**BEFORE NEW ERA ARBITRATION**
**CASE NO. 25090505**

---

UNITED STATES ANTI-DOPING AGENCY,
Claimant,

v.

AARON BROOKS,
Respondent

---

# FINAL AWARD

---

I, THE UNDERSIGNED ARBITRATOR, having been designated, and having been duly sworn, and having duly heard the allegations, arguments, submissions, proofs, and evidence submitted by the Parties prior to and at the evidentiary hearing held on November 24, 2025, do hereby FIND and AWARD as follows:

## I. INTRODUCTION AND THE PARTIES

1.1 Respondent's out-of-competition urine sample, collected on April 21, 2025, tested positive for an anabolic agent of exogenous origin as a result of his purchase and use of a clearly-labeled, single ingredient DHEA supplement. All anabolic androgenic steroids, including DHEA, are non–Specified Substances prohibited at all times. The sole issue in this case is whether Respondent has met his burden of establishing that his violations were unintentional and if so, whether he can establish no significant fault or negligence.

1.2 The United States Anti-Doping Agency ("USADA" or "Claimant") is the independent anti-doping organization, as recognized by the World Anti-Doping Agency, for all Olympic, Paralympic, Pan American and Parapan American sport in the United States. USADA is authorized to execute a comprehensive national anti-doping program encompassing testing, results management, education, and research, while also developing programs, policies, and procedures in each of those areas.

1.3 Aaron Brooks ("Mr. Brooks" or "Respondent") is a 25-year-old elite wrestler. As a track athlete, Mr. Brooks earned a bronze medal in wrestling at the 2024 Olympic Games, and has won multiple NCAA national championships in the sport.

1.4 USADA was represented in this proceeding by Spencer Crowell, Esq., Olympic & Paralympic Counsel, and Muriel Ossip, Legal Assistant.

1.5 Respondent was represented in this proceeding by Howard Jacobs, Esq. and Katy Freeman Esq. of the Law Offices of Howard L. Jacobs.

1.6 Claimant and Respondent will be referred to collectively as the "Parties", and individually as "Party".

## II. THE FACTS AND PROCEDURAL HISTORY

2.1 Though there was no stipulation of facts, the facts and procedural history are largely agreed and not in dispute.

### A. The Facts

2.2 Respondent is a 25-year-old elite-level wrestler and was a bronze medalist in the 2024

Olympic Games. He has competed at a high level for several years, having won multiple NCAA national championships and the 2023 U23 World Championships. Respondent has an active membership with USA Wrestling and has held a membership with USA Wrestling since 2008. USADA first added Respondent to the Registered Testing Pool ("RTP") in 2024, and he remained in the RTP until May 2025.

2.3 USADA provided Respondent anti-doping education when he was added to the RTP in 2024 and again at the beginning of 2025, mere months before the events giving rise to this case. This anti-doping education consisted of quick reference material like the Clean Sport Handbook—which lists examples of various prohibited substances including DHEA—and online education tutorials, among others. Through the tutorials, USADA educated Respondent that he was responsible for everything that went into his body, the risks posed by supplements, the dangers and consequences of doping, and the prohibited status of various substances. USADA also educated Respondent that supplements are particularly risky because they have been known to contain anabolic agents. Each tutorial includes an online assessment that all athletes are required to complete with 100% accuracy. In both tutorials, Respondent correctly identified and acknowledged strict liability as the concept that athletes are responsible for everything that goes into their bodies.

2.4 The tutorials also "strongly encourage the use of USADA's dietary supplement safety education and awareness resource, Supplement Connect, as well as the Nutrition Guide and Supplement Guide," which can all be found on USADA's website. The Supplement Connect page contains a High Risk List that identifies specific unsafe supplements on the market, many of which list prohibited substances such as DHEA on the product label.

2.5 In addition to yearly tutorials and supplement information, USADA maintains a number of educational articles on its website dedicated to specific prohibited substances. One such article on USADA's website titled "What Should Athletes Know About DHEA?" was published in 2023 and explains that "[a]thletes should not use DHEA supplements because DHEA is prohibited at all times, even if it is consumed through a dietary supplement." That article can be found by navigating USADA's website or by simply Googling "DHEA USADA" or "DHEA prohibited," where it appears as one of the first results.

