

GAA ANTI-DOPING HEARING COMMITTEE

RE: THOMAS CONNOLLY

The Committee wish to place on record its thanks to Counsel in this case for their diligence in the preparation of written and oral submissions and for the expeditious manner in which the hearing was conducted. The Committee also thank Paul Keane of Reddy Charlton Solicitors and Mr Dessie Farrell of the GPA for their assistance in the conduct of this matter. Thanks also to Dr May of the Irish Sports Council for her attendance and for her assistance in the provision of the additional report from Dr Geyer. In particular, we thank our secretary, Mr Stephen Browne BL and our stenographer Colin Hackett.

We would also thank all the witnesses who gave evidence in this case, particularly those who attended on a voluntary basis.

1. Introduction:

- 1.1 Thomas Connolly (hereinafter referred to as 'the Athlete') was born on 23 February 1992. From a very early stage in his life he has played for Latton Gaelic Football Club in Co Monaghan. He was a non-playing member of the Monaghan Minor Football Panel for one year and was involved with the County Under-21 team for 2 years playing one championship match before elimination from the competition. In or about November 2014, he was invited to attend training and to play a number of practice matches with the

Monaghan Senior County Football Panel. He trained with the Panel until March 2015, sometimes training 4 nights per week. During that time he played one full half of a McKenna Cup Match and made two other brief appearances (for 5 minutes each) as a substitute in Monaghan's remaining McKenna Cup Games. The Committee were satisfied that at all relevant times the athlete was a member of the GAA.

1.2 He was named on the Panel for one National League game and continued to train with the team when he was subjected to an out of competition testing by the Irish Sports Council (hereinafter referred to as ISC) on 13 February 2015 at a training session with the County Panel at Cloghran, Co Monaghan. Upon analysis, the Deutsche Sporthochschule Min Instilut IUr Biochemie reported the presence of a prohibited substance, namely, Stanozolol in the Athlete's 'A' sample. Stanozolol is listed as an exogenous anabolic androgenic steroid under the WADA prohibited list.

1.3 On 18 March 2015, the ISC notified the Athlete of an Adverse Analytical Finding and informed him that he was being charged with the following anti-doping Rule violation, (hereinafter referred to as an 'ADRV'), namely –

'Article 2.1 – the presence of a prohibited substance or its metabolites or markers in your sample'

On 3 April 2015, the Athlete responded to the ISC's notification and admitted to the ADRV indicating, however, that he wished to dispute/seek to mitigate

the consequences of the ADRV and requesting a hearing before the GAA Anti-doping Hearings Committee.

On 10 April 2015, the ISC wrote to the Athlete confirming that, in accordance with his indications, the matter had been referred to the GAA Anti-doping Hearings Committee.

2. History of Hearings:

2.1 The Anti-doping Hearings Committee met on the 27 April 2015. It received written submissions on behalf of the Athlete; written submissions on behalf of the GAA together with an expert report issued by Dr. Hans Geyer; a summary of proposed witness statements from Mr Feargal McGill – GAA Director of Games Administration and Player Welfare GAA Representative; Mr Ruairi Harvey – GAA Former Player Welfare Administrator and Mr Ryan Porter – Monaghan Strength and Conditioning Coach. The Committee heard oral submissions from Counsel - Mr Aaron Shearer BL on behalf of the Athlete and Mr David Casserly BL on behalf of the GAA. The Committee also heard evidence from the Athlete in respect of tablets he had consumed prior to the out-of competition testing. The Athlete admitted that he had taken tablets prior to the testing and at the hearing produced the actual container and the remainder of the batch of tablets which he kept in his possession before passing them on to his representatives. The container indicated that the tablets in question were Anavar 10. Dr Geyer in a report dated 27 April 2015 indicated that Anavar is a trade name of the prohibited anabolic steroid Oxandrolone. The ingestion of these tablets, as admitted by the Athlete,

would not have explained the finding of Stanozolol in his sample. Mr Shearer, on behalf of the Athlete, applied to have the hearing adjourned so that the tablets produced by the Athlete could be tested by Dr Geyer to establish the actual ingredients as he was acting under the firm instructions from the Athlete that these were the only tablets he had taken at any time prior to the testing. The Committee agreed to adjourn the hearing to enable the tablets to be tested as it felt this issue would be crucial in determining the credibility of the Athlete which could have a significant bearing on the outcome of the hearing.

