



**COMPLAINT PRESENTED BY ZOUXUAN SPORTS ON BEHALF OF SHIMING ZOU
OF THE WBO CHAMPIONSHIP COMMITTEE DETERMINATION OF DENIAL
RETURN FIGHT**

THIS CAUSE coming to be heard by the WBO Grievance Committee¹ upon the complaint of ZouXuan Sports, on behalf of Shiming Zou from the September 18, 2017 WBO Championship Committee determination, the WBO Grievance Committee having received the Ruling of the WBO Championship Committee, all written submittals of the interested WBO participants, having considered our WBO Rules and Regulations, WBO Constitution and the provisions of the WBO Championship Contests, ABC guidelines and being fully advised in the premises,

IT IS ORDERED: The Appeal is Denied

THE FOLLOWING is established as the Record of Proceedings in the present cause:

1	8/12/2017 Letter via email from ZouXuan Sports on behalf of Shiming Zou petitioning a Return Fight pursuant to Rule 18	1-8
2	8/12/2017 Letter via email from ZouXuan Sports on behalf of Mr. Kelly James Tucker M.D.	1
3	8/12/2017 Letter via email from ZouXuan Sports on behalf of Mr. Robert Anthony Ruelaz M.D.	1
4	8/12/2017 Letter via email from ZouXuan Sports dated 7/31/2017 on behalf of Mr. Jacob Durán	1
5	8/12/2017 Copy of receipt via email of PBCC Commission Fees on behalf of ZouXuan Sports	1-2
6	8/12/2017 Physical examination report via email from ZouXuan Sports on behalf of Dr. Yuqi Dong	1
7	8/12/2017 Letter via email from ZouXuan Sports on behalf of the Chinese Boxing Federation	1-2
8	8/12/2017 Letter via email from ZouXuan Sports on behalf of Jianwu Chen, President of Europe Shanghai	1

¹ Luis Batista Salas, Esq. recused himself from any participation in this deliberation due to his position as chairman of the WBO Championship Committee, from whose decision Petitioners appeal.



World Boxing Organization

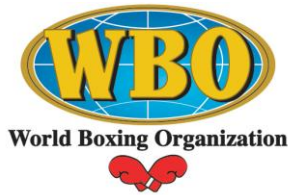


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	Chamber of Commerce and East Asia Chamber of Commerce	
9	8/12/2017 Letter via email from ZouXuan Sports on behalf of Mr. Wan Ping Zhang Director of Chinese Martial Arts Association	1
10	8/12/2017 Letter via email from ZouXuan Sports on behalf of T.V. Producer Mr. Xiao Zhang	1
11	8/18/2017 Submitted Supervisory Report on behalf of WBO Supervisor Leon Panoncillo Jr.	1-15
12	8/18/2017 Letter from Dr. Marina Sheppard on behalf of Boxrec.com certifying the PBCC Boxing Commission	1
13	8/23/2017 Letter via email from Mr. Takashi Aoshima on behalf of Sho Kimura	1
14	8/24/2017 Letter via email from ZouXuan Sports on behalf of Han Ying Wang Huangpu Sports	1
15-18	8/24/2017 Letter from ZouXuan Sports on behalf of Yingying Ran and Supplementary documents	1-3
19	8/25/2017 Supplemental Supervisory Report submitted on behalf of WBO Supervisor Leon Panoncillo Jr.	1-31
20	10/02/2017 Appeals Petition and exhibits submitted by ZouXuan Sports on behalf of petitioner Shiming Zou.	1-6
21	YouTube Video of the Zou-Kimura Championship Event, <i>available at</i> https://www.youtube.com/watch?v=dZYjsSNr1hk	N/A

INTRODUCTION AND BACKGROUND

ZouXuan Sports, on behalf of Shiming Zou, (collectively, "Petitioners") appealed the dismissal of their complaint to the WBO Grievance Committee on October 2, 2017. They request reversal of the September 18, 2017 determination of the WBO Championship Committee denying Mr. Zou a Return Fight pursuant to the WBO Championship Contests Regulations.



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Petitioners aver that the Championship Committee's determination should be reversed, because (1) it did not take into account statements made by other individuals, specifically ringside doctors from California and a "world-renowned" cut-man; and (2) that Mr. Leon Panoncillo's relationship with both the WBO and Professional Boxing Commission of China ("PBCC") created an impermissible conflict of interest. Moreover, Petitioners argue that Mr. Zou is entitled to a Return Fight due to excessive water spillage on the ring, which allegedly affected his performance, and that the fight in question was not conducted pursuant to applicable rules, because Mr. Zou was not granted a compulsory eight-count, before the fight was stopped.