**B. Procedural History**

2.6 USADA selected Respondent for out-of-competition testing on April 21, 2025, and Respondent duly provided a sample. Respondent made no declarations on the doping control form during sample collection, which indicates he did not consume any supplements or medications within the seven days prior to sample collection. USADA sent Respondent's sample to the WADA-accredited laboratory in Los Angeles, California, which conducted specialized Gas Chromatography Carbon Isotope Ratio Mass Spectrometry ("IRMS") analysis on Respondent's sample and reported the presence of an anabolic agent of exogenous origin in his sample. USADA notified Respondent of his positive test on June 13, 2025, and imposed a provisional suspension against him.

2.7 Respondent waived testing of his B sample and explained that his positive test was caused by a DHEA supplement he had purchased and taken in the days leading up to sample collection despite not having declared it on his doping control form. Responded explained that on April 15, 2025, five days after being released from the hospital where he was treated for double pneumonia, he purchased a container of Life Extension brand DHEA from his local grocery store while stocking up on his "normal supplements." He stated that while he was hospitalized, doctors told him he might have sleep apnea which could negatively impact his testosterone levels, although no testing was done to confirm a low testosterone diagnosis. Respondent recalled this conversation on April 15 while buying his usual supplements and noticed a DHEA product (pictured below) that he believed would increase his testosterone based on the label advertising the promotion of "optimal hormone levels."


2.8 Despite having received no recommendations to use DHEA, Respondent immediately purchased the product without conducting any research. He initially explained that he took one 25 mg DHEA tablet "on 2-3 different days" between April 15 when he purchased the DHEA and April 21 when his sample was collected, although he later recalled more specifically that he had actually taken two 25 mg DHEA tablets per day during that time.

2.9 Only after having taken the product for two weeks did Respondent consider researching DHEA to see whether it was providing any benefit. Respondent recalled that on or about April 30, 2025, he searched DHEA on his ChatGPT account, which immediately notified him that DHEA was a prohibited substance for Olympic athletes. In Respondent's words, realizing that DHEA was prohibited "was a tough moment. The bottle literally says DHEA, and Igo to the [Prohibited] List, and it says DHEA, so I knew right away what it was."

2.10 USADA charged Respondent on August 28, 2025, for the use of DHEA and the presence of an anabolic agent of exogenous origin in his sample. On September 5, 2025, Respondent requested a hearing on the matter, and USADA contacted New Era to initiate the arbitral process the same day.

2.11 After appointment, the Arbitrator convened a case management conference and pre-hearing dates and deadlines were set. The Parties made their submissions in accordance with thereof.

2.12 On November 24, 2025, the Arbitrator conducted a one (1) day hearing on Zoom with the Parties presenting their witnesses, evidence, and submissions/argument.

2.13 At the conclusion of the hearing, all Parties acknowledged that they had been provided with a full and fair opportunity to present their case, and no objections to the Arbitrator serving as arbitrator in this case was raised.

2.14 At the conclusion of the hearing, the Arbitrator discussed with the Parties the impact of the holidays on the issuance of this Award, and all were in agreement that a slight extension of time to issue this Award would be acceptable.

2.15 The Arbitrator issued this Award on the date set forth below.

**C. DHEA**

2.11 DHEA is included on the Prohibited List as an anabolic agent and is classified as a non–Specified substance prohibited at all times. DHEA has remained on the Prohibited List since it was first published in 2004. Despite being a relatively weak androgen, it can still promote muscle growth, stimulate red blood cell production, and decrease a user's overall body fat percentage. DHEA is a prohibited anabolic agent in sport but is legally sold in dietary supplements

under U.S. law.

