

AFFIDAVIT OF EMMA O'REILLY

I, Emma O'Reilly, under penalty of perjury, declare and state:

1. I am forty-two (42) years old and was born on 22 July 1970. I was a soigneur for the U.S. Postal Service Cycling Team during the 1996 through 2000 cycling seasons.

2. I am currently self-employed as a massage therapist and live in Manchester, England.

3. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.

4. 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.

5. 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.

6. 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 investigations or in connection with any decision or announcement of sanctions or violations issued by USADA.

7. I understand that a requirement of my cooperation with USADA is that I provide USADA truthful and complete testimony and information concerning my involvement in doping and the involvement in anti-doping rule violations of all others of which I am aware.

8. The statements provided in this affidavit were provided directly to USADA and have not previously been provided to the Union Cycliste Internationale or USA Cycling.

9. A brief history of my career and experiences in cycling follows.

10. During my career in cycling, I worked as a soigneur for the Irish National Cycling Team (volunteer) from 1989-1993, Shaklee from 1994-1995 and the U.S. Postal Service team from 1996-2000.

11. I interviewed for the position with the U.S. Postal Service team at the Montgomery Securities offices located in the Pyramid building in San Francisco, California. During the interview I met with Diana Sangston, Dan Osipow and Mark Gorski. I was considered a Montgomery contractor but was not required to sign a written agreement at that time. The first written contract I signed as part of my employment with the U.S. Postal Service team was for the 2000 season.

12. As a soigneur it was my responsibility to look after the needs of the riders who were assigned to me. I gave massages, ordered clothing from sponsors, laundered race kits, provided general first aid, prepared the race food and handled lodging arrangements to make sure they were checked-in properly and had adequate dinners when they arrived at the hotel each evening.

13. 1996 was the first season with the U.S. Postal Service as the title sponsor. As the title sponsor, it was U.S. Postal Service's role to make it possible for the team to exist. It is my understanding that they paid the riders wages and paid for transport for the team, support and equipment.

14. During the 1996 season, Eddie Borysewicz ("Eddie B.") was the team director, Prentice Steffen was the team doctor Waldek Stepanoski ("Wally B.") was the head soigneur.

15. Two of the riders on the U.S. Postal Service team during the 1996 season were Tyler Hamilton and Marty Jemison.

16. After the Tour de Suisse, I recall a conversation between Tyler and Marty that can best be described as a venting session. Tyler and Marty were complaining that Dr. Steffen was not providing them with enough assistance for the team to be competitive in races. My understanding from the conversation was that the riders were complaining about the lack of legitimate recovery products and not necessarily banned performance enhancing substances like erythropoietin ("EPO"), human growth hormone ("hGH") or testosterone.

17. I was not aware of the use of any performance enhancing substances by U.S. Postal Service team riders during the 1996 season.

18. Several staff changes were made for the 1997 cycling season.

19. Prior to the start of the season Johnny Weltz replaced Eddie B. as the U.S. Postal Service team director. Eddie was kept on staff for races in the United States but was demoted to the Assistant Director.

20. Pedro Celaya replaced Dr. Steffen as the team doctor and brought Jose Arenas along as a soigneur.

21. Wally B. was initially retained as head soigneur but was eventually replaced by Freddy Viaene because of repeated conflicts with Johnny Wertz.

22. Some of the riders on the U.S. Postal Service team during the 1997 season were Tyler Hamilton, Marty Jemison, George Hincapie, Viatcheslav Ekimov ("Eki") and Tony Cruz.

23. Tyler Hamilton was one of the riders I worked with during the 1997 season.

24. I remember being aware that some of the riders on the team were on doping programs in 1997 but do not recall having a conversation with any of the riders about their use of banned performance enhancing substances or methods during that season. Everybody knew what was happening but I never had a conversation with a rider in which the doping program was openly discussed.

25. It was my understanding that **Other-9** Dr. Celaya and **Other-10** were the only staff members involved in the administration of the doping program in 1997.

26. I did not discuss the doping program with any of the staff members during the 1997 season but in April of that year I did observe **Other-10** as he prepared syringes that were to be administered to the riders during the Circuit de la Sarthe. I recall that **Other-10** used a syringe to pull a substance out of a glass vial but do not remember the name or appearance of the substance because I had made a deliberate choice to avoid all conversations about and involvement with the doping activities on the team.