Thereafter, on November 7, 2017, the Grievance Committee issue an "Initial Notice and Order Setting Docketing Conference" (the "Initial Notice"). In the Initial Notice, the Grievance Committee requested that all participants to this Appeal provide the names and contact information of any witnesses, along with the subject matter of their testimony and a brief summary thereof, by November 9, 2017. Further, the Initial Notice also provided participants an opportunity to submit their respective arguments and replies thereto, respectively, by November 9, 2017 and November 17, 2017. Neither party, however, chose to provide the Grievance Committee with any of the aforementioned items.

Moreover, the Initial Notice also set forth a Docketing Conference for November 9, 2017, which was rescheduled for November 10, 2017. The participants failed to appear, and the Grievance Committee received no communication from the participants as to their absences.

In light of the above, the Grievance Committee understands that the participants do not desire to present witness testimony nor additional arguments, and are content with the present state of the Record of Proceedings. Therefore, the Grievance Committee understands that there is no just reason for delaying a decision on the merits, and deems the case submitted and actionable pursuant to the Record of Proceedings.



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To afford Petitioners due process and to ensure a prompt, fair and equitable resolution of this dispute, this Committee has evaluated Mr. Zou's record as WBO Flyweight Champion, examined thoroughly all submitted evidence, and considered his extraordinary amateur career accomplishments, upon requesting a Return Fight pursuant to our WBO Championship Contests Regulations.

Considering the totality of the Record, this Committee holds that the championship contest between the Shiming Zou and Sho Kimura was fairly fought by both contestants at the highest skill level, and that it was well officiated and adequately resolved pursuant to our WBO Championship Contests Regulations and the Local Host Commission PBCC.

In terms of evidence presented by the interested WBO petitioners, we received numerous written communications and exhibits regarding Shiming Zou's popularity, exposure and significance upon his professional boxing performances within the People's Republic of China. Furthermore, supervisory reports and supplemental documents by WBO officials were submitted and comprehensively analyzed.

In summary, Petitioners argue that excessive spillage of water present at the appellant's corner apron became saturated to the extent of falling multiple times and consequently, affecting his professional performance. Moreover, petitioners contend that ring officials did not comply with their respective duties nor applied corrective measures to attend such allegations. In addition to this, appellants alleged incompliance with the compulsory eight-count or request in the alternative, resorting to the fight's official score cards if a stoppage was ordered. Lastly, Petitioners argue that WBO bout supervisor Leon Panoncillo Jr. had an impermissible conflict of interest, because of his supervisory duties in the WBO and his alleged position as "head" of the PBCC, the Local Host Commission.

While this Committee comprehends the nature of Petitioners' contentions, we are not moved by Petitioners' arguments, nor has this Committee considered the evidence submitted sufficient to reverse the ruling of the WBO World Championship Committee.



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DISCUSSION

The WBO Championship Committee, exercising its powers and discretion pursuant to Section 1 (b) (17) of the WBO World Championship Contests Regulations, held that Petitioners' request for a Return Fight be denied. A Return Fight may be granted if the World Championship Committee determines either that **the resolution of a Championship Contest was substantially irregular, or that there was a clear misapplication of the rules of boxing resulting in a manifest unfairness** (See Section 18 of the WBO World Championship Contests Regulations). The Championship Committee understood that the contest's resolution was not substantially irregular, and that the rules were not misapplied, nor that their application resulted in unfairness.

In the Appeal, Petitioners contend that we should reverse this determination based on the following grounds:

1. Presence of excessive water spillage on Zou's ring corner apron, which allegedly caused physical injuries to the fighter and claims of inaction by PBCC officials;
2. Supervisor Leon Panoncillo Jr. exhibited impermissible conflicts of interest, due to his role in the WBO, while simultaneously presiding the Local Host Commission, PBCC;
3. The appointed referee did not finish the Mandatory eight (8) count, or in the alternative, that the Contest's resolution should have been based on the fight's official score cards after the referee ordered the fight's stoppage;
4. Granting a "Return Fight" Pursuant to Rule 18 of Championship Contests Regulations;



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5. The Championship Committee's purported failure to mention statements from other individuals, including California ringside physicians and a world-renowned cut-man.

