

AFFIDAVIT OF TOM DANIELSON

I, Tom Danielson, under penalty of perjury, declare and state:

1. I am thirty-four (34) years old and was born on March 13, 1978. I have been a professional cyclist during the time period from 2002 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 grew up on East Lyme, Connecticut riding dirt bikes and motorcycles.

13. I got interested in mountain biking when my parents would not let me ride a motorcycle any longer.

14. I went to college at Ft. Lewis in Durango, Colorado to study business and continue to compete in mountain biking.

15. My collegiate cycling coach was Rick Crawford.

16. I won two collegiate cycling titles, winning the U.S. collegiate mountain bike championship in 2001 and 2002.

17. My coach thought that my build and abilities suited competing in road cycling so we targeted for me to compete in the 2001 Tour of Gila, and I ended up getting third in a stage and finishing eighth overall.

18. Thereafter, I was contacted by John Wordin of Team Mercury and he signed me to ride for Mercury in 2002. Riding for Mercury in 2002 I was first overall at the Tour of Qinghai Lake in China.

19. I first met Lance Armstrong in 2002. I had broken Tyler Hamilton's time record on Mount Washington and Lance wanted to meet me and flew me to Austin, Texas for some training rides. I was in awe of Lance at the time and recall getting an autographed cycling magazine from Lance and a picture from him.

20. I rode for the Saturn Cycling Team in 2003 and finished first overall in the Tour of Langkawi and first overall at the Redlands Bicycle Classic, the Cascade Classic and several other races.

21. My performances caught the attention of Giancarlo Ferretti who ran the Italian Fassa Bortolo Cycling Team. Mr. Ferretti gave me a substantial salary increase to join Fassa Bortolo, but the reason I took him up on the offer and moved to Italy was because I thought it was a good opportunity and the team would treat me well.

22. However, it turned out to be very difficult living in Italy. I was the only American on the team and it was apparent that doping was prevalent in European cycling.

23. The cycling was very hard. I was having trouble keeping up, and the team management made it clear that they were unhappy with my results. Ferretti said, that my performances were "not what we expected."

24. I did not see how I could improve as much as expected as quickly as Ferretti was expecting it.

25. The team doctor **Other-1** (who is currently the team doctor for Liquigas-Cannondale) said that some riders had second or third apartments which they used to store their performance enhancing drugs. I also came to understand that the wives of my teammates were serving as drug runners.

26. As a consequence, I began to realize the prevalence of doping and to ask questions about doping methods.

27. At one point I was called into a meeting with Ferretti and he asked me if I had a doctor. I said “no” and he just laughed at me.

28. After that, I asked Ferretti for help in finding a doctor.

29. Eventually, he set up what he called a “test” with Dr. Michele Ferrari. Ferretti was very secretive about the meeting. I was not allowed to speak with Dr. Ferrari prior to the meeting and had to go through a third person to learn the arrangements for the meeting.

30. However, I was excited because I understood that Dr. Ferrari worked with Lance Armstrong.

31. I was told that the location for the “test” would be on a road in the Italian countryside near Bologna. I was instructed to go by myself in a Fassa car with no team markings.

32. Dr. Ferrari met me in a camper.

33. Dr. Ferrari had me go through several 1 kilometer climbs on the Monzuno, the opening climb in the Giro dell'Emilia, an annual cycling race near Bologna, and he took various measurements, including my lactate, body fat and hematocrit and hemoglobin levels.

34. Dr. Ferrari seemed very surprised and impressed with my numbers. He asked how I was so good and had done so poorly in races.

35. He told me that I had outperformed Lance Armstrong and the great Italian climber Francesco Casagrande on the climb.

36. Dr. Ferrari told me that I was good and could be exceptional.

37. Dr. Ferrari told me that he would contact Johan Bruyneel and that he thought the U.S. Postal Service Team would be a good fit for me.

38. I understood that Floyd Landis was leaving the U.S. Postal Service team and that they needed someone to fill his role.

39. Soon thereafter Johan Bruyneel called me and offered me a two year deal at \$125,000 per year. I had been making \$200,000 a year with Fassa Bortolo but I jumped at the chance to be on Lance Armstrong's team and work with Lance, Johan and Dr. Ferrari.

40. I worked with Dr. Ferrari after the 2004 season in preparing for 2005.

41. Lance's team had picked up a new title sponsor, Discovery Channel, and I attended the first training camp in 2005 in Austin, Texas.

42. I met Johan Bruyneel in person for the first time at the training camp. Johan was introduced to me as the team director for the Discovery Channel cycling team.

43. Jose "Pepe" Marti was at the first training camp in Austin and was presented as the team trainer for the Discovery Channel Cycling team.

44. As the team trainer Pepe was supposed to be the coach for the riders. However, I got the impression that Pepe was stealing training programs from Dr. Ferrari. He was always asking what Dr. Ferrari was telling me to do and then writing it down.

