

AFFIDAVIT OF STEPHEN SWART

I, Stephen Swart, under penalty of perjury, declare and state:

1. I am forty-seven (47) years old and was born on January 5, 1965. I was a professional cyclist during the time period from 1987 through 1995.
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. USADA has full authority to use this affidavit as appropriate in connection with its anti-doping responsibilities under the World Anti-Doping Code.
5. In 1994 and 1995 I was teammates with Lance Armstrong on the Motorola Cycling Team.
6. The day after the Milan-San Remo race in 1995 I went on a training ride in Como when the subject of EPO use was discussed.
7. Lance Armstrong was the leading the conversation and stated strongly that the riders who were in line to ride the Tour De France that year needed to begin an EPO program.
8. Prior to the start of Tour Of Switzerland I obtained EPO from a pharmacy in Switzerland and began using EPO.

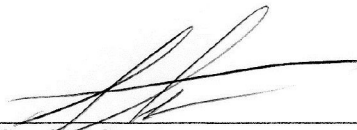
9. I understood that my other teammates on the 1995 Tour de France team including Lance Armstrong were using EPO.

10. As a result of our EPO use the team had a centrifuge to check each rider's hematocrit level (i.e., percentage of blood cells).

11. I recall that during the 1995 Tour de France most of the riders, including Mr. Armstrong had a hematocrit above 50.

I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this 17th day of September, 2012.



Stephen Swart

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) ss.
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PHILIPPA ROSEMARY WILSON September

Subscribed and sworn to before me by _____ on this 17 day of 2012.

Witness my hand and official seal. Phillippa Wilson JP.

My commission expires: _____

JUSTICE OF THE PEACE

Notary Public

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