

**AFFIDAVIT OF TYLER HAMILTON**

I, Tyler Hamilton, under penalty of perjury, declare and state:

1. I am forty-one (41) years old and was born on March 1, 1971. I was a professional cyclist during the time period from 1995 through 2009.
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 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.

8. 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.

9. 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.

10. A brief history of my sports career follows.

11. I attended college at the University of Colorado in Boulder where I studied economics and competed on the ski team during my freshman and sophomore years. During my sophomore year I had an accident which resulted in two broken vertebrae, and I never skied competitively again.

12. I joined the University of Colorado Cycling Team to get in shape following my injury and the following spring won the collegiate national championship in cycling.

13. In 1994 I joined the U.S. national cycling team.

14. I began racing professionally in 1995 with the Montgomery-Bell cycling team. We competed mostly in the United States but went to Europe on a couple of occasions to compete in smaller races.
15. In 1996 the team signed the United States Postal Service as a sponsor and became the U.S. Postal Service cycling team.
16. We spent more time competing in Europe in 1996 and found it very difficult to compete. The speed of the peloton was tremendous and it was generally acknowledged that doping with the banned blood boosting hormone erythropoietin (EPO) was prevalent.
17. In 1996 the team doctor for the U.S. Postal Service Cycling team was Prentice Steffen.
18. 1997 was the first year that I competed full time in Europe.
19. In 1997 the new team doctor for the U.S. Postal Service Cycling team was Dr. Pedro Celaya.
20. One of the first things that Dr. Celaya did was to measure my hematocrit, which is the percentage of red blood cells in my blood. My reading was 43.
21. The U.S. Postal Service team added several new riders in 1997, among them were European professionals Viatcheslav Ekimov, Jean-Cyril Robin, and Adriano Baffi and American George Hincapie who had been riding professionally in Europe for several years with the Motorola team.

22. Early in the year I moved to Girona, Spain which would become my European home for the season.

23. In 1997 I first heard the term riding “pan y agua” (or “paniagua”) – the Spanish terms for bread and water – to refer to a cyclist that was not using performance enhancing drugs.

24. For the first two years of my professional career and first two months of my third pro season I raced paniagua, without chemical assistance.

25. However, after the Tour of Valencia which took place in late February 1997 Dr. Celaya offered me a testosterone capsule to assist my recovery. The capsule was a small, red colored, egg shaped pill filled with a liquid testosterone known as “andriol.” Dr. Celaya said, “this is not doping, this is for your health.” However, I knew it was breaking the rules.

26. My roommate early in the season was the Italian professional **Rider-3** **Rider-3** had a centrifuge which he would use to check his hematocrit.

27. In May of 1997 Dr. Celaya gave me my first injection of EPO and provided some EPO to take home. After using EPO I began to notice significant improvement in my endurance and in my racing performances.

28. I completed the 1997 Tour de France and finished 69<sup>th</sup>.

29. In 1998 Lance Armstrong joined the U.S. Postal Service team.

30. I finished my second Tour de France in 1998, a competition that was marred by the Festina doping scandal.

31. The 1999 season brought significant changes to the team. Lance had brought about the hiring of Johan Bruyneel as the new U.S. Postal Service team director. Johan had been a rider the previous year on the Spanish team ONCE.

32. Johan brought with him a new team doctor, Luis Garcia del Moral, with whom Johan had previously worked while on ONCE.

33. Johan was immediately very interested in our individual blood tests and hematocrit levels. Lance shared Johan's interest in hematocrit levels, and he would sometimes go around the hotel at a training camp or race talking about everyone's hematocrit. Once I recall my hematocrit being at 49.7 and not only did Lance tell the whole team but his wife, Kristin Armstrong even made a comment to me about my hematocrit level that day.

34. During the 1999 cycling season my residence was in Girona, Spain. However, I spent a great deal of time in Nice, France and in Switzerland training with Lance. Pepe Marti an assistant to Dr. del Moral and the team's trainer would make the three and a half hour drive from Valencia to Girona, to deliver drugs such as EPO. I recall that on one occasion in 1999 Pepe told me that he was driving on to Nice, France to make a delivery.

35. In May of 1999 I was in Nice at Lance and Kristin Armstrong's villa. My hematocrit was down, and I asked Lance if he had any EPO I could borrow. Lance directed me to the refrigerator where the EPO was next to the milk. I helped myself to a vial.

36. Like most of the riders Lance had a thermos to keep his EPO cool when traveling. I can recall his soigneur Emma O'Reilly getting ice for Lance's thermos.