45. I understood that Dr. Ferrari was in regular contact with Johan or Pepe or both. Dr. Ferrari and Pepe both seemed to know things I had told the other one, and Dr. Ferrari knew my race schedule without me ever having to tell him. Johan always seemed to be aware of what I was doing with both Pepe and Dr. Ferrari.

46. At either the team training camp in Austin or the next one which was held in Solvang, California I had my first conversation with Pepe about doping.

47. I learned that Pepe would get me the drugs that I needed and that this would begin once we got to Europe.

48. Dr. Ferrari had made clear to me that there was a “system” on the Discovery Channel Team, by which he meant a doping program. The cornerstone of this doping program was EPO.

49. At the training camp in Solvang, California I was around Lance Armstrong from time to time. On one such occasion he got a phone call and I stood next to him while he had a very relaxed conversation with someone he was calling “Hein.” After he finished the call he told me, “That was Hein Verbruggen.” I was impressed that he had such a friendly and casual relationship with the President of the UCI.

50. After the training camps in the U.S. I moved to Girona, Spain in January, 2005. Right after I got there Pepe came by and provided EPO to me.

51. The way it happened was I got a call on my cell phone from Pepe. He had driven up from Valencia, was near the bus station and asked me to meet him. Pepe had EPO which I paid him for.

52. Pepe then provided some instructions on the use of EPO. I was to inject the EPO intravenously in the evening and never to take it subcutaneously. I was to always try to hide from testers and was to try not to get tested. But, if I was tested I was to try to pee before providing a sample.

53. On Fassa Bortolo I had learned to inject vitamins intravenously so I was fairly comfortable injecting myself.

54. With the EPO, at first I generally would use 1000 international units at night and decrease the dosage closer to races.

55. In addition to the advice received from Pepe, I got discussed EPO use with Michael Barry.

56. Pepe delivered EPO to Michael and I together on several occasions. Michael and I also drove to Valencia to get drugs from Pepe. Michael would use more EPO than I because he had a lower natural hematocrit.

57. Johan Bruyneel stayed on top of my hematocrit level and seemed to be communicating with Pepe and Dr. Ferrari about my doping and my training program. When I would talk to Johan he would state that Pepe had kept him informed about my program.

58. Johan would ask me to go to the blood lab in Girona to get blood work done before nearly every race so that Johan could keep track of my blood parameters.

59. I was happy to have the opportunity to interact with Lance early in the season during my first year on the team.

60. We both raced in Paris-Nice an eight day stage race known as “the Race to the Sun” which was held March 6 – 13, 2005. I finished 38th in this race. However, Lance finished 140th in the Prologue (I finished 51st), and Lance dropped out in the first stage. Lance’s fitness early in the season was not good and he seemed to be far behind the rest of us in his conditioning.

61. Lance and I did testing with Dr. Michele Ferrari in Girona early in the year in 2005. We were both doing the same training protocol. We did a three hour ride and then did repeats up the same climb, and Michele would prick our fingers for blood to check lactate levels and other measurements. Lance appeared to be struggling.

62. Although I never made it on the “A” team, the team that raced the Tour de France, at times I thought that I might be close. Early in the season I felt that I was on the B+ team and it seemed as if Lance was trying to make me feel that with some hard work I could make it on the A team.

63. I competed in the Vuelta Ciclista al País Vasco, also known as the Tour of the Basque Country, which was contested April 4 – 8, 2005. In that race my chain skipped, and I hit my knee. I did not think there was anything wrong with my knee but nonetheless Dr. Celaya came to me and said, “I can give you cortisone for the Tour of Georgia, we’ll just say it is for your knee.” I responded that I was alright. However, Dr. Celaya said, “it is good for your muscles, it will give you more power.” I was somewhat concerned because I did not know the

side effects of this drug. However, I relented and had intramuscular injections of cortisone for the Tour of Georgia.

64. At the Tour of Georgia held April 19-24, 2005, Lance gave me the opportunity to do well. He said the team would work for me and they did, and he did, and I ended up winning the race. I was very excited about this result.

65. We returned to Girona, and I did some training rides with Lance. Lance seemed to be very familiar with all aspects of my training program. Lance brought up the subject of out of competition drug testing and told me to be careful. He said that he felt there was going to be more targeted testing of team members that year and warned me to be careful.

66. Referring specifically to the prospect of being tested in Girona he said “it is dangerous here.”

67. I was told while in Girona not to answer the door and if I had to go out not to wear clothing with the team name or logo on it.

68. I rode in the 2005 Giro d'Italia held from May 7 – 29, 2005 which was ultimately won by Paolo Savoldelli, one of my teammates. I did not finish, leaving the race during the ninth stage due to a knee problem.