2.2 The Committee reconvened on the 3 June 2015 at which stage it had received a further report from Dr Geyer who confirmed that he tested the tablets provided by the Athlete and confirmed that they did in fact contain Stanozolol and not Oxandrolone, which was declared on the label. At the reconvened hearing the Committee heard further submissions from Counsel and also heard evidence from Mr McGill; Mr Harvey; the Athlete; Malachy O'Rourke, Manager of the Monaghan Senior Football Team and Pdraig Sherry, Chairman of the Monaghan GAA County Board.

3. **Decision of the Anti-doping Hearing Committee:**

3.1 Has the Athlete committed an Anti-doping Rule Violation under the Irish Anti-doping Rules?

The GAA allege that the Athlete is in breach of Article 2.1 of the Anti-doping Rules by reason of the presence of a prohibited substance in his sample.

On the face of it, it would seem that the Athlete is clearly in breach of the relevant provision. He has not disputed the presence of the prohibited substance in his sample. Indeed, when he wrote to the Sports Council on 3 April 2015 (a letter which was written on his behalf) he states –

‘please be advised that I am admitting the ADRV outlined in your letter but wish to dispute and/or seek to mitigate the consequences specified in the letter and wish to request a hearing before the GAA Hearings Committee’

However, at the hearing Mr Shearer challenged the authority of the Sports Council to test the Athlete and argued that the Rule upon which the GAA relied could not be enforced against the Athlete. In summarising his arguments we hope not to do a disservice to his detailed and thoughtful written and oral submissions. In short, he argued firstly that the authority to test Gaelic players was limited to Senior Inter-county players and secondly that because of a failure to inform the Athlete of the existence of the Anti-doping provisions in the GAA Rules, the relevant Rule could not be enforced against him under, what he referred to as ‘the Red Hand Rule’ as set out in the case of *Carroll v An Post* (1996) 1 IR 443.

In relation to his first argument he referred the Committee to the Irish Sports Council Website which indicated that the National Testing Pool for athletes included *'Senior Inter-county players in GAA'* and also to the GAA Website which in its Anti-doping Section contains the following information –

'In July 2001 the GAA agreed to begin drug testing Senior Inter-county players as part of an agreement with the Irish Sports Council'

He further referred to that part of the Website which states –

'all Inter-county players may be selected for testing. Indeed it is a condition of eligibility for the Government Eligible Expense Scheme. All County Team support personnel, eg, managers, coaches, medical personnel, nutritionists, psychologists, officials) have a responsibility to ensure that they are aware of the Irish Anti-doping Rules and that there is an atmosphere supporting a drug-free sport within each County'

He pointed out that neither the ISC nor the GAA have any clear definition of what is meant by 'a Senior Inter-county Player in GAA'. He did refer to two documents in which there is reference to 'Senior Inter-county Players' namely the GAA Official Guide and a Memo of Agreement between GAA and GPA for disbursement of funding provided under ISC Inter-county Players Support Schemes. He argued that the Committee could not be satisfied that there was a jurisdictional basis to test the Athlete. In reply Mr Casserly BL argued that in fact the relevant Rule in the GAA Official Guide makes it clear

that the Irish Anti-doping Rules are part of the Rules of the GAA and that the Rules apply to all athletes which include any person competing at any level under the authority of a sports organisation. He further argued that in any event on any showing the Athlete was in fact a Senior Inter-county player. The specific definitions to which Mr Shearer referred were definitions for a specific purpose and could not be the basis for an appropriate definition for the purposes of anti-doping tests. Indeed if those definitions were accepted as the appropriate definitions, then it would be virtually impossible to test Senior Inter-county players at all. In his evidence, Mr McGill referred to an Appendix to the Official Guide in 2003 which dealt with drug testing within the GAA. That Appendix defined participants who were subject to the Code as –

‘any player, coach, trainer, official, adviser, medical or paramedical personnel working with or treating players participating in or preparing for any Senior Inter-county Championship and National League Games’

The same Appendix also indicated that *‘this Code applies to all participants competing in or concerned with senior football and hurling, Inter-county Championship and National League games’*. From 2006 onwards the GAA Rules became in effect the Irish Sports Council’s Rules which ultimately led to the current situation whereby the Rules are applicable to all athletes as set out above.

