

Mr. Agron Zeqiri  
President  
Kosovo Aquatic Sports Federation  
43 St. "Agim Ramadani"  
House of Sport  
10000; Prishtine  
Kosovo

Geneva, 12 September 2024

**Re : Provisional Suspension and Notice of Charge**

Dear President Zeqiri,

Reference is made to our letter of 16 July 2024, in which we offered you the opportunity to provide your position regarding the report we received against you, and which remains unanswered.

**Exhibit 1: 2024.07.16 NJ Letter to Mr. Zeqiri re Opportunity to provide your position**

**Exhibit 2: Report from Whistleblower of 5 July 2024**

In the meantime, we have continued our investigation, in the context of which we gathered additional information and evidence.

Against this background, it was brought to our attention that by official decision of the Executive Board of the Kosovo Aquatic Sports Federation ("KSF") of 23 December 2023, the athlete Adell Sabovic ("Mr. Sabovic") would be officially allowed to represent KSF in aquatic competitions as of 1 January 2024.

**Exhibit 3: Decision of KSF Board of 23 December 2023**

Additionally, upon Mr. Sabovic's request for information on how to be selected for competitions, you allegedly replied that the selection would be based on the number of AQUA Points.

**Exhibit 4: KSF Letter to Mr. Sabovic re Criteria for selection in KSF**

Nevertheless, it appears that the KSF prevented Mr. Sabovic from participating at the World Aquatics Championships 2024 in Doha ("Doha 2024"), although he had the highest AQUA Points. He was told that this was due to his failure to participate in national championships, yet Mr. Sabovic seemed to have never been invited to this event. Moreover, the KSF did not provide any national regulations or other selection criteria in which this requirement appears.

**Exhibit 5: Decision of the KSF Board regarding Mr. Sabovic's participation in Doha**

In this context, Mr. Sabovic appealed the decision to the Court of Arbitration for Sport. As a result of his appeal, Mr. Sabovic allegedly received personal threats from you, indicating that he would be suspended or excluded from the KSF.

**Exhibit 6: 2024.01.04 KSF Email to Mr. Sabovic re CAS Appeal**

Moreover, it appears that there were also attempts to obstruct the participation of Mr. Sabovic in the Paris 2024 Olympic Games (“Paris 2024”).

As you know, National Olympic Committees (“NOCs”) that do not have athletes who have achieved an Olympic Qualifying Times or an Olympic Consideration Times, as in the case of Kosovo, could still enter a maximum of two (2) athletes, one male and one female athlete, through Universality Places.

Pursuant to Article D.3 of the Paris 2024 Swimming Qualification, specifically the Universality Places (Unqualified Athletes) (the “Universality Rules”), there were four primary criteria to enable one male and one female athlete to receive an invitation to compete in Paris 2024:

- 1) Athlete must not be older than the age of thirty (30) years on January 1, 2024.
- 2) Athlete must not have already participated in two prior Olympic Games.
- 3) NOCs are obligated to enter the male athlete and the female athlete who have achieved the highest AQUA Points Table score in any individual Olympic event, as achieved at a World Aquatics–approved qualification event during the qualification period.
- 4) Athlete must have competed in the World Aquatic Championships 2023 in Fukuoka (“Fukuoka 2023”) or in Doha 2024.<sup>1</sup>

Under the Universality Rules, the highest-ranked athletes, based upon the AQUA Points were:

- Male – Adell SABOVIC  
Men Freestyle 100m (Entry Time: 00:51.46)
- Female – Hana BEIQI  
Women Freestyle 50m (Entry Time: 00:26.65)

Having clarified this, it was reported to us that you allegedly orchestrated a targeted and discriminatory campaign against Mr. Sabovic.

**Exhibit 7: 2024.06.18 KSF Email to AQUA re Paris 2024 Universality Places**

**Exhibit 8: Decision of KSF Executive Board of 5 June 2024**

**Exhibit 9: 2024.06.24 KSF Email to AQUA re Paris 2024 Universality Places**

**Exhibit 10: 2024.06.27 BN Letter to KSF re Paris 2024 Universality Places**

**Exhibit 11: 2024.07.04 NC Letter to KOS re Paris 2024 Universality Places**

In this connection, you allegedly called press conferences to oppose Mr. Sabovic's participation in Paris 2024, attempting, among other things, to influence the public opinion. In this context, it seems he was at times referred to with discriminatory remarks such as “Serb” or “Russian”, referring to his ethnicity.

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<sup>1</sup> This last point of the rule was later abolished by the World Aquatics Bureau in April 2024.

**Exhibit 12: Press Conference Invitation**

**Exhibit 13: Media Article “Why the opposition to Sabovic representing Kosovo in the Olympics?”**

What is more, it seems that you also tried to prevent the athlete Hana Beiqi (“Ms. Beiqi”) from participating in Paris 2024.

As demonstrated above, under the Universality Rules, Ms. Beiqi was the highest-ranked female athlete based on AQUA Points. However, in order to compete in Paris 2024, (before this last point of the rule was later abolished), she was required to participate in at least one of two World Aquatics Championships: Fukuoka 2023 or Doha 2024.

For Fukuoka 2023, the highest-ranked athletes based on AQUA Points relevant for Paris 2024 were Mal Gashi (male athlete) and Ms. Beiqi (female athlete). However, the KSF entered Mal Gashi and your daughter, Eda Zeqiri, instead.

