

AFFIDAVIT OF GEORGE HINCAPIE

I, George Hincapie, under penalty of perjury, declare and state:

1. I am thirty-nine (39) years old and was born on June 29, 1973. I have been a professional cyclist during the time period from late 1993 through this year.
2. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.
3. I am providing this affidavit to the United States Anti-Doping Agency (USADA) as part of my voluntary cooperation with USADA and as a part of USADA's investigation of doping in the sport of cycling.
4. I understand that this affidavit will be submitted in legal proceedings, including arbitrations, in which USADA is presently involved, or may become involved, and in connection with cases that USADA has brought, or may bring, in connection with doping in the sport of cycling.
5. USADA has full authority to use this affidavit as appropriate in connection with its anti-doping responsibilities under the Code, including use in any legal proceedings or investigations or in connection with any decision or announcement of sanctions or violations issued by USADA.
6. I understand that a requirement of my cooperation with USADA is that I provide USADA truthful and complete information concerning my involvement in doping and the involvement in anti-doping rule violations of all others of which I am aware.

7. I am aware that should I fail to provide truthful information to USADA that I may lose any and all benefits of my cooperation with USADA.

8. I have also previously provided truthful information about doping on the U.S. Postal Service Cycling Team to the United States federal government in connection with a criminal investigation.

9. I understand and agree that I am subject to the results management jurisdiction of USADA as a former member of the USADA registered testing pool, as a former U.S. Olympic Team Member and as a United States athlete who is a member of USA Cycling and who is subject to the USA Cycling Medical Control rules, the USADA Protocol for Olympic and Paralympic Movement Testing and the United States Olympic Committee National Anti-Doping Policies.

10. The statements provided in this affidavit were provided directly to USADA and have not previously been provided to the Union Cycliste Internationale or USA Cycling.

11. A brief history of my cycling career follows.

12. I began cycling when I was eight (8) years old and soon began competing in junior cycling races. When I was twelve (12) years old I won a national championship and a bronze medal at the junior World Championships.

13. In 1988 I was the National U-17 Road Race Champion.

14. In 1991 I was third in the pursuit at the World U-19 Track Cycling Championships. 1991 was the last year I competed as a junior.

15. In 1992 I competed in my first Olympics. My coach on the Olympic team was Chris Carmichael. While on the 1992 Olympic team I received what I understood to be vitamin B-12 injections from Angus Fraser. This was the first time I had ever been injected with any substance in connection with sport.

16. In 1993 I was contacted by Jim Ochowicz to turn professional and ride with the Motorola Cycling Team. I rode with the team at the end of the year in at least one race in Italy.

17. In 1994 Motorola was considered the top U.S. men's professional road cycling team and I was excited to be on it. My teammates on this team included Lance Armstrong, Frankie Andreu and Stephen Swart.

18. I got to know Frankie Andreu once I joined the team. Frankie and I roomed together for several years.

19. Prior to joining Motorola I knew that Lance Armstrong was on the team as I had met him several years prior when we had raced on the national team together.

20. Lance and I were friends from the start.

21. I won a couple of stages at the Tour of Luxemburg in 1994 and was first in the points classification in that race.

22. During 1994 I was given injections by the team's Belgian massage therapist. I asked what was in the injections and was told that the substances were legal products such as Vitamin C, Vitamin B-12 and liver cleaner.

23. In 1995 there appeared to me to be a major change in the peloton. It was becoming very difficult to keep up, and I learned that the reason was the widespread use of erythropoietin (“EPO”), a banned blood oxygen booster for which there was, at the time, no effective doping test. As the speed of the peloton increased we seemed to be confronted with the choice of using EPO or not performing well in races.

24. At this point in time people in the peloton were talking about EPO quite openly.

25. I recall that around this time Dr. Michele Ferrari, an Italian physician working with cyclists was quoted as saying that EPO was no more dangerous than orange juice.

26. I also recall talking with my teammate Stephen Swart who said everybody was taking EPO.

27. Around this time we got crushed in the Milan-San Remo race and coming home from the race Lance Armstrong was very upset. As we drove home Lance said, in substance, that, “this is bull shit, people are using stuff” and “we are getting killed.” He said, in substance, that he did not want to get crushed any more and something needed to be done. I understood that he meant the team needed to get on EPO.

28. In 1995 and 1996 I lived in Como, Italy with **Rider-4** Kevin Livingston, and Frankie Andreu.

29. Lance also lived in Como at the time but on his own and not with the three of us.

30. Eventually, I came to understand that Frankie Andreu had experimented with EPO, and he told me how I could obtain it in Switzerland. Kevin **Rider 4** and I discussed using EPO at this time and my understanding was that we all began using it around this time.

31. I purchased EPO for the first time in 1996 at a pharmacy in Switzerland, which was only a one hour drive from Como. I injected it subcutaneously as I had previously injected vitamins. I began by using 2,000 international units every two to three days. I had made up my mind that if I wanted to be a professional cyclist I had to do this.

32. It soon became clear to me that most of the riders, if not everyone on the team, were using EPO. EPO needs to be kept cold and the guys began carrying around coolers and coffee thermoses with ice in them. I generally recall that almost everyone on our team had a thermos.

33. Our performance began to improve. Lance started to do better. **Rider 4** did very well at the Vuelta a España. We all routinely acknowledged that the improvements came about through use of EPO.

34. I understood that by 1996 Lance had also begun working with Dr. Ferrari.

35. In 1996 Customs seized EPO that I had with me when entering the U.S. I told them it was medicine, and I was allowed to retain it.

36. In 1997 I began riding for the U.S. Postal Service Cycling Team.

37. Pedro Celaya was the team doctor for the U.S. Postal Service Team and I received EPO from him beginning in 1997. Dr. Celaya provided me EPO on several occasions in 1997, and I used EPO in completing my first Tour de France that year.

38. In 1998 Dr. Celaya continued as the team doctor. I recall getting human growth hormone (hGH) from Dr. Celaya in 1998. I may also have gotten hGH from Dr. Celaya in 1997.

39. I recall that in 1998 at the Tour de France the team staff was very afraid of police attention given to doping as a result of the Festina team having been caught with doping substances. I understood from conversations with some of the soigneurs that drugs were dumped overboard when the ferry carrying the team was making the passage from Ireland where a portion of the Tour had been run.

40. Later during that Tour, I was in the team camper when team staff flushed drugs down the toilet of the team camper.

41. During the Tour that year I recall using testosterone pills and hGH to recover after stages of the race and using EPO.

42. One of the soigneurs on the team at this time was Emma O'Reilly. I considered her to be trustworthy. While I do not recall discussing performance enhancing drugs with her, I do recall that on at least one occasion I gave her some drugs in a package and, without telling her what was in the package, asked her to bring it for me to the next race.

43. In 1998 I was the U.S. National Road Race Champion.

44. In 1999 Johan Bruyneel became the new team director for the U.S. Postal Service Team.

45. Johan brought Dr. Luis Garcia del Moral to the team as the team doctor and brought in Jose "Pepe" Marti as the team trainer.

46. Johan brought about several additional changes to the team. He was more involved in my training and kept track of my blood parameters. He typically knew my hematocrit level (the percentage of red blood cells in my blood) and generally called me if he had a concern about my hematorcrit level, such as if it was close to the fifty percent cut off level over which we could not race.

47. My hematocrit was relatively high, so when using EPO I had to be concerned about crossing the fifty percent threshold at which I would be kept out of races. Dr. del Moral provided saline infusions on many occasions during each year from 1999 through 2003 in order to keep my hematocrit level below the threshold.

48. Dr. del Moral also provided testosterone to me from time to time. For instance, he provided a testosterone pill to me in the 1999 Tour de France.

49. I also received from Dr. del Moral a testosterone product known as the "oil" which was testosterone mixed with olive oil. Many on the team carried around little vials or bottles with this testosterone olive oil mixture.

50. I was generally aware that Lance was using testosterone throughout the time we were teammates. For instance at a race in Spain in 2000 Lance indicated to me he had taken testosterone. Lance told me that he was feeling good and recovered, that he had just taken some "oil." When I heard that drug testing officials were at the hotel, I texted Lance to warn him to avoid the place. As a result, Lance dropped out of the race.

51. Johan knew about my drug use and from time to time he facilitated it by providing drugs to me.

52. For instance, after the Tour of Valencia in 1999 Johan Bruyneel provided hGH to me at my request. I paid Johan for the hGH.

53. Lance told me that he stopped using hGH after his cancer. I understand, however, that he used hGH before he contracted cancer.

54. Pepe Marti provided me testosterone and EPO in 1999. On more than one occasion, he delivered EPO to my residence, and I paid him for it.

55. In 1999 I used EPO in the lead up to the Tour de France. This EPO was provided by Pepe Marti who lived about 3 hours from where I lived in Girona, Spain. I lived in Girona for parts of the year from 1997 through 2010.

56. I was aware that Lance Armstrong was using EPO in 1999.

57. During the 1999 Tour de France I knew that Tyler Hamilton and Kevin Livingston were using EPO.

58. I also observed Frankie Andreu being injected with EPO by Dr. del Moral in 1999.

59. "Po" was a slang term I recall being used for EPO during my time on the U.S. Postal Service Team. I recall hGH being referred to as "Giaca."

60. In 2000 while on a training ride I asked Lance Armstrong about Dr. Michele Ferrari. I felt that I had been putting in a great deal of work but not getting the results that I should have been able to achieve. Lance told me that he would contact Dr. Ferrari on my behalf.

61. Thereafter, Dr. Ferrari came to a training camp in Austin, Texas in late 2000 or early 2001.

62. This training camp is the first that I recall working with Dr. Ferrari. Others present at the camp included Tyler Hamilton, Christian Vande Velde, Roberto Heras and Chechu Rubiera.

63. At this training camp there was a discussion about blood doping. I asked about the benefits of blood doping, and Dr. Ferrari said that it improved performance. Thereafter, at that camp I personally discussed with Johan Bruyneel and Pepe Marti my beginning a blood doping program for the upcoming season. Johan explained how the program would work, how blood would be taken out and re-infused and that hiring Dr. Ferrari was part of the program. I was told that it would cost me \$15,000 to hire Dr. Ferrari for the season. I agreed to hire Dr. Ferrari, and Johan and I made the decision that I would begin on a blood doping program supported by the team. I understood that there was no test that could detect blood doping.

64. Following this training camp I met with Dr. Ferrari and thereafter I worked with him until 2006.

65. Dr. Ferrari told me that the team doctors would assist me with the blood doping and they did.

66. Later, I was told by Johan that I needed to travel to Belgium where my blood would be extracted. In Belgium I met Dr. del Moral and blood was extracted from me in a hotel room.

67. On other occasions I met Dr. del Moral in Valencia, Spain to have my blood extracted. Dr. del Moral continued to assist me with blood transfusions through his tenure with the team which ended in 2003.

68. In 2004 Pedro Celaya was re-hired as the team doctor and he assisted me with blood doping in 2004 and 2005.

69. Pepe Marti also assisted with the blood doping program, helping me with the extraction and re-infusion process from 2001 through 2005.

70. In addition to the involvement of Johan, Pepe, Ferrari, del Moral and Celaya in the blood doping program, I understood that **Other-3** (known as **Other-3**) was involved in transporting blood to riders.

71. I spoke with Lance in 2001 about beginning on the blood doping program.

72. As part of the blood doping program my blood was re-infused into me at the hotel during a stage race. On several occasions I was present when other riders were having their blood re-infused. For instance, I recall seeing **Rider-5** Floyd Landis, **Rider-6** and **Rider-7** having their blood re-infused. On another occasion **Rider-8** and I laid side by side while team staff assisted with the re-infusion of our blood.

73. After having our blood re-infused the team physicians and staff disposed of the blood transfusion paraphernalia, including needles and blood bags. The riders were told to wear long sleeve shirts to cover the needle marks.

74. In 2003 Lance Armstrong contacted me about needing to do something private at my apartment in Girona because he had guests at his apartment. I agreed and Lance came to my apartment with Dr. del Moral. Lance and Dr. del Moral went into my bedroom and Dr. del Moral was carrying what I thought was a blood bag. He asked to borrow a coat hanger and Lance and Dr. del Moral closed the door behind them. They were in the room about 45 minutes to an hour which is about the time it generally takes to re-infuse a bag of blood. I know from experience that when blood is re-infused a common practice is to tape the blood bag to a coat hanger and hang the hanger on the wall to facilitate transfer of the blood into the vein. Although we did not discuss the incident, I believed that Dr. del Moral was re-infusing blood for Lance as Dr. del Moral had followed a similar procedure when re-infusing my blood on prior occasions.

75. While blood was re-infused during competitions in order to enhance performance, blood was also periodically re-infused at other times in order to keep the blood fresh.

76. After a stage during the 2004 Tour de France blood transfusions were given on the team bus to most of the riders on the team.

77. On another occasion during the Tour de France in 2003 or 2004 Lance said to me, "I am going to be 500 grams heavier today." I understood this to mean he had received a blood transfusion.

78. From my conversations with Lance Armstrong and experiences with Lance and the team I am aware that Lance used blood transfusions from 2001 through 2005.

79. Dr. Ferrari's training plans included notations for when I was to take EPO, blood transfusions and testosterone. He also placed a dot on some days and a circle on other days to indicate the amount of EPO to be taken.

80. Dr. Ferrari was present on occasion when I received injections of EPO.

81. Dr. Ferrari instructed that EPO should be injected directly into the vein to reduce the risk of detection. I understood from Dr. Ferrari that if taken this way that EPO should clear the system and not be detectable within 12 hours.

82. Shortly before the 2005 Tour de France I was in need of EPO and I asked Lance Armstrong if he could provide some EPO for me. Lance said that he could, and he gave me two vials of EPO while we were both in Nice, France.