In relation to his second argument, Mr Shearer referred the Committee to the body of jurisprudence dealing with what has been judicially described as ‘the Red Hand Rule’. In essence he argued that the relationship between the Athlete and the GAA was a contractual one and that where contractual documentation (in this case the GAA Rules) includes conditions so onerous or unusual (in this case the requirement to submit to anti-doping testing) that they fundamentally alter or undermine a party’s rights under contract, so much so that the terms or conditions in question require to be specifically drawn to the attention of a party likely to be affected by them. He referred the Committee to the Judgement of Costello J in the case of *Carroll v An Post* (1996) 1 IR 443 and in particular the following –

‘If the condition relied upon by the party tendering the document is particularly onerous or unusual the party must show that it has been fairly and reasonably brought to the other party’s attention’

The Athlete asserted in his evidence, supported by Mr O’Rourke and Mr Sherry that throughout the time he was training with the Monaghan Senior Team he was never told about the existence of the Anti-doping Rules; about their applicability to him or of the sanctions which flowed from a breach of the Rules. He alleged that he was never advised of sources of information about anti-doping or given any instruction or education as to his obligations under the Rules. Mr Shearer also emphasised the fact that the Irish Sports Council in its Website states –

'National governing bodies of sport play a pivotal role in ensuring their membership are informed and educated about the Anti-doping Rules and ensuring that all athletes and all athlete support personnel participate in an environment that is drugs free and promotes the spirit of sport'.

He says that anti-doping testing is something which is onerous and something which must be drawn to the attention of an athlete before the Rules are enforceable.

In reply Mr Casserly argued that there is nothing onerous or unusual about anti-doping in sport. He called evidence from Mr McGill and Mr Harvey setting out the history of anti-doping in the GAA. The evidence indicated that use of drugs was contrary to the GAA Rules as long ago as 1988. The testing of Senior Inter-county players has been ongoing since 2001 and is now an established part of life for GAA Senior Inter-county players. In particular, Mr Harvey set out in detail the communication strategy of the GAA in relation to the question of anti-doping and he drew specific attention to e-mails sent to the Monaghan County doctor on the 8 December 2014 and to the Monaghan County Secretary on the 12 January 2015 drawing their attention to changes in the Anti-doping Rules which came into effect on the 1 January 2015. The e-mail specifically drew attention to the increased sanctions for anti-doping violations. The e-mail to the County Secretary asks that the e-mail with the booklet in relation to anti-doping which was attached be circulated to members of management teams within the County and to anyone involved with them. Mr Padraig Sherry, the Monaghan Chairman, indicated that he

had never seen this e-mail and that the information had not been circulated as requested. Mr Harvey indicated that since September 2012 until April of this year, he was the Player Welfare Administrator of the GAA and had played a significant part in the GAA's Anti-doping Programme. He referred to ongoing meetings with the Irish Sports Council and to an educational plan and communications plan which had been developed in consultation with both the Irish Sports Council and the GPA. He pointed out firstly that the GAA Rules themselves were widely available for members and that the GAA's website provided easy and ready access to the Anti-doping Rules and the obligations being placed on Inter-county medical teams, Inter-county management teams and players together with their support personnel. He referred to e-mail correspondence which had been sent; to a medical conference organised in Croke Park in November 2014 which was actually attended by the Monaghan physiotherapist, to wallet cards which are circulated to players by the GPA and to other communication tools, such as e-booklets on anti-doping. However, he was not in a position to contradict the evidence of the Athlete that he had not been personally informed of the existence of the Rules and their implications.

Mr Casserly urged the Committee to draw an adverse inference from the athletes failure not to call evidence from the colleague who supplied him with the tablets. However we were not willing to do so and did not want to speculate on the many potential reasons why he did not attend the hearing.

3.2 The Panel's Decision in Relation to the Alleged Anti-doping Rule Violation:

The Committee carefully considered the submissions of Mr Shearer and all the evidence on this issue. We are satisfied that the Athlete's submissions should be rejected for the following reasons:-

- (a) The Rules of the Association are clear. Article 1.15 of the GAA Official Guide provides as follows:-

'The Association forbids the use of prohibited substances or methods, a practice generally known as doping in sport. The Rules of the Association regarding doping are the Irish Anti-doping Rules as adopted by the Irish Sports Council and as amended from time to time. The Rules contained in the said Irish Anti-doping Rules have effect and be construed as Rules of the Association'

The Anti-doping Rules of the GAA are therefore the Irish Anti-doping Rules.