(1) Presence of excessive water spillage on Zou's ring corner apron, which allegedly caused physical injuries to the fighter and claims of inaction by PBCC officials;

Petitioners contend that the excessive over-pouring of water on Zou's ring apron resulted in him suffering from additional physical injuries, which caused him to lose his WBO Flyweight Title against Sho Kimura. In addition to this, Petitioners claim that the assigned PBCC officials did not fully comply with the governing rules and regulations.

Section 24 (a), (e), (f) of the WBO Regulations of Championship Contests in relevant provides the following:

(a) The Referee shall be the chief official in all Championship contests and shall be in charge of the control of the fight.

[. . . .]

(e) The Referee may stop the fight and consult with the ringside physician on whether, in the physician's opinion, a contestant is physically able to continue.

(f) The Referee may impose discipline and enforce the WBO Rules and the Uniform Rules regarding the conduct and behavior of the Contestants and Seconds.

In light of the above rule, this Grievance Committee is forced to conclude that referee Danrex Tapdasan acted accordingly during the contest. First, Referee Tapdasan did not abuse his discretion in admonishing Shiming Zou's corner men over the excess



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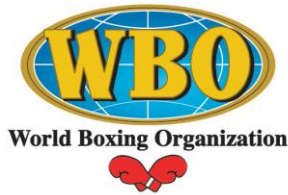
over-pouring of water at the fighter within their respective corner on numerous occasions. Instead, such acts demonstrate that referee Tapdasan took reasonable efforts to correct ring conditions.

Furthermore, Referee Tapdasan called "Timeout" after Zou slipped in his own red corner in the 10th round. The Referee directed both fighters to their neutral corners while ordering Zou's camp to wipe the ring apron properly and ensured its dryness before resuming the action. This procedure by the arbiter exemplifies good judgement, discretion and full compliance with WBO Championship Contests Regulations. Similarly, PBCC Ring Inspector Haiyan Yin, in like manner, repeatedly addressed such issues by ordering Zou's camp to desist such actions and requested compliance with the rules and regulations during the rests periods.

Section 23 (g) of the WBO Championship Contests Regulations in relevant provides the following:

"The WBO Supervisor is empowered to resolve, with the information and advice that may be offered by the Local Boxing Commission, any problem, matter or incident that has to be solved with respect to the holding of the fight that relates to the awarding of the WBO Championship and these Rules, including the resolutions required to deal with unforeseen events".

With respect to the correspondent supervisor and supplemental reports prepared by the assigned Official, there are no indications of any substantially irregular, negligent nor inadequate application of the WBO Championship Contests Regulations by any of the appointed officials, including the PBCC. Furthermore, the PBCC is a professional supervisory authority that has hosted and enforced its rules in more than seven hundred professional boxing fights, composed of competent officials who ensure the primary safety of all participants subject to their jurisdiction. In the event of any incidents, issues or affairs within any sanctioned WBO bout that could jeopardize the safety of participants,



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WBO rules provide relief for such matters and require that officials observe strict compliance thereto.

Conversely, having examined the fight video, it is apparent that Zou showed no signs of a physical injury or impediment which would have required intervention from the referee, officials or even his own corner. Although Zou slipped in various occasions during the bout, he resumed fighting without requiring any assistance. Further, neither Zou nor his corner addressed allegations of potential physical injuries to ring officials as result of Zou's saturated corner. Moreover, it would be unreasonable to attribute fault to fight officials, after their continuous reprimands against petitioner's corner. This Committee stands by its principled, Constitutional objectives of preserving all participants' physical safety and well-being. Moreover, the PBCC affirms faithful compliance on behalf of the WBO appointed officials. Nothing in the Record of Proceedings persuades the Committee to the contrary.

In light of the above-mentioned rules, this Committee is forced to conclude that all officials appointed to the Zou-Kimura bout acted in accordance with both WBO Championship Contests Regulations and Local Host Commission Rules and procedures. Hence, allegations number one (1) have no merits on grounds for reversal of the WBO Championship Committee's determination of denying petitioners a Return Fight pursuant to WBO Regulations of Championships Contests.

(2) Supervisor Leon Panoncillo Jr. exhibited impermissible conflicts of interest, due to his role in the WBO, while simultaneously presiding the Local Host Commission, PBCC;

Petitioners argue that the appointed WBO Bout Supervisor, Leon Panoncillo Jr., exhibits an impermissible conflict of interests due to his work both as an official supervisor within the WBO and as the alleged president of the Local Host Commission, PBCC.