83. Lance had previously provided EPO to me on another occasion following a training camp in Santa Barbara, California. Lance and I had stayed after the camp a few days to train and I asked him if he had any EPO I could use. Lance thereafter provided me with EPO.

84. EPO use was common on the U.S. Postal Service and Discovery Channel teams during the period from 1999 through 2007 and I discussed EPO use with other riders on the team.

85. I used the "oil," the product described in paragraph 49 above, on occasion between 1999 and 2005.

86. I am also aware that cortisone was used by riders on the U.S. Postal Service and Discovery Channel Team although they did not have a valid medical excuse to use the substance.

87. I recall Lance Armstrong testing positive for a corticosteroid at the 1999 Tour de France. When it came out that he had tested positive Lance and the team said that he had tested positive because he had taken a cream for a saddle sore. I assumed this excuse was made up and remember not believing it because cortisone injections were so frequently given by the team doctors to assist the riders with their performance.

88. After the 2000 Tour de France I understood that French law enforcement had commenced an investigation regarding "medical waste" dumped by U.S. Postal Service team staff. I read in press accounts that one of the products found in the medical waste was a substance known as Actovegin. While I was on the Postal Service Team Actovegin was used by riders and injected by the medical staff because it was believed to improve circulation and enhance performance. Dr. del Moral promoted the use of Actovegin by riders on the team and in 2000 my understanding was that most of the riders on the U.S. Postal Service Team were using Actovegin. Actovegin would generally be injected the night before a race. It was not used to treat road rash, although I knew that this false claim was made to the media and others during the course of the French investigation.

89. Lance retired after the Tour de France in 2005. I returned to Girona but Lance did not. Shortly after the Tour Johan called me up and asked me to go over to Lance's apartment to

go through the apartment and the closets to make sure that there was nothing there. I understood that Johan wanted me to make sure that there were no doping materials in the apartment. I went over to the apartment and texted Johan back that I had not found anything to worry about.

90. After Lance retired I began to think about my involvement in doping and that it was time to try to stand up for change in the sport. I was tired of the doping, and I thought if I talked with other riders perhaps I could influence a change in our sport. As I talked with other riders, most approved of this approach.

91. In 2006 I talked with Dr. Ferrari about wanting to use fewer performance enhancing drugs and blood transfusions. In 2006 I had some blood extracted but did not have it re-infused. I used some testosterone pills and patches in 2006, but by the end of the year had stopped using any banned products. 2006 was the last year that I worked with Dr. Ferrari.

92. I have not used any banned drugs or methods since 2006.

93. At the 2010 Tour de France I had a conversation with Lance Armstrong about the U.S. federal government investigation into doping on the U.S. Postal Service Team, and I told Lance that government investigators wanted to talk to me. Lance said that maybe I should stay in Europe a little longer; I understood by this that he wanted me to stay off the government's radar and was asking me to avoid testifying as long as I could.

94. I road for Team High Road in 2008 and 2009 and for BMC Racing Team in 2010 through 2012. I am not aware of any doping occurring on those teams.

95. This affidavit is not an exhaustive summary of my testimony; however, it fairly and accurately sets forth information within my personal knowledge, information and belief.

96. In making this statement I have endeavored above all things to be truthful and accurate. Although I know that my testimony is painful for some, including myself, it is not made with any animosity and, in fact, is made with some regret.

97. While I ultimately came to the conclusion that I needed to be fully truthful and transparent with USADA, I continue to hold many with whom I cycled, including Lance Armstrong, in very high regard.

98. I continue to regard Lance Armstrong as a great cyclist, and I continue to be proud to be his friend and to have raced with him for many years.

99. I have witnessed many important things that Lance has done for his fellow man through battling cancer and being a role model for many. My testimony is not intended to take away from, or diminish those things.

100. Lance and I, and our teammates, raced on the Motorola Team, on the U.S. Postal Service Team and on the Discovery Channel Team during a time period when our sport was inundated with performance enhancing drugs. The doping controls were not very good and we came to believe that we needed to use banned substances to compete at the very highest levels.

101. While I understand that the choices we made were wrong, I understand why we made them and why, at the time, we felt justified in making them. I do not condemn Lance for making those choices and I do not wish to be condemned for the choices I made.

I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this 24 day of Sept., 2012.

George Hincapie
George Hincapie

STATE OF South Carolina)
) ss.
COUNTY OF Greenville)

Subscribed and sworn to before me by Sept on this 24th day of 2012.

Witness my hand and official seal.

My commission expires: 11/19/2019

Andrea O. Honey
Notary Public

Address: 203 Foxhound Rd
Greenville SC 29681

AFFIDAVIT OF LEVI LEIPHEIMER

I, Levi Leipheimer, under penalty of perjury, declare and state:

1. I am thirty-eight (38) years old and was born on October 24, 1973. I have been a professional cyclist during the time period from 1997 until the present.

2. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.

3. I am providing this affidavit to the United States Anti-Doping Agency (USADA) as part of my voluntary cooperation with USADA and as a part of USADA's investigation of doping in the sport of cycling.

4. I understand that this affidavit will be submitted in legal proceedings, including arbitrations, in which USADA is presently involved, or may become involved, and in connection with cases that USADA has brought, or may bring, in connection with doping in the sport of cycling.

5. USADA has full authority to use this affidavit as appropriate in connection with its anti-doping responsibilities under the Code, including use in any legal proceedings or investigations or in connection with any decision or announcement of sanctions or violations issued by USADA.

6. I understand that a requirement of my cooperation with USADA is that I provide USADA truthful and complete information concerning my involvement in doping and the involvement in anti-doping rule violations of all others of which I am aware.

7. I am aware that should I fail to provide truthful information to USADA that I may lose any and all benefits of my cooperation with USADA.

8. I have also previously provided truthful testimony under oath and subject to penalties of perjury about doping on the U.S. Postal Service Cycling Team to the United States federal government in connection with a criminal investigation.

9. I understand and agree that I am subject to the results management jurisdiction of USADA as a member of the USADA registered testing pool, as a former U.S. Olympic Team Member and as a United States athlete who is a member of USA Cycling and who is subject to the USA Cycling Medical Control rules, the USADA Protocol for Olympic and Paralympic Movement Testing and the United States Olympic Committee National Anti-Doping Policies.

10. The statements provided in this affidavit were provided directly to USADA and have not previously been provided to the Union Cycliste Internationale or USA Cycling.

11. A brief history of my cycling career follows.

12. I have competed on the following professional cycling teams: Comptel – Colorado Cyclist (1997), Saturn (1998-1999), U.S. Postal Service (2000-2001), Rabobank (2002-2004), Gerolsteiner (2005-2006), Discovery Channel (2007), Astana (2008-2009), Team Radioshack (2010-2011), Omega Pharma-Quick Step (2012).

13. I have competed in fifteen (15) grand tours, including participating ten times in the Tour de France (2002, 2003, 2004, 2005, 2006, 2007, 2009, 2010, 2011, 2012), twice in the Giro d'Italia (2008, 2009) and twice in the Vuelta a España (2001, 2003, 2008).

14. I have more podium finishes in grand tours than any American cyclist other than Greg Lemond and Lance Armstrong.

15. I have had four (4) top ten finishes in the Tour de France, including third overall in 2007.

16. I have twice finished on the podium of the Vuelta a España, finishing second in 2008 and third in 2001.

17. I won the bronze medal in the individual time trial at the 2008 Olympic Games.

18. I won the Tour of California in 2007, 2008 and 2009 and finished second in the Tour of California in 2011 and third in the Tour of California in 2010.

19. I was the U.S. National Time Trial Champion in 1999 and the U.S. National Road Race Champion in 2007.

20. Other significant race wins in my career have included: 1st overall 1998 Tour de Beauce, 1st overall 1999 Tour de Beauce, 1st overall 2002 Route du Sud, 1st overall 2005 Tour of Germany, 1st overall 2006 Dauphiné Libéré, 1st overall 2009 Vuelta a Castilla y León, 1st overall 2009 Tour of the Gila, 1st overall 2010 Tour of the Gila, 1st overall 2010 Tour of Utah, 1st overall 2011 USA Pro Cycling Challenge, 1st overall 2011 Tour of Switzerland, 1st overall 2011 Tour of Utah, and 1st overall 2012 Tour de San Luis.

21. Other than the foregoing, I have won many additional stages of races and finished on the podium in many other competitions.

22. While riding with Comptel – Colorado Cyclist in 1997 one of my teammates was Jonathan Vaughters. Jonathan discussed with me his use of erythropoietin (EPO) which apparently began when he had previously competed for a Spanish team.

23. By 1999 I had come to believe that in order to be successful in professional cycling it was necessary to use performance enhancing drugs.

24. I was offered EPO in 1999 while on the Saturn team. The EPO was offered by **Other-7** a cycling coach with whom I worked in 1999, 2000, and 2001. I debated

internally about whether to use EPO for about six months before trying EPO during the second half of the 1999 season.

25. I got EPO from **Other-7** for three (3) years and paid him for the EPO separately from what I paid him for coaching me.

26. During this time period I administered EPO through subcutaneous injection and followed the instructions on the package insert on how to inject it.

27. **Other-7** put together my training plans and instructed me when to use the EPO. He also advised that I get a centrifuge to monitor my hematocrit, and I did this.

28. After the 1999 season I negotiated with Mark Gorski and Dan Osipow to join the U.S. Postal Service Cycling Team. The team was attractive to me as Lance Armstrong had just won the Tour de France.

29. I was told that I would be brought in to do some races domestically but that 80% of my racing would be in Europe. Initially, my focus was to be competing in the smaller stage races.

30. After signing with the U.S. Postal Service Team for the upcoming season, I was on the U.S. team at the 1999 World Championships in Italy which is where I first met Johan Bruyneel. We discussed the upcoming U.S. Postal Service Team training camp in Austin, Texas to take place in December 1999.

31. At the training camp in Austin, Texas I met Dr. Luis Garcia del Moral and Jose "Pepe" Marti. Dr. del Moral was introduced to me as the U.S. Postal Service team doctor and Pepe was introduced to me as the team trainer.

32. At this training camp Dr. del Moral asked me if I had used performance enhancing drugs previously. I was taken aback and did not respond to him right away. Dr. del Moral was not happy by my reticence, and I eventually told him that I had used EPO.

33. I moved to Girona, Spain at the beginning of the 2001 season, and I have lived in Girona during the cycling season since that time.

34. During the 2000 season I was competing in mostly smaller races for the Postal Service Team, and I was not supplied banned drugs by the team. I did continue to use EPO that was supplied to me by **Other-7**

35. In 2001, I was second overall in the Vuelta a Castilla y León a fairly significant 5 day stage race held in Castile and León, Spain which took place on August 5-9, 2001.

36. After the 2001 Vuelta a Castilla y León Dr. del Moral called me and asked if I had used performance enhancing drugs to achieve this result. I responded, "yes" and told him that I had used EPO.

37. Shortly after that Johan called to confirm I had used EPO without telling him in advance and he was not happy. Johan said "nobody uses that stuff."

38. A few minutes later Dr. del Moral called back and gave me specific instructions on how to use EPO to prepare for an event. He told me when to use it, how much to use and when to stop before a competition. He also instructed me to inject EPO intravenously rather than subcutaneously so that it would clear my body faster, and I would test positive for a shorter period of time. I realized then that Johan's concern and Dr. del Moral's concern was not necessarily that I had used EPO but that because they had not been told of my use, and I might not be using it safely, that I could have had a positive test which could have lead to problems for the team.

39. Nevertheless, I was put on the team for the 2001 Vuelta a España which took place on September 8 – 30, 2001. This was my first opportunity to compete in a grand tour.

40. Before the race started Dr. del Moral gave me a saline infusion to make sure my hematocrit was not too high.

41. Before the individual time trial at the Vuelta Dr. del Moral gave me an injection of a substance that he said was called “Actovegin.” Dr. del Moral said that it would bind oxygen to my hemoglobin and make me more efficient.

42. During the Vuelta I roomed with **Rider-13** and became aware that **Rider-13** was using EPO and human growth hormone (hGH).

43. I ended up finishing third at the Vuelta, which was the first time an American had ever finished on the podium in the Vuelta a España.

44. After the race, and although he knew that I had been using EPO, Johan said, “don’t worry you were the real winner.” I took this to mean that he was aware that others in the race were likely using more effective doping techniques than EPO, such as blood transfusions.

45. I left the U.S. Postal Service Team after the 2001 season because after performing so well in the Vuelta my market value went up substantially, and I thought that I would have a better opportunity to be a team leader on another team.

46. After leaving the U.S. Postal Service team I had continued to live in Girona, and remained friends with many riders on that team.

47. After leaving the U.S. Postal Service team I learned that Pepe Marti was providing performance enhancing drugs to many individuals on the team.

48. I approached Pepe in 2003 about purchasing EPO from him, and he sold me EPO in 2003.

49. I continued to use EPO while with Rabobank in 2002, 2003 and 2004, and was also assisted in using it by the Rabobank team doctor **Other-8** from whom I purchased EPO.

50. During my time on Rabobank I was aware that **Rider-14** was using EPO, and on several occasions we discussed his EPO use.

51. I went on a training ride with Lance Armstrong in 2003 while I was recovering after breaking my hip. Lance asked who handled the training on Rabobank, and I told him, **Other-8**. **Other-8** Lance then said, "What about the other stuff." I believe we both understood he was asking who was handling the doping program, and I responded, "Same."

52. Before the 2005 season I left the Rabobank team to join the Gerolsteiner Cycling Team.

53. While with the Gerolsteiner team in 2005 I talked with Pepe Marti at a race and asked if he could get me some EPO. Pepe agreed to provide EPO to me. He told me, however, not to tell Johan Bruyneel that Pepe was providing drugs to a rider from a rival team.

