

11 June 2025

**DECISION OF THE INTERNATIONAL TENNIS INTEGRITY AGENCY
PURSUANT TO ARTICLE 7.14 OF THE 2025 TENNIS ANTI-DOPING PROGRAMME**

I. Introduction

1. The International Tennis Integrity Agency (**ITIA**) is the delegated third party, under the World Anti-Doping Code (**Code**), of the International Tennis Federation (**ITF**), the international governing body for the sport of tennis and signatory of the Code. Under the delegation, the ITIA is responsible for the management and administration of anti-doping across professional tennis in accordance with the Tennis Anti-Doping Programme (the **TADP** or the **Programme**), which sets out Code-compliant anti-doping rules applicable to players competing in Covered Events.¹
2. Chia Yi Tsao (the **Player**) is a 21-year-old tennis player from Chinese Taipei. She has achieved a career-high WTA singles ranking of 464 and a career-high WTA doubles ranking of 115. By virtue of (among other things) her ITF and WTA rankings and participation in Covered Events in 2025, the Player was bound by and required to comply with the TADP.
3. The ITIA charged the Player with the commission of anti-doping rule violations under Article 2.1 and/or Article 2.2 of the TADP (copied below), and proposed certain Consequences based on its analysis of the degree of fault that the Player bears for those violations:
 - “2.1 *The presence of a Prohibited Substance or any of its Metabolites or Markers in a Player’s Sample, unless the Player establishes that such presence is consistent with a TUE granted in accordance with Article 4.4.*”
 - “2.2 *Use or Attempted Use by a Player of a Prohibited Substance or a Prohibited Method, unless the Player establishes that such Use or Attempted Use is consistent with a TUE granted in accordance with Article 4.4.*”
4. The Player has admitted the anti-doping rule violations charged and accepted the Consequences proposed by the ITIA.
5. In such circumstances, Article 7.14 of the 2025 TADP provides that:
 - “7.14.1 *At any time prior to a final decision by the Independent Tribunal, the ITIA may invite the Player or other Person to admit the Anti-Doping Rule Violation(s) asserted and accede to specified Consequences [...]*
 - 7.14.2 *In the event that the Player or other Person admits the Anti-Doping Rule Violation(s) asserted and accedes to Consequences specified by the ITIA [...], the ITIA will promptly issue a reasoned decision confirming the commission of the Anti-Doping Rule Violation(s) and the imposition of the specified Consequences [...], will send notice of*

¹ Unless specified otherwise, references in this decision to the TADP are to the 2025 edition. Any defined term denoted by an initial capital letter that is not otherwise defined in this decision has the meaning given to it in the TADP.

the decision to the Player or other Person and to each Interested Party, and will Publicly Disclose the decision in accordance with Article 8.6. [...]

7.14.3 Any decision issued by the ITIA in accordance with Article 7.14.2 that an Anti-Doping Rule Violation has been committed [...] will address and determine (without limitation): (1) the factual basis of the decision that an Anti-Doping Rule Violation was committed; and (2) all of the Consequences to be imposed for such Anti-Doping Rule Violation, including the reasons for imposing the Consequences specified, and in particular the reasons for exercising any discretion not to impose the full Consequences available under this Programme.”

