

English Translation

FILIPPO SIMEONI'S WITNESS STATEMENT

I, the undersigned, Filippo Simeoni was born in Desio on August 17, 1971 and reside in [REDACTED]

WHEREAS THAT

- USADA asked me to testify in a proceedings and investigations for doping.
- I do not speak English, therefore, I am giving my testimony in the Italian language, but I am aware that this will be translated into English.
- To testify facts of which I am aware is a legal and moral duty;
- what I am going to declare corresponds to the truth;
- I authorize USADA to use this statement in any proceeding or investigation, in particular with regard to doping cases related to the infringement of the WADA Anti-Doping Code.

I DECLARE

- a) I was a professional cyclist from 1995 to 2009. In those years I competed for several teams including Carrera, Asics, Amica Chips, Cantina Tollo, Domina Vacanze and Flaminia;
- b) In a proceeding for doping carried out by the Italian judicial branch, I was interrogated by the Carabinieri (the Italian law enforcement agency) and I admitted the use of performance-enhancing drugs;
- c) In this proceeding I declared that in 1996/1997 I asked my team (Asics) to be treated by Dr. Michele Ferrari, who already worked with my other team-mates.
- d) During visits, Dr. Ferrari told me that in order to improve my athletic performance I had to take doping and prescribed me substances like Andriol (testosterone) and EPO. He made these prescriptions by noting on my training plan an asterisk (Annex 1). I want to specify that Ferrari has never provided me with these drugs but that 3 or 4 times, at his office, gave me an injection of kenacort retard.
- e) I have repeated such statements even in the proceeding against Dr. Michele Ferrari, the Italian judge considered my testimony credible and he based the judgment also on my testimony;

- f) Following my testimony, an athletic proceeding was brought against me. I was condemned to a three months disqualification from the Italian Cycling Federation (which recognized my great contribution to the investigations). The UCI (International Federation), without a trial, but only by sending a letter (Annex **2**) decided that my disqualification should last from November 24, 2001 until July 31, 2002 and that I had to pay a fine of 2000 CHF. Because of this disqualification I could not attend the most important part of my athletic season;
- g) I appealed against the UCI letter before the CAS which reduced the sanction (Annex **3** CAS decision);
- h) Other cyclists involved in the same investigation have denied their involvement in doping in front of the law enforcement agency. In my own circumstances, I have not been condemned by the athletic court. For this reason, the Italian Public Prosecutor who followed the investigation concerning doping, Dr. Spinosa, stated in the newspaper: "I find it absurd that the only cyclist who pays for the use of performance-enhancing drugs is the only one who spoke".
- i) Afterwards, when the criminal proceedings against Mr. Michele Ferrari started, Mr. Lance Armstrong began to make statements against me, first of all, on the Italian TV and, then, in the French newspaper "Le Monde", where he called me a total liar. Following his statements, some criminal proceedings started against Mr. Lance Armstrong
- j) Afterwards, during the 18th stage of the Tour de France in 2004, happened a fact recorded by the TV and reported by many newspapers. During the stage there was a breakaway of 6 riders, at one point I moved out of the peloton in order to go catch up to these riders. In that moment I heard Armstrong who encouraged his team to follow me but, when I turned around, I saw that his team was not able to catch me (they were also very tired because, the day before had been a very hard stage). At one point Armstrong jumped up and joined me and followed me very close to my wheel. I went on and, after a while, I reached the 6 breakaway riders. I felt healthy and I still had a lot of energy because the day before I saved myself. When we reached the other riders they had figured out that, with Armstrong in the breakaway, all the best teams would cycle in order to catch us. Armstrong spoke with the riders and told them that if I stayed Armstrong would stay too and, thus, the peloton would cycle to reach us. The riders asked me to give up and I did it. On that occasion Armstrong told me in Italian: "You

made a mistake when you testified against Ferrari and you made a mistake when you sued me. I have a lot of time and money and I can destroy you."

- k) In the last stage of the 2004 Tour de France, I tried several times to make a breakaway, but the Armstrong team cycled in order to reach me. I want to point out that in the overall ranking I was behind and, therefore, I was not a threat for the yellow jersey, even if I won the stage I would have been far behind compared with Armstrong
- l) Due to the above mentioned facts a criminal proceeding started in Italy and Armstrong was interrogated by the Public Prosecutor. On that occasion he told to the Public Prosecutor he had no assets, that he was not able to speak Italian and to reach me because he would do it with anyone. While, I have read in Italian newspapers that, with regard to the 18th stage's episode, he stated: I only defended the group (Annex 4).
- m) In the newspapers I also read that my Team Manager of that time had been threatened by my captain in order to prevent me from taking part in the Tour de France;
- n) Afterwards, in 2008 I became the Italian national cycling champion. During the Tour of Italy in 2009 (the year in which I was the Italian champion), Armstrong decided to take part in the Tour of Italy. My team, that year, was not invited to take part in the Tour of Italy. I did everything in order to participate, I attended press conferences but was denied the opportunity. I have returned the Italian champion's jersey. I do not know if there have been other occasions when an Italian Champion did not take part in the most important race in Italy, but it happened to me and I think that teams less important than mine (Xacobeo Galicia) took part in that race and, if I had not spoken out and told the truth about doping problems then I believe I would not have been prevented from participating in important cycling races.
- o) As a consequence of this episode, I lost all my passion for cycling (and even if physically I could still ride for another couple of seasons) I gave up.

/s/ Filippo Simeoni



Certification by Translator

I, Dr. Ilaria Pasini, certify that I am conversant in the English and Italian languages, and that the above document is an accurate translation of the document attached entitled DICHIARAZIONE TESTIMONIALE DI FILIPPO SIMEONI.

Ilaria Pasini

Dr. Ilaria Pasini

Milan, 5 October 2012