54. I purchased EPO from Pepe on numerous occasions in 2005 and 2006. I also received testosterone from Pepe.

55. On one occasion in 2005 I met Pepe at a rest stop south of Girona, and, in addition to EPO for me, he gave me EPO and other drugs to provide to George Hincapie and Michael Barry who were on the Discovery Channel team which Pepe was working for at the time. As requested by Pepe, I delivered the drugs to George and Michael.

56. I trained with Michael Barry on many occasions during 2005 and 2006 and we discussed the performance enhancing drugs we were using. I recall that Michael was trying hGH and using EPO, testosterone patches and a testosterone product known as the "oil."

57. In March of 2005 I got a call from Lance Armstrong who said that he was flying to the Island of Tenerife for 8 to 10 days to train. Lance said that he would be taking Sheryl Crowe, and he asked if I and my wife Odessa Gunn would like to join them on the trip. Odessa is a former professional cyclist, and she and Sheryl Crowe had gone on rides together in Girona and become friends. We agreed to go.

58. When we got to Tenerife I was introduced to Dr. Michele Ferrari who was there to assist with the training of several riders, including Lance and **Rider-1**. I asked Dr. Ferrari if he would begin working with me, and he agreed to do so.

59. Beginning in March of 2005 I became a client of Dr. Ferrari and he wrote a number of training plans for me. We discussed my use of EPO, and Dr. Ferrari advised me how much EPO to take during my training for the 2005 Tour de France. I became familiar with the fact that a nickname used by Dr. Ferrari is "Schumi" and that Lance called him "Schumi."

60. On the training plans prepared by Dr. Ferrari he would use a code for EPO. A dot represented 500 international units of EPO. A dot with a circle around it stood for 1000 international units of EPO.

61. Dr. Ferrari also recommended that I use a version of testosterone known as "Andriol." Andriol came in red gel pills and Dr. Ferrari provided a formula for mixing the Andriol liquid contained in the red jell caps in olive oil. The mixture was then to be taken under the tongue.

62. Dr. Ferrari instructed me to take the Andriol and olive oil mixture after stages in races.

63. I would keep the product, known as the "oil" in a small bottle the size of a small shampoo bottle. Floyd Landis told me that he also used the "oil."

64. 2005 was the first year that I transfused blood. Early in 2005 I was talking with Floyd Landis who had recently left the U.S. Postal Service Team, and Floyd suggested that I contact Dr. del Moral, who had been the team physician with the U.S. Postal Service Team until the end of 2003. In our conversation we had been talking about how Lance Armstrong seemed to be levels ahead of everyone else when it came to the Tour de France, and Floyd talked about his knowledge of Lance's blood doping program. Floyd also said that he thought Dr. del Moral would assist me with a blood doping program.

65. After the conversation with Floyd I got in touch with Dr. del Moral and asked him to assist me with a blood doping program. Dr. del Moral agreed to assist me with such a program, and I traveled to Valencia to meet him for the extraction. In both 2005 and 2006 I made two to three trips each year to Valencia prior to the Tour de France to have Dr. del Moral assist with the extraction or re-infusion of blood. These visits were to the sports clinic in Valencia at which Dr. del Moral worked.

66. On one occasion Dr. del Moral drove to Girona to assist me because it was close to the Tour.

67. I paid Dr. del Moral personally and in cash for these services.

68. In May of 2005 I attended a second training camp on the island of Tenerife with Dr. Ferrari. The purpose of my attendance at this camp was to train at altitude and to have Dr. Ferrari monitor my training. Also present at the camp were Yaroslav Popovych, Andrey Kashechkin, Alexandre Vinokourov and Michael Rogers. Dr. Ferrari performed testing on me during training rides, including taking lactate measurements. At this camp I discussed with Dr. Ferrari the use of EPO and blood transfusions as part of my training and racing program.

69. In June of 2005 I attended a third training camp with Dr. Ferrari. This camp was held in St. Moritz, Switzerland and again the cyclists in attendance were followed by Dr. Ferrari on their training rides and lactate testing was performed. Riders present at this camp included Paolo Savoldelli, Yaroslav Popovych, Michael Rogers and Eddy Mazzoleni. I also discussed the use of EPO and blood transfusions with Dr. Ferrari at this camp.

70. During 2005 Floyd Landis assisted me with my blood doping program. Floyd was aware that I was working with Dr. Ferrari at the time and Floyd suggested that I should not mention to Dr. Ferrari that I was working with Floyd. Prior to the 2005 Tour de France Floyd Landis and I rented an apartment in France in which we stored our blood. During the Tour we used the apartment to re-infuse the blood.

71. During the 2005 Tour Floyd told me that Lance had made a comment about the apartment in France where Floyd was keeping his blood. Floyd felt that the comment indicated that Lance had found out about his blood doping program, most likely from Dr. del Moral.

72. As we worked on our own blood program in 2005 Floyd discussed his blood doping on the U.S. Postal Service Team. Floyd told me about an incident during the 2004 Tour de France in which he said that the entire team received blood transfusions on the team bus following a stage in the Tour. He told me that Lance was present in the bus and received a transfusion at that time.

73. I was good friends with George Hincapie, and following the 2005 Tour George told me that Lance had only used a single bag of blood during that Tour. I believe that this conversation occurred in 2006 or 2007.

74. In 2008 **Rider-15** told me that he was using EPO during his recovery from an injury in 2005 before the Tour of Switzerland.

75. I discontinued working with Dr. Ferrari in 2005.

76. In 2007 I returned to the Discovery Channel Team (the successor to the U.S. Postal Service Team).

77. Once back on the team I had a discussion with Johan in which he said that he was frequently asked how Lance had doped and whether there was some mysterious substance that Lance had and no one else did; Johan said, however, that Lance used the same things everyone else did, which I understood him to mean EPO, testosterone and blood transfusions. Johan said it was funny to watch everyone freak out trying to find out what Lance was doing when he was simply using the same substances everyone else was using.

78. In April of 2007 at the Tour of Georgia I asked Johan Bruyneel whether the team was going to organize a blood doping program for the 2007 Tour de France. Johan responded, "you're a pro, you should do it on your own." I told Johan, however, that it was too stressful and that without team assistance I would not be using blood at the 2007 Tour. Johan seemed upset by my response.

79. More than once thereafter Johan brought up whether I was going to organize my own blood program for the 2007 Tour, and I told him that I was not going to do it.

80. During the 2007 Dauphiné Libéré, which took place from June 10 to June 17, 2007, Johan again brought up the topic of organizing a blood program for the 2007 Tour, and this time he said, "I think we can make it work."

81. After the Dauphiné Pepe Marti extracted a bag of blood from me. Prior to the Tour I had to go to an apartment in France to have another bag extracted and then the blood extracted after the Dauphiné was reinfused.

82. When I went to the apartment in France for the extraction prior to the Tour I was met by Discovery Channel employee **Other-3**. This did not surprise me as I was aware that **Other-3** was part of the doping going on on the team, and on several occasions **Other-3** had told me about close calls that had occurred when he was transporting banned drugs for the team.

83. When I returned to France prior to the Tour de France to get my blood re-infused and to have another bag extracted I saw my teammate **Rider-16** having his blood extracted.

84. During the 2007 Tour de France at a hotel in the South of France **Rider-16** and I went to the room of **Other-5** one of the team physicians. **Other-5** closed the drapes and told us not to say anything and then re-infused bags of blood into both of us.

85. Johan was very aware of my training program and my hematocrit level throughout the time that I rode for him. He would frequently discuss my hematocrit level with me.

86. At the 2007 Tour de France I also received a saline infusion after putting in the blood bag in order to make sure my hematocrit was not too high.

87. In 2008 I was riding with the Astana cycling team for which Johan Bruyneel was the team director, Pepe Marti was a trainer and Dr. Pedro Celaya was a team physician.

88. In 2008 Lance Armstrong announced that he was making a comeback to professional cycling and would join the Astana team.

89. I trained with Lance in 2008, 2009 and 2010.

90. At the 2009 tour de France I asked Lance whether he still talked with "Schumi" and he said not directly but that he and Dr. Ferrari communicated through a middle person.

91. In October of 2008, before he made his comeback, Lance asked if there was any talk of any new performance enhancing drugs in the peloton. I responded that I had not done anything and Lance said, "if you had done something I would know."

92. I was Lance Armstrong's teammate on the Astana cycling team in 2009.

93. I had a good season in 2009 and got along well with the riders and support staff on Astana.

94. Prior to the 2009 Tour de France Lance invited me to train with him in Aspen, Colorado.

95. In the 2009 Tour de France I was in fourth place in the general classification when I fell and broke my wrist during the 12th stage of Tour forcing me to abandon the race.

96. Lance and Johan were involved in the founding of the RadioShack team which I joined after the 2009 season.

97. I rode for RadioShack in 2010 and had a good year, and my relationships with Johan and Lance were good throughout the year.

98. I recall in 2009 or 2010 discussing with Lance a theoretical new drug being discussed in the media. I asked him if he knew anything about it and his response was "you know I am always down for it" by which I understood him to be saying that he was always willing to try a new doping product.

99. In October of 2010 I was subpoenaed to testify before the federal grand jury in California, and I testified truthfully.

100. Shortly after my grand jury testimony I attended a dinner with Lance and sat next to him. Lance was very cold towards me, and I figured that he had learned of my grand jury testimony. During the course of that dinner, although he did not speak to me, Lance sent a text

to my wife Odessa that said, "Run don't walk." A true and accurate copy of this text message is attached hereto as Attachment A. This was the first time in several years that Lance had communicated to Odessa and in context his message to her felt threatening.

101. The 2011 cycling season was very difficult as I experienced a great deal of animosity from teammates and staff on the RadioShack team.

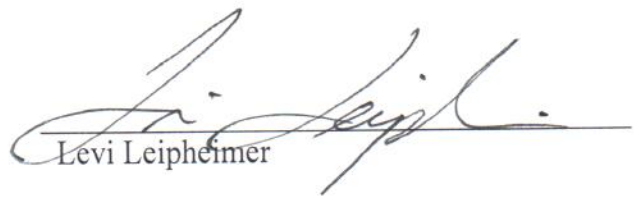
102. For instance, **Other-3** was very aggressive towards me. When I would walk by him he would make comments like, "I never forget. One day I will pay back." On another occasion, he was speaking to Andreas Klöden and when I walked into the room, **Other-3** said in a very loud voice: "I will pay back anyone who fucks with me!"

103. In 2011 my agent Paul Degeyter had a conversation with Johan Bruyneel in which Paul asked Bruyneel whether RadioShack was going to renew my contract in 2012. Paul told me that Bruyneel said words to the effect of, "Don't tell anyone but we are not bringing Levi back because he testified to the grand jury and we didn't know about it."

104. During the 2012 Tour de France, and shortly after I had been interviewed by USADA's General Counsel, my wife Odessa received a text from Lance asking, "Are you in CA." A true and accurate copy of this text message is attached hereto as Attachment B. Both Odessa and I found this text to be very disturbing as she was indeed home alone at the time, and I was in Europe competing. The text made her feel very vulnerable, and there was no legitimate reason for Lance to communicate with Odessa.

I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this ____ day of _____, 2012.



Levi Leipheimer

STATE OF Texas
COUNTY OF Dallas

)
) ss.
)

Subscribed and sworn to before me by Levi Leipheimer on this 21 day of
September 2012.

Witness my hand and official seal.

My commission expires: 6/30/15

Haven Parchinski
Notary Public

Address: 1301 W 25th St #406
Austin, TX 78705



AFFIDAVIT OF CHRISTIAN VANDE VELDE

I, Christian Vande Velde, under penalty of perjury, declare and state:

1. I am thirty-six (36) years old and was born on May 22, 1976. I have been a professional cyclist during the time period from 1998 until the present.
2. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.
3. I am providing this affidavit to the United States Anti-Doping Agency (USADA) as part of my voluntary cooperation with USADA and as a part of USADA's investigation of doping in the sport of cycling.
4. I understand that this affidavit will be submitted in legal proceedings, including arbitrations, in which USADA is presently involved, or may become involved, and in connection with cases that USADA has brought, or may bring, in connection with doping in the sport of cycling.
5. USADA has full authority to use this affidavit as appropriate in connection with its anti-doping responsibilities under the Code, including use in any legal proceedings or investigations or in connection with any decision or announcement of sanctions or violations issued by USADA.
6. I understand that a requirement of my cooperation with USADA is that I provide USADA truthful and complete information concerning my involvement in doping and the involvement in anti-doping rule violations of all others of which I am aware.



7. I am aware that should I fail to provide truthful information to USADA that I may lose any and all benefits of my cooperation with USADA.

8. I have also previously provided truthful testimony under oath and subject to penalties of perjury about doping on the U.S. Postal Service Cycling Team to the United States federal government in connection with a criminal investigation.

9. I understand and agree that I am subject to the results management jurisdiction of USADA as a former member of the USADA registered testing pool, as a former U.S. Olympic Team Member and as a United States athlete who is a member of USA Cycling and who is subject to the USA Cycling Medical Control rules, the USADA Protocol for Olympic and Paralympic Movement Testing and the United States Olympic Committee National Anti-Doping Policies.

10. The statements provided in this affidavit were provided directly to USADA and have not previously been provided to the Union Cycliste Internationale or USA Cycling.

11. A brief history of my cycling career follows.

12. I won my first track cycling national championship in 1994 in Indianapolis, Indiana. At that time I was 18 years old, lived at the Olympic Training Center and was on the national team for track cycling. I would, however, train at road races.

13. In 1997 I won the World Cup on the track over Stuart O'Grady and decided I would like to try road racing. I approached Mark Gorski, whom my father knew, and who was working for the U.S. Postal Service Team and he signed me to a contract.



14. Although from 1998 on I primarily focused on road races, I did race in the 2000 Olympics as a track cyclist.

15. After I joined the U.S. Postal Service Cycling Team, the first training camp in which I participated took place in January of 1998 in Julian, California in the San Diego area.