II. The Player's commission of anti-doping rule violations

6. On 1 January 2025, while competing at the WTA ASB Classic event in Auckland, New Zealand (the **Event**), the Player was required to provide a urine sample for drug testing pursuant to the TADP. The sample she provided was given reference number 1542039 and was split into an A sample and a B sample, which were sealed in tamper-evident bottles and transported to the WADA-accredited laboratory in Montreal (the **Laboratory**) for analysis.
7. The Laboratory detected the presence in sample A1542039 of Methylephedrine, which is prohibited in competition under Section S6.B (Stimulants) of the 2025 WADA Prohibited List. Methylephedrine is a Specified Substance.
8. The Adverse Analytical Finding reported by the Laboratory in respect of the A sample was considered by an independent Review Board in accordance with TADP Article 7.4. The Review Board did not identify any apparent departures from the applicable sample collection and sample analysis procedures that could have caused the Adverse Analytical Finding. It therefore decided that the Player had a case to answer for breach of TADP Articles 2.1 and/or 2.2.
9. Accordingly, on 20 February 2025 the ITIA sent the Player a formal pre-charge Notice, asserting that the Player had a case to answer for breach of TADP Articles 2.1 and/or 2.2.
10. The Laboratory subsequently analysed sample B1542039 and reported, on 21 March 2025, that it had detected the presence of Methylephedrine, i.e., the B sample analysis confirmed the Adverse Analytical Finding made in respect of the A sample.
11. TADP Article 2.1 is a strict liability offence that is established simply by proof that a prohibited substance was present in the Player's sample, i.e., the ITIA does not have to prove how the substance got into the Player's system or that the Player took the substance intentionally (or even knowingly).
12. Given that Methylephedrine is classified as a Specified Substance under the TADP, the Player was not subject to a mandatory provisional suspension under TADP Article 7.12.1. However, on 1 March 2025, the Player accepted a voluntarily provisional suspension under TADP Article 7.12.5.
13. On 3 April 2025, the ITIA sent the Player a formal Charge Letter, asserting that the presence of Methylephedrine in her sample collected on 1 January 2025 constituted anti-doping rule violations under TADP Articles 2.1 and/or 2.2.

14. In her response to the Charge Letter, on 11 April 2025, the Player admitted that she had committed the anti-doping rule violations with which she was charged. However, she asserted that the violations were not intentional.

III. Consequences

A. Period of Ineligibility

(i) How Methylephedrine got into the Player's system

15. The Player has asserted that she did not intend to cheat and did not knowingly ingest Methylephedrine. She asserts that she took a cold medication (manufactured by Taisho with a brand name of Pabron Gold A) during the Event to treat flu-like symptoms which she had been experiencing for a few days.
16. In support of her explanation, the Player provided (among other things):
 - 16.1 an explanation that, on 25 October 2024, she purchased Pabron Gold A from a drugstore chain in Narita Airport, Tokyo, Japan, on the basis that the packaging and tablets appeared similar to Pabron cold medication (also manufactured by Taisho) which she had used in Chinese Taipei;
 - 16.2 an explanation that she began consuming Pabron Gold A on 31 December 2024, taking three tablets that evening and a further three tablets the following morning on 1 January 2025;
 - 16.3 photographs of the packaging of Pabron Gold A purchased in Japan as well as Pabron purchased in Chinese Taipei;
 - 16.4 product information in relation to Pabron Gold A (taken from the Taisho website) which lists Methylephedrine as an ingredient; and
 - 16.5 purchase records from Tokyo-Narita International Airport.
17. When the Player's urine sample was collected on 1 January 2025, she was asked to declare on the Doping Control Form, *“any prescription/non-prescription medications or supplements, including vitamins and minerals, taken over the past 7 days (include substance, dosage and when last taken)”*. The Player explained that she did not list Pabron Gold A on the Doping Control Form because she was not aware she was required to declare her use of over-the-counter medications on the Doping Control Form, on account of language difficulties and inexperience.
18. Methylephedrine is listed as an ingredient of Pabron Gold A.
19. Given all of the circumstances of this case, the ITIA accepts the Player has established that it is more likely than not that the presence of the Methylephedrine found in her urine sample 1542039 was due to the presence of Methylephedrine as a listed ingredient in Pabron Gold A that she consumed the day of and day prior to collection of that sample.

