



**Operation Delphin**

2021-020

30 May 2022

## Executive Summary

The World Anti-Doping Agency Intelligence and Investigations Department has completed Operation Delphin, an investigation into allegations involving the Bulgarian Swimming Federation (“BSF”). More specifically:

- (i) That a doping program existed within the BSF. (“Allegation One”)
- (ii) That BSF athletes (including minors) were unwittingly doped with supplements (the “Supplements”) that the BSF supplies and requires the athletes to take. (“Allegation Two”)
- (iii) That BSF Chairman Georgi Avramchev (“Chairman Avramchev”) was secretly recorded saying he could protect doped athletes from discovery and sanction. (“Allegation Three”)
- (iv) That the National Coaches of the BSF solicited athletes for 30% of their earnings in recognition of their coaching. (“Allegation Four”)

During the investigation, Operation Delphin also discovered potential non-compliance issues by the Bulgarian Anti-Doping Center (“BADC”).<sup>1</sup> These issues have since been resolved (See “Compliance Issues”).

### Background

On 4 February 2021, three BSF athletes<sup>2</sup> (collectively, the “Athletes”) were tested out-of-competition at a training camp for the National Team (the “Training Camp”). The samples of all three reported an Adverse Analytical Finding for Stanazolol (the “AAFs”).

On 15 February 2021, the media entity, “Sports Integrity Initiative”, reported (the “Article”) allegations that a doping program existed within the

BSF, that the Athletes were unwitting participants in the program, and that they had tested positive for Stanazolol. The Article also purportedly quoted the Athletes as claiming they were compelled by coaching and medical staff to take the Supplements during training camps and were not told what the Supplements contained.

On 23 February 2021, the BADC notified the Athletes of their suspected violation of World Anti-Doping Code Article 2.1 (Presence).

On 3 March 2021, the Sports Integrity Initiative further reported allegations that Chairman Avramchev had been secretly recorded (the “Recording”) on 25 February 2021, telling the Athletes that had he known they were in danger of testing positive, they would not have been tested. In other words, had he known of the doping, Chairman Avramchev would have protected the Athletes from discovery and sanction.

On 9 March 2021, Operation Delphin commenced.

On 12 April 2022, following an extensive hearing, the Bulgarian Disciplinary Commission found the Article 2.1 (Presence) violation proved and imposed a four-year period of ineligibility on the Athletes.

### Allegations One and Two

Allegations One and Two were ostensibly advanced by the Athletes in explanation of their AAFs. In other words, according to the Athletes, the AAFs were evidence that the doping program existed and that supplements provided by the BSF during training were to blame.

Operation Delphin found both allegations unsubstantiated. More specifically, the investigation established that:

- (i) It was “likely”, based on the concentration of Stanazolol in the samples, that Stanazolol entered the bodies of the Athletes one or two days prior to Sample Collection.

<sup>1</sup> This is the National Anti-Doping Organization for the Republic of Bulgaria.

<sup>2</sup> Names withheld for privacy.

- (ii) The Athletes produced no evidence as to how the Stanazolol had entered their bodies.
- (iii) Supplements administered during the Training Camp, that were seized and analyzed by the BADC, were not contaminated with Stanazolol and, therefore, did not cause the AAFs.<sup>3</sup>
- (iv) There was no evidence of a doping and protection program within the BSF.

On the issue of supplements, Operation Delphin established that while athletes were encouraged to take the supplements supplied by the BSF, the supplement program was voluntary, and athletes were not compelled to take part. That said, Operation Delphin found that the supplement program was poorly operated and managed by the BSF, for example, no records of dosage, administration or type of supplement were kept. Moreover, no consent forms were obtained from participants in the supplement program, and better education should have been provided about the risks associated with supplements. That said, as a direct result of Operation Delphin, the BSF has greatly improved its supplement program, particularly in the areas of education and record keeping.

### Allegation Three

Operation Delphin, with the assistance of WADA's Confidential Information Unit, obtained a copy of the Recording. However, despite forensic enhancement, the audio quality was very poor, and many inaudible segments remained.

That said, within the audio Chairman Avramchev could be heard saying: *"Do you think that if we gave, I mean doping, something, we would let you in the team? Won't we hide you then and tell you corruption, that is one to one, right? You were part of the team, so at least you know."*

The conversations surrounding and contextualising this statement were impossible to decipher.