16. Prior to that training camp in December of 1997 and early 1998 I trained in the Santa Barbara area with Lance Armstrong who was making a comeback to cycling after cancer treatment.

17. Lance and I did some hard training together. We were a couple of insecure racers, he making a comeback and me a new professional.

18. I asked Lance advice about what to do as a professional. He advised to focus on one thing and do it well.

19. At the time Lance was not thinking about Grand Tours he was focused on the classics, much shorter one day races such as La Flèche Wallonne and Liège–Bastogne–Liège.

20. I asked Lance about doping in the sport and his response was to change the subject and say not to worry about it.

21. On one of the days that I was training with Lance in California during this time frame I was sitting next to Lance in a car. Our gear bags were in the car and Lance was rummaging in his bag for his wallet, and I noticed that Lance had a thermos in his bag with his name on it. At the time it struck me as odd that Lance was carrying a thermos in his training bag as I had not noticed Lance drinking any warm beverages or anything else out of a thermos.



22. At this point in 1998 I had heard about erythropoietin ("EPO") but never been directly confronted with its abuse in sport.

23. Shortly after the team training camp in California in 1998 I moved to Europe and began living in Girona, Spain. At the outset Jonathan Vaughters, **Rider-17** (and his wife and mother-in-law) and I (as well as other riders and staff members who needed a place to stay while in town) shared an apartment.

24. The apartment was in a building owned by team director Jonny Weltz.

25. It was in this apartment early in my first season that I first saw EPO. "Hey, want to see EPO?" Jonathan asked, as he held open the refrigerator and pointed out a vial to me in a water bottle with ice and plastic bags in it that had been placed there by **Rider-17**

26. I raced in Europe the early part of that season.

27. Later in the summer I returned to the United States to race. I remember being in Oregon for the Cascade Classic which took place during July while the Tour de France was being contested. I was with Lance Armstrong and Jonathan Vaughters who also competed at the Cascade Classic that year and we were watching coverage of an interview of Bobby Julich at the Tour who happened to comment something about this being "the Tour de France and not the Cascade Classic," which struck us as funny since we were watching from the Cascade Classic. Bobby Julich would take third place in the Tour that year.

28. Lance and Jonathan and I also competed in the 1998 Vuelta a España from September 5- 27, 1998.



29. I recall several things about the 1998 Vuelta. First, I was not given any “recovery” until about ten days into the race. Second, Lance did very well at the race, eventually finishing just one spot off the podium.

30. During the Vuelta in September 1998 Pedro Celaya, the United States Postal Service team physician, gave me injections of something known as “recovery” which he told me consisted of vitamins. He had to calm me down as the injection scared me, and I did not know what was being injected.

31. I also recall a situation that developed in one of the stages and which I did not fully understand at the time. Late in a very difficult stage in the 1998 Vuelta Lance asked Jonathan and I to go back to the team car to get something for him. I do not recall being able to hear what Lance was asking for. However, I remember thinking how hard it was going to be to get from the car back to Lance at that stage in the race. Nevertheless, Jonathan Vaughters and I dropped back to the car and asked for Jonny. Jonathan was doing the talking with Jonny who eventually put a pill in my hand and told me to take it up to Lance. I think I may have dropped the first pill and then we eventually got it back up to Lance.

32. I later learned that the pill that was given to Lance was aspirin. I also later learned from Jonathan that Lance had asked for us to retrieve a cortisone pill for him to help him complete the stage.

33. I knew that Jonathan had been using EPO coming into the Vuelta as he had told me that he was. Jonathan explained the process of EPO use to me, such as how the body should be prepared by taking in iron, B vitamins and vitamin C to make the EPO more effective.



34. At this time, however, I was just 22 years old I understood that Pedro was keeping me from the drugs. In fact, while the other guys had been given "recovery" all year and it was only supposed to contain vitamins, Pedro only gave me the "recovery" when he thought I needed it for my health.

35. I finished in 90th place at the 1998 Vuelta, over 2 hours and 56 minutes behind the winner.

36. Lance finished the 1998 Vuelta in 4th place.

37. The 1998 World Championships were held in Valkenburg aan de Geul, Netherlands, between October 4 and October 11, 1998. The United States team for the Men's Individual Road Race was: Lance , Dylan Casey, David Clinger, Christopher Horner, Trent Klasna, William Chann McCrae, me and Jonathan. The competitors in the Men's Individual Time Trial were Lance and Jonathan.

38. At the 1998 World Championships Lance and Jonathan and I stayed with Lance and Dr. Celaya at a bed and breakfast. The rooms were arranged such that each of the bedrooms opened into a single common area. While we were staying at the bed and breakfast a UCI drug tester showed up to test us and began setting up in the common area. Dr. Celaya was with us at the World Championships and I recall that after the UCI tester arrived Dr. Celaya went out to the car and then went into Lance's room and closed the door. I recall that Jonathan knew what Dr. Celaya had gone outside to retrieve and we discussed it later, but at the time I was only aware that Dr. Celaya had gone outside and then returned and gone into Lance's room.



39. I recall that on race day at the World Championships it was raining and we had a tent or a place in a tent near the start line of the road race. Kristin Armstrong was in the tent and Lance asked her to wrap cortisone tablets in tin foil for the riders to tuck into the pocket of their racing jersey. Kristin wrapped the cortisone tablets in tin foil and handed them out to the riders.

40. After the 1998 season Jonny Weltz was replaced by Johan Bruyneel as team director and Johan brought in Luis Garcia del Moral as the new team doctor.

41. Johan explained to me that he had known Dr. del Moral while Johan was on the Spanish team ONCE, run by the well known Team Director Manolo Saiz.

42. Manolo Saiz would later be implicated in doping his riders in the Operación Puerto doping investigation. I would later ride for Manolo Saiz's team in 2004 and experience firsthand the doping on his team.

43. Dr. del Moral was apparently a satellite doctor for the ONCE team. If ONCE cyclists were near Valencia they would use Dr. del Moral. I would eventually be sent to Dr. del Moral's office in Valencia for testing in March of 1999 and would see pictures on the walls of the many cyclists with whom Dr. del Moral said that he had worked.

44. I recall Johan calling me up at home during the Christmas holidays and introducing himself. I was impressed by this gesture and respected his professionalism.

45. Our first two week training camp was held in Buellton, California. I showed up to camp fit and excited about the new year.



46. I recall early in the year, perhaps at the first training camp, being introduced to Pepe Marti who was supposed to be one of the team's trainers, although he did not speak very much English.

47. I received the "recovery" at the first training camp and this was a change over the prior year when I had not been given the "recovery" at all at training camps.

48. Dr. del Moral was gruff, aggressive and always seemed in a hurry. He would run into the room and you would quickly find a needle in your arm. Where Dr. Celaya would take the time to explain things, Dr. del Moral did not seem to like questions. Even so, I would ask questions. It was considered an "American thing" to ask questions about what the doctor was giving you. On Spanish teams apparently the riders are expected not to ask the doctor questions. In any case, when I asked Dr. del Moral would say things like I was "bloated" or "blocked" and needed vitamins. The "recovery" or whatever he injected was always described as vitamins.

49. I achieved some good results in 1999, including first overall at the Redlands Bicycle Classic and 3rd overall at the Four Days of Dunkirk (Quatre Jours de Dunkerque).

50. Early in the 1999 season I got a clear indication from one of U.S. Postal's executives that he believed that a doping doctor was a necessary condition for a successful cycling program. I was in the Washington, D.C. area for a race and took the opportunity to meet with Mark Gorski who ran the team's business operations. Mark was a 1984 Olympic Gold medalist in cycling, and I knew he knew his way around the sport. Mark told me he had been watching my results and was very impressed. He then asked me if I had a private doctor who was helping me. When I said, "no" he was adamant in continuing to inquire, pressing his point



and approaching the question from several angles, making it clear that he did not think I was being straight with him.

51. Soon thereafter I took another step along the path toward chemical performance enhancement. I was in Europe to participate in a couple of the Ardennes classics, La Flèche Wallonne, and Liège–Bastogne–Liège, two of the most storied one day races in cycling. At these events Dr. del Moral approached me to give me injections of a new substance that he said would help my circulation. It was going to be cold racing the next day and Dr. del Moral said that this substance, Actovegin, would help me perform better. As I later learned, the substance was in somewhat of a legal grey area, some would say it was prohibited due to a relationship with other drugs on the prohibited list. However, Dr. del Moral assured me it was not banned, so I used it on these occasions and on future occasions.

52. Later, following the 2000 Tour de France, the media would report finding Actovegin packaging in medical waste for the U.S. Postal Service Team and Lance Armstrong and U.S. Postal Service Team officials would state publicly that Actovegin was only used for road rash and to treat diabetes for team mechanic Julien DeVriese. I knew, however, that these public claims about how Actovegin was used on the Postal Service team were not true. Actovegin was given by the team doctor to Postal Service cyclists to enhance performance and with the claim that it would improve our circulation. I never heard of Actovegin being used to treat road rash.

53. In June of 1999 I was elated to learn that I had been selected to ride in the Tour de France.

54. I first received solid confirmation that Dr. del Moral was involved in doping at the 1999 Tour de France. He came into the room while I was on a massage table and asked “do you want this testosterone?” I was hesitant, the person giving the massage was a part time employee and I was apprehensive, “would it be out of my system in time?” However, Dr. del Moral wanted a “yes” or “no” answer. He said, “I’ll come back.” He came back a few minutes later and I said, “yes.”

55. The testosterone product that Dr. del Moral gave me at the 1999 Tour de France was an olive oil and testosterone mixture which I came to know as the “oil.” The use of this product in the 1999 Tour de France was the first time I knowingly violated sport anti-doping rules.

56. Also during the 1999 Tour de France I walked into a room at the hotel and saw Kevin Livingston getting a subcutaneous injection in his upper arm with a small needle. Kevin and Dr. del Moral seemed surprised and said, “shut the door.” I came into the room and Kevin said the injection was for an upper respiratory infection. The explanation was odd. I had not been aware that Kevin was having respiratory issues and, in fact, he had been having a fantastic Tour, serving as one of the Lance’s key climbers in the mountains. I also was not aware at any time of subcutaneous injections being given to clear up respiratory infections.

57. I stayed in the room with Kevin and del Moral until the injection was completed and we finished a short conversation and then I left.

58. By this time I knew that Jonathan had used EPO to prepare for the 1999 Tour de France as he had told me before the race. Jonathan had shared with me that EPO is injected



subcutaneously with a small needle, and I felt sure that I had just seen Kevin receiving an injection of EPO. This conclusion was only strengthened later through my own experiences when I began using EPO.

59. Jonathan crashed early in the 1999 Tour and was out of the race.

60. I, however, was fortunate enough to complete the 1999 Tour after having led the youth classification (under 23) during stages 2 through 7.

61. In early 2000 I approached Dr. del Moral about putting together a "program" to improve my cycling performance. The term "program" was a euphemism but one with a very specific and well understood meaning on the team. The terms "program" and "preparation" were specifically used to refer to combining drugs and training to bring the rider to a level of peak performance.

62. Dr. del Moral agreed to put together a program for me. My initial program with Dr. del Moral did not include EPO. I realized that I had a naturally high hematocrit and a mistake with EPO could put me over the fifty percent threshold at which a rider could be prevented from competing. EPO could be used later in the year when training or racing led to a drop in hematocrit, but my initial doping program with Dr. del Moral focused on human growth hormone (hGH) and cortisone.

63. I discussed Dr. del Moral's program with Johan Bruyneel as I was somewhat nervous about it. In response to my questions and concerns about using performance enhancing drugs, Johan told me he had done the same things as a rider. He said not to worry if I felt bad at first that I would feel good at the end.



64. The cortisone was injected intramuscularly with a very long needle and in my buttocks. I learned to give myself injections and on occasion Dr. del Moral injected me.

65. On the last day of the Setmana Catalana de Ciclisme race in 2000 Dr. del Moral gave me hGH to take home.

66. Dr. del Moral also injected me with Synacthen, a form of cortisone, at the Amstel Gold Race in the Netherlands in 2000.

67. Dr. del Moral also injected me with hGH at the Tour of the Basque Country in 2000.

68. I had difficulty staying on Dr. del Moral's program when he was not around to inject me because I greatly disliked needles and injecting myself.

69. I really only followed Dr. del Moral's program from Setmana Catalana de Ciclisme through the Tour of Basque Country.

70. I was selected for the Tour de France team in 2000 but had to withdraw right before the race.

71. At the very end of 2000 I attended a training camp in Austin, Texas that I believe occurred in December 2000. Dr. Michele Ferrari attended the training camp and many of the other cyclists on the team also attended.

72. Dr. Ferrari was by this time a well known figure within the peloton, with a reputation for technologically advanced training methods that included the use of performance enhancing drugs like EPO.

73. I recall that Dr. Ferrari was introduced to the team by Johan Bruyneel. It was explained that each cyclist would be given the opportunity to have individual meetings with Dr. Ferrari and that if a cyclist wanted to hire Dr. Ferrari to assist with his training the cyclist would be required to pay Dr. Ferrari a percentage of the cyclist's salary.

74. At this camp I came to understand that Lance Armstrong was also working with Dr. Ferrari who had the nickname "Schumi," a reference to Michael Schumacher, the famous race car driver who used to drive for the Ferrari team.

75. I was initially excited about the opportunity to work with Dr. Ferrari.

76. I believed that Dr. Ferrari would likely be able to improve my performance, and I began working with him at that camp. I would end up working with Dr. Ferrari until July 2003 when I left the U.S. Postal Service Team.

77. Dr. Ferrari would provide training plans that set forth my workouts and the amount of EPO to be used was indicated on the plan. I started using EPO when I began working with Dr. Ferrari. The symbol we used for 500 international units of EPO was a period. A period with a circle around it indicated 1000 international units of EPO.