Section 23 (i) of the WBO Championship Contests Regulations provides the following:



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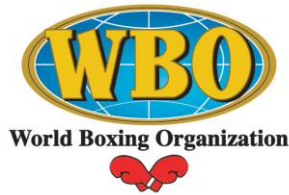
"The WBO recognizes and abides by Local Boxing Commission rules and regulations concerning the appointment of Officials to a World Title Contests. The WBO President shall have the discretion to accept or reject officials so selected".

Section 31 of the WBO Championship Contests Regulations provides the following:

"The President of the Organization shall attend or designate a WBO Supervisor to attend every World Championship contest sanctioned by the WBO. The duties of said Supervisor shall be to represent the WBO at the Championship Match and prefight events including the weigh in, the Rules Reading Ceremony, and the dressing room instructions, to interpret and enforce the WBO Rules, and to award the Championship belt".

This Committee disapproves of any conflict of interests that may arise with respect to any of its officials. Nevertheless, the Record of Proceedings does not support a claim that Mr. Panoncillo has a conflict of interest, nor that the WBO and PBCC are impermissibly intertwined. Instead, the Committee finds that the PBCC and WBO are two distinct and separate entities. For starters, the PBCC was created and founded in 2013 by current President Mr. Daniel Han Jianping along with General Secretary Maggie Wei Na of Beijing, China, and Executive Director Samson Lu Kin Hang of Macau. Second, the PBCC is not owned nor funded by the WBO. Third, the PBCC has supervised and monitored hundreds of boxing events in China involving championship fights sanctioned by other boxing bodies, such as the WBA, WBC and IBF.

The sole and exclusive obligations of the appointed WBO Supervisor was to exercise and enforce his WBO obligations as its representative in accordance with the host commission. Mr. Panoncillo fully complied with his responsibilities and duties as evidenced by all the documentation submitted.



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With respect to Petitioners' assertion that Mr. Panoncillo held a presidential position at the PBCC, the Record cannot support such claim. Although Petitioners refer to an article stating that Mr. Panoncillo is "head of the [PBCC],² such reference is contradicted by the record and the article itself. The article's reference to Mr. Panoncillo as the PBCC's "head" is best read in the context of him serving as a "driving force" for boxing in China. This, because aside from supervising events as a WBO official, he has also conducted professional workshops for Chinese boxing officials. In other words, the cited article merely describes Mr. Panoncillo's involvement with the PBCC, in the development of professional boxing in China. However, as noted by Mr. Panoncillo in his Supplemental Report, he is an outside Consultant for the PBCC, such that he does not occupy any position nor represent the PBCC.

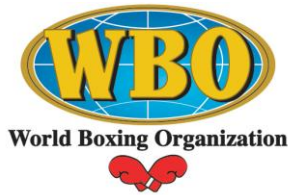
Consequently, the WBO Grievance Committee rejects Petitioners' conflict of interest allegations, and instead holds firmly that Mr. Panoncillo Jr. thoroughly complied with his functions.

In light of the above, this Committee holds that Petitioners' second argument does not warrant reversal of the WBO Championship Committee's determination, insofar as the conflict of interest Petitioners allege is nonexistent.

(3) The appointed referee did not finish the Mandatory eight (8) count, or in the alternative, that the Contest's resolution should have been based on the fight's official score cards after the referee ordered the fight's stoppage;

Petitioners argue in summary, that Shiming Zou should have been subjected by the referee to the Mandatory eight (8) count, or, in the alternative, that the ultimate decision should have been based on the fight's official score cards if a stoppage was ordered by the referee. Additionally, Petitioners also raises questions with regards to Zou's ceasing

² See Rene Bonsubre, Jr., Notes from Shanghai Part I: PBCC and China's Boxing Boom, World Boxing Organization (Aug. 26, 2014) <http://www.wboboxing.com/notes-shanghai-part-pbcc-chinas-boxing-boom/>.



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to fight after the referee assessed his physical condition in the 11th round. Finally, Petitioners contend that, considering the match was inside the 11th round, the referee should have permitted Zou to finish the bout.