The IADR Rules provide that they apply to *'all athletes and other persons who are members or licence holders of a National Governing Body and/or a member or affiliate organisation or licensee of a National Governing Body'*

and the term *'athlete'* is defined as –

‘any person who competes at any level of any sport under the authority of any signatory, government or other sports organisation accepting the Code, including any person who competes in sport at the International Level (as defined by each International Federation) or the National Level.’

Articles 1.3.2 and 1.3.2.1 of the IADR provide as follows:-

***‘1.3.2** – to be a member of a National Governing Body and/or of a member or affiliate organisation or licensee of a National Governing Body or to be eligible to participate (in the case of an athlete) or assist any participating athlete (in the case of an acting support person) in any event, competition or other activity organised, convened, authorised or recognised by a National Governing Body or any of its members or affiliate organisations or licensees, a person must agree to be bound by and to comply with these Rules. Accordingly by becoming such a member or by so participating or assisting an athlete or athlete support person shall be deemed to have agreed -*

***1.3.2.1** – to be bound by and to comply strictly with these Rules without prejudice to any other Anti-doping Rules applicable to him or her.’*

Furthermore, Article 2.1 (d) of the GAA Official Guide provides as follows:-

‘The rights of a Member of the Association shall be conditional upon the Member complying with the Rules and Regulations of the Association and Club, including payment of any annual membership fees and levies. Such rights may be withheld, restricted or suspended in accordance with the Rules of the Association or Club’

As a Member of the GAA the Athlete is subject to the Rules set out above and by his own admission is in breach of Article 2.1 of the Anti-doping Rules which are part of the GAA Rules which are applicable to him as a Member of the GAA;

- (b) We do not accept therefore that the Irish Sports Council does not have the authority to test the Athlete. Under the existing Rules of the GAA it is not necessary that he be a Senior Inter-county player before he can be tested. It appears to be the case that as a matter of practice and as a result of an agreement between the GAA and the Irish Sports Council, it is only Senior Inter-county players who are in fact tested. Insofar as it is relevant the Panel’s view is that the Athlete clearly was a Senior Inter-county player at the time he was tested. He had been training with the Monaghan Senior Panel for over 3 months. He had represented the Monaghan Senior

County team in 3 matches in an official competition, the McKenna Cup. He was a Member of a Panel for the National League game. He continued to train with the Panel at the time he was tested. We are of the view that on any rational analysis of the facts he was an Inter-county player at the relevant time;

- (c) We do not believe that the 'Red Hand Rule' assists the Athlete in the circumstances of this case. We do not accept that the Anti-doping Rules which are applied to GAA players and in particular, GAA Inter-county players are either unusual or particularly onerous. The Anti-doping Rules are part and parcel of the life of Inter-county players in the GAA. The use of drugs has been expressly prohibited in the Rules since 1988. There has been testing of players since 2001. Mr O'Rourke who gave his evidence in a very straightforward and forthright manner indicated that he himself had been tested when he was a player and he was aware that testing had taken place for Monaghan players, both in competition and out of competition. Indeed this testing could not have taken place without officials in Monaghan notifying the Irish Sports Council as they were obliged to do of where and when they are training. In the course of the hearing there was much debate about whether or not Members of Senior County Panels were '*elite athletes*' and whether it was fair to put them in the same category as professional athletes. Whilst this debate was very interesting the truth is that it does not really impinge on this

Committee's decision. We are, however, aware from our own knowledge that the vast majority of Irish sports persons who come before Anti-doping Panels are amateur athletes. Certainly Inter-County GAA players enjoy a very high profile within the sporting arena in Ireland. But in any event, the fact remains that the Anti-doping Rules apply to GAA players. Having heard the evidence of Mr McGill and Mr Harvey and that of Mr O'Rourke, we are of the view that the information that Inter-county players are subject to testing for anti-doping and to the Anti-doping Rules is easily and readily available to all GAA players. We simply do not accept that lack of knowledge by an Inter-county player would justify him/her being excluded from Anti-doping Rules which are so well established;

- (d) Whilst there is undoubtedly an obligation on a National Governing Body such as the GAA to educate and inform its Members, the fundamental principle remains that the primary obligation to ensure that an athlete complies with Anti-doping Rules rests with the athlete himself. It is each athlete's personal duty and responsibility to ensure that he/she does not permit a prohibited substance to enter his/her body. As Mr O'Rourke said in his evidence –

*I do understand that players are subject to Anti-doping Rules,
yes,*

Q. OK, and do you think that they have a responsibility to make sure that they don't take steroids, for example?

A. Yeah'

(e) In coming to its decision the Committee is also mindful of the underlying fundamental purpose of Anti-doping Rules. The Rules are there to protect the good name both of sport and of a clean athlete, to ensure a level playing field for all competitors including team mates, the interests of the clean athletes and for protecting the ethic of sport. An important factor also is the health of the athlete who uses drugs. In this case, for example, we would be very concerned that the use of the anabolic steroid in question could have had an adverse impact on the health of the Athlete.