## III. SUMMARY OF PARTIES' SUBMISSIONS/REQUESTS FOR RELIEF

3.1 USADA argues in summary that:

a. Respondent has failed to meet his burden of proving lack of intent. He displayed recklessness in buying and using a single ingredient product clearly labeled as DHEA and not making any effort to vet the product in advance. As an Olympian with recent and repeated anti-doping education, there is no excuse for his failures to uphold his anti-doping obligations—failures that directly resulted in his violations. Respondent's willful ignorance is not a valid defense, nor is his ADHD for which he chose to not take his prescribed medication.

b. Unlike other cases where athletes' decision making was impaired by acute pain and distress, Respondent's release from the hospital five days prior gives him no such justification.

c. He cannot show that he was unaware his conduct might constitute a violation or result in a violation and that he did not manifestly disregard that risk.

3.2 USADA seeks a sanction of a four-years period of ineligibility beginning June 13, 2025, the date Respondent was provisionally suspended, with the disqualification of results on and after April 21, 2025. In the alternative, if the Arbitrator accepts that the four years maximum period can be reduced to a two (2) years period of ineligibility, then USADA seeks the maximum two (2) years period of ineligibility with no further reduction.

3.3 Respondent argues in summary that:

a. Despite his previous anti-doping experience and training, Mr. Brooks was merely oblivious to his anti-doping situation and peril when he took the DHEA supplement and was not manifestly disregarding his anti-doping obligations.

b. Mr. Brooks was impaired by the fact that he had recently come out of the hospital where he was diagnosed with double pneumonia and had learned he had obstructive sleep apnea. He also suffered from ADHD and had failed to take his medicine for the same when he made the choice that caused his positive test.

c. He found the DHEA supplement in a search for a supplement that he understood could assist him in avoiding going through the illness that had recently hospitalized him, he was unaware it was prohibited when he purchased it or that there was any risk of him testing positive for having taken it, and he was not going to be able to compete again for another 6-8 weeks so he could fully recover from his illness.

3.4 Mr. Brooks accepts that fault is present but he seeks a punishment of a period of ineligibility of no more than two (2) years, but makes a request and arguments for receiving even less of a period of ineligibility.

## IV. JURISDICTION

4.1 This proceeding is governed by the Protocol for Olympic and Paralympic Movement testing (effective as revised January 1, 2025) ("USADA Protocol"), including the Procedures for the Arbitration of Olympic & Paralympic Sports Doping Disputes ("Arbitration Procedures").

4.2 Under R-7 of the Arbitration Procedures, which are part of the USADA Protocol, "[t]he arbitrator shall have the power to rule on his or her own jurisdiction, including any objections with respect to the existence, scope or validity of the arbitration agreement." Moreover, "[a] party must object to the jurisdiction of the arbitrator or to the arbitrability of a claim or counterclaim no later than the filing of the answering statement to the claim or counterclaim that gives rise to the objection."

4.3 No party has objected to my jurisdiction or to the arbitrability of the claim, and all parties have participated fully in the proceedings.

4.4 Accordingly, I conclude that arbitration jurisdiction is present and the issues presented in this case are properly before me.

## V. ANALYSIS

### A. Relevant Legal Standards

5.1 As set forth in Article 3.1 of the Code (as USADA did in its submissions, references to the Code herein are, for ease of reference, references to the World Anti-Doping Code in effect at the time of the alleged violation), governing burdens of proof generally:

> "The Anti-Doping Organization shall have the burden of establishing that an anti-doping rule violation has occurred. The standard of proof shall be whether the Anti-Doping Organization has established an anti-doping rule violation to the comfortable satisfaction of the hearing panel, bearing in mind the seriousness of the allegation which is made. This standard of proof in all cases is greater than a mere balance of probability but less than proof beyond a reasonable doubt. Where the Code places the burden of proof upon the Athlete or other Person alleged to have committed an anti-doping rule violation to rebut a presumption or establish specified facts or circumstances, except as provided in Articles 3.2.2 and 3.2.3, the standard of proof shall be by a balance of probability."

5.2 As a foundational principle, the Code charges athletes with the responsibility for every substance that enters their bodies. Art. 2.1.1. The Code further states that sufficient proof of an ADRV is established by the "presence of a Prohibited Substance or its Metabolites or Markers in the Athlete's A Sample where the Athlete waives analysis of the B Sample and the B Sample is not analyzed." Art. 2.1.2. Respondent waived testing of his B Sample on June 30, 2025. Accordingly, USADA has met its burden that Respondent has committed the charged ADRVs, which Respondent does not contest. Art. 3.1.