37. I met Dr. Michele Ferrari in the Spring of 1999 due to my relationship with Lance. During 1999 and 2000 Dr. Ferrari assisted me with my training because I was working out frequently with Lance, but I did not pay Dr. Ferrari for his services although I understood that Lance was paying him. In 2001 I paid Dr. Ferrari to assist me. Dr. Ferrari would meet us at various locations in Europe where he would generally weigh us, conduct a climbing test or series of climbing tests and measure our blood parameters and lactate level.

38. Dr. Ferrari did not like to meet in France so we would typically meet him at some location in Italy. Sometimes we would drive from Nice and just meet Dr. Ferrari on the side of the highway. I recall the first time I met Dr. Ferrari we met him at a rest stop on the side of a road that runs between Monaco and Genoa, Italy, and he put us through a test on stationary trainer and then measured our body weight, lactate and blood levels. Dr. Ferrari asked me my next race. I said Liège-Bastogne-Liège, and he said I would not finish the race. Ferrari was wrong, however, I did finish the race in 23<sup>rd</sup> place. When it came to a knowledge of doping and cycling performance though, Dr. Ferrari was rarely wrong.

39. Dr. Ferrari injected me with EPO on a number of occasions. The first was in his camper at Sestriére during training in 1999. Another occasion was in March 2001 at a training camp in Tenerife where we had gone for altitude training. This camp lasted approximately two weeks and every second or third day Dr. Ferrari gave me an injection of EPO in my hotel room. Lance attended this training camp along with me and several other members of the U.S. Postal Service cycling team.

40. Dr. Ferrari came up with an olive oil – testosterone mixture that we called simply the “oil.” The “oil” was to be squirted under the tongue. We would use the oil to get a recovery boost after races.

41. On several occasions, including at least once during the 1999 Tour de France, Lance squirted the “oil” in my mouth following a stage of a race.

42. Lance kept a bottle of the “oil” in his race bag and I saw him use it on many occasions.

43. During the 1999 season Lance, Kevin Livingston and I trained closely together. We called ourselves the “Band of Brothers” and Lance called our team, the “Bad News Bears.”

44. At this time, when in Girona I got my EPO from Dr. del Moral’s clinic in Valencia. Either I would drive down to pick it up or Pepe Marti the team trainer would deliver it to me in Girona.

45. The 1999 U.S. Postal Service Team was relatively underfunded. We did not stay in luxury accommodations or have a plush bus like other teams I would later be on. Rather, the team had rented a couple of used campers for our use during races.

46. During the Tour Lance, Kevin and I shared the same camper. The rest of the team used another camper. This arrangement was reached in order to facilitate our doping, as plans had been made to smuggle EPO into France for our use during the Tour.

47. Lance always had his own hotel room, and Johan required that Kevin Livingston and I room together in order to facilitate meetings between him and the three of us.

48. Lance and Johan would come to Kevin and my room so that we could talk openly about doping.

49. The rest of the team caught on that there was some differential treatment going on. Frankie Andreu, referred to by some as "Ajax" for his habit of sometimes abrasively calling things like he saw them, started calling the three of us the "A" team.

50. We used EPO which we called "Poe" or "Edgar" throughout the 1999 season and during the 1999 Tour de France.

51. The EPO was smuggled to us by a French handyman and motorcycle enthusiast named **Other-18** who followed the Tour on his motorcycle and made deliveries to Pepe or another Postal Service team staffer. We soon took to calling **Other-18** "Motoman."

52. **Other-18** also known as "Motoman" is pictured in the three photographs attached to this Affidavit as Attachments A.

53. My experience with Dr. del Moral in 1999 is that he would sometimes authorize my use of cortisone for a made up injury. Cortisone was widely abused in this way on the U.S. Postal Service team.

54. The 1999 Tour de France was one of the least predictable in modern history as, due to a series of injuries to contenders and doping scandals, no former winner was in the race. Following the Festina scandal in 1998, it was called by the organizers the "Tour of Renewal."

55. I recall some of the commotion at the 1999 Tour regarding Lance's positive test for cortisone. About this situation, I recall a great deal of swearing from Lance and Johan and Dr. del Moral repeating *¡Qué lío!* (in English, "what a mess!"). The general understanding was

that they were scrambling to come up with something because Lance had used cortisone without medical authorization.

56. During the 1999 Tour de France Lance, Kevin and I used EPO every third or fourth day, until the third week of the Tour. Dr. del Moral or Pepe would bring the EPO to us in our camper or hotel room. The EPO would already be loaded in a syringe. We would inject quickly and then put the syringes in a bag or Coke can and Dr. del Moral would get the syringe out of the camper as quickly as possible.