69. I was disappointed by my performance in the Giro and apparently others were too. I was not named to the 2005 Tour de France Team.

70. Later in the year after Lance had won his seventh straight Tour, I was given the opportunity to ride in the Vuelta a España, the last Grand Tour of the year.

71. Before the Vuelta I asked Dr. Ferrari if the team would have EPO at the Vuelta. He told me that the team would provide small doses of EPO to keep our blood levels up during the race.

72. During the 2005 Vuelta I would go to Pepe's hotel room for EPO injections which were given intravenously. The blinds would always be drawn in the room and Dr. Celaya was also sometimes present.

73. I understood that the entire team was receiving injections during the 2005 Vuelta. I know Michael Barry was receiving injections at the 2005 Vuelta.

74. I finished seventh overall at the 2005 Vuelta a España conducted from August 27 through September 18, 2005.

75. Before the 2006 Tour of California, which was held February 19 – 27, 2006, I was training in Durango, Colorado.

76. I spoke with Pepe over the phone from Durango and he told me that he was shipping EPO to me. He understood that I needed the EPO to perform well and to stay on the program that Dr. Ferrari had designed for me. After the EPO arrived I spoke with Johan Bruyneel and told him the EPO had arrived. Johan was involved in every aspect of the team's training and doping program; he was very controlling, and I never did anything significant without Johan knowing about it. I gave some of this EPO to Michael Barry for his use in preparing for the Tour of California.

77. I ended up finishing eighth in the 2006 Tour of California, one minute and forty-nine seconds behind Floyd Landis of Phonak who won. The Discovery Channel Team finished second in the team classification behind CSC. Michael Barry finished 16th.

78. In 2006 Dr. Ferrari told me about a recipe for mixing small testosterone balls known as Andriol in olive oil. I was instructed to place the mixture in a container and extract 1 ml with a syringe and squirt the liquid under my tongue. This was supposed to be done at night, and I was told that by morning I would not test positive. This product was known as the “oil,” and I would get it as needed from Pepe Marti.

79. I discussed the “oil” with George Hincapie on a bike ride and understood that he used it.

80. While on the Discovery Channel Team I also used testosterone patches. I obtained some of these from Michael Barry.

81. I also discussed testosterone patches with Pepe who said that he could get them for me.

82. In 2006 Pepe asked me whether I wanted to try human growth hormone (hGH). I tried it and shortly thereafter got a call from Johan who said he thought I had more muscle definition.

83. I asked Dr. Ferrari about hGH, however, and Dr. Ferrari said it was “bullshit” and that I did not need it.

84. Dr. Celaya and Pepe would also give me something they called a “hormone booster” before a big stage. They never told me what it was but said it would make my hormones increase. This product was injected.

85. After competing in Europe in the Spring of 2006 I returned to the United States to try to defend my victory in the 2005 Tour of Georgia and came up just short, finishing four

seconds behind Floyd Landis and in second place in the general classification of the 2006 Tour of Georgia held April 18 – 23.

86. Like the previous year, in 2006 I was given cortisone injections by Dr. Celaya to compete in the Tour of Georgia.

87. I then returned to Europe to ride in the 2006 Giro d'Italia which was held May 6 – 28, 2006.

88. Prior to the 2006 Giro d'Italia I asked Johan Bruyneel whether the team had an organized doping program for the 2006 Giro. Johan said “no” but that he thought **Rider-1** **Rider-1** had organized a system for obtaining EPO during the race.

89. I also spoke with Dr. Ferrari about obtaining EPO for the 2006 Giro. **Rider-1** was also a client of Michele's and Michele was also aware that **Rider-1** had a system for obtaining EPO during the 2006 Giro.

90. I went to **Rider-1** and asked him if he could help me with EPO for the race but he said that he had only enough for himself.

91. I discussed the situation with my teammate **Rider-2** who was very upset that the team did not have an organized program for this race.

92. I left the 2006 Giro after the 19th stage, just two stages from the finish. The race was won by Ivan Basso of Team CSC and my teammate Paolo Savoldelli finished fifth.

93. The 2006 Giro d'Italia was the third Grand Tour in which I competed. Although I was a very strong climber, I was getting blown out towards the end of these long races.

94. In 2005 I had become aware that others on the team were on a blood transfusion program but that I was not. I discussed this with Michael Barry who was good friends with George Hincapie and was aware from George about the team's blood doping program.

95. By now, I had come to believe that I would need to do blood transfusions in order to be successful in the Grand Tours.

96. Therefore, at the end of the Giro d'Italia in 2006 I discussed with Johan Bruyneel the possibility of the Discovery Channel team assisting me with blood transfusions in the 2006 Vuelta a España. Johan said "ok" the team would assist me with a blood program and that the blood program would begin after I came back from a trip to the U.S.