78. I understood from conversations with Dr. Ferrari and other riders that EPO is a hormone which increases the body's production of red blood cells and that it can provide a great performance benefit to a cyclist because red blood cells carry oxygen and, as a result, increasing red blood cells increases an individual's endurance capacity.

79. I understood that use of EPO would raise my hematocrit and the hematocrit level of each of the riders was monitored closely throughout the season by Johan and the team doctors.

80. Dr. Ferrari advised that the EPO was to be injected in the vein in order to reduce the likelihood of detection as this would cause the EPO to stay in your system a shorter period of time. I was supposed to use the EPO after dinner and not walk around outside or be available to testers for 12 hours. If I got up in the morning and went on a bike ride I was to pee before arriving home. I recall explaining these aspects of the program to Jonathan Vaughters but telling him the advice had come from Johan rather than Dr. Ferrari because I kept my involvement with Dr. Ferrari a secret even from Jonathan.

81. Although I kept Dr. Ferrari a secret from Jonathan, there were no secrets from Johan regarding my relationship with Dr. Ferrari. On several occasions Johan repeated things I had told only Dr. Ferrari and by that I was aware that Johan and Dr. Ferrari were communicating regarding my program.

82. I believe there was also a symbol used for the "oil" – testosterone olive oil mixture – and that this was noted on the training plans, though I do not recall the symbol at present.

83. Dr. Ferrari also discussed testosterone patches with me and told me that I could safely use them for a couple of hours at night or after training and that they should not result in a positive drug test.

84. EPO was on my first training plan from Dr. Ferrari. After getting that training plan Pepe showed up with EPO for me without my having to ask him for it.

85. I obtained EPO on a number of occasions during each year from 2001 through 2003 from Pepe Marti. We called Pepe "the courier" because he would frequently drive up from Valencia with doping products.

86. EPO had to be kept at a constantly cool temperature. I used a thermos filled with ice in it to keep my EPO cool.

87. In addition to delivering drugs to me I was aware that Pepe was delivering drugs to others on the team as he made many deliveries to my roommates over these years.

88. When discussing EPO we generally called it "EPO" or "Po," although Tyler Hamilton liked to refer to it as "Edgar" – as in, Edgar Allen Poe.

89. Two of my roommates to whom Pepe delivered EPO were **Rider-18** and Michael Barry. I also saw **Rider-18** use the "oil."

90. I was also aware of **Rider-9**'s use of testosterone because he had it in his refrigerator, and we discussed his use of testosterone, EPO and cortisone.

91. Another guy on the team using testosterone and EPO was Michael Barry. We discussed the use of these substances and Barry shared testosterone patches with me on a couple of occasions.

92. I discussed EPO use with **Rider-11** in Valencia in 2001. He told me that he had done EPO and not to worry about using it. He said that EPO had worked well when he first started using it but not so well later.



93. George Hincapie and I were also quite open with each other about our use of performance enhancing drugs. I kept EPO at George's home from time to time in 2001 and 2002, and I know he saw me using EPO. On several occasions I expressed my nervousness about using EPO to George and he reassured me and got me through it.

94. On more than one occasion I received doping products such as EPO from Pepe that I knew George Hincapie was using. Pepe would provide us both EPO and say, "you guys share it." I recall both George and I using the "oil" and EPO in St. Moritz in 2001. Dr. Ferrari was there in St. Moritz and told me I needed the EPO to boost my blood values before the Tour de France.

95. Frequently, Pepe seemed to know when we needed various doping products, so I assumed he was communicating with Dr. Ferrari about my program. However, there were occasions that I would have to call Pepe and tell him what I needed.

96. **Rider-18** and I both got very sick from EPO on one occasion when we believed it had gotten too warm.

97. I would keep EPO in ice in a thermos in my room. I was nervous about having EPO with me and being stopped and so did not take it with me when I traveled.

98. On occasion Pepe or Dr. del Moral delivered doping products to my room at a race.

99. At the Milan-San Remo race in 2001 Dr. del Moral made a special trip, flying in for the race, to give me and George Hincapie subcutaneous injections of an undisclosed substance. When we asked what the substance was Dr. del Moral refused to tell us. Immediately

after the injection he asked us if we felt nauseous. After the race he asked us how we felt and what we thought of the substance. I never learned what the substance was.

100. I recall coming back from a race on one occasion with hGH and on other occasions bringing back "oil."

101. I had some good results on the program. In 2001 I was 4th overall in the Three Days of De Panne and 5th overall in the Volta a la Comunitat Valenciana. In June I learned that I had been selected to ride in my second Tour de France.

102. I ended up crashing at the 2001 Tour de France and as a consequence had to pull out of the race early. After the crash Dr. del Moral gave me some cortisone and told me to take one half on an ampoule then and the other half later. Johan was present, however, and he took the other half of the vial and injected himself with it right there.

103. In 2002 I continued working with Dr. Ferrari.

104. A new addition to the team in 2002 was Floyd Landis.

105. Landis was a likeable guy with a big smile and a great sense of humor. He and Lance seemed to quickly hit it off and Lance took Floyd under his wing and they spent a great deal of time together both socially and in training.

106. I was aware that Floyd and Lance confided in each other and that Floyd watched Lance's house in Girona from time to time.



107. In addition to his engaging personality Landis had a strong determination to succeed. Over time we had a number of discussions about the drugs Floyd was using, which I came to learn included EPO, hGH, testosterone and blood transfusions.

108. Although the training program provided to me by Dr. Ferrari involved regular use of EPO and testosterone, I was not a model patient.

109. I would stay on the program for awhile and then discontinue the drugs for periods without telling Ferrari.

110. I was both nervous about needles and apprehensive about being caught.

111. The surreptitious nature of the doping program, the constant need for secrecy, worry about testing positive, the risk of being caught, covering needle marks when in public, my dislike of needles, the potential health risks of EPO, the risk of crossing the hematocrit threshold, it all wore on me and took its toll.

112. By August of 2002 I was a bundle of nerves.

113. Although I had had some good results on Dr. Ferrari's program, as of 2002 I had been off the doping program more than I had been on it during both 2001 and the first part of 2002.

114. I was not selected for the Tour de France team in 2002 and I was concerned about my standing with the team.

115. In August after winning his 4th Tour in a row Lance Armstrong called me up and asked me to come to his apartment in Girona to discuss my role with the team.



116. Although I feared losing my spot on the team, it was in some ways a relief to be meeting with Lance.

117. I was hopeful that Lance would tell me where I stood.

118. When I arrived I saw that Armstrong was accompanied by Dr. Ferrari. At that point I realized that Lance wanted to talk about more than just my performance in races.

119. Lance began without any small talk and got right to the point. He told me that he felt I was not serious about my preparation for cycling and had not been following Dr. Ferrari's program.

120. Armstrong told me that if I wanted to continue to ride for the Postal Service team I would have to use what Dr. Ferrari had been telling me to use and would have to follow Dr. Ferrari's program to the letter.

121. The conversation left me with no question that I was in the doghouse and that the only way forward with Armstrong's team was to get fully on Dr. Ferrari's doping program.

122. Johan Bruyneel confirmed this a few days later when he referenced the meeting with Armstrong and Ferrari and said he expected to see improvement.

123. This meeting confirmed what I had known to be true for a long time. Lance called the shots on the team, he was very aware of what went on on the team and what Lance said went. Johan Bruyneel was the team director but if Lance wanted him out he would be gone in a minute.

124. For a time I put my nose to the grindstone, suppressed my concerns and complied.



125. I used drugs on the schedule prepared by Dr. Ferrari. I used EPO and testosterone with regularity.

126. And it paid off in a way. In the Vuelta a España in September I helped Roberto Heras to a second place finish and Bruyneel kept saying I had done it on “pan” and “aqua” – “bread and water.”

127. I thought to myself, “If this is bread and water what must others be using?”

128. The following year I found out.

129. Floyd Landis confided in me that he had been told that I was left off the Tour de France team in 2002 because I was not on a blood doping program.

130. I was surprised to learn from Floyd and others about how extensive the blood doping program on the U.S. Postal Service Team had been. I was not aware of it for most of my time on the team.

131. I was also offered cortisone about halfway through the 2002 Vuelta by Johan Bruyneel and declined to use it. Johan knew that I did not have a legitimate medical need for the cortisone that he proposed I take; it was just to help me get through the race.

132.

133. At the end of 2003 I left the U.S. Postal Service Team and joined the Liberty Seguros team for the 2004 season. The team director was Manolo Saiz, and this team as well had an organized doping program in which the team doctors were very involved in providing performance enhancing drugs.



134. In 2004 I obtained hGH from another physician. I also used EPO in 2004. I had communications with Michael Barry in 2004 in which he told me that he was using EPO and hGH.

135. In 2005 I joined the CSC Cycling Team and I rode for CSC until the end of 2007. During my time with CSC I used cortisone once (with a doctor's note) and testosterone once but increasingly regretted the decision I had made to compromise and use performance enhancing drugs. Eventually, outside the pressure of an organized team doping program I decided that I would only continue in the sport if I could ride clean. Since April 2006 I have not used any banned substances.

136. While on the U.S. Postal Service team and around Lance I saw how either you were friends with him or he assumed you were his enemy (and treated you that way). There was very little neutral ground. Most of those who left his team Lance regarded as enemies to the point of berating them and refusing to allow those on the team to continue to maintain friendships with those who had left. After I left the U.S. Postal Service team in 2003 I continued to live in Girona and I tried to maintain a cordial relationship with Lance. I tried to be like Switzerland, living at peace with people on both sides of the Lance divide. I think I generally succeeded in doing so, although Lance may not agree.

137. While on the team and around Lance I saw how you were either friends with him or he assumed that you were his enemy and treated you as an outcast. Yet, there were those for whom Lance reserved even higher levels of scorn.



138. Lance was very upset with those who were openly critical of drug use in the sport and seemed to take criticism of drug use personally. For instance, in 1999 Lance was highly critical of French rider Christophe Bassons about whom Lance made demeaning and derogatory comments. I was present on several occasions when Lance criticized Bassons for speaking out against drug use in the peloton.

I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this 25 day of September, 2012.



Christian Vande Velde

STATE OF ILL
COUNTY OF COOK

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) ss.
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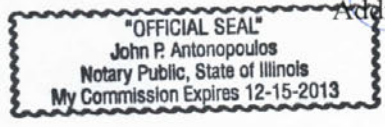
Subscribed and sworn to before me by CHRISTIAN on this sept 25 day of 2012.
VAMPOLDE

Witness my hand and official seal.

My commission expires: _____

John Antonopoulos
Notary Public

Address: 15419-127 St
Forest, IL



AFFIDAVIT OF JONATHAN VAUGHTERS

I, Jonathan Vaughters, under penalty of perjury, declare and state:

1. I am thirty-nine (39) years old and was born on June 10, 1973. I was a professional cyclist during the time period from 1994 through 2003. Since 2005 I have managed the cycling teams TIAA-CREF and Slipstream.
2. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.
3. I am providing this affidavit to the United States Anti-Doping Agency (USADA) as part of my voluntary cooperation with USADA and as a part of USADA's investigation of doping in the sport of cycling.
4. I understand that this affidavit will be submitted in legal proceedings, including arbitrations, in which USADA is presently involved or may become involved and in connection with cases that USADA has brought or may bring in connection with doping in the sport of cycling.
5. USADA has full authority to use this affidavit as appropriate in connection with its anti-doping responsibilities under the Code including use in any legal proceedings or in connection with any decision or announcement of sanctions or violations issued by USADA.
6. I understand that a requirement of my cooperation with USADA is that I provide USADA truthful and complete information concerning my involvement in doping and the involvement in anti-doping rule violations of all others of which I am aware.

7. I am aware that should I fail to provide truthful information to USADA that I may lose any and all benefits of my cooperation with USADA.
8. I have also previously provided truthful testimony under oath and subject to penalties of perjury about doping on the U.S. Postal Service Cycling Team to the United States federal government in connection with a criminal investigation.
9. I understand and agree that I am subject to the results management jurisdiction of USADA as a former member of the USADA registered testing pool and as a United States athlete who is a member of USA Cycling and who is subject to the USA Cycling Medical Control rules, the USADA Protocol for Olympic and Paralympic Movement Testing and the United States Olympic Committee National Anti-Doping Policies.
10. Except as stated herein the testimony and statements provided in this affidavit were provided directly to USADA and have not previously been provided to the Union Cycliste Internationale or USA Cycling.
11. A brief history of my cycling career follows.
12. I rode for the following professional teams Porcelena Santa Clara (1994-1996), Comptel – Colorado Cyclist (1997), U.S. Postal Service Cycling Team (1998-1999), Crédit Agricole (2000-2002), Prime Alliance (2003).
13. I competed in the Tour de France four times.
14. I entered my first cycling race in 1986 when I was 13 years old.
15. In 1988 I medaled in my first national championship. My contemporaries in junior cycling at this time included Lance Armstrong, George Hincapie, Bobby Julich and Kevin Livingston.

16. I raced with Lance Armstrong in what I believe was his first national level race, a junior level qualifier at the Arches National Monument in Moab, Utah in 1989. At that race Bobby Julich won, I was second and Lance finished third. I recall Lance was this big kid with broad shoulders and he came straight out of the gate flying. While Bobby and I ended up beating him in the road race, Lance ended up winning the time trial.
17. Lance and I raced frequently on the junior race circuit.
18. Lance would usually be accompanied by his mother, and I would be accompanied by my parents. Lance's mother and my mother became roadside acquaintances and friends.
19. Lance turned professional in 1992 with the Motorola team, and I continued to race primarily domestically and as an amateur.
20. During the period 1994 – 1996 I raced in Europe for a small Spanish professional team known as Porcelena Santa Clara.
21. I first used EPO on the Porcelena Santa Clara team. The team doctor provided it to me on the theory that it would simply bring me back to my natural hematocrit level and prevent me from being anemic.
22. At this point I used 1000 international units about three times a week, for one month.
23. I returned to the U.S. in 1997 to race for the Comptel – Colorado Cyclist team. In 1997 I won the U.S. National Time Trial Championship.
24. I joined the U.S. Postal Service Team in 1998.