57. Lance, Kevin and I all also used a substance known as Actovegin during 1999 and 2000. Actovegin was provided by the team medical staff to the riders and was supposed to improve oxygen delivery to the muscles.

58. On July 13, 1999, during the ninth stage of the 1999 Tour de France Lance blew away the field on the first mountain stage which finished at Sestrière and picked up significant time on his principal rivals.

59. Later, I watched Lance's ride up to Sestrière on television. In Lance's terminology he was "riding with two fingers up his nose" – meaning that he was riding at ease despite the difficulty of the terrain.

60. The next day in the stage that finished at Alpe d'Huez Lance was again strong. During this stage Lance rode up to the French cyclist Christophe Bassons who had been writing a column for the French paper *Le Parisien* in which he was regularly discussing doping in the peloton. Lance tore into Bassons for his comments and said Bassons was hurting the sport.

Lance suggested that Bassons get out of cycling. A day later Bassons had dropped out of the race.

61. By the third week of the 1999 Tour de France Lance had a sufficient lead that we did not need to take further risk, and we stopped using EPO.

62. After the 1999 Tour de France we celebrated with a team victory dinner at the Musée d'Orsay, and I had a conversation with Bill Stapleton about the EPO that had been snuck into France during the Tour. Bill had had a bit too much wine and seemed to want me to know that he was in on the secret dealings.

63. After the 1999 season Lance asked me to move to Nice, France to make it easier to train with him.

64. During the 2000 season my wife Haven and I lived in Nice.

65. In 2000 while we were in Nice Betsy Andreu discussed with me that she had overheard Lance discussing the performance enhancing drugs he had been using when she and Frankie had visited Lance at an Indiana hospital during his cancer treatment.

66. We all knew that Betsy was opposed to doping, and whenever she was around the conversation could not go to doping.

67. In 2000 I won the Dauphiné Libéré, a key tune up for the Tour de France.

68. We had heard that a new EPO test was being developed and might soon be implemented by the drug testing laboratories.

69. On a sunny morning in June of 2000, on the Tuesday following the Dauphiné Libéré, Lance Armstrong, Kevin Livingston and I boarded a private jet in Nice, France for a quick flight to Valencia, Spain.

70. It was my first time in a private jet. Lance, Kevin and I joked around. Johan Bruyneel explained to us that five hundred cc's of blood would be withdrawn from each of us to be reinfused the following month during the Tour de France.

71. The reinfused blood would boost the oxygen carrying capacity of our blood and help our stamina and ability to recover, much as EPO had improved our endurance during the previous Tour.

72. There was no test for blood transfusions, so this method of cheating would be undetectable.

73. After landing we went to a hotel in Valencia.

74. Dr. Michele Ferrari and Dr. Luis Garcia del Moral and Pepc Marti were waiting for us at the hotel.

75. Ferrari and del Moral supervised the extraction process.

76. We were told that Marti and del Moral would be responsible for reinfusing the blood during the Tour.

77. The whole process took only about an hour and then it was time to do a training ride down the coast.

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78. As we headed out we talked about repeating the Tour success of 1999. However, we did not feel like champions. After having lost a bag of blood we were all quickly fatigued. It was funny but also somewhat pathetic. Supposedly among the best cyclists in the world, after losing a bag of blood we could barely make it up small hills.

79. We received our blood transfusion during the 2000 Tour de France on the evening of July 11 in the Hôtel l'Esplan in Saint-Paul-Trois-Châteaux near Mount Ventoux. The whole process took less than 30 minutes. Kevin Livingston and I received our transfusions in one room and Lance got his in an adjacent room with an adjoining door. During the transfusion Lance was visible from our room, Johan, Pepe and Dr. del Moral were all present and Dr. del Moral went back and forth between the rooms checking on the progress of the re-infusions. Each blood bag was placed on a hook for a picture frame or taped to the wall and we lay on the bed and shivered while the chilly blood re-entered our bodies. Kevin, Lance and I joked about whose body was absorbing the blood the fastest.

80. In 2000 Lance won his second Tour de France and later that year the French authorities opened an investigation into doping by Lance and the U.S. Postal Service team.

81. In 2001 Haven and I moved back to Girona and the Armstrong's moved to Girona as well.

82. Eventually, we moved into an apartment in the same building in which Lance and Kristin lived.

83. Before the 2001 cycling season I was in Massachusetts and did not have access to EPO. I had had a quarterly health check and my hematocrit was around 40. I called Lance on

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the phone and asked if he could send me EPO. Lance agreed, and several days later the EPO arrived in the mail.

