

AFFIDAVIT OF DAWN POLAY

I, Dawn Polay, under penalty of perjury, declare and state:

1. I am forty-five (45) years old and was born on November 21, 1966.
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. 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.
7. I have known Frankie Andreu for about thirty-three (33) years; going back to when we were in the 6th or 7th grade. We attended junior high and high school together in Dearborn, Michigan, and have been friends ever since.

8. I have known Betsy Andreu for about twenty-eight (28) years; since she was a freshman at the University of Michigan – Dearborn and I was a freshman at the University of Michigan – Ann Arbor. Betsy and I became good friends and even ended up rooming together for a year after she transferred to the University of Michigan – Ann Arbor.

9. In October of 1996, I received a call from Betsy. I was pregnant with my first child at the time and Betsy was engaged to be married, so we frequently spoke on the phone to discuss my pregnancy and her wedding.

10. During our conversation, it immediately became apparent that Betsy was extremely upset. Betsy explained to me that she and Frankie had recently traveled to Indianapolis to visit one of Frankie's teammates, Lance Armstrong, who was in the hospital for cancer treatments. I had never met Lance but I knew who he was because Betsy is my best friend and she talked to me about everything that was going on in her life, including Frankie's cycling career.

11. Betsy told me that during one of their visits to the hospital, Lance's doctor entered the room and began to ask Lance questions. Betsy said that she and Frankie offered to leave the room but Lance told them to stay. At some point the doctor asked Lance what kinds of medications and drugs he was on and had used in the past. Betsy said that Lance responded to the question by rattling off several different substances, including EPO. I had never heard of some of the substances and did not understand the significance of Lance's disclosure until Betsy explained to me that in the course of answering his doctor's question, Lance had admitted to using several prohibited performance enhancing drugs during his cycling career.

12. Betsy told me that Lance's admission upset her because he was Frankie's teammate and she did not want to marry Frankie if he had used drugs or would be required to use drugs in order to compete. It was my understanding that Betsy was ready to call off the wedding if it turned out that Frankie had used or was using banned performance enhancing drugs.

13. I told Betsy that she needed to have a heart-to-heart with Frankie and tell him how she was feeling. Then, depending on what he said, she would have to decide whether she wanted to go through with the wedding.

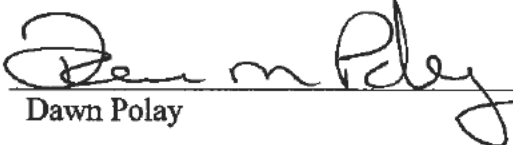
14. Betsy told me that she and Frankie had a long heart-to-heart after our talk. She said he was able to put her concerns to rest and they went through with the wedding as planned in December of that year.

15. Betsy and I have talked about the hospital room incident many times over the past sixteen (16) years and her account of what happened that day has never changed.

16. 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 September 2012.


Dawn Polay

COMMONWEALTH OF MASSACHUSETTS)

COUNTY OF WORCESTER

) ss.
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Subscribed and sworn to before me by DAWN POLAY on this 26th ^{September} day of 2012.

Witness my hand and official seal.

My commission expires: August 9, 2013

Carla R. Senst
Notary Public

Address: 82 Prospect Street
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