Section 25 of WBO Championship Contests Regulations provides:

- (a) When a contestant is down, the Referee shall order the opponent to retire to the farthest neutral corner and shall immediately begin the count on the fallen contestant. The Referee shall audibly announce the count while he moves his arm downward indicating the end of each second of the count.**
- (b) If the opponent refuses to remain in the neutral corner farthest from the fallen boxer, the Referee shall stop the count until the boxer returns to the corner and shall then resume the count at the point in which it was interrupted. The fallen fighter shall take the compulsory eight (8) count.**
- (c) If, when reaching the count of eight (8), the fighter is up, the Referee, if he deems it necessary, may examine said contestant taking all the time needed to evaluate whether the contestant is fit to continue. If the Referee determines that the fighter is fit to continue, the Referee shall promptly order the contest to continue.**
- (d) If the contestant taking the count is still down when the Referee calls the count of ten (10), the Referee shall wave both arms indicating that the contestant has been knocked out.**
- (e) A fighter may not be saved by the bell in any round. If a contestant is down when a round's three-minute duration has expired, the timekeeper shall not ring the bell, and the Referee shall continue**



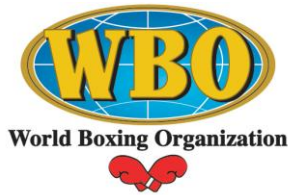
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the count until the contestant rises or is counted out. If the Referee determines that the contestant is on his feet and fit to continue the fight before he reaches the ten-count, he shall indicate to the timekeeper to ring the bell and the round will thereupon terminate. The one-minute rest period will then commence at the termination of the round as determined by the Referee. Only the Referee may make the determination when the round ends when there is a knockdown within 10 seconds of the end of the round. If a timekeeper inadvertently rings the bell before the Referee determines that the knocked down fighter is fit to continue, the Referee will continue his count and resolve the knockdown and determine the end of the round without regard to the inadvertent bell. If the Referee determines that the knocked down fighter is fit to continue before the ten count, he will thereupon terminate the round and will instruct the timekeeper to commence the one-minute rest period from the point of that determination.

(f) A contestant shall be considered down when any part of his body, other than his feet, is on the floor, or if he is hanging helplessly over the ropes, and only is held up by the ropes, as the result of a legal blow. Only the Referee may determine whether there has been a knockdown.

This Committee has made a comprehensive evaluation of the video footage regarding the championship contest of reference, along with all evidenced submitted by Petitioners and by the WBO Supervisor, and the PBCC's position. Consequently, the Grievance Committee holds that no violations of the Rules occurred.

The appointed WBO referee, Danrex Tapdasan, methodically executed the proper knockdown procedure upon such event suffered by Zou during the 11th round of the title fight. **Referee Tapdasan clearly uttered the word "Down" and pointed to the**



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floor, demonstrating his call of a legitimate knockdown. Thereupon, the assigned referee directed Zou's opponent, Sho Kimura, to the neutral corner, while the knockdown timekeeper started the mandatory 8-count. Referee Tapdasan then picked up the count from the knockdown timekeeper, starting his count at "4" and clearly counted until "8". After completing the mandatory 8-count, Referee Tapdasan directed Zou to move forward and assessed his fitness to continue the contest. Immediately thereafter, Zou was asked if he was ready to continue. **As the video footage reflected, Zou moved his head side-to-side, looked at the referee, verbally stated "NO," then rested on the ropes, showing that he was not willing to continue.** These circumstances clearly indicate that Referee Tapdasan engaged in a corrective assessment in compliance with WBO Championships Regulations, and did not abuse his decisional discretion. Therefore, the fight was properly stopped.

Further, Petitioners' alternative argument—that, upon stopping the fight, the result should have been based on the scorecards—is unavailing. The subject bout was held in accordance with the ABC Unified Rules of Boxing and contingent to Local Host Commission rules and regulations.

Section 12, subsection A (1), (2) of the ABC Unified Rules of Boxing in relevant, provides the following:

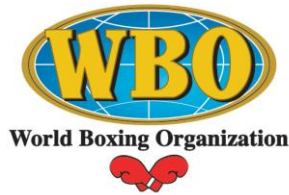
12. Injuries sustained by Fouls:

A. Intentional fouls.

1. If an intentional foul causes an injury, and the injury is severe enough to terminate the bout immediately, the boxer causing the injury shall lose by disqualification.

2. If an intentional foul causes an injury and the bout is allowed to continue, the referee shall notify the authorities and deduct two (2) points from the boxer who caused the foul. Point deductions for intentional fouls will be mandatory.