25. Early on at a Postal Service training camp I had a conversation with Lance in which he told me that the UCI should have detected a high level of HCG in his doping controls when he had cancer but had failed to do so. Thus, in Lance's eyes the UCI was somewhat at fault for the extent of his cancer. In any case Lance said, "if I ever have a doping problem, I have this card to play."

26. At the beginning of the season Dr. Pedro Celaya, the U.S. Postal Service team physician, and I had a frank conversation about my prior use of erythropoietin (EPO). Dr. Celaya discussed with me how the drug was used and injected. At that time injections of EPO were given subcutaneously. During 1998 Dr. Celaya gave me injections of EPO on several occasions.

27. EPO use on the U.S. Postal Service Team in 1998 prior to the Festina doping scandal at the 1998 Tour de France was relatively open. Although a neo-pro such as Christian Vande Velde would be more shielded, for others who were already using drugs the communications about performance enhancing drugs were generally fairly open.

28. Dr. Celaya would deliver EPO to riders on the team in U.S. Postal Service water bottles with EPO vials packed in ice in the bottles. On the side of the bottle would be the name of the rider and the doses of EPO in the bottle. For instance, I might receive a bottle that would say "Jonathan – 5 x 2" meaning that the bottle held 5 vials of EPO containing 2,000 international units each. The first time Pedro injected me or advised me to use EPO was June, 1998.

29. On March 8, 1998, Lance began Paris-Nice, an eight day road race in France. However, he abandoned the race the next day and left the team, returning to the United

States. At that time many, including many on the team, thought that he had quit cycling for good. He would not return to the team until June.

30. In March 1998 I won the Redlands Bicycle Classic in California.

31. In June 1998 I rode in the Dauphiné Libéré which took place on June 7-14, 1998. I finished in 57th place in this race. Johan Bruyneel, riding for the Spanish team ONCE finished 63rd. The best day for both of us was the fourth stage on June 11, 1998, when I finished 7th and Johan finished 3 seconds behind me in 8th place.

32. On June 7, 1998, while I was beginning the Dauphiné Libéré, Lance Armstrong was beginning his comeback to professional cycling by racing in the U.S. Pro Cycling Championships, a one day event in Philadelphia that was won by our teammate George Hincapie.

33. In July I was back in the United States to race in the Cascade Classic in Oregon with Lance Armstrong and Christian Vande Velde. While at the Cascade Classic I recall discussing with Lance and Christian the Festina doping scandal that was taking place at the Tour de France. I recall Lance laughing about the massive quantities of EPO and human growth hormone (hGH) that were seized. The Festina scandal was a clear indication of what we already knew about our sport which was that performance enhancing drug use, and particularly the use of EPO was rampant in professional cycling. Lance and I, having been professionals for years by that time, were under no illusions that we could be successful without EPO.

34. Lance won the Cascade Classic and he and I and Christian returned to Europe to complete the season.

35. During 1998 I roomed with Christian Vande Velde and had several frank and open conversations with him about my EPO use. Christian understood the prevalence of doping in the sport, and I think he accepted that he would probably have to dope someday, but he was hopeful that there would be a testing for EPO before he ever had to use it.

36. Lance and Christian and I competed in the 1998 Vuelta a España from September 5 – 27, 1998. Prior to the 1998 Vuelta I could not have said with absolute certainty that Lance Armstrong was using EPO. I suspected that he was. He would frequently joke about doping. He had been a successful pro for nearly six years, and I knew how prevalent EPO use was in the peloton.

37. I also knew that Lance had a thermos. Now, having a thermos is not prohibited, but I had a thermos and I knew that I, like many cyclists at the time, used a thermos to carry ice in order to keep the EPO I was using cold. I had never seen Lance drinking coffee or any other beverages out of his thermos, and I, therefore, suspected he was using it for EPO.

38. At the same time, however, admitting doping is not something one tends to do in public places and to that point Lance had not admitted to me that he was using EPO.

39. During the Vuelta the team doctor, Pedro Celaya, brought a centrifuge to measure the riders' hematocrit levels which he would write down on the back of a napkin. I recall the hematocrit levels of the riders staying consistently high during the race. I know that Lance was very aware of the hematocrit levels of the other riders on the team as he would

talk openly about them. In fact, he kidded me about how high my hematocrit was. It was very close to the 50 percent threshold.

40. As a consequence, I believe it was apparent to Lance that I was using EPO. I did not make any effort to hide from Lance that I was using EPO. There was no point in doing so. After all, my hematocrit was not going down as it would have had I not been using EPO, and Lance knew this. One evening I was in Lance's room, borrowing his laptop, and Lance was brushing his teeth. To the best of my recollection this was the evening that we were in Andorra, which would have been September 15, 1998. After brushing his teeth, and with me still in the room, Lance gave himself a subcutaneous injection in the stomach with a very short insulin syringe of the sort used for EPO injections. After giving himself the injection Lance said words to the effect of, "Now that you are doing EPO too, you can't go write a book about it." From that point on, while I was on the U.S. Postal Service team, Lance was open with me about his use of EPO.

41. Later, towards the end of the 1998 Vuelta we were getting toward the end of a long and difficult day. We were fighting a crosswind and the peloton was strung out. Lance and Christian and I were riding together, and Lance said to me, "I didn't bring cortisone. I need someone to back to the car and get cortisone for me." At that point I think Christian and I looked at Lance like he was crazy, but we dropped back to the team car. I told Jonny Wertz the team director what Lance wanted and Jonny said, "I don't have cortisone in the car." Jonny then told me to wait a second and he took a knife and whittled down an aspirin and wrapped the aspirin in tin foil so that it looked like a

cortisone tablet. Christian and I then rode back up to Lance and gave him the fake cortisone tablet.

42. In the village prior to the start of a stage during the 1998 Vuelta I was talking with Lance, and he complained about Dr. Celaya, saying that he was way too conservative in the way he dispensed doping products. Lance's comment was something like "might as well race clean, he wants to take your temperature to give you even a caffeine pill."

43. My personal view of Pedro is that even though he provided performance enhancing drugs to the riders he did care about the riders' health and tried to balance performance issues and health risks.

44. Lance finished fourth in the 1998 Vuelta which was a very good result for him. I recall however that Pedro Celaya was very stressed out at the end of the Vuelta and made comments to the effect that he and Lance did not get along and that he was not sure how long he would be on the team.

45. Following the Vuelta we went to the World Championships in Valkenburg aan de Geul, Netherlands, between October 4 and October 11, 1998. The United States team for the Men's Individual Road Race was: Lance , Dylan Casey, David Clinger, Christopher Horner, Trent Klasna, William Chann McCrae, Christian Vande Velde and me. The competitors in the Men's Individual Time Trial were Lance and me.

46. At the World Championships Lance and Christian and Dr. Celaya and I stayed at a bed and breakfast. The individual bedrooms opened into a single common area. One morning a UCI drug tester showed up to test us and began to set up in the common area. At that point, Dr. Celaya went out to the car and retrieved a liter of saline. He hid the

saline under his raincoat, walked right past the UCI tester and went into Lance's room, closed the door and administered the saline to lower Lance's hematocrit level.

47. Later, Dr. Celaya and I had a good laugh about how he had been able to smuggle in saline and administer it to Lance essentially under the UCI inspector's nose.

48. On the day of the road race at the World Championships someone apparently decided that cortisone should be made available for the team; I recall that Kristin Armstrong was wrapping cortisone tablets in tin foil and handing them out to the riders. Someone made the remark, "Lance's wife is rolling joints."

49. In 1999 I continued on the U.S. Postal Service Team. Johan Bruyneel became the new team director for 1999, and he brought with him a new team doctor, Luis Garcia del Moral, and Jose "Pepe" Marti who was introduced as the team trainer.

50. By this time the Festina scandal led to a bit more caution in how EPO was handled around the team, particularly while in France.

51. A difference I noticed between Dr. del Moral and Dr. Celaya was that, while Dr. Celaya had tended to provide EPO in vials, Dr. del Moral provided EPO in preloaded syringes.

52. While the team was somewhat more cautious about talking about doping after the Festina scandal, Dr. del Moral was far more aggressive than Dr. Celaya in providing doping products to riders. While Dr. Celaya would play something of the psychologist, trying to help the riders see how much they could get out of themselves naturally, Dr. del Moral came into the early season training camp in Solvang, California, with an Excel spreadsheet, on which, after meeting with each rider and discussing their schedule, he had

developed a doping plan, and he would tell us, “this is when you use growth hormone, this is when to start EPO.”

53. Our new team director Johan Bruyneel took a very active interest in the hematocrit level of each team member. He always knew our current hematocrit level and whether it had gone up or down recently and would frequently discuss our hematocrit level with us.

54. Johan was very knowledgeable about the specifics of doping, including the dose and frequency of EPO to use and the impact of training, racing and EPO on hematocrit, and I had conversations with him about these topics in 1999.

55. While I lived in Girona, Spain, Lance and Kristin and a couple of other U.S. riders, including Frankie Andreu, Kevin Livingston and Tyler Hamilton, lived in Nice, France, which is over 350 miles, and nearly a five and a half hour drive, from Girona.

56. It was known that drug laws and enforcement in France were stricter than in Spain, and I recall a conversation with Kristin Armstrong about whether it was frightening to live in France and have EPO in the house. Kristin said that she and Lance’s code word for EPO was “butter.” The question for whether there was any EPO at home would be: “Is there any butter?” According to Kristin, the reason this terminology came about was that they stored Lance’s EPO in the butter in the refrigerator.

57. Despite Kristin’s game attitude, I definitely think the doping took its toll on the wives and girlfriends of the riders. They were concerned about the health risks, and more than one wife told my former wife how much they hated the doping and wished that the guys did not have to do it.

58. Lance's favorite term for EPO was "Po" and many other riders used this term as well.
59. On two or three occasions in 1999 Dr. del Moral drove from Valencia, Spain where he lived to deliver EPO to me in Girona. Girona is nearly 300 miles, and about a four hour drive, from Valencia. On those occasions he told me that he was stopping in Girona on his way to Nice. I understood from this that he was delivering doping products, including EPO, to my teammates in Nice.
60. The Dauphiné Libéré was an important eight day stage race held in France on June 6 – 13, 1999. I ended up finishing second in the general classification in this race. My teammate Kevin Livingston finished sixth, Lance Armstrong was eighth, and Tyler Hamilton was fifteenth.
61. I used EPO in the lead up to the Dauphiné.
62. During the race Dr. del Moral gave the riders injections of a product called "Actovegin" which was supposed to enhance oxygen circulation and improve recovery after a race. I recall that it gave a warm feeling in the legs. Dr. del Moral said that Actovegin got more oxygen to the muscles.
63. Actovegin received a great deal of attention in 2000 when packaging for the product was found in the waste of the U.S. Postal Service team and the team circulated the story that the product was used to treat road rash. I can state unequivocally, however, that Actovegin was dispensed in 1999 for purposes of performance enhancement and that U.S. Postal Service staff was well aware of this fact.

64. In fact, I later learned that Actovegin was made of calf's blood and I recall contacting **Other-15** in 2000 or 2001 about my concern over whether mad cow's disease could be contracted from the product. My recollection is that **Other-15** said, "don't worry you'll be fine."

65. During the Dauphiné Dr. del Moral also gave injections of a product he called a "testosterone stimulant." I did not know what was in these injections, however, the product was clear and administered intravenously.

66. I used a cortisone pill on the second to last day of the Dauphiné that was given to me by Dr. del Moral.

67. The last stage of the Dauphiné was won by Christophe Bassons, a French rider, who was an outspoken advocate for eliminating doping in cycling. Bassons's stage win was relatively meaningless as he was no threat for the general classification in that race. Yet, Lance was very upset by Bassons's success. Lance did not like Bassons's outspokenness about doping, and Lance frequently made fun of him in a very merciless and venomous fashion, much like a playground bully. I recall on one occasion patting Bassons on the back, in part because I felt bad he was taking so much grief from Lance all the time, and Lance happened to see my gesture and said to me, "what are you turning into Bassons?"

68. The Route du Sud was a four day stage race held in the Pyrenees in France on June 19-22, 1999. I ended up winning the race and Lance finished in 19th place, 29 minutes and 42 seconds behind me, although Lance did win the final stage of the race.

69. Before the Route du Sud my hematocrit had gone down to around 47, and Dr. del Moral that said I could use EPO in the lead up to the Tour de France. I could not use very much, as my hematocrit was always so close to the limit, naturally. This worried Bruyneel and del Moral.

70. I had been delivered some EPO in Girona prior to arriving in France for the Dauphine but did not bring any EPO into France due to concerns about raids by the French police.

71. Prior to the Tour de France I had a conversation with Johan about whether the team was planning on bringing any doping products into France during the Tour. My concern was that I did not want to go to jail, and I did not want to be on the Tour team if the plan was to bring doping products into France for the race. Bruyneel just smiled and said, "You don't have anything to worry about."

72. However, by the time of the Tour, Johan was very worried. He was stressing about everyone's hematocrit levels and the blood testing at the Tour.

73. I paid close attention to the hematocrit levels of the riders on the team. Both Dr. del Moral and Johan would frequently go around with a piece of paper with rider's hematocrits listed, so it was relatively easy to keep with everyone's level. Plus, Lance was not shy about discussing others' hematocrit levels.