27. While U.S. Postal Service riders and staff did not openly discuss the doping program with me in 1997, I do recall one conversation that occurred after the 1997 Tour de France. 1997 was the first year that the U.S. Postal Service team competed in the Tour and the team managed to finish with all nine of its riders who had started the race. After the finish, a mechanic from another team came up to me and commented on the team's surprising performance by saying "you've got a good doctor." The implication was that the U.S. Postal Service team doctor was good at supplying recovery products and banned performance enhancing substances because all of the riders were able to finish the race.

28. Johnny Weltz and Dr. Celaya remained on the U.S. Postal Service team staff for the 1998 season. Freddy Viaene left prior to the 1998 season to work with Frank Vandenbroucke. Freddy worked with Vandenbroucke for the 1998 and 1999 seasons but returned to the U.S. Postal Service team for the 2000 season. I ended up taking on some of Freddy's old responsibilities but the U.S. Postal Service team effectively operated without a head soigneur during the 1998 season.

29. In addition to Tyler Hamilton, Marty Jemison, George Hincapie, Eki and Tony Cruz; Lance Armstrong was signed as a rider for the U.S. Postal Service team for the 1998 season.

30. I first met Lance at a training camp in Ramona, California – a small town in Southern California where Eddie B. lived.

31. The next time I saw Lance was four or five months later at the Core States U.S. Pro Cycling Championship. I ended up working with Lance during his victory at the Tour of Luxembourg and again at the Vuelta a España.

32. I think that Lance preferred to have me work with him because he considered me the best of a bad lot.

33. Despite my earlier decision to not involve myself in the U.S. Postal Service team's doping program, in 1998 I had several conversations about the doping program and on one occasion actively participated in the transport of a banned performance enhancing substance.

34. In May or June of the 1998 season, George Hincapie learned that I was traveling to Belgium and asked me to pick up a package for him from [REDACTED]. [REDACTED] was no longer associated with the U.S. Postal Service team but both George and I had remained on friendly terms with him.

35. I arranged a meeting with [REDACTED] at a restaurant in the Hotel Nazareth in Ghent to pick up the package.

36. When we met, [REDACTED] handed me a small package. I remember being surprised by how small the package was and telling [REDACTED] that I would try to get the package to George in Girona but was happy to deliver it to him when I returned to the United States if I did not happen to see him before he left Spain.

37. When I mentioned traveling with the package to the United States, [REDACTED] said something like, "Don't do that. Give it to George. It is testosterone and you do not want to transport it yourself."

38. I asked [Other-11] why George would want to take testosterone and he explained that it is good for long events and gives a rider enough energy to finish a sprint.

39. I do not recall ever witnessing [Other-11] directly distribute or administer banned performance enhancing substances to the riders but he did explain to me how certain substances worked to the benefit of the riders.

40. In addition to the testosterone explanation, [Other-11] also told me that there were certain prohibited substances that were used by U.S. Postal Service riders to regulate their temperatures and ensure that they did not get too hot or too cold during a race.

41. The 1998 Tour de France was scheduled to begin in Dublin, Ireland, on July 11, 1998.

42. I am from the Dublin area and have family there, so I traveled to Ireland early to visit with them and made arrangements to meet the team at the port when they arrived on the ferry from Belgium.

43. The ferry was scheduled to arrive at the port after midnight, so I was surprised when customs agents showed up to meet the ferry to carry out searches of the team vehicles. I convinced the customs agents to leave by explaining that they would have a riot on their hands if they tried to search the trucks at 2:00 am and that any search they felt was necessary could just as easily occur in the morning.

44. Later that same morning was when word of Willy Voet's arrest started to make its way around the Tour de France.

45. Voet, a soigneur for the Festina cycling team, was arrested while attempting to transport a substantial amount of doping products across the Belgian-French border while driving a Festina team car.

46. It was no secret that Festina had a doping program, but I do recall that everybody was surprised when we learned about the amount of drugs that Voet was transporting for the Festina team.