5.3 The default period of ineligibility for an ADRV involving a non–Specified Substance like DHEA is four years unless the athlete can establish by a balance of probabilities that the ADRV was not intentional, in which case the period of ineligibility shall be two years. Arts. 10.2.1, 10.2.2. Under Code Article 10.2.3, "the term 'intentional' is meant to identify those Athletes or other Persons who engage in conduct which 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." Art. 10.2.3. This is a notable change from the definition in the previous version of the Code, which stated that "the term 'intentional' is meant to identify those Athletes who cheat." See, 2015 World Anti-Doping Code Art. 10.2.3.

5.4 A further reduced sanction is available to athletes who can also establish no significant fault or negligence. Art. 10.6. It is the athlete's burden of proof to establish by a balance of probability (i.e., preponderance of the evidence) that any reduction from the default four-year sanction is appropriate. Arts. 3.1, 10.2.2.

5.5 The specific wording of the relevant Code provisions may be found below:

> "Article 2. Anti-Doping Rule Violations
>
> The purpose of Article 2 is to specify the circumstances and conduct which constitute anti-doping rule violations. Hearings in doping cases will proceed based on the assertion that one or more of these specific rules have been violated.
>
> Athletes or other Persons shall be responsible for knowing what constitutes an anti- doping rule violation and the substances and methods which have been included on the Prohibited List.
>
> The following constitute anti-doping rule violations:
>
> 2.1 Presence of a Prohibited Substance or its Metabolites or Markers in an Athlete's Sample

2.1.1 It is the Athletes' personal duty to ensure that no Prohibited Substance enters their bodies. Athletes are responsible for any Prohibited Substance or its Metabolites or Markers found to be present in their Samples. Accordingly, it is not necessary that intent, Fault, Negligence or knowing Use on the Athlete's part be demonstrated in order to establish an anti-doping rule violation under Article 2.1

* * *

Article 10: Sanctions on Individuals

* * *

10.2 Ineligibility for Presence, Use or Attempted Use or Possession of a Prohibited Substance or Prohibited Method

The period of Ineligibility for a violation of Article 2.1, 2.2 or 2.6 shall be as follows, subject to potential elimination, reduction or suspension pursuant to Article 10.5, 10.6 or 10.7:

10.2.1 The period of Ineligibility, subject to Article 10.2.4, shall be four (4) years where:

10.2.1.1 The anti-doping rule violation does not involve a Specified Substance or a Specified Method, unless the Athlete or other Person can establish that the anti-doping rule violation was not intentional.

10.2.1.2 The anti-doping rule violation involves a Specified Substance or a Specified Method and the Anti-Doping Organization can establish that the anti-doping rule violation was intentional.

10.2.2 If Article 10.2.1 does not apply, subject to Article 10.2.4.1, the period of Ineligibility shall be two (2) years.

10.2.3 As used in Article 10.2, the term "intentional" is meant to identify those Athletes or other Persons who engage in conduct which 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. An anti-doping rule violation resulting from an Adverse Analytical Finding for a substance which is only prohibited In- Competition shall be rebuttably presumed to be not "intentional" if the substance is a Specified Substance and the Athlete can establish that the Prohibited Substance was Used Out-of-Competition. An anti-doping rule violation resulting from an Adverse Analytical Finding for a substance which is only prohibited In-Competition shall not be considered "intentional" if the substance is not a Specified Substance and the Athlete can establish that the Prohibited Substance was Used Out-of-Competition in a context unrelated to sport performance.

6

* * *

10.6 Reduction of the Period of Ineligibility based on No Significant Fault or Negligence

10.6.1 Reduction of Sanctions in Particular Circumstances for Violations of Article 2.1, 2.2 or 2.6.

All reductions under Article 10.6.1 are mutually exclusive and not cumulative.