74. I observed that by the time of the 1999 Tour each rider's hematocrit was nailed to the ceiling. Kevin Livingston was about 49.9. I was at 51 (I had a dispensation that allowed up to 52%, due to pediatric records that showed my natural level was quite high).

Tyler was at 49. Lance was almost 49, while he had been at 47 at Route du Sud and at 42 or 43 earlier in the year.

75. Dr. del Moral had saline ready to keep our level below the 50% threshold as necessary. I used a saline product with glycerol in it before the 1999 Tour and recall that it caused me to pee purple.

76. The Postal Service staff, including Johan and the soigneurs seemed to have an outstanding early warning system regarding drug tests. We typically seemed to have an hour's advance notice prior to tests. There was plenty of time in advance of tests to use saline to decrease our hematocrit level. There were at least 3 or 4 occasions during the year where I and other riders used saline after receiving advance warning of a doping control.

77. Another strategy we would use is to have the guys with lower hematocrit be tested first. By the time the testers got to those with a higher hematocrit there would be plenty of time for a saline infusion and the opportunity to drink plenty of water to dilute the urine sample and reduce hematocrit.

78. One of our soigneurs in 1999 was Emma O'Reilly. Emma was spunky and knowledgeable, a hard worker and she had a good relationship with Lance. I recall that she was trustworthy and on at least one occasion I entrusted her with transporting a vial of EPO for me, although I do not know whether she knew what was in the vial.

79. The 1999 Tour de France was conducted from July 3 – 25, 1999.

80. I had a conversation with Lance prior to the Prologue time trial conduct on July 3 in which Lance won and took the yellow jersey for the first time, and we discussed my

concern about the high hematocrit numbers. Lance was calm and said, "You're looking at it the wrong way; we know the whole team is ready."

81. Unfortunately, in the second stage of the 1999 Tour I crashed and had to leave the race.

82. After the Tour de France in 1999 George Hincapie, Christian Vande Velde and I did a race in the Houston area and George and Christian told me how during the Tour de France Jose "Pepe" Marti would show up at strange times sweating and nervous and be gone again. Their assumption was that he had been meeting someone and was delivering something.

83. On that occasion we discussed the incident at the 1999 Tour where Lance tested positive for cortisone, and I was told that Lance's positive arose from an intramuscular injection of Kenacort around the time of the Route du Sud and that the saddle sore cream story had been developed to hide this impermissible use of cortisone.

84. In August or September of 1999 I had a conversation with Johan about the Tour de France. We were talking about how all the other teams were saying that Lance had a drug that was developed by NASA. Johan said, "if people only knew we were using the same amount of drugs we used back on ONCE, in fact we used a lot less than we did on ONCE."

85. On August 7, 1999, I competed in the San Sebastián Classic. I believe it was at this race that I told Lance that I had gotten an offer from Crédit Agricole and asked Lance whether he thought I should accept the offer. Lance said, "you won't be fast on a slow

team and your results won't be as good" which I took to be a reference to the fact that I would not be able to dope as easily as on the Postal Service team.

86. At this point I had a contract option for 2000 from the Postal Service team for less money than Crédit Agricole was offering. Yet, I did not get a sense from Lance or Johan that they were fighting for me to stay.

87. Therefore, I ultimately decided to leave the U.S. Postal Service team to begin competing for Crédit Agricole.

88. I still remained friends with Lance after I left the U.S. Postal Service team.

89. I was surprised to learn how little doping there appeared to be on Crédit Agricole, and there was no organized team doping program. I continued to use small amounts of leftover EPO that I had from my Postal Service days but began to evaluate whether I would continue using drugs in order to stay in the sport as a professional rider.

90. In 2000 or 2001 French authorities announced that they were going to be retesting samples from the 2000 Tour for EPO and I asked George Hincapie if he was worried. He said that he was not because he understood that the way the team had been using EPO in 2000, injecting it intravenously, would not show up in doping tests.

91. In the Spring of 2001 Lance Armstrong came to Girona shortly before he moved there permanently. He stayed with me and Dylan Casey at my apartment for a night while in town to look for a place to live.

92. I ended up serving as a Spanish language interpreter for Lance during his home search.

93. While Lance was in town on this occasion we went on a training ride together, and I asked Lance whether he thought the new EPO test works? He said that his sources told him that it works like a spectrum, and as long as you are in the grey area you do not need to worry about testing positive.

94. Lance then asked me, "Do you know who invented the EPO test?" I did not so Lance told me, "Conconi." Lance said, "I have a couple of friends of Conconi who have told me how the test works."

95. In May of 2001 I got a phone call from Christian Vande Velde with whom I had remained close friends. Christian told me not to tell anyone but he had just gotten off the phone with Johan Bruyneel and that Johan had said, "the way we can still take EPO is to take intravenously no more than 10 international units per kilogram of body weight and it will be out of our system probably within 12 hours and certainly within 24 hours."

96. Later in 2001 I had a conversation with a friend about a new EPO product called "Aranesp" my friend said he could get some but that it was expensive. I asked Lance about Aranesp and he told me that he would not touch it with a ten foot pole. Lance said it was a totally different molecule from EPO and that it would be easy to find when they go looking for it. That conversation saved me some money and, sure enough, at the 2002 Winter Olympics a number of athletes were detected using Aranesp.

97. In the 14th stage of the 2001 Tour de France I was stung by a wasp above my right eye. My face swelled up terribly. However, under UCI rules I was not allowed to take cortisone to treat the swelling because the route of administration of the cortisone was not permitted. I came to the start of the race the next day in part because I was frustrated

with the rules and thought showing up would put a spotlight on the unfairness of the UCI's doping rules. Lance saw me and asked me, "What the f . . . happened to you?" I told him and he asked why I had not used cortisone. I said it was not permitted under the rules and Lance responded, "you gotta change teams. If you were on this team, we would take care of the problem." That experience was so frustrating, it was probably the last time I put my heart in a bike race. I raced another two years but it was never the same. I was growing tired of the drugs, and I had come to the realization that for me the sport would not change in time for to have an opportunity to compete on a level playing field.

98. In 2003 I ended my career as a professional cyclist. Shortly thereafter I became a team manager.

99. One of my goals as a team manager became to develop a professional team that could compete without using performance enhancing drugs. As I began to talk about this goal, my relationship with Lance began to change.

100. One of the first bumps in the road that I had with Lance was in 2005. Dr. Prentice Steffen was the physician for TIAA-CREF, and had made a couple of comments to the media about Lance that could be interpreted as suggesting that Lance was doping.

101. Shortly after these comments were published Lance called me and asked, "what's this guy's deal, why did you hire him?" Lance went on to say, "I don't know if he was the best choice for you, everyone knows he used to be a heroin addict."

102. Lance called a couple of times about Dr. Steffen, and it soon became clear to me that we would likely lose sponsorships we had with Lance's sponsors such as Oakley,

Shimano, Trek and Giro if Dr. Steffen stayed with the team. Lance would say things like, “I certainly hope this doesn’t become a bigger issue for you than it needs to be.”

103. As a consequence, we ultimately decided that to avoid a war with Lance we would need to let Dr. Steffen go for a period of time. Although, we let Prentice know it was temporary.

104. Not long after this incident some private text messages I had exchanged with Frankie Andreu about doping on the Postal Service team became public, and Lance’s attorney’s were back in touch asking what had happened and insisting on a retraction. A true and accurate copy of at least a portion of my text message with Frankie Andreu is attached to this affidavit as Attachment **A**.

105. Lance’s lawyers came after me aggressively on that one, and I ultimately agreed to sign an affidavit for them in which I disavowed any knowledge of doping on the 2005 Discovery Channel Team – something I was willing to do in order to avoid trouble because I had no first hand knowledge about doping on the 2005 team. This doesn’t mean I didn’t know about doping in 1999. A true and accurate copy of the affidavit prepared by Lance’s lawyers and which I signed is attached to this Affidavit as Attachment **B**.

106. After Doug Ellis and I formed Slipstream Sports Lance began contacting Doug Ellis suggesting that Doug should remove me from management of the team.

107. I attributed these efforts to get me removed from Slipstream as tied to my statements about doping in cycling, much as Lance had attacked Christophe Bassons years before about his opposition to doping.

108. For me the stress associated with doping took all of the youthful enthusiasm out of cycling and, while it did not destroy my love for the sport, it caused me to want to retire from professional competition sooner than I might otherwise have.

109. I know others felt the same way. For instance, Kevin Livingston and I have guided Trek travel trips from time to time and on one occasion in 2004 we roomed together and Kevin said that he had gotten sick of the doping in the sport and retired early because of it. He told me he had become “really tired of the game you have to play.”

110. My goal for the Slipstream Cycling Team is to have a successful team that is completely based on good health, good nutrition and sound training methods without any performance enhancing drugs.

111. In 2006 I learned that Frankie Andreu had decided to publicly admit his EPO use in an interview with New York Times reporter Juliet Macur.

112. I understood that Frankie would likely be attacked and vilified for his admission, therefore, I decided to acknowledge my use of EPO to Juliet Macur on the condition of anonymity in order to support Frankie.

113. I did not allow my name to be used in the article by Juliet Macur because I did not want to jeopardize my job in cycling. A true and accurate copy of the September 12, 2006, New York Times article in which my use of EPO is referenced is attached to this Affidavit as Attachment C.

114. As stated in this article, in 1999, while riding for the U.S. Postal Service cycling team, the environment was certainly one of, to be accepted, you had to use doping products. There was a very high pressure to be one of the cool kids

115. Although the article by Juliet Macur states, “Both of Armstrong’s former teammates also said they never saw Armstrong take any banned substances[,]” I do not recall stating this; rather, I recall refusing to answer questions about Lance Armstrong because my purpose in giving the interview was to support Frankie rather than give a complete description of my knowledge of doping on the U.S. Postal Service Cycling Team.

116. I want Slipstream to be a haven for those individuals who wish to escape the pressure to dope and to compete clean.

117. This affidavit is not an exhaustive summary of my testimony, however, it fairly and accurately sets forth information within my personal knowledge.

I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this 12 day of Sept, 2012.


Jonathan Vaughters

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

Subscribed and sworn to before me by September on this 12 day of 2012.

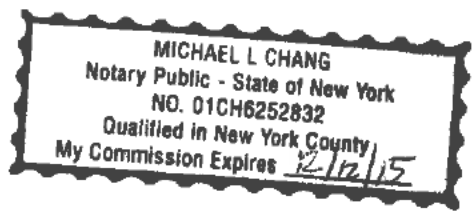
Witness my hand and official seal.

My commission expires: 12/12/15



Notary Public

Address: 804 W 4th St
New York, NY 10004



AFFIDAVIT OF DAVID ZABRISKIE

I, David Zabriskie, under penalty of perjury, declare and state:

1. I am thirty-three (33) years old and was born on January 12, 1979. I have been a professional cyclist since 2001.

2. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.

3. I am providing this affidavit to the United States Anti-Doping Agency (USADA) as part of my voluntary cooperation with USADA and as a part of USADA's investigation of doping in the sport of cycling.

4. I understand that this affidavit will be submitted in legal proceedings, including arbitrations, in which USADA is presently involved or may become involved and in connection with cases that USADA has brought or may bring in connection with doping in the sport of cycling.

5. USADA has full authority to use this affidavit as appropriate in connection with its anti-doping responsibilities under the Code including use in any legal proceedings or in connection with any decision or announcement of sanctions or violations issued by USADA.

6. I understand that a requirement of my cooperation with USADA is that I provide USADA truthful and complete information concerning my involvement in doping and the involvement in anti-doping rule violations of all others of which I am aware.

7. I am aware that should I fail to provide truthful information to USADA that I may lose any and all benefits of my cooperation with USADA.

8. I have also previously provided truthful testimony under oath and subject to penalties of perjury about doping on the U.S. Postal Service Cycling Team to the United States federal government in connection with a criminal investigation.

9. I understand and agree that I am subject to the results management jurisdiction of USADA as a member of the USADA registered testing pool, as a former U.S. Olympic Team Member and as a United States athlete who is a member of USA Cycling and who is subject to the USA Cycling Medical Control rules, the USADA Protocol for Olympic and Paralympic Movement Testing and the United States Olympic Committee National Anti-Doping Policies.

10. A brief history of my cycling career is as follows:

11. I developed an interest in cycling growing up in Salt Lake City, Utah. While in junior high school I participated in mountain biking and rollerblading. In 1994, at fifteen (15) years of age, I went for the first time to a meeting of a local cycling club. Steve Johnson, the President of USA Cycling, who was then with the Human Performance Laboratory at the University of Utah, was the guest speaker. Johnson spoke on cycling tactics. I eventually got to know Steve quite well and we became friends..

12. I recall the first training ride I went on with the cycling club; it was 50 to 60 miles long and I rode that route over and over until I started to beat guys in the club. I became the state champion the next year for my age group. I began winning all the amateur races.

13. Cycling became a refuge for me. Long, hard training rides were cathartic and provided an escape from the difficult home life associated with a parent with an addiction. My father had a long history of substance use and addiction. Seeing what happened to my father

from his substance abuse, I vowed never to take drugs. I viewed cycling as a healthy and wholesome outlet that would keep me far away from following my father's footsteps.

14. In 1996 I did one race in the Lance Armstrong Junior Points Service races and qualified to participate in training at the Olympic Training Center in Colorado Springs (the "OTC"). At OTC, physiological testing was performed on me. Based on the results, I was invited to return to the OTC.

15. In 1997, I was selected to compete at the World Championships in San Sebastian with the National Team.. It came easy to place 4th in the Worlds Time Trial. This success helped me make a decision to continue on with cycling.

16. In 1998 I was on the National Team, as well as Team Jeep Brielle, and Saturn. I met Lance Armstrong for the first time that year. I received an invitation to ride with Lance Armstrong and Kevin Livingston through Chris Carmichael. Steve Johnson arranged for my host housing in Austin so that I could ride with Armstrong and Livingston.