47. The news of Voet's arrest caused a lot of anxiety among the Tour de France teams because it prompted raids and searches by the police after the Tour resumed in France.

48. Dr. Celaya was typically very laid back and relaxed but his demeanor changed drastically in the wake of Voet's arrest and resulting police raids. Dr. Celaya was frantic because he knew he would be held responsible if the U.S. Postal Service team was busted and found to be in possession of banned performance enhancing substances during the Tour de France.

49. Dr. Celaya remained in an extremely agitated state until the U.S. Postal Service team made the decision to discard all of the remaining doping products during the Tour de France's second time trial.

50. The second time trial started in a small village named Meyrignac-l'Église. During the stage, camper van that the U.S. Postal Service was using was parked in a large field that was adjacent to the course.

51. I knew to stay away from the team bus during time trials because all of the doping products the riders are using need to be on the bus during those stages. However, **Other-12**

Other-12, who was working as a host for the U.S. Postal Service team, told me that \$25,000 worth of doping products were flushed down the toilet of the team bus and discharged into the field.

52. It is my understanding that **Other-12** learned about the dump from the team mechanic, **Other-13**. **Other-12** and **Other-13** were dating at the time and he told her that Dr. Celaya was terrified and wanted all of the doping products to be removed from the bus in case it was searched by the French police.

53. After hearing about the team's decision to dump everything out in the field I remember saying to one of the other staff members that \$25,000 worth of doping products probably does not make very good fertilizer and that the team should come back to the field in a few years to check out the grass.

54. Dr. Celaya seemed much more relaxed after the doping products were flushed and discharged in the field.

55. The U.S. Postal Service team intention was to remove all doping products from the team bus during the second time trial; however, a single thermos in the refrigerator was overlooked and made it all the way through the Tour de France.

56. By the time I noticed the thermos I understood that riders used them to store and keep their EPO cold. During the course of the year, several of the riders, including George Hincapie, asked me for ice for their thermoses so that the contents would remain cold when a refrigerator was not readily available for their use.

57. I first noticed the thermos shortly after the second time trial. When I shook the thermos I could hear vials rattling inside of it.

58. I finally mentioned the thermos to **Other-9** one evening during the Tour of Denmark. I remember that **Other-9** face went pale when I asked him about the thermos after the team dinner.

59. When I checked the refrigerator the following morning, I noticed that the thermos was gone.

60. Approximately two weeks after the Tour of Denmark the U.S. Postal Service team competed in the Tour of the Netherlands.

61. On the final day of the race I used one of the team cars to give Lance Armstrong a ride to the airport.

62. When we arrived at the airport Lance gave me a small package wrapped in plastic. He explained that the package contained some things that he was uneasy traveling with and had not wanted to throw away at the team hotel. He then asked me if I would be willing to dispose of it for him on the way to my next destination.

63. From Lance's explanation and the shape and feel of the package I assumed that the package contained syringes that had been used by Lance during the Tour of the Netherlands. I do not know what the syringes were used for; but, if they had been used to administer legitimate recovery products then there is no reason they could not have been disposed of by a doctor or trainer at the team hotel.

64. I planned to travel to Ghent to visit with U.S. Postal Service team mechanic Julien DeVriese and his family after dropping Lance off at the airport and agreed to dispose of the package for him.

65. I was driving a U.S. Postal Service branded vehicle and did not want to arouse suspicion by pulling off to the side of the road for the sole purpose of throwing away some trash so I decided that the safest course of action was to wait until I arrived at Julien's house in Ghent to dispose of the package.

66. Despite my experiences over the course of the 1998 season, I do not recall having a conversation with any of the riders during that season in which they admitted to engaging in a doping program.

67. None of the riders told me that they received their doping products from Dr. Celaya, but it was my understanding that he was responsible for administering the program.

68. I never saw any of the riders receive injections but that is likely due to the fact that I knew not to inquire when hotel room doors were closed.

69. I also knew not to ask questions when pictures were removed from hotel room walls but came to understand that the riders used the hooks in the wall to hang their IV bags.