* * *

10.6.1.2 Contaminated Products

In cases where the Athlete or other Person can establish both No Significant Fault or Negligence and that the detected Prohibited Substance (other than a Substance of Abuse) came from a Contaminated Product, then the period of Ineligibility shall be, at a minimum, a reprimand and no period of Ineligibility and at a maximum, two (2) years Ineligibility, depending on the Athlete or other Person's degree of Fault.

* * *

10.10 Disqualification of Results in Competitions Subsequent to Sample Collection or Commission of an Anti-Doping Rule Violation

In addition to the automatic Disqualification of the results in the Competition which produced the positive Sample under Article 9, all other competitive results of the Athlete obtained from the date a positive Sample was collected (whether In-Competition or Out- of-Competition), or other anti-doping rule violation occurred, through the commencement of any Provisional Suspension or Ineligibility period, shall, unless fairness requires otherwise, be Disqualified with all of the resulting Consequences including forfeiture of any medals, points and prizes.

* * *

Appendix 1: Definitions

Fault: Fault is any breach of duty or any lack of care appropriate to a particular situation. Factors to be taken into consideration in assessing an Athlete's or other Person's degree of Fault include, for example, the Athlete's or other Person's experience, whether the Athlete or other Person is a Protected Person, special considerations such as impairment, the degree of risk that should have been perceived by the Athlete and the level of care and investigation exercised by the Athlete in relation to what should have been the perceived level of risk. In assessing the Athlete's or other Person's degree of Fault, the circumstances considered must be specific and relevant to explain the Athlete's or other Person's departure from the expected standard of behavior. Thus, for example, the fact that an Athlete would lose the opportunity to earn large sums of money during a period of Ineligibility, or the fact that the Athlete only has a short time left in a 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.

No Fault or Negligence: The Athlete or other Person's establishing that he or she did not know or suspect, and could not reasonably have known or suspected even with the exercise of utmost caution, that he or she had Used or been administered the Prohibited Substance or Prohibited Method or otherwise violated an anti-doping rule. Except in the case of a Protected Person or Recreational Athlete, for any violation of Article 2.1, the Athlete must also establish how the Prohibited Substance entered the Athlete's system.

No Significant Fault or Negligence: The Athlete or other Person's establishing that any 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 relationship to the anti-doping rule violation. Except in the case of a Protected Person or Recreational Athlete, for any violation of Article 2.1, the Athlete must also establish how the Prohibited Substance entered the Athlete's system."

**B. Application of the Rules to the Facts**

*i. Anti-Doping Rule Violation*

5.6 It is undisputed that Respondent's sample tested positive for the presence of an exogenous anabolic agent prohibited both in- and out-of-competition. Respondent admits that he committed an ADRV under Article 2.1 of the Code for the presence of a prohibited substance and claims it was caused by his ingestion of a DHEA supplement. Accordingly, USADA has met its burden of proof to demonstrate that an ADRV has occurred.

*ii. Source and "Intentional"*

5.7 The core issue to be decided is whether, under Article 10.2.1.1 of the Code, Respondent has met his burden of establishing that his ADRV was unintentional.

5.8 Respondent bears the burden of establishing, by a balance of probabilities, that his ADRV was not intentional.

5.9 If Respondent cannot carry his burden, then no further analysis is necessary, and the sanction for his ADRV is four (4) years.

5.10 If Respondent meets his burden, the default starting sanction for Respondent's ADRV is two (2) years, subject to possible reduction on the basis of the presence of fault in varying degreees.

5.11 On the facts of this case, and without any dispute as to source from USADA, I find that the Respondent has met his burden of establishing the source of his positive test for purposes of establishing that his ADRV was unintentional. But this is not the end of the inquiry.

5.12 A violation is intentional if an athlete engages in conduct which 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. Art. 10.2.3. USADA contends that Respondent blatantly ignored his anti-doping education and the multitude of resources at his disposal by inexplicably failing to perform even the most basic due diligence before buying and using a supplement that listed DHEA—the only ingredient—in prominent, block lettering on the front supplement label.