17. The decision of whether to go to college or continue cycling was upon me. Doping had been in the news a great deal in 1998 with the Festina scandal at the Tour de France, and I knew that I did not want to use drugs. Among the people I went to for advice was Steve Johnson. He said not to worry about the drugs in cycling. He said that the sport is cleaning up and it is a great time to enter. He said college would always be there and encouraged me to go into the sport rather than college.

18. In 1999 I rode for Nutrifig and in 2000 I rode for the Colorado Cyclist Team and National Team.

19. In 2000 I competed at the Tour of L'avenir in France. My father passed away at this time while I was competing in Europe. I attribute his untimely death to his drug use.

20. I missed my dad's funeral because of a race -- the GP Des Nations. I won the under 23 category and Lance Armstrong won the professional category. Johan was at the race and I was introduced to him there. Johan gave me a chance to ride on the U.S. Postal Service Team. Johan negotiated with me for my first contract with Tailwind Sports. I recall that the agreement was that I was to be paid \$40,000 for one year.

21. Immediately after joining the team, Johan sent me to Valencia for physiological testing with the Postal Service Doctor Dr. Luis Garcia del Moral. At training camp in Alicante Spain in 2001 Levi Leipheimer and I did a training ride that was observed by the U.S. Postal Service team doctor Dr. Luis Garcia del Moral and another individual who I later learned was Dr. Michele Ferrari. I was told to ride up the hill at full speed so that the doctors could measure my lactic acid levels and assess my power output.

22. I never worked with Dr. Ferrari, but I did notice that Dr. Ferrari on at least one or two occasions was at Lance Armstrong's apartment in Girona, Spain when I went to meet up with Lance for a ride. While Lance and I never became close friends, over time we became friendly.

23. At race hotels, I witnessed roommates getting injections from team doctors. It was explained to me that the injections were called "recovery." Generally, the explanation I was given was that it was a mix of vitamins. At times the "recovery" was a greenish liquid. At other times it appeared to be yellowish. On other occasions the "recovery" was a clear liquid, and at other times it had a reddish hue. I was asked whether I wanted the "recovery," and during the

first part of 2001 I refused, because I was not sure what was in it. I was afraid it might be a doping product.

24. At a training camp in Tucson at the beginning of 2001, I got very intoxicated during a celebration of my birthday, eventually falling asleep in a bath tub. Johan goaded me into drinking more saying, "take another shot or I'll fire you." His comment was in jest, however, those of us not on the Tour team knew that we were expendable, and our careers were very much controlled by team management.

25. After the training camp in Tucson, I moved to Spain. I had trouble making the adjustment to living in Spain. I was in a small town, isolated from other teammates. I did not speak the language. I had no support, no help. I was lonely and, for the most part, distant from my older, more experienced teammates. I was struggling mentally and emotionally and it affected my racing season. I had to beg Johan to keep me on the team for 2002. He said he could only pay me \$15,000 for the season, so I agreed to the reduction in my pay and rededicated myself to doing my best.

26. I began using the "recovery" injection product provided by the team regularly in 2002 because I came to believe it was just vitamins as consistently represented to be by the team doctors. I looked on the packaging of what I was taking when I was able to read it and the ingredients were only vitamins. Sometimes the doctors injected the recovery and other times we did it ourselves, with the instruction to inject the product in the vein. This was the first time I ever used a needle.

27. In 2002 I put a lot of work in and made the Vuelta a España team. At the 2002 Vuelta Johan Bruyneel said that they were going to increase my dose of the recovery because of the difficulty of the race.

28. A teammate, commenting on my progress, told me I was doing great without drugs.

29. During the 2002 Vuelta, my roommate was **Rider-19**. He began to feel badly and eventually dropped out of the race. After **Rider-19** had left the competition, Johan Bruyneel came to the hotel room I had been sharing with **Rider-19** in which we had a small refrigerator and took out a box wrapped in black plastic. I do not know what was in the box.

30. I looked up to Johan Bruyneel and looked to him for guidance and insight regarding how to progress as a professional cyclist.

31. After the 2002 season Johan and I reached an agreement for me to come back to the Postal Service team in 2003 and 2004 for \$50,000 and \$65,000 respectively.

32. In 2002 I started the habit of "entertaining" the Team on the long bus rides with various and sundry songs. I remember one time that year I was at the front of the bus and sang a song to Johan about EPO (to the tune of Jimi Hendrix's song, *Purple Haze*) that I had heard from **Rider-22** and it stuck in my head. Johan laughed along as I sang:

EPO all in my veins

Lately things just don't seem the same

Acton' funny, but I don't know why

'Scuse me while I pass this guy.

33. The 2003 season started well. I had a good performance at the Four Days of Dunkirk (Quatre Jours de Dunkerque) where I finished 5th overall. I recall the assistant team director, **Other-16** saying it was really impressive what I had done and that I could make a lot of money in the sport.

34. Soon after the Dunkirk race my teammate Michael Barry and I were asked to meet Johan Bruyneel and Dr. del Moral (also known as "El Gato") at a Café in Girona, Spain.

35. I had roomed with Michael Barry on some road trips, and we both lived in Girona. Prior to this meeting Michael Barry and I had talked about performance enhancing drugs, and I had gotten the impression that Michael was of the same mindset as myself and was opposed to drugs.

36. At the café, Bruyneel quickly made clear why he and Dr. del Moral were there. Johan and Dr. del Moral had brought not one, but two injectable products for me and Michael. In addition to recovery, they had brought the banned oxygen booster, EPO. I was shocked. This was my third full year on the European team, and I never thought that I would be expected to dope. I certainly did not expect Johan to push me to dope. Of course, I understood that some cyclists in the peloton fueled their success with banned substances. I suspected that some of my teammates were using performance enhancing drugs. (Johan always seemed to know when drug testers were coming at races. His warning that "they're coming tomorrow" came on more than one occasion.) But, until this very moment I was unaware of how involved the team leadership was in drug use by its riders on the team. Until then I had been largely shielded from the reality of drug use on the Postal Service Team.

37. I began to ask questions. I was afraid of the health risks of using EPO and I had a lot of questions, such as: was it safe? Would I be able to have children? Would it cause any physical changes? Would I grow larger ears? I persisted with many questions.

38. Bruyneel said, "everyone is doing it." He assured me that if EPO were dangerous no professional cyclists would be having kids. Bruyneel said that everyone who beat me at the Four Days of Dunkirk was on drugs and that even guys behind me were on drugs.

39. I felt cornered. I had pursued cycling to escape a home life torn apart by drugs, and now I was faced with this. I looked to Michael for support, but it became clear he had decided to use EPO. He kept repeating Bruyneel's opinions that EPO use was required for success in the peloton.

40. At some point I had no more questions. The fear was still there in the pit of my stomach, but I could think of nothing else to say. Johan, Dr. del Moral, Michael and I left the Café and we all four went to Michael's apartment where Dr. del Moral injected both Michael and me with EPO. Dr. del Moral said that EPO should be injected just like the "recovery" which was to be injected in the vein. Bruyneel told us that if someone came to the door of the apartment after using EPO we should not answer the door. Johan and Dr. del Moral told us that EPO and testosterone worked better when taken together, and they left a box of testosterone patches which Michael and I split between us.

41. That night Michael and his wife Dede and I had a conversation about EPO and its wide use in the peloton. They proceeded to come up with justifications for the drug use.

42. I went back to my Spanish apartment and had a breakdown. I called home, crying. I had pursued cycling as an escape from drugs, and here I was, having succumbed to the pressure.

43. For that week I received EPO injections at Michael Barry's apartment per Johan's instruction. Johan said that it was safer to use Michael's apartments for injections because

Michael is not a U.S. rider and therefore was not generally tested out of competition while overseas. On the other hand, USADA testers sometimes showed up to test U.S. athletes in Europe. Therefore, I did it with Michael in Michael's apartment.

44. After that week, I flew back to Utah. A few days later, I was hit by a SUV while on a training ride. I broke my leg and my arm and was out of competition the rest of the year. It was not clear at first if I would ever ride again. It took a long time to be able to walk, let alone ride a bike. I used nothing more that year.

45. I came back to Europe in 2004 and started racing again. At this point, Floyd Landis explained to me that members of the support staff worked with Johan to facilitate doping on the team, including the team trainer "Pepe" Marti and a Belgian named "Other-5"

46. While on the U.S. Postal team bus during the Tour of Luxembourg one year, I remember we were told that police were at the team hotel and "Other-16" advised that if any rider had any drugs in their bags that they should get rid of them. "Rider-20" went into the woods to bury what he was carrying and team employee "Other-13" commented that, "those trees will be big in a few years."

47. Following the 2003 season Dr. del Moral left the team and the primary team doctor for the U.S. Postal Service Team became Pedro Celaya.

48. In addition to the SUV crash in 2003, I had a very bad crash at the Redlands race in 2004. I woke up in a helicopter and had to be airlifted to the hospital. It took me a while to recover from the incident. I then went back to Europe to race the Vuelta.

49. During the 2004 Vuelta, starting with Stage 9, U.S. Postal Team Dr. Celaya injected me with a micro dose of EPO. This was done with the intent to prepare me for the end

of the race and Worlds. He was planning to give me micro doses daily until the end of the race. However, I ended up not getting the cumulative effect that was intended because I dropped out of the race several days later and stopped the use at that point. That was the end of any drug use that year.

50. I was roommates with **Rider-21** in 2004, and I became aware that he was using testosterone.

51. During 2004, Floyd Landis and I spent a great deal of time together as we both lived in Girona, and for a time during the season Floyd lived with **Rider-21** and myself until, eventually, **Rider-21** kicked Floyd out of our apartment. In 2004 Floyd told me of an incident that he said occurred that year in which multiple members of the Postal Service team had blood re-infused right on the team bus during a race. (The windows of the team bus were opaque and could not be seen through by individuals outside the bus. Guys would frequently change on the bus without fear of being seen from outside it.)

52. In 2005, Floyd told me of another incident that had happened in 2004. Lance Armstrong had asked Floyd to check on Lance's blood bags in Lance's apartment while Lance was out of town. Floyd showed me that he still had the keys to Lance's apartment. He told me that the blood was kept in the refrigerator and that the temperature in the refrigerator needed to be checked regularly so that the blood would not go bad.

53. I also recall being in Belgium for a race while on U.S. Postal and **Rider-5** and **Rider-8**, who lived in Spain, came to the race hotel in Belgium even though they were not in the race. I thought it odd that **Rider-5** and **Rider-8** had traveled all the way from Spain when there was no apparent team-related reason for them to be in Belgium. However, the team doctor was there and I was later told by Floyd that **Rider-5** and **Rider-8** showed up there to meet up

with the team doctor to facilitate their blood doping, either to get blood taken out or to have it re-infused.

54. Floyd Landis told me that Dr. Ferrari took a percentage of Floyd's salary for assisting him (Floyd) with doping and training regimen. Christian Vande Velde also told me that Dr. Ferrari was getting a percentage of his (Christian's) salary for Ferrari's help.

55. I also recall hearing team members talk at dinner about how they used to mix red testosterone pills in olive oil for use after training and races.

56. I left the U.S. Postal Service Team at the end of the 2004 season.

57. Around August 2005 I was in Girona Spain and Floyd drove me to Levi Leipheimer's house in Girona. There, I witnessed Levi and Floyd extracting each other's blood.

58. I went to Floyd's house for Christmas and New Years in December 2005. Floyd convinced me to try growth hormone. He said it wasn't fair that I didn't know what the others were doing and have all of the information the others had. I was having trouble with my leg from the accident and based on what Floyd was telling me it seemed that it should help my leg. I did it 5 to 7 times with him. In late May and early June of 2006, for two weeks, I used EPO and growth hormone provided by Floyd Landis. Floyd said the EPO and growth hormone worked better when taken consistently throughout the year, but I did not do that. I stopped after the two weeks and never did it again. The only other use in 2005 and 2006 was an infrequent testosterone patch. Even though my use was highly minimal compared to others around me, I was ecstatic to have those incidents behind me and to never use a banned substance again after June 2006.

59. In 2006 Floyd Landis shared with me his doping practices and those of several other riders and told me about **Other-17** providing Floyd in excess of one hundred thousand dollars to fund Floyd's doping program

60. I was one of the first to sign the UCI's riders anti-doping commitment. I even took it a step farther and offered to wear a tracking unit so I could be identified 24/7 as evidenced in the following article: <http://www.cyclingnews.com/news/zabriskie-wants-100-percent-transparency>


61. After Floyd Landis made public his doping allegations concerning doping on the U.S. Postal Service Team in approximately May of 2010, I called Johan Bruyneel about what he thought might happen, and he said not to lose sleep over it.

62. At the next race I was in, which I believe was in New Mexico, I discussed the situation with Lance Armstrong, and he told me he had things under control. Lance said that he listened in on my conversation with Johan and "if Floyd goes to USADA, we'll know about it." Lance told me to let him handle the press, he said "I'll take care of it. . . you don't need to do anything."

63. I believe that was the last time that I spoke with Lance Armstrong.

I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this 4 day of September, 2012.



David Zabriskie

STATE OF COLORADO

)

) ss.

COUNTY OF EL PASO

)

Subscribed and sworn to before me by _____ on this _____ day of
September, 2012.

Witness my hand and official seal.

My commission expires: _____

Notary Public

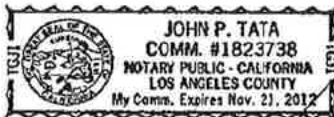
Address: _____

SEE NEW CALIF.
NOTARY FORM
ATTACHED *DX*

State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 4th
day of October, 2012, by David Zabriskie

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.



(Seal)

Signature

A handwritten signature in black ink, appearing to read "D. Zabriskie", written over a horizontal line.