84. In 2001 Dr. Ferrari told Lance that he could continue to use EPO in competition if he microdosed EPO and slept in an altitude tent. His explanation was that the altitude tent would boost the natural production of EPO and throw off the EPO test.

85. Dr. Ferrari's strategy was also to inject smaller doses directly into the vein, rather than subcutaneously, so the drug would clear the system more quickly.

86. Other drugs could also be taken in smaller doses to avoid testing positive. For instance, testosterone patches could be used to administer small doses of testosterone with a very short detection window. In 2001 on Dr. Ferrari's recommendation we began using testosterone patches.

87. We also had another time honored strategy for beating the testing – we hid. At the time, the whereabouts programs of drug testing agencies were not very robust, the UCI did not even have an out of competition testing program. If a tester did show up, you typically would not get a missed test even if you decided not to answer the door. In any case, there was no penalty until you had three missed tests. So, avoiding testing was just one more way we gamed the system.

88. Lance, however, had even more direct ways to game the system. Lance told me that he had actually tested positive for EPO on a test at the 2001 Tour of Switzerland. He said, however, that his people had been in touch with UCI, they were going to have a meeting and

everything was going to be ok. By this I understood that Lance's positive drug test for EPO was simply being ignored by the UCL

89. In July 2001 Lance Armstrong won his third Tour de France.

90. By the end of the season I had signed with another team, Team CSC.

91. When I met with the CSC Team Director **Other-2** he quickly referred me to the Spanish doping doctor, Dr. Eufemiano Fuentes, for blood transfusions.

92. I went to see Dr. Fuentes at his office in Madrid the following Spring. Dr. Fuentes lied to me regarding how many cyclists he was working with. He led me to believe that he was not working with many cyclists. I would work with him for the 2002, 2003 and 2004 seasons and embarked on a program of regular and systematic blood transfusions.

93. **Other-2** also connected me with Dr. Luigi Cechini who assisted with my training. Dr. Cechini was aware of my relationship with Dr. Ferrari and, therefore, my doping but never provided any doping products to me and never encouraged me to dope.

94. In the 2002 Giro d'Italia 2002 I fractured my shoulder in a crash in the fifth stage but still finished second in the overall classification. By coming in second in a grand tour I was now considered a legitimate Tour contender.

95. In 2003 I became the first American to win the important classics race known as Liège-Bastogne-Liège.

96. I also won the individual time trial and was first in the general classification in the Tour of Romandie.

97. During the 2003 Tour de France I crashed in the first stage breaking my collarbone. I managed to stay in the race however, won a mountain stage in the Pyrenees and finished fourth overall.

98. During the 2003 Tour Lance crashed while in the yellow jersey. Jan Ullrich did not realize that Lance had crashed and would have potentially made up serious time on Lance while Lance was recovering from the crash. However, an unwritten rule in the peloton is that the peloton does not race while the rider in yellow (i.e., the race leader) has crashed and should wait for him to return to the race. As a result, I chased down Ullrich and told him to wait for Lance. Had I not done this Lance may not have won the Tour that year. Afterwards Lance was publicly appreciative of my gesture.

99. In 2004 I moved to the Phonak team where I would be the team leader. On CSC I had been one of multiple teammates gunning for the general classification in the Tour, but now the team would be built to try to put me on the podium. I was gunning for the top spot in the Tour in the year in which Lance would go for a potential record setting sixth straight Tour de France victory.

100. In 2004 I again won the Tour of Romandie

101. I also competed in the Dauphiné Libéré which commenced on June 6 and concluded on June 13, 2004.

102. On June 10, 2004, I was second to Iban Mayo in the 4<sup>th</sup> stage of the Dauphiné which went up Mount Ventoux (the mountain known as the "Giant of Provence"). Both Mayo and I bested Jonathan Vaughters' time record for the climb up Mount Ventoux, and Lance

Armstrong finished fifth in the stage and would ultimately finish fifth in the general classification for the Dauphiné. It was clear at this point that if we stayed healthy Mayo and I would be serious threats for Lance to contend with at the Tour coming up in just a few weeks.

103. I later heard from Floyd Landis that Lance had stormed onto the team bus after the stage on June 10 throwing things and swearing. That same afternoon Landis had overheard Lance call UCI President Hein Verbruggen and say words to the effect of: "You have got to get these guys, Hamilton and Mayo are not normal."

104. As I recall, Floyd said, Lance "called Hein, after Ventoux. Said you guys and Mayo were on some new shit, told Hein to get you. He knew they'd call you in. He's been talking shit nonstop. And I think it's right that you know."