3. If an intentional foul causes an injury and the bout is allowed to continue, and the injury results in the bout being stopped in any



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round after the fourth (4th) round, the injured boxer will win by TECHNICAL DECISION if he is ahead on the score cards; and the bout will result in a TECHNICAL DRAW if the injured boxer is behind or even on the score cards.

Since there was no sustained nor perpetrated fouls by either contestant during the bout, there was no obligation to go to the score cards. Furthermore, the appellant did not sustain a physical injury which would cause or justify the stoppage of the bout for such purposes. Hence, a **Technical Decision** is only possible if there is an **INJURY** which results in the fight being stopped or a **FOUL** committed by one of the contestants.

In light of the above rule this Committee concludes that allegation number three (3) does not warrant reversal of the WBO Championship Committee's determination.

(4) Return Fight Pursuant to Rule 18 of Championship Contests Regulations

Petitioners also request a Return Fight Pursuant to Rule 18 of WBO Championship Contests Regulations based on the above foundations and Shiming Zou's renown within the sport of boxing in China.

Section 18 of WBO Championship Contests Regulations provides:

The WBO shall not allow direct return fights, unless recommended by the World Championship Committee and authorized by the Executive Committee. A direct return fight is a fight between the new Champion and the former Champion from whom the new Champion won the title (or between a new Champion and the losing Contestant in a Vacant Title Fight), before the new Champion defends his title against any of the other fighters classified in his category. If the World Championship Committee determines either that the resolution of a Championship Contest was substantially irregular, or that there was a clear misapplication of the rules of boxing resulting in a manifest unfairness, such that in either case the World Championship



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Committee determines that the Championship was substantially unresolved, the World Championship Committee may, in its discretion, recommend a direct return fight, which may be authorized only by the majority vote of the Executive Committee. The World Championship Committee may recommend a direct return fight for any other circumstance; in that event a direct return fight shall only be authorized by the affirmative vote of not less than 75% of the Executive Committee.

In light of the above rule and the evidence and arguments on the Record, the WBO Grievance Committee affirms the determination of the WBO World Championship Committee and agrees with the foundations outlined therein, finding no compelling arguments that would justify overturning the same.

(5) The Championship Committee’s purported failure to mention statements from other individuals, including California ringside physicians and a world-renowned cut-man.

Petitioners further argue that the Championship Committee’s determination should be reversed, because it failed to mention statements from California ringside physicians and a world-renowned cut-man. However, Petitioners’ argument stops short of even mention the names of the individuals in question.

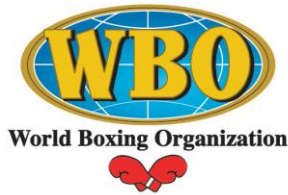
Article 3 of WBO Appeals Regulations provides:

Any Appeal, Complaint, or Grievance (hereinafter referred to as a “Complaint”) shall be submitted in writing to the President. Any WBO participant may submit a Complaint. [. . .]

All such Complaints shall:

[. . . .]

b) Contain a clear and specific summary of the Complaint, reasons and arguments upon which it is based, with a clear statement of the relief that the Complainant is seeking.



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- c) Shall have attached clear and legible copies of all the documents, contracts, instruments, reports, tests, precedents or other materials relevant to the Complaint, and shall indicate clearly the provision of the WBO constitution, by-law, rule or regulation the Complainant considers relevant to the resolution of the Complaint.**

[. . . .]

As set forth by the cited article, Petitioners had a duty to (1) contain a *clear and specific* summary of the Complaint, reasons, and arguments, and (2) attach to the appeal all relevant materials. However, Petitioners perfunctory reference to "other individuals," without even mentioning their names is not a *clear and specific* summary. Further, even if they had done so, Petitioners would have also been required to attach to their appeal such statements. Nonetheless, the appeal is absent of any such statements, and this Committee has not been put in a position to determine which portion of the Record of Proceedings, if any, Petitioners reference.

However, assuming that Petitioners refer to the letters they submitted on behalf of Dr. Kelly James Tucker, Dr. Robert Anthony Ruelaz, and Mr. Jacob Durán, the argument is unavailing on the merits. As previously stated above, the fact that Mr. Zou's corner was wet does not merit reversal, insofar as WBO and PBCC officials acted pursuant to WBO Championship Contests Regulations. Further, Petitioners ask that this Committee rule on credibility matters, which we are not inclined to do, particularly when no participant asked to present additional witness statements or testimony.