70. As was the case prior to the 1997 season, several staff changes were made for the 1999 cycling season.

71. Johan Bruyneel replaced Johnny Wertz as director for the 1999 season.

72. Dr. Celaya left the U.S. Postal Service team to become the team doctor for the ONCE team and was replaced by Luis Garcia del Moral.

73. Jose "Pepe" Marti Marti was added to the staff as a coach but I never witnessed him provide coaching to any of the riders. To me, it seemed that Pepe's primary responsibility

was to obtain and transport doping products for the team. Pepe would show up every once in a while with a bunch of boxes of from the Valencia Institute, which is where he worked. Some of the product that Pepe transported would end up on the U.S. Postal Service team truck and some of it would go to Dr. del Moral's hotel room for distribution to the riders. There would always be a lot more product in the truck after Pepe rejoined the team. The staff would have discussions amongst ourselves about Pepe's role and we eventually came to the conclusion that he was just a courier. A particular conversation I recall was on the Tour of Burgos with the riders; where they were saying that's all Pepe seemed to do, was act as a courier.

74. Most significantly for me, I was promoted and officially assumed the position of *head soigneur for the U.S. Postal Service team*.

75. I remember receiving the call from Johan offering me the new position while I was visiting my sister in Dublin. I was excited about the opportunity but made clear to Johan that I would only accept the position if it would not require me to become involved in the team's doping program. Johan assured me that it would not be a problem if I chose to keep my distance from the doping program and I accepted the job.

76. In May of 1999, I attended a training camp in the Pyrenees with Lance and a few other U.S. Postal Service team staff members. After the training camp, Lance asked me drive to the team's base in Piles, Spain to collect something for him from the team doctor.

77. I told Lance that Simon Lillistone, my boyfriend at the time, would want to accompany me on the journey as I was doing it during a weekend. Lance advised me not to tell

Simon that I was traveling to Piles to pick up something for Lance, but I ignored that request because I did not think it would be fair to put Simon in that position without his knowledge.

78. Lance did not tell me what I would be picking up and I did not ask. However, I understood that he was asking me to pick up doping products for him because he asked me not to tell my boyfriend about the purpose of the trip.

79. Despite my misgivings about participating in the U.S. Postal Service team's doping program, I agreed to make the trip and pick up whatever it was that Lance wanted me to get for him.

80. I rented a car and Simon and I set out for Piles from Valras-Plage, France, which is where Simon's apartment was located. The drive from Valras-Plage took about six hours to complete and we arrived in Piles after dark.

81. The U.S. Postal Services team rented two houses in Piles. One of the houses was occupied by Louise Donald and Geoff Brown, and they sublet a room for me to use when I was in town.

82. Johan came to Louise and Geoff's house the morning after Simon and I arrived in Piles. Prior to Johan's arrival, I had been working in the garage under Louise and Geoff's house, packing one of the team trucks for any upcoming race. When Johan arrived I stepped out of the garage and onto the driveway that sloped down from the street and into the garage. I was standing at the entrance to the garage when Johan walked down the driveway and discretely handed me a small pill bottle.

83. The pill bottle looked like a standard bottle that any prescription medication would come in – round and made of an orange-brown plastic with a white lid. Through the plastic I was able to see about twenty small white tablets. I placed the pill bottle in my toiletry bag for safe keeping.

84. Simon and I made the five-hour journey back to Valras-Plage the following afternoon. As we pulled up to the border there was a queue, which was not a normal occurrence. While we waited in the queue, Simon and I had a conversation about what to do if I got caught with the pills. We decided that we would use my phone call to call Thom Weisel, if we ran into any problems, because he would probably have the best lawyers.

85. We ended up crossing the border without incident and continued on to Valras-Plage. We arrived in the city after dark and I spent the night at Simon's apartment.

86. The following morning I arranged to meet Lance at a McDonald's car park, just outside of Nice, France – approximately three and a half hours from Valras-Plage.

87. Lance and I agreed to meet in the car park at 11:30 but I was held up in traffic and did not arrive until close to noon.

88. When I arrived at the car park Lance was already there waiting. Lance was sitting in the driver's seat and his wife at the time, Kristin, was sitting beside him on the passenger's side with Boone, their Maltese, in her lap.

