges to rescore the bout. Rescoring will occur independently based on video footage of the bout and no communication between the three (3) judges will be allowed.*
- *The final result of the counter-arbitration process will be determined based on the summary of the three (3) judgement results from: the original score of the bout, the arbitration score, and the counter-arbitration score, i.e. the total score of nine (9) judges.*
- *The result after counter-arbitration is final and will no longer allowed to be contested.*
- *When post-competition arbitration succeeds, the arbitration fee will be returned to the applicant. If the arbitration fails, the arbitration fee will not be returned to the applicant".*

49. Specifically, the Applicants assert that Article 19(b) of the Competition Rules was breached in respect of four separate issues:
1. The electronic random draw procedure was not followed correctly;
 2. The nine judges calculation was not properly followed;
 3. The independent scoring requirement (no consultation between judges) was not followed; and
 4. No details or explanation were provided with the decision.
50. The burden is on the Applicants to establish that there was a material breach of the Competition Rules by the Respondents. This is not a trivial burden and, in order to be adequately discharged, requires substantial evidentiary support.
51. While the Applicants raise certain questions in respect of arbitration and counter-arbitration procedures and indicate potential points of concern where more optimal measures could perhaps have been taken (for example in respect of transparency, providing additional documentation, resourcing, etc.), this does not rise to the level required to establish that a material breach was present.

52. Specifically, following the sequence set forth above (para.49), the Applicants' assertions lack adequate evidence to sustain the serious allegations of breach. In respect of the electronic selection of judges for the arbitration and counter-arbitration, the Applicant raised two distinct issues concerning the procedure undertaken.
53. First, it is not disputed that the selection process was made for all six judges before the arbitration (i.e., a sufficient number of judges to conduct not only an arbitration but also a counter-arbitration, which counter-arbitration had not at that point – and might have not ever – been required). While arguably combining two separate procedural steps, the Respondent's evidence that this was merely a time-saving and practical efficiency was credible and is accepted by the Sole Arbitrator.
54. The second issue raised by the Applicant regarding judge selection was an initially unexplained judicial substitution that was made in respect of the counter-arbitration. Specifically, a judge from Kazakhstan was randomly selected but then replaced. On evidence given at the hearing the reasoning (that fellow regional countries should not judge matters involving regional neighbouring states) was made clear and the Sole Arbitrator is satisfied it was not contrary to the Competition Rules, was standard practice and was within the reasonable discretion one should anticipate of a body implementing such rule set.
55. Details of the complete nine judge scoring of the overtime round was provided at the hearing, to supplement the six arbitration and counter-arbitration judge scores that had already been provided. In any event, a reversal of the result would have been mathematically impossible given the arbitration and counter-arbitration scoring.
56. The Applicants raised concerns about the brevity of the timing of the arbitration and counter-arbitration scoring review exercises, the possibility that because the judges were in the same room, they may have spoken during deliberations and the synchronicity of the scores submitted by the final six judges. The Respondent asserted without being contradicted that a neutral party (a representative from Sportsdata/Bornan the games management system service provider used by AMMA) was present and there was no credible evidence adduced to suggest that any of those concerns were founded, effectively leaving the suggestions as bald assertions without merit.
57. In respect of the lack of detail provided by the AMMA officials after the arbitration and counter-arbitration proceedings, the Sole Arbitrator is not without some concern as to the difficulty this leaves the athletes with; however, given the timing dynamics during competition and the lack of expressly detailed requirements in the Competition Rules, the situation does not lend support to a claim of any breach of the Competition Rules.

58. In fact, comments from both sides during the hearing suggested that the AMMA may be willing to revisit the Competition Rules in advance of the next major competition. If so, rather than an admission of any material breach in application of the Competition Rules in this case, one could suggest this is a positive indication of a willingness to enhance and incrementally develop the Competition Rules in a manner that will improve the administration of the sport for the benefit of participants, administrators, coaches and officials. The sport of Mixed Martial Arts made its debut at the XXth Asian Games in Aichi-Nagoya and it is expected that its rules and practices will become better known and more transparent over time.
59. The Applicants have failed to sufficiently establish that any material breach in the application of the Competition Rules occurred in the present circumstances. As such, the first key question for determination (identified at para. 44 above), specifically: *Have the Applicants demonstrated that the Respondents materially breached the Competition Rules?* must be answered in the negative.
60. The Sole Arbitrator takes the view that because this fundamental question is answered in the negative, it is not necessary to consider the second or third questions and the application must fail on its merits.

VIII. DECISION

61. In light of the above, the Sole Arbitrator deems that the Applicants' Application shall be dismissed in its entirety.

IX. COSTS

62. According to Article 22 para. 1 of the CAS Ad hoc Rules, the services of the CAS Ad hoc Division "*are free of charge to the parties*".
63. According to Article 22 para. 2 of the CAS Ad hoc Rules, parties to CAS Ad hoc proceedings "*shall pay their own costs of legal representation, experts, witnesses and interpreters*".
64. Consequently, there is no order as to costs.

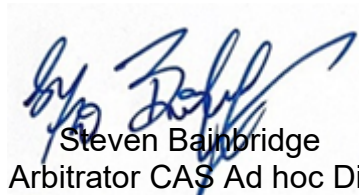
DECISION

The Ad hoc Division of the Court of Arbitration for Sport renders the following decision:

1. The “Request for Arbitration” filed by the National Olympic Committee of the Kyrgyz Republic and by Yryskeldi DUISHEEV against the Asian Mixed Martial Arts Association on 22 September 2026 is dismissed in its entirety.

Nagoya, 3 October 2026

THE AD HOC DIVISION OF THE COURT OF ARBITRATION FOR SPORT

A handwritten signature in blue ink, appearing to read 'S. Bainbridge', is written over a light blue rectangular background.

Steven Bainbridge
Sole Arbitrator CAS Ad hoc Division