

**AFFIDAVIT OF S. JACK ROBERTSON**

I, S. Jack Robertson, under penalty of perjury, declare and state:

1. I am fifty-two (52) years old and was born on August 11, 1960. I am the Chief Investigative Officer for the World Anti-Doping Agency ("WADA"). Prior to joining WADA, I was a United States Federal Special Agent for 26 years.

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. WADA was admitted as a party in the investigative proceedings related to Italian Case File n. 6989/2010 RGNR and has been given access to the file in order to review and obtain documents and information related to Dr. Michele Ferrari, including his clients and relatives, and others involved in potential violations of sport anti-doping rules.

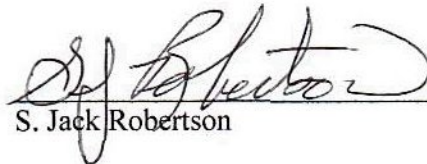
7. As part of WADA's review of Italian Case File n. 6989/2010 RGNR, I was given a copy of the CD-ROM referenced at paragraph 18 and attached as **Annex F** to the Affidavit of Renzo Ferrante. Lt. Ferrante told me that the CD-ROM contained true and accurate copies of emails between and among Dr. Ferrari, his son Stefano and his clients, and that the emails were obtained from a portable computer device owned by Stefano Ferrari.

8. I personally reviewed the contents of the CD-ROM and thereafter made copies of emails concerning Lance Armstrong from the CD-ROM and provided them to USADA. Attached hereto as **Exhibit A** and labeled as USADA00001 – USADA00070 are true and accurate copies of the emails I provided to USADA.

9. As the WADA representative I was also provided access to financial records for Health & Performance, SA, an entity controlled by Dr. Ferrari and Stefano Ferrari. The financial records, as maintained in Italian Case File n. 6989/2010 RGNR, included accounting ledgers for Health & Performance, SA, and other financial documents and bank records relating to payments made by Lance Armstrong to Dr. Ferrari and Health & Performance, SA, during the time period from February 1996 through December 2008. A true and accurate copy of bank, accounting and financial records for Health & Performance, SA, are attached hereto as **Exhibit B** and labeled as USADA00071 – USADA00096.

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

Dated this 9<sup>th</sup> day of October, 2012.

  
S. Jack Robertson

STATE OF \_\_\_\_\_ )  
 ) ss.  
COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to before me by S. Jack Robertson on this \_\_\_\_\_ day of October, 2012.

Witness my hand and official seal.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*See attachment*



