

**ALEXANDER LEGKOV V. IOC:
CAS CAN'T GET NO (COMFORTABLE) SATISFACTION**

by *Mario Vigna** and *Rustam Sethna***

ABSTRACT: The Court of Arbitration for Sport's decision in the case of Alexander Legkov v. International Olympic Committee is among the most significant CAS rulings in recent times. In upholding the appeal of the Russian (a skier, along with 27 other Russian athletes), the CAS Panel has delivered an award that is both logical and fair. Among the legal issues, the Panel's assessment of the standard of proof—i.e. comfortable satisfaction—reveals the Panel's focus on each individual athlete, without being unduly influenced by the debate surrounding the existence of Russia's State-sponsored doping program.

Keywords: Sport – Olympics – skiing – sports law – anti-doping – CAS – standard of proof – comfortable satisfaction – Russia – doping scandal – conspiracy – evidence – due process.

SUMMARY: 1. Introduction – 2. Facts of the Case – 2.1 General Facts – 2.2 Facts Specific to the Legkov Appeal – 3. Legal Analysis – 3.1 The Notion of Comfortable Satisfaction – 3.2 Individual Case Management – 3.3 Evidentiary Standard – 4. Conclusions

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