89. As I pulled up Lance stepped out of his car and walked over to where I was parked. When Lance reached my vehicle I discretely handed him the pill bottle so that Kristin or

anybody else who happened to be observing our interaction would not be able to tell that a handoff had occurred.

90. After the handoff, the three of us made small talk for a while and then we went our separate ways. To this day, Lance and I have never discussed the trip to Spain, the pills or what the pills were used for.

91. About a month after Lance asked me to go to Piles for him, the U.S. Postal Service team competed in the Critérium du Dauphiné Libéré in France.

92. On June 10, the fifth day of the race, Lance and I had a discussion about his hematocrit level. I can clearly recall that the conversation occurred while I was giving Lance a massage but I do not remember how the topic came up.

93. At some point during the massage Lance told me that his hematocrit was at a forty-one when his measurements were taken earlier that day. I knew that forty-one was considered a low hematocrit level and that it would be difficult for him to remain competitive if it remained at that level.

94. When I asked him what he was going to do about his low hematocrit Lance just laughed and said, "You know, Emma. What everybody does." I understood Lance's response to mean that he intended to use EPO in order to raise his hematocrit levels.

95. Approximately three weeks after we discussed his low hematocrit and a day or so before the start of the Tour de France, Lance asked if he could borrow some of my makeup to cover up a bruise that he had on his upper arm. According to Lance, the bruise had been caused by a syringe mark.

96. Lance was concerned about the bruise because he was expected to make an appearance at the Tour de France's official medical examination and photographers and other members of the media would be in attendance. Lance did not want to show up at the event with any marks on his body that might arouse suspicions among the assembled members of the media.

97. I told Lance that the makeup I used would not work to cover up the bruise on his arm but that I had to go to the shops anyway and would pick up some concealer for him to use while I was out.

98. I ended up purchasing a few different types of concealer makeup for Lance so that he could try them out and see which one worked best for him.

99. Lance applied the makeup to his arm by himself and asked me what I thought. We both ended up laughing because I did not think the makeup did a very good job of covering up the bruise and Lance thought it was okay.

100. It turned out that the makeup did an adequate job of covering the bruise because there were no reports of a bruise or syringe mark in the media following Lance's medical examination.

101. Less than a week after providing Lance with makeup to conceal his bruise, Kevin Livingston, one of the other U.S. Postal Service riders that I was responsible for, told me that a sample Lance had provided during doping control had tested positive for a corticosteroid.

102. Kevin mentioned Lance's positive by way of his explaining why he was late for his post-race massage. Kevin told me that he was late because he was called into medical, as the

second reserve, to provide a sample so that the head medical commissar for the Tour could warn Johan, who accompanied Kevin as an independent observer, about Lance's positive.

103. I remember that Kevin did not seem upset about being called into doping control or alarmed about Lance's positive. The positive had been kept quiet so there was still time to come up with a plan so that the team could get ahead of the story.

104. There was no sense of panic about Lance's positive on the U.S. Postal Service team until we got word that reporters from Le Monde were prepared to break the story.

105. I remember being in a room with Lance, **Other-14** and **Other-15** when the three of them came up with the explanation for the presence of corticosteroids in Lance's sample. I was giving Lance a massage at the time and the three of them were talking about what needed to be done in order to excuse Lance's positive test.

106. The obvious solution was to obtain a backdated prescription for the corticosteroid. I was there while Lance, **Other-14** and **Other-15** came up with the saddle sore excuse and figured out how far to backdate the prescription. Once they settled on the saddle sore story **Other-15** left the room to get the prescription from Dr. del Moral for the corticosteroid cream.

107. During the meeting, Lance was calling the shots but **Other-14** and **Other-15** did not seem surprised when the conversation turned to the need for a backdated prescription to excuse the corticosteroid positive. It was my impression that both **Other-14** and **Other-15** were aware of what was going on with the U.S. Postal Service team's doping program but I had no further discussions with them about the doping program after that evening.

108. Lance explained to me that that had not been worried about testing positive for corticosteroids because he had been tested two weeks prior to the Tour de France at the Route du Sud and the sample came back clean. Lance did not realize that a more sensitive test had been adopted and implemented for the Tour de France until his sample came back positive.