5.13 I start by noting that Respondent admitted that he took the DHEA without knowing it was prohibited and has never taken any other prohibited substances. I found Respondent to be very credible on this point. While I acknowledge that protestations of innocence generally are given little weight since they are the common currency of the innocent and the guilty, and that, standing alone, they would be insufficient to carry Respondent's burden, I see no reason to entirely ignore Respondent's credibility in evaluating whether he has met his burden on the intention element of the first element to be considered in sanctioning.

5.14 In addition, with the exception of the one positive test at issue, Respondent has never had a positive anti-doping test despite having been tested several other times.

5.15 Respondent's lack of any apparent incentive to dope to enhance his performance, while insufficient alone to carry his burden, is also part of the totality of the evidence to be considered. Respondent's positive test came at a time when he was not competing and would not be doing so for a number of weeks. While it could be argued that perhaps he took the DHEA to assist with recovery from his prior illness, there is no evidence that was what was occurring or that DHEA would assist in his recovery. DHEA has been on the Prohibited List for a long time, meaning it is well and easily tested for, and its performance enhancing qualities are known to be of low value, albeit there is some value to taking it according to expert testimony in this case.

5.16 There is no question that Mr. Brooks was dramatically negligent, and cavalier, in his approach to his anti-doping obligations, especially as an elite NCAA wrestler and one who has won an Olympic medal in wrestling, and received, especially compared to many athletes, anti-doping education in spades. He took no steps to protect himself, simply deciding he wanted to purchase and take DHEA and doing so, without any care for whether it was on the Prohibited List or making any effort to determine the same until weeks later.

5.17 This case is distinguishable from the case of CAS 2018/A/5784, *WADA v. CTOC & CTADA & Lin*, not least because in that case 1) the athlete was unable to establish source, and 2) it was a second violation for an athlete in the sport of weightlifting yet the punishment from the first instance tribunal was dramatically less than it should have been for a second offense. Similarly, this case can be distinguished from CAS 2023/A/9525 ¶ 83, *WADA v. Živković*, insofar as the athlete in question took the diuretic, in a weight class sport, the day before the competition, and claimed to have relied solely on the advice of her doctor without more, suggesting there was a performance enhancing intent in the background. These factors are not present here. Other cases were referenced and considered but if not discussed here they were rejected as operative.

5.18 "In percentage terms, on a balance of probability simply means the Panel must be satisfied that there is more than a 50% chance the ADRV was not intentional." CAS 2021/A/7628, *Puerta v. UCI* ¶ 129. I am satisfied the burden has been met, albeit, honestly, just barely.While the facts presented make this a very close case on manifest disregard (dangerously so for Mr. Brooks, who should have learned a lesson here as should any athlete reading this decision), I find that, given the totality of the evidence, Respondent has met his burden of proving that it is "more likely than not" that the ADRV was not intentional for the analytical purposes set forth in the first prong of the test.

5.19 I do not reach this conclusion easily or lightly. I cannot say with any degree of certainty whether Mr. Brooks' ADRV was intentional or not. But certainty is not the standard. The question is whether, in each individual case, the record as a whole - considering the entirety of the evidence collectively and not in isolated pieces is persuasive such that it is more likely than not (by even as little as 50.1%) that the violation was not intentional. I so find here having considered the factors listed above.

5.20 Having fared as well as he could hope for under this portion of the sanction test, Mr. Brooks unfortunately cannot fare nearly as well under the next prong.

*iii. No Significant Fault or Negligence*

5.21 The Respondent has demonstrated that his ingestion was not intentional. To obtain a further reduction in sanction based on a degree of fault analysis under Article 10.6, Respondent bears the burden of establishing, by a balance of probabilities, how the Prohibited Substance entered his system and that any 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 relationship to the ADRV.

5.22 The degree of fault framework established by the CAS panel in the leading case of *Cilic v. ITF* consists of evaluating objective and subjective factors where the objective standard is used to place an athlete in one of the two fault categories and the subjective standard is used to move an athlete up and down within the category. CAS 2013/A/2237, *Cilic v. ITF* ¶¶ 71-73. Under only the most extenuating circumstances would subjective factors warrant movement between the categories. *Id*. ¶ 74.