Chairman Avramchev confirmed to Operation Delphin that it was his voice in the Recording, but

<sup>3</sup> The BADC obtained and tested 13 supplement products from the BSF. These supplements included those provided to athletes (including the Athletes) during the Training Camp and

explained his statements were an analogy used to emphasise the absurdity of the allegation, namely, that the BSF would secretly dope athletes to enhance their performance but then test them. The Chairman refuted any suggestion that his statements indicated that he would or could hide doping or protect a doped athlete.

Operation Delphin found no evidence of a cover-up, attempted or otherwise, by Chairman Avramchev. Moreover, the Recording in and of itself does not support the allegation and was therefore unsubstantiated.

### Allegation Four

A senior coach of the National Team ("Coach A")<sup>4</sup> admitted to Operation Delphin that on one occasion he asked athletes from the National Team to give 30% of their event earnings to the National Coaches. Coach "A" contextualised the request by saying that athletes had shared their earnings with their personal coaches, but not the National Coaches who had worked just as hard, if not harder than the personal coaches. Coach "A" explained that the request had only ever been made once and, in any event, the athletes ignored the suggestion and never paid any money.

This conduct, by Coach "A", fell outside the jurisdiction of the Code; however, it may be captured by the BSF Code of Ethics. To this end, it is a matter for the BSF as to what, if any, action it takes in response to this allegation.

### Compliance Issues

During investigations, Operation Delphin identified three potential contraventions of Code and International Standards by the BADC, more specifically:

- (i) Unjustified Advance Notice Testing. ("Advance Notice Testing")
- (ii) Failure to keep an athlete under constant observation during a Sample Collection Session. ("Failure to Monitor")
- (iii) Breach of confidentiality concerning an AAF. ("Information Leak")

those from the same production batch as those during the Training Camp.

<sup>4</sup> Name withheld for privacy.

### *Advance Notice Testing*

In early 2021, the BADC planned a sample collection mission (the “Testing Mission”) in circumstances tantamount to Advance Notice Testing. Such testing is prohibited by Article 5.3.1 of the International Standard for Testing Investigations (“ISTI”) except in exceptional or justifiable circumstances.

The circumstances of the Testing Mission were unlikely to meet the exceptional or justifiable threshold. Fortunately, prior to conducting the Testing Mission the BADC self-identified the error, cancelled the Testing Mission, and implemented new sample collections on multiple dates at different places to ensure there was no Advance Notice Testing.

### *Failure to Monitor*

A BADC Doping Control Officer (“DCO”) contravened ISTI Article 5.4.2 by failing to maintain constant observation of an athlete during a Sample Collection Session. The lead DCO in attendance was open and frank about the failing at the time and recorded its occurrence in a Supplementary Report. The BADC has since intervened with the responsible DCO to ensure the error would not reoccur.

### *Information Leak*

Code Article 14.1.15 requires Anti-Doping Organisations with Results Management responsibility to follow the ‘need-to-know’ principle when disclosing AAFs.

During Operation Delphin, the BADC proactively disclosed to investigators that an unidentified person from within the BADC had leaked information about the AAFs which ended up in the media. Notably, on the same day that the AAFs were uploaded to ADAMS, a journalist began making inquiries into the AAFs.

In response to the leak, the BADC conducted an internal investigation, however, the person or persons responsible were not identified.

The BADC internal investigation was sufficiently thorough and included witness interviews and the examination of telephone records. The BADC was also forthright in its disclosures and dealings with Operation Delphin.

### Post-Investigation

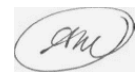
Following its investigation, Operation Delphin provided a copy of its investigation report to relevant internal WADA entities including the WADA President, Director General, and the Compliance Taskforce. Copies were also provided to relevant WADA departments including the Compliance, Rules, and Standards Department and Education Department for their respective information and assessment. Relevant extracts of the investigation report were also provided to the *Fédération Internationale De Natation* Integrity Unit for their information.<sup>5</sup>



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Approved: 30 May 2022



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<sup>5</sup> FINA, as the International Federation, oversees the BSF, as a National Federation.