97. I went back to the U.S. and then returned and finished first overall at the 2006 Tour of Austria held from July 3 - 9.

98. Sometime around the Tour of Austria Johan called. I was anxious to begin the blood program but he put me off and began discussing my 2007 contract.

99. He first asked that I get a blood test. He told me that in order to take out blood I needed to have a high hematocrit so that after removing the blood I would still be able to train.

100. As we discussed the doping program and my contract I began to realize that Johan was using the blood program as leverage in our contract negotiations and would not begin the blood program until I signed a contract for the following season.

101. As we discussed the contract Johan referred to the benefits of staying with the Discovery Channel team and that I was safe there. I understood him to mean that I should sign with the Discovery Channel team for less money than I might get elsewhere because the team

had a well organized doping program and that I had access to the expertise I needed to not test positive.

102. After I had signed a one year contract for 2007 the blood program began.

103. My hematocrit turned out to be relatively low, and Pepe Marti gave me more EPO and tried to get me to be more aggressive with the EPO to boost my hematocrit. However, I did not want to change my EPO protocol due to my concern over testing positive. I started to worry that Johan, Pedro and Pepe had waited until too late in the summer to start a blood program for me.

104. Thereafter, I went to Valencia to meet with Pepe and Dr. Pedro Celaya and they took out 2 bags of blood.

105. I returned to Girona and attempted to increase my hematocrit by using more EPO. By now it was August and the Vuelta was coming up August 26 through September 17.

106. Johan suggested that I keep my reported whereabouts at my Girona home but that I not tell USADA and go to stay at the Hotel Fontanals Golf in Puigcerdà, Spain, where he said that Lance Armstrong had gone in the past to avoid drug testing.

107. Over the coming weeks I returned to Valencia twice more to have blood re-infused and re-extracted in order to keep the blood fresher.

108. I found this process to be both physically draining and mentally terrifying.

109. To give your blood to a guy who places it in a plastic cooler takes it away and then comes back a few weeks later with a bag of blood that he says is yours I found to be very nerve wracking.

110. I began to worry that my blood would be mistaken for someone else's. When I first had blood extracted Pepe asked me to come up with a symbol to put on the blood bag to make sure that it did not get mixed up with someone else's blood and this seemed very amateurish to me.

111. The more I thought about it the more worried I became. I began to wonder if I could die if they gave me the wrong blood or did not handle my blood correctly, and I remember staring to think, "I don't like this."

112. I found the whole process to be almost emotionally paralyzing.

113. I did receive my blood transfusions at the Vuelta but the whole process had been so emotionally draining that I believe it prevented me from being a serious contender for the podium.

114. Even when I got to the race itself my anxiety did not let up. I had never had severe nerves at a race before, but now I was having a panic attack. It got so bad I told Johan and Dr. Celaya that I thought I might be having a heart attack. I was convinced I was having heart problems from the blood transfusion.

115. Things got so bad that Johan had one of the doctors give me a sedative the last night of the race.

116. Throughout the 2006 Vuelta Dr. Celaya injected me with small doses of EPO. I was told that these injections of EPO were necessary because the blood transfusions would cause my body to lower its production of new immature red blood cells, known as reticulocytes. The EPO was thought to boost reticulocytes so that the effect of the blood transfusion would be masked.

117. I also received cortisone injections from Dr. Celaya in the 2006 Vuelta, although I did not have a real medical need for these injections.

118. Although I did have one stage win, I finished a disappointing sixth overall at the 2006 Vuelta a España and by the end of the race I could tell that Johan had given up on me.

119. I continued to experience anxiety attacks and had trouble finishing well in races. As a result, I stopped doping in 2007.

120. My last meeting with Dr. Michele Ferrari was in 2006.

121. In 2007 the Discovery Channel Team had Alberto Contador, Ivan Basso and Levi Leipheimer and it was clear to me that I was not getting off the B team any time soon.

122. My relationship with Johan was not good. He knew I was not on the doping program, and he was not happy about it.

123. To top it off I got a stomach illness and had to return to the States. Dr. Celaya, however, refused to ok my absence and said I was fine. When I got back home I confirmed with a physician that I had a stomach illness but that did not seem to matter to Johan.

124. Around this time Jonathan Vaughters sent me a text and asked if I would like to join the Slipstream team for the following year.

125. Soon thereafter, I contacted Johan and told him I would be leaving to join Slipstream. Johan was very upset with this decision.

126. Lance also called me after I made the decision to go to Slipstream and left several voicemails telling me how unhappy he was by my decision and that he did not like it that I was going to Jonathan Vaughter's team.

127. However, I stuck by my decision and joined Slipstream in 2008 because I wanted to go to a team that was actively anti-doping, and where I knew I would be comfortable competing clean.

128. 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 26 day of Sept, 2012.



Tom Danielson