(f) There was ample information on doping readily available to the Athlete.

Therefore the Committee has come to the decision that the Athlete has committed an Anti-doping Rule Violation under Article 2.1 of the 2015 Anti-doping Rules by reason of the presence of a prohibited substance, namely, Stanozolol, in a sample provided by him on 13 February 2015.

Notwithstanding this finding the Committee is seriously concerned about the apparent lack of understanding and application of the anti-doping rules and processes at County Level in this case. Whilst we were impressed by the evidence of Messers McGill and Harvey in respect of anti-doping education at central level, we would urge the GAA to intensify its work to ensure that all players, county officers, coaches, managers, medical and allied sports science personnel and players representatives are fully cognisant of their obligations under the Association's anti-doping rules.

4. **Sanction:**

4.1 Article 10.1 of the IADR provides as follows:-

'10.1.1 – the period of ineligibility imposed for a violation of Article 2.1 ... shall, subject to the conditions for a potential reduction or suspension under Articles 10.3, 10.4 or 10.5 be 4 years'

As has been indicated by Mr Casserly in his submissions, the 4 years suspension is the standard suspension for this offence. The Rules, however, do provide for some potential for a reduction in a suspension but only in very limited and strictly defined circumstances. The effect of 10.1.1 and 10.1.2 of the Rules is that it is open to the Committee to reduce the period of suspension to 2 years if the athlete can establish that the Anti-doping Rule Violation was '*not intentional*'.

10.1.3 provides that *'as used in Articles 10.1 and 10.2, the term 'intention' is used to identify those athletes who cheat. The term, therefore, requires that the athlete or other person engaged in conduct which he/she knew constituted an Anti-doping Rule Violation or knew that there was a significant risk that the conduct might constitute or result in an Anti-doping Rule Violation and manifestly disregarded that risk'*.

Thus it is clear that if we are to reduce the period of suspension from 4 years to 2 years, the Athlete must in effect satisfy the Committee that when he ingested the tablets in question he neither did so intentionally or recklessly. In applying this test, the Committee had regard to the decisions of CAS which were referred to us by Mr Casserly in his very comprehensive and detailed written submissions.

The Athlete set out his version of events as to how the prohibited substance was present in correspondence, in written submissions and in oral evidence. He indicated that he was given a container with tablets by a work colleague, whom he named. He said the colleague gave him these tablets because he, the Athlete, was complaining of pain and stiffness as a result of the training he had undertaken with the County Panel. He took 4 tablets per day – 2 in the morning and 2 with his dinner for 4 or 5 days and stopped using the tablets a day or two before he was tested because they were of no benefit to him and he continued to feel the pain. He asserts that he did not take the product with a view to enhancing performance but hoped that it would

relieve his pain. He says he was not aware that the product he took was a prohibited substance. When he took the drug test on the 13 February 2015 he had no inclination at all that he might test positive and he made no effort to avoid testing. He did not pay for the tablets and as is apparent from earlier in this decision he kept them after the test and they have since been tested by Dr Geyer who has confirmed that they were Stanozolol. The work colleague who provided the tablets had no medical training or qualifications. He never thought for one minute that they were anabolic steroids.

This evidence was strongly challenged by Mr Casserly in cross-examination. Mr Casserly's submission on behalf of the GAA was that the Athlete knew he was ingesting anabolic steroids. He knew he would be playing at a higher level in 2015 , ie, Senior Inter-county, which could also explain why he was having to adjust to the rigors of increased and/or more training in preparation for competing at this level. Any potential pain about which the Athlete complained to his work colleague was clearly linked to his goal to be able to endure and/or excel at the rigor of the training to which he was being subjected. He chose to accept tablets from a non-medically qualified person. He did not seek the advice or help of the Monaghan Team doctor or Nutritionist. He did not seek the assistance of a Pharmacist. He took the tablets in a regimented fashion consistent with anabolic steroid use rather than pain relief. Mr Casserly drew attention to the fact that the Athlete did not disclose his use of these tablets when asked about any other products he was taking at the time of the testing. At the very least he must have been reckless to the fact that he was using a prohibited substance.