105. Soon after this stage I got a call from the UCI asking me for a meeting at UCI headquarters.

106. I later received a letter from the UCI dated June 10, 2004, stating, "We hereby inform you that during the blood checks that took place during the Tour de Romandie 2004 (Switzerland), the test results showed an abnormal profile. Indeed, your blood values showed strong signs that could lead to think about a possible manipulation. Therefore, we inform you that we will give special attention to your monitoring (doping tests) during the 2004 season." A true and accurate copy of this letter is attached to this Affidavit as Attachment B.

107. On June 13, 2004, I finished second in the general classification of the Dauphiné Libéré.

108. A few days later I traveled to UCI headquarters to meet with Mario Zorzoli of the UCI concerning my blood test results from the Tour of Romandie.

109. At the 2004 Tour de France I crashed in Stage 8 and suffered severe injuries to my back which eventually caused me to have to withdraw from the race during Stage 13.

110. I won the gold medal in the individual time trial at the 2004 Olympic Games in August, 2004.

111. I competed in the 2004 Vuelta a España which took place from September 4 – 26, 2004.

112. On September 16, 2004, I found out that my blood sample collected from September 11, 2004, was positive for a mixed blood cell population. In other words, I had tested positive for a homologous blood transfusion. I would subsequently serve a two year period of ineligibility for this positive drug test.

113. I retired from professional cycling in the spring of 2009, following a second positive test, this one arising from DHEA contained in a supplement I was using.

114. In June of 2010 I got a phone call from Jeff Novitzky, a special agent with the United States Food and Drug Administration Office of Criminal Investigations.

115. Once Lance learned that I had been contacted by federal agents he offered to provide me a lawyer free of charge. I declined, however.

116. On July 21, 2010, I testified truthfully, under oath and subject to penalties of perjury, before a federal grand jury regarding many of the same topics addressed in this affidavit.

I followed my grand jury appearance with a lengthy proffer of testimony to the U.S. Department of Justice attorneys and agents working on the case.

117. I had lived with the double life and lies necessitated by my doping activities for so long that I found the opportunity to tell the truth to the federal grand jury a very liberating and cleansing experience.

118. In March of 2011 I was contacted by the news show *60 Minutes* for an interview which I eventually agreed to give. As I prepared to go on *60 Minutes* I was required to go to many people to whom I had not previously told the truth about my doping, including most painfully my mother and father and other family members. These meetings were also very difficult, but, as I told the truth, I felt a great weight being lifted from my shoulders.

119. The *60 Minutes* interview aired on May 22, 2011.

120. On June 11, 2011, I traveled to Aspen, Colorado to attend an event organized by *Outside* magazine to which I had been invited. Before traveling to Aspen I had actually checked Lance's schedule online just to confirm that he was not going to be in town and found that he was supposed to be at an event in Tennessee.

121. Part of the *Outside* magazine event in Aspen involved an afternoon bike ride. After the ride a group of us went to the restaurant Cache Cache for dinner.

122. During dinner that evening I got up from dinner table and walked to the back of restaurant to use the facilities.

123. I was returning to our table when a hand reached out and forcibly stopped me. It was Lance and all of a sudden he was in my face, saying sarcastically, Hey Tyler, how's it

going? In comments punctuated with expletives, Lance asked, "How much did *60 Minutes* pay you? How much are they fucking paying you?"

124. He said, "When you're on the witness stand, we are going to fucking tear you apart. You are going to look like a fucking idiot." Lance continued, "I'm going to make your life a living . . . fucking . . . hell."

125. The whole episode took perhaps ten minutes, and it really shook me up. I believe it was a clear effort to intimidate me and to try to discourage me from testifying against Lance.

126. As a consequence of my doping during my career, I ultimately decided to return the gold medal I won at the 2004 Olympic Games to the International Olympic Committee and to disclaim any interest in that medal.

127. In June of 2012 I wrote Mr. Jacques Rogge, the Secretary General of the International Olympic Committee to tell him I wanted the medal returned to the IOC. An accurate copy of my letter to Mr. Rogge is attached to this Affidavit as Attachment C. Mr. Rogge's response to me is attached as Attachment D.

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 28 day of September, 2012.

  
Tyler Hamilton

STATE OF MONTANA

COUNTY OF Missoula

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) ss.  
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Subscribed and sworn to before me by Tyler Hammon on this 23 day of 2012.

Witness my hand and official seal.

My commission expires: May 30, 2016



Notary Public

Address: 234 W. Main  
Missoula, MT. 59802