For Doha 2024, the highest-ranked athletes based on AQUA Points relevant for Paris 2024 were Mr. Sabovic (male athlete) and Ms. Beiqi (female athlete). Nevertheless, the KSF again entered Mal Gashi and your daughter Eda Zeqiri, although this would prevent Mr. Sabovic and Ms. Beiqi from being eligible for Paris 2024 and would give your daughter a path to participate.

In this context you would even have disregarded the official request of the Kosovo Olympic Committee (“KOS NOC”) to include Ms. Beiqi in Doha 2024.

This situation was reported by the KOS NOC to World Aquatics and acknowledged by the latter in a letter dated 11 March 2024. In response, you allegedly brought World Aquatics into disrepute by accusing it of falsification, manipulation of results and committing illegal actions toward the KSF rules.

**Exhibit 14: 2024.02.01 KOS NOC Letter to KSF re Request to Include Hana Beiqi at the World Aquatics Championship in Doha**

**Exhibit 15: KOS NOC Letter to World Aquatics re Discrimination against Hana Beiqi**

**Exhibit 16: 2024.03.11 DN Letter to NOC KOS re Paris 2024 Universality Places**

**Exhibit 17: 2024.04.02 KSF Letter to KOS NOC re General Assembly of 27 March 2024**

**Exhibit 18: Minutes of the General Assembly of 27 March 2024**

**Exhibit 19: 2024.06.28 KSF Letter to KOS NOC re Paris 2024 Universality Places**

In light of the above, the Chief Ethics and Compliance Officer of the Aquatics Integrity Unit (the “CECO”), after review and analysis of all relevant documentation and pursuant to Article 21 of the [World Aquatics Integrity Code](#) (“Integrity Code”), has decided to impose a provisional suspension on you given that public confidence in the integrity of the sport of Aquatics is at risk.

This provisional suspension is effective as of today and prevents you from taking part in any Aquatic-related activities on behalf of World Aquatics and/or Continental Organisation and/or World Aquatics Member and/or recognised body.

Additionally, the CECO has decided to formally charge you with a possible violation of:

I. Article 7 paragraph b), c) and l) of the [World Aquatics Constitution](#):

*“Members are obliged:*

*[...]*

*b) to fully comply at all times with this Constitution and the World Aquatics Rules, the WADA Code, the decisions and directives of the World Aquatics Bodies, as well as the decisions of CAS;*

*c) to respect the principles of loyalty, integrity, sportsmanship and all the values expressed in the Mission Statement of this Constitution;*

*[...]*

*l) to ensure that World Aquatics is not brought into disrepute in any way whatsoever as a result of actions or omissions of the Member or of any of its members, representatives, athletes, officials or any other person subject to the Member”.*

II. Articles 5.1, 5.2, 5.3 and 5.6 - Duties of good conduct of the Integrity Code:

*“5.1 Covered Persons must always act honestly, fairly, impartially and in accordance with the highest ethical standards of integrity and transparency.*

*5.2 Covered Persons must avoid any conduct that is inconsistent with or that undermines in any way the objectives of this Integrity Code.*

*5.3 Covered Persons must avoid acts or omissions that give the appearance of impropriety, or that disparage World Aquatics, or that bring (or have the potential to bring) World Aquatics, Aquatics and/or sport generally into disrepute.*

*5.6 Covered Persons must avoid any act of discrimination against anyone on the basis of race, skin colour, gender, religion, sexual orientation, language, political or other opinion, national or social origin, property, birth, disability or any other ground”.*

III. Article 9.9 - Duty of undivided loyalty of the Integrity Code:

*“9.9 Covered Persons must not abuse their position within Aquatics in any way, especially for their own aims or objectives”.*

Since you serve as President of the Kosovo Aquatic Sports Federation, you fall within the definition of a “Covered Person” under Article 4.1 a) of the Integrity Code.

As per Article 33.1 of the Integrity Code, the sanctions that can be imposed for an Integrity Code Violation range from a reprimand to a lifetime suspension. In the

context of this notice of charge, and without prejudice, the CECO considers that that the following sanctions should be imposed:

- i. A four-year suspension from taking part in any Aquatic-related activities on behalf of World Aquatics and/or Continental Organisation and/or World Aquatics Member and/or recognised body.
- ii. A fine of USD 25,000.

In accordance with art. 23.3 of the Integrity Code, you may now respond to the present notice of charge in one of the following ways **by Friday, 20 September 2024**:

- i. admit the charge and accept the consequences and sanctions;
- ii. admit the charge, but dispute and/or seek to mitigate all or any of the potential consequences and have the Adjudicatory Body determine the consequences and sanctions; or
- iii. deny the charge, and have the Adjudicatory Body determine the charge and any consequences and sanctions.

Please note that any document you submit must be in English or accompanied by an English translation.

In the event you do not respond by the specified deadline, you will be deemed to have admitted the charge, and the sanctions will apply.

We thank you for your attention to the above and remain at your disposal for any questions.

Respectfully yours,



Marc Cavaliero  
Chief Ethics and Compliance Officer of the Aquatics Integrity Unit

Copy to: President Antonio Silva (European Aquatics), Kosovo Aquatic Sports Federation