(ii) TADP Article 10.2 – Analysis of Intent

20. This is the Player's first doping violation.

21. TADP Article 10.2.1 mandates a four-year ban for a TADP Article 2.1 and/or 2.2 violation that is “intentional” and is a first violation.² If the prohibited substance in question is classified as a Specified Substance (as here), the ITIA has the burden of proving that the violation was “intentional.” If the ITIA does not believe, or is not able to prove, that the violation was “intentional”, then TADP Article 10.2.2 provides for a two-year period of ineligibility, subject to potential further mitigation. TADP Article 10.2.3 explains that in this context “the term ‘intentional’ is meant to identify those Players or other Persons who engage in conduct that they 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”. The jurisprudence is clear that what counts in this context is what the Player actually knew, not what she should have known.³
22. As set out above, the ITIA has accepted that a listed ingredient of Pabron Gold A was more likely than not the source of the Player’s positive test. The ITIA accepts that the Player did not intend to cheat. Accordingly, the ITIA accepts that in all of the circumstances the Player’s commission of the violation was not “intentional” within the meaning of TADP Articles 10.2.1 and 10.2.3, and so the two-year period of ineligibility set out in TADP Article 10.2.2 is appropriate.

(iii) TADP Articles 10.5 and 10.6

23. TADP Article 10.5 provides that if a player establishes that they bear No Fault or Negligence for the anti-doping rule violation in question, the otherwise applicable period of ineligibility will be eliminated. No Fault or Negligence is defined in the TADP as follows: “The Player or other Person establishing that they did not know or suspect, and could not reasonably have known or suspected even with the exercise of utmost caution, that they had Used or been administered the Prohibited Substance or Prohibited Method or otherwise violated an anti-doping rule.”
24. TADP Article 10.6.1.1 provides that where the anti-doping rule violation involves a Specified Substance (as here) and a player can establish that they bear No Significant Fault or Negligence, then the otherwise applicable two-year period of ineligibility may be reduced by up to 100% (in which case there would be a reprimand only). The definition of No Significant Fault or Negligence is: “The Player or other Person establishing that their Fault or Negligence, when viewed in the totality of the circumstances and taking into account the criteria for No Fault or Negligence, was not significant in relation to the Anti-Doping Rule Violation”. Where No Significant Fault or Negligence is found, the amount of reduction to be applied depends upon the degree of the player’s Fault.
25. A plea of No Fault or Negligence or No Significant Fault or Negligence is assessed by considering how far the player departed from their duty under the TADP to use “utmost caution” to ensure that they would not ingest any prohibited substances or otherwise do anything that might

² In accordance with TADP Article 10.9.4.1, for the purposes of imposing consequences under the TADP, the anti-doping rule violations will be “considered together as one single first Anti-Doping Rule Violation, and the sanction imposed will be based on the Anti-Doping Rule Violation that carries the more severe sanction” if (as here) the Player did not commit the second anti-doping rule violation after they received notice of the first.

³ ITF v Sharapova, Independent Tribunal decision dated 6 June 2016, para 68, not challenged on appeal, Sharapova v ITF, CAS 2016/A/4643.

constitute or result in the commission of an anti-doping rule violation.⁴ *“The difference between the two [...] is one of degree: to establish No Fault or Negligence, the athlete must show that he took every step available to him to avoid the violation, and could not have done any more; whereas to establish No Significant Fault or Negligence, he must show that, to the extent he failed to take certain steps that were available to him to avoid the violation, the circumstances were exceptional and therefore that failure was not significant”*.⁵ The TADP definition of Fault⁶ makes clear that the first question is how far the player departed from the duty of utmost caution (objective fault) and the second question is whether there is any acceptable explanation for that failure (subjective fault).

26. The standard of *“utmost caution”* is very onerous and requires a player to show that they *“made every conceivable effort to avoid taking a prohibited substance”*.⁷ It follows that *“even in cases of inadvertent use of a Prohibited Substance, the principle of the Athlete's personal responsibility will usually result in a conclusion that there has been some degree of fault or negligence”*.⁸
27. The Player asserts that she bears No Significant Fault or Negligence for her violation, so that a period of ineligibility of less than two years should be imposed, because:
 - 27.1 she used Pabron Gold A to treat symptoms of illness;
 - 27.2 she did not seek assistance from the tournament doctor when she began to feel unwell during the Event, and instead used the Pabron Gold A she purchased and brought from Japan, because she was not aware such support was available, at the time, as she had only recently commenced competing at WTA level⁹;

⁴ See, e.g., Kutrovsky v ITF, CAS 2012/A/2804, para 9.49 (*“the athlete's fault is measured against the fundamental duty that he or she owes under the Programme and the WADC to do everything in his or her power to avoid ingesting any prohibited substance”*); FIFA & WADA, CAS 2005/C/976 & 986, paras 73-75 (*“The WADC imposes on the athlete a duty of utmost caution to avoid that a prohibited substance enters his or her body. [...] It is this standard of utmost care against which the behaviour of an athlete is measured if an anti-doping violation has been identified”*).