In light thereof, this Committee must conclude that this argument does not warrant reversal of the Championship Committee's determination. Petitioners had the burden on appeal to proffer the statements in question, or at minimum, to specifically point to the same; yet they failed to meet the same. Furthermore, this argument does not warrant reversal, because ringside officials properly acted within the scope of their duties.



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CONCLUSION

The appeal is denied, and the September 18, 2017 determination of the WBO Championship Committee is affirmed. This Decision is the Final Action of the WBO Grievance Committee, and constitutes the Final Arbitration Award issued pursuant to P.R. Laws Ann. tit. 32, § 3201 et. seq., the United States Arbitration Act, 9 U.S.C. § 1 et seq., the Inter-American Convention on International Commercial Arbitration, January 30, 1975 O.A.S.T.S. No. 42, 14 I.L.M. 336 (1975), and the Convention on the Recognition and Enforcement of Foreign Arbitration Awards of June 10, 1958, 21 U.S.T. 2517, T.I.A.S. No. 8052, and WBO Rule 35, which in relevant provides:

- (d) These Regulations are to be interpreted in conformity with the Laws of the Commonwealth of Puerto Rico. All WBO Participants agree and consent that the exclusive venue for any or all action in which the WBO is made a party, whether it is to enforce, interpret or declare the application of these Regulations or to appeal from any determination of the WBO, including, but not limited to a determination of the Grievance Committee, may be maintained only in the Superior Court of the Commonwealth of Puerto Rico, or, if applicable, in the U.S. District Court for the Commonwealth of Puerto Rico.**
- (e) All WBO participants acknowledge and agree that the mandatory resort to the WBO Appeals Regulation is the sole and exclusive remedy for any claim, appeal, grievance or contest that arises from any right or status that is or could be subject to these Regulations or which results or could result from or relate to the interpretation or application of these Regulations. These WBO Appeals and Grievance Committee determinations are Arbitrations within the contemplation of the Arbitration Law of Puerto Rico, 32 LPR Section 3201 et. seq. and the US Arbitration Act, Title 9 of the United States Code and the Inter-American Convention on International Commercial Arbitration of July 30, 1975 and the Convention**



**COMPLAINT PRESENTED BY ZOUXUAN SPORTS ON BEHALF OF SHIMING ZOU
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on the Recognition and Enforcement of Foreign Arbitration Awards of June 10, 1958. All WBO participants stipulate and agree that the nature of the sport requires a prompt, final and uniform resolution of all disputes concerning application of these Regulations by a tribunal experienced with the application of these Regulations and with special knowledge and experience in world championship professional boxing.

(f) These Regulations apply to all WBO Participants. The term WBO Participant includes any and all person or company who participates in any WBO activity, including, but not limited to any and all current or former WBO World Champions, WBO Regional Champions, or WBO Zone Champions; WBO World Championship contenders or WBO Regional Championship contenders, or WBO Zone Championship contenders; all WBO World, Regional or Zone ranked or rated boxers; Manager and/or Promoters of any of the foregoing; all WBO Members, and all WBO Officials. The WBO is a voluntary not-for profit organization. All WBO Participants who participate in any WBO sanctioned activity do so on the express condition that such WBO Participant is bound by and subject to these WBO World Championship Rules and all WBO Rules and Regulations.

All WBO Participants are reminded that the sole remaining opportunity to review this determination is an appeal to the WBO Executive Board, which may be initiated only by written application to the WBO President per Article 7 of the WBO Appeals Regulations which provides:

"The decision of the Grievance Committee is final unless an appeal is granted pursuant to this Article. In the sole discretion of the President, a decision may be reviewed by the Executive committee of the WBO. This extraordinary review may be ordered by the President upon independent decision of the President after receipt and consideration of a written Appeal by a WBO Participant



World Boxing Organization



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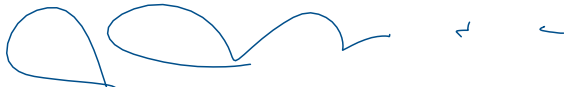
affected by the decision within five (5) days following the date of the decision. The effect of a decision of the Grievance Committee will not be affected by an Appeal unless the President determines to stay the decision pending Appeal”.

In San Juan, Puerto Rico, this 20th day of November 2017.

Respectfully Submitted,

World Boxing Organization

Grievance Committee

By: 

Fernando J. Gierbolini, Esq.