109. It was clear to me after the meeting that Lance's positive sample was not caused by the medical treatment of a saddle sore and that the only reason he obtained a prescription was to excuse his improper use of a prohibited substance.

110. Lance acknowledged that I had been present for a significant moment in his cycling career when he told me, "Now, Emma, you know enough to bring me down."

111. The U.S. Postal Service team provided the prescription Dr. del Moral wrote for Lance to the UCI and all of the commotion surrounding the positive test quickly died down.

112. A few days later Lance won his first Tour de France championship.

113. The 1999 season was my last season as Lance's soigneur and also my last season working the full cycling calendar. Johan and I had a number of run-ins during the course of the 1999 season and by the end of the year our relationship had deteriorated to the point that it was beyond repair.

114. By the time the next season started I had made up my mind that it would be my last year working in professional cycling. During that final season I only worked the events that Johan did not attend. As a result, I ended up missing all of the major tours and races.

115. I resigned from the U.S. Postal Service team after the 2000 season and have not worked in cycling since that time.

116. In the years following my resignation, I was contacted by several members of the media who wanted to speak to me about my experiences working with Lance and for the U.S. Postal Service team. For a long time I declined to speak to the media about my experiences out of a sense of loyalty to the team and because I thought it was best to let sleeping dogs lie.

117. My feelings about keeping quiet about my experiences began to change in 2003 because cycling seemed to keep getting messier and messier. A lot of riders had died in the previous year, and I was convinced that their deaths were prematurely caused by the use of doping products. I started to feel that my silence helped allow the doping culture to remain in place and thought that by refusing to speak up about my experiences in cycling, I was no better than the directors, doctors and trainer who were actively running the doping programs. That was my state of mind, and why I was finally willing to go on the record, when the journalist David Walsh contacted me.

118. David first contacted me in June of 2003. David is a highly respected journalist in the United Kingdom and I was familiar with his work before he contacted me. I still had some reservations about going on the record for the first time, so David and I arranged to meet in person to discuss his project, what he needed from me and what he was hoping to accomplish with the book.

119. The meeting took place in late June of 2003. David came to my village and we went to dinner to get acquainted. It was never my intention to harm Lance or provide information for a scandalous newspaper article, and David seemed to want to write a balanced and reasoned account of drug use in cycling. I thought that my participation might actually help to clean up the sport of cycling.

120. Shortly after the dinner, David and I made arrangements for him to return to my village in order to conduct a proper interview. The interview ended up taking place just a few weeks later, at the same time as the 2003 Tour de France.

121. The interview lasted for more than six (6) hours and was recorded by David. David followed up the interview with a few telephone calls and some email exchanges. After the interview, David sent me a transcript of the interview and asked me to review it and make any necessary changes. I made some corrections in the transcript and also provided additional input via phone and email. After my review of the transcript was complete, David asked me to read the drafts of the chapters that included the information I provided. I was then asked to read the final drafts of the same chapters. Finally, David asked me to conduct a few interviews to help publicize the book.

122. As the project started to take up more and more of my time I mentioned to David that I thought I should be compensated for my efforts. David agreed to discuss the idea of paying me with his co-author, Pierre Ballester. Eventually they decided to pay me £5,000. I did not consider that to be a large sum, especially for the amount of work I did for them, but I appreciated the gesture because it was an acknowledgement of my contributions to the project.

123. Once my involvement in the project became known, Lance wasted no time attacking me and my reputation. Lance filed suit against me and the *Sunday Times* of London in the United Kingdom and then sued me and *L'Express*, a French magazine that published an excerpt from the book, in France. Lance also tried to discredit me by publicly referring to me as a prostitute and an alcoholic. The lawsuits against me were dropped or settled in 2006 but the damage Lance caused to my reputation still remains.

124. 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 9 day of October 2012.

Emma O'Reilly
Emma O'Reilly

NOTARY

CITY OF MANCHESTER)
) ss.
COUNTRY OF UK)

Subscribed and sworn to before me by EMMA CATHERINE O'REILLY on this 9th day of October 2012.

Witness my hand and official seal.

My commission expires: PERMANENT

Geoffrey Smith
Notary Public

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