⁵ IBAF v Luque, IBAF Anti-Doping Tribunal decision dated 13 December 2010, para 6.10.

⁶ *“Fault is any breach of duty or any lack of care appropriate to a particular situation. Factors to be taken into consideration in assessing a Player's or other Person's degree of Fault include, for example, the Player's or other Person's experience, whether the Player or other Person is a Protected Person, special considerations such as impairment, the degree of risk that should have been perceived by the Player and the level of care and investigation exercised by the Player in relation to what should have been the perceived level of risk. In assessing the Player's or other Person's degree of Fault, the circumstances considered must be specific and relevant to explain the Player's or other Person's departure from the expected standard of behaviour. Thus, for example, the fact that a Player would lose the opportunity to earn large sums of money during a period of Ineligibility, or the fact that the Player only has a short time left in their career, or the timing of the sporting calendar, would not be relevant factors to be considered in reducing the period of Ineligibility under Article 10.6.1 or 10.6.2”*.

⁷ Knauss v FIS, CAS 2005/A/847, para 7.3.1; WADA v NSAM et al, CAS 2007/A/1395, para 80 (*“The burden is therefore shifted to the athlete to establish that he/she has done all that is possible to avoid a positive testing result”*).

⁸ Adams v CCES, CAS 2007/A/131, para 155.

⁹ The player received relevant WTA educational resources on 31 December 2024, but asserted that she did not access them until after the Event.

- 27.3 she was not aware that Pabron Gold A contained Methylephedrine as a listed ingredient because she is unable to read or speak Japanese;
- 27.4 on the basis of their similar name, packaging and appearance, she assumed Pabron Gold A contained the same ingredients as the Pabron medication she was familiar with in Chinese Taipei, a common over-the-counter cold medicine which she used from a young age and does not contain Methylephedrine; and
- 27.5 she was in the early stage of her professional tennis career, with a relatively low level of anti-doping awareness and understanding.¹⁰

However:

- 27.6 Article 1.3.1 of the TADP states that it is the “*personal responsibility*” of each player bound by the TADP to “*be knowledgeable of and comply with this Programme at all times*”, “*take responsibility for what they use*”, “*carry out research regarding any products or substance that they intend to Use to ensure that Using them will not constitute or result in an Anti-Doping Rule Violation*”, and “*ensure that any medical treatment they receive does not violate this Programme*”.
- 27.7 Article 4.2.1.5 of the TADP specifically reminds players that “[*many Prohibited Substances may appear (either as listed ingredients or otherwise, e.g., as unlisted contaminants) within supplements and/or medications that may be available with or without a physician’s prescription. Since Players are strictly liable for any Prohibited Substances present in Samples collected from them (see Article 2.1.1), they are responsible for ensuring that Prohibited Substances do not enter or come to be present in their bodies by any means and that Prohibited Methods are not Used*]”.
- 27.8 In the present case, product information available in respect of Pabron Gold A clearly listed Methylephedrine in its ingredients, which the Player failed to check for prohibited substances. The Player did not disclose to the store assistant who supplied the medication that she was a professional athlete subject to anti-doping rules nor consult any other person, such as a qualified medical professional or a person fluent in the Japanese language, regarding the ingredients of Pabron Gold A before ingesting it. Nor did the Player attempt to use a freely-available instantaneous translation service to check the medication’s ingredients. Further, the Player was specifically made aware through TIPP training completed in September 2023 that the ingredients of the same brand of medication may differ between countries, and accordingly ought to have been aware that diligent checks were required and she was not entitled to assume that Pabron Gold A contained the same ingredients as Pabron.
- 27.9 The Player also both failed to read the WTA educational resources sent to her in advance of competing at that level and failed to heed the warnings set out in the TIPP online educational programme she completed.