The Committee found this the most difficult aspect of the entire case. Having considered the matter carefully and having regard to all the evidence and submissions, we have come to the view that the Athlete has established the Anti-doping Rule Violation was not intentional. Implicit in this is that we do not consider that he was reckless. The decision for us was a very finely balanced one. At the end of the day we were influenced by the following factors in his favour:-

- (a) he promptly admitted the presence of the prohibited substance and did not insist on his 'B' sample being tested;
- (b) the report from Dr Geyer which was obtained between the two hearings, gave support to the account he gave in his correspondence and to the Committee. This was so not only in terms of the actual substance itself, but also the extent of the use of the substance which was also consistent with Dr Geyer's analysis of the sample. We consider that this finding added considerably to his credibility;
- (c) whilst his apparent lack of knowledge of the Anti-doping Rules could not operate as a defence to the violation itself, we do consider that it is relevant in terms of assessing his state of mind when he agreed to take the tablets in question and could well explain, what we consider to be, his naivety in the matter;

- (d) most importantly of all we had the opportunity to hear Mr Connolly in person and form a view as to the truth of his evidence.

The Committee went on to consider whether it would be appropriate to reduce the suspension further under the provisions of Article 10.4.2 of the Rules. In order for this to apply, the Athlete needs to establish that he bears no significant fault or negligence (ability to be reduced to a minimum of one year). In order for this to apply the Athlete must establish, on the balance of probabilities –

- (i) how the prohibited substance entered his body,
and
- (ii) He was not significantly at fault or negligent in committing the Anti-doping Rule violation.

Having regard to what we have found above, we are satisfied as to how the prohibited substance entered the Athlete's body. However, as is implicit in our reservations in terms of intention or recklessness, we are not satisfied that the Athlete has established no significant fault or negligence in committing the Anti-doping Rule Violation. Whilst we accept that his conduct falls short of recklessness, we consider that there is a high degree of negligence in this case.

The Athlete is someone who has been involved in GAA sport for most of his life. He has been on County Panels at both Minor, Under 21 and Senior Level. We accept that it was highly unlikely that he would have made the Monaghan Championship team but nonetheless was participating at a relatively high level. He is someone who had medical problems in the past and presumably would have been aware of the importance of his health and would have been familiar with medical treatment. He chose to accept tablets from a work colleague with no medical qualifications. He did not seek advice from a doctor, pharmacist, nutritionist or anyone involved in the Monaghan set-up. He appears to have taken no steps to identify what it was that was provided to him, something he did quite easily after the substance was detected. We consider that he was guilty of a high degree of negligence in consuming the tablets in question.

Given this finding, it is not necessary for us to consider whether the Athlete can establish no negligence.

5. Decision:

5.1 The Committee, having considered the evidence and the submissions made to it determine that there has been a violation of Article 2.1 of the Anti-doping Rules.

5.2 The Committee further determine that the Athlete has established that the Anti-doping Rule Violation was not intentional as per Rule 10.1.3.

5.3 The Committee further determine that the athlete has failed to establish that there was no significant fault or negligence as per Rule 10.4.2.

5.4 The Committee, accordingly determines, that the automatic period of 4 years ineligibility be reduced to 2 years commencing from the 18 March 2015.

5.5 The Committee makes no order in relation to costs.

5.6 The parties have a right of appeal in respect of this decision. Under the agreement between the GAA and the ISC such an appeal lies with the Irish Sport Anti-Doping Disciplinary Panel.

Any person who wishes to appeal this decision must lodge a notice of appeal with the Chair of the Irish Sport Anti-Doping Disciplinary Panel within 21 days. The Notice of Appeal shall:

- specify the decision being appealed;**
- provide a statement of the grounds upon which the appeal is being made;**
- state whether interim relief is sought and/or whether expedited proceedings are required; and**
- confirm that a copy of the Notice of Appeal is being served simultaneously on any person entitled to notification pursuant to Article 13 of the Irish Sport Anti-Doping Rules.**

Adrian Colton QC
Chairman

Dr Pat O'Neill

Nickey Brennan