5.23 With respect to the objective standard, the *Cilic* panel suggested that, at a minimum, athletes should



> "(i) read the label of the product used (or otherwise ascertain the ingredients), (ii) cross-check all the ingredients on the label with the list of prohibited substances, (iii) make an internet search of the product, (iv) ensure the product is reliably sourced and (v) consult appropriate experts in these matters." *Id*. ¶ 75(a).

The *Cilic* panel added that for substances prohibited at all times, "the above steps are appropriate because these products are particularly likely to distort competition." *Id*. In such circumstances, "an athlete must be particularly diligent and, thus, the full scale of duty of care" applies. *Id*.

5.24 Mr. Brooks took none of these steps. He in fact did nothing to protect himself from consuming a prohibited substance. He simply determined he wanted to take a supplement, plainly marked on its label in large letters with the name of the operative ingredient, which was on the

Prohibited List under the same name, and he took that supplement. This is plainly below the standard of any objective view of fault and there was insufficient evidence to show that he was impaired in any other way that would implicate a further analysis of the subjective factors in the *Cilic* analysis.

5.25 For the reasons discussed above, Respondent has failed to meet his burden of establishing, by a balance of probabilities, that his Fault or Negligence was not significant in relation to the ADRV. Code. 10.6.1.2. In fact, the opposite was true. He literally did nothing to protect himself from ingesting a prohibited substance.

5.26 As a result, Respondent has not established any basis for a reduction of his sanction based on his lack of fault at any level.

5.27 Accordingly, Respondent shall be sanctioned with a two (2) years period of eligibility.

*iv. Start Date of Sanction*

5.28 Article 10.13.2.1 of the code states: "If a Provisional Suspension is respected by the Athlete or other Person, then the Athlete or other Person shall receive a credit for such period of Provisional Suspension against any period of Ineligibility which may ultimately be imposed." There was no evidence here that Mr. Brooks failed to honor his provisional suspension.

5.29 Respondent accepted a provisional suspension on June 13, 2025, and appears to have respected the provisional suspension.

5.30 The start date for Respondent's period of ineligibility is June 13, 2025.

5.31 Imposition of a 2-year period of ineligibility results in the expiration of Respondent's ineligibility on June 12, 2027.

*v. Disqualification of Results*

5.32 Respondent's competitive results, if any, are to be disqualified from the date of his positive test, April 21, 2025, through the commencement of his provisional suspension on June 13, 2025.

## VI. AWARD

6.1 The Arbitrator hereby determines and awards as follows:

a. Respondent, Aaron Brooks, has committed an ADRV under Article 2.1 of the Code for the presence of a prohibited substance in his April 21, 2025, in-competition sample.

b. Respondent has met his burden of proving, by a balance of probabilities, that the ADRV was not intentional. The default starting sanction, therefore, is two years.

c. Because Respondent has failed to meet his burden of proving, by a balance of probabilities, that he was not significantly at fault a period of Ineligibility of two (2) years is imposed.

d. The start date of Respondent's period of Ineligibility shall be June 13, 2025, the date on which the provisional suspension was imposed and shall run through June 12, 2027.

e. Respondent's competitive results, if any, from the date of his positive test on April 21, 2025, through the commencement of his provisional suspension on June 13, 2025, are to be disqualified, and any medals, points and prizes earned during that period shall be forfeited.

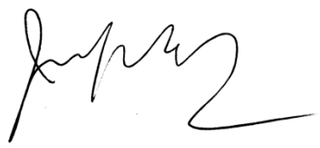
f. The parties shall each bear their own respective attorneys' fees and costs associated with this Arbitration.

g. The administrative fees and expenses of New Era and the compensation and expenses of the Arbitrator shall be borne by USADA and the USOPC as set forth in the Arbitration Procedures.

h. This Award shall be in full and final resolution of all claims and counterclaims submitted in this Arbitration. All claims not expressly granted herein are hereby denied.

IT IS SO DECIDED, ORDERED, AND AWARDED.

Dated: February 8, 2026.



Jeffrey G. Benz
Arbitrator
London, United Kingdom



11