¹⁰ While the player asserted that she had not received any formal anti-doping education, she had in fact completed the Tennis Integrity Protection Program (TIPP), an online educational tool designed to assist players in recognising and adhering to their obligations under the TADP in October 2021, October 2022 and September 2023.

28. The ITIA accepts that, in the specific circumstances of this case, the Player's fault was not 'significant' within the meaning of TADP Article 10.6.1, justifying a reduction from the two-year starting point. Therefore, discretion arises to reduce the two-year ban applicable under TADP Article 10.2.2 by up to 24 months, depending on the Player's level of objective and subjective fault.
29. In determining the appropriate period of ineligibility, the ITIA is mindful of the bans imposed in other recent comparable cases including those of *Drug Free Sport New Zealand v Spessot and UKAD v Bodman*. Through the ITIA's education the Player should have been on notice of the need to be diligent in relation to all substances she consumed and the need to carry out thorough checks and through the WTA's education she should have known to go to the tournament doctor for advice. Taking the foregoing and the specific facts of this case into account, the ITIA has proposed, and the Player has acceded to, a period of ineligibility of 12 months.
30. In accordance with TADP Article 10.13.2, the Player is entitled to credit for the period of provisional suspension served to date, such that her 12-month period of ineligibility will be deemed to have started running from 1 March 2025. Therefore, it will expire at midnight on 28 February 2026.
31. During her period of ineligibility, the Player's status will be as set out under TADP Article 10.14, i.e., she may not play, coach or otherwise participate in any capacity in (i) any Covered Event; (ii) any other Event or Competition, or activity (other than authorised anti-doping education or rehabilitation programmes) authorised, organised or sanctioned by the ITF, the ATP, the WTA, any National Association or member of a National Association, or any Signatory, Signatory's member organisation, or club or member organisation of that Signatory's member organisation; (iii) any Event or Competition authorised or organised by any professional league or any international or national-level Event or Competition organisation; or (iv) any elite or national-level sporting activity funded by a governmental agency. Nor will she be given accreditation for or otherwise granted access to any Event referred to at points (i) and (ii). In accordance with TADP Article 10.14.5.2, the Player may use the facilities of a club or other member organisation of a Signatory's member organisation for training purposes in the last two months of her period of ineligibility, i.e., from 28 December 2025 on.

B. Disqualification of results

32. The results obtained by the Player at the Event and in subsequent events are disqualified pursuant to TADP Articles 9.1 and 10.10, and the points and prize money that she won at those events are forfeited in accordance with the same provisions.

C. Costs

33. Each party shall bear its own costs of dealings with this matter.

D. Publication

34. In accordance with 2025 TADP Article 8.6, this decision will be publicly reported by being posted (in full and/or summary form) on the ITIA's website.

E. Acceptance by the Player

35. The Player has accepted the consequences proposed above by the ITIA for her anti-doping rule violations and has expressly waived her right to have those consequences determined by the Independent Tribunal at a hearing.

IV. Rights of appeal

36. This decision constitutes the final decision of the ITIA, resolving this matter pursuant to 2025 TADP Article 7.14.
37. Further to 2025 TADP Article 13.2.1, each of WADA and Chinese Taipei Anti-Doping Agency (**CTADA**) has a right to appeal against this decision to the CAS in Lausanne, Switzerland, in accordance with the procedure set out at 2025 TADP Articles 13.8 and 13.9.
38. As part of this resolution of the matter, the Player has waived her right to appeal against or otherwise challenge any aspect of this decision (both as to the finding that the Player has committed anti-doping rule violations and as to the imposition of the consequences set out above), whether pursuant to 2025 TADP Article 13.2.1 or otherwise. However, if an appeal is filed with the CAS against this decision either by WADA or CTADA, the Player will be entitled (if so advised) to exercise her right of cross-appeal in accordance with 2025 TADP Article 13.9.4.

Issued Decision of the ITIA

London, 11 June 2025

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