

## **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 57<sup>th</sup> place in this race. Johan Bruyneel, riding for the Spanish team ONCE finished 63<sup>rd</sup>. The best day for both of us was the fourth stage on June 11, 1998, when I finished 7<sup>th</sup> and Johan finished 3 seconds behind me in 8<sup>th</sup> 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 19<sup>th</sup> 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 14<sup>th</sup> 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

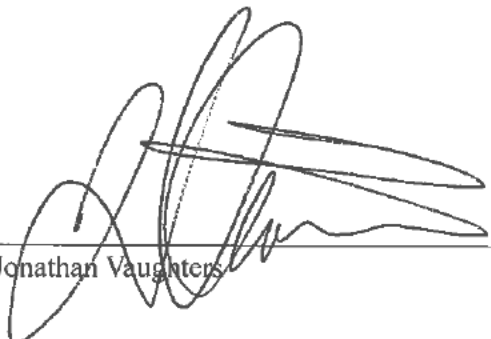
115. Although the article by Juliet Macur states, “Both of Armstrong’s former teammates also said they never saw Armstrong take any banned substances[,]” I do not recall stating this; rather, I recall refusing to answer questions about Lance Armstrong because my purpose in giving the interview was to 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  
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