

## **AFFIDAVIT OF PAUL SCOTT**

I, Paul Scott, under penalty of perjury, declare and state:

1. I am forty-five (45) years old and was born on May 31, 1967.
2. I am the founder, President and Chief Science Officer of Scott Analytics, Inc., a company that provides internal anti-doping programs for professional cyclists and other non-cycling events.
3. I do not presently, nor have I ever held a license from the Union Cycliste Internationale (“UCI”).
4. The statements contained in this affidavit are based on my personal knowledge and are true and accurate.
5. 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.
6. 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.
7. 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.

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

9. I have known Floyd Landis for approximately six years.

10. In early April of 2010, I received a call from Floyd.

11. Floyd told me that he was considering coming clean about his use of performance enhancing drugs during his cycling career and wanted me to help him get the information to someone at USADA who could act on the information.

12. I told Floyd that I had a good relationship with Daniel Eichner, the Science Director for USADA, and that I would reach out to Daniel to see if USADA would be interested in what Floyd had to say.

13. I called and spoke to Daniel on the phone within a day or so of my conversation with Floyd.

14. I told Daniel that I had recently been contacted by an elite professional cyclist who provided me with information about doping activities engaged in by him and others while he was riding for high profile cycling teams. I explained to Daniel that the cyclist was considering going public with the information and that he had asked me to contact USADA and pass along information he had given me.

15. The information I shared with Daniel during the phone call was high-level in nature but I did specify that the cyclist had information about systemic doping on the U.S. Postal Service team and that he had engaged in doping activities with several elite cyclists, including Lance Armstrong, Levi Leipheimer and David Zabriskie.

16. I told Daniel that the cyclist was willing to meet with USADA but did not disclose that Floyd was the cyclist. Still, by the end of our conversation, I believe it was obvious who had provided me with the information given my known relationship with Floyd.

17. After I gave Daniel an overview of Floyd's information, we made arrangements to meet in person the following Monday so that I could provide Daniel with more details about Floyd's knowledge and experiences concerning the use of prohibited substances and methods in professional cycling. Daniel flew into town a couple days later and we met at my home office to resume our discussion on the morning of April 12, 2010.

18. During our meeting, I confirmed that Floyd was my source and provided Daniel with Floyd's description of the U.S. Postal Service doping program and information about the various riders, support staff, team officials and others who were actively involved in carrying out the system.

19. I cannot speak, now or then, to the veracity of the information contained in paragraphs 20 to 24 except in so far as it was the information I relayed to Daniel as having come from Floyd. As to the truth of the allegations, I have no personal knowledge. To the extent that any paragraph, or sentence, reads as if I had or have personal knowledge, that is not that case. All information provided to Daniel was provided at the request of Floyd and represents information about which Floyd represented to me he had personal knowledge.

20. I told Daniel that Floyd admitted to using EPO, testosterone and hGH supplied to him by U.S. Postal Service team doctors and staff members. I specifically recall telling Daniel that Dr. del Moral and "Pepe" Marti administered and/or supplied Floyd with banned

performance enhancing substances during his time with the U.S. Postal Service team. I also told Daniel that the U.S. Postal Service team Director, Johan Bruyneel, had several conversations with Floyd about the team's doping program and had either facilitated the procurement of or provided Floyd with EPO on at least one occasion.

21. Floyd provided me with information about the use of autologous blood transfusions on the U.S. Postal Service cycling team and I shared that information with Daniel as well, including how the blood was stored and transported and the various individuals involved in executing the procedure. I specifically recall relaying Floyd's account of how the U.S. Postal Service team bus pulled to the side of the road after a stage of the Tour de France and faked a mechanical breakdown so that several members of the team could receive blood transfusions on the bus.

22. Floyd provided me with a list of the riders whose doping activities he had witnessed first-hand prior to my meeting with Daniel. I do not remember all of the riders on the list, but I do recall that Lance Armstrong, Levi Leipheimer, David Zabriskie, and George Hincapie were identified. I told Daniel that Floyd told me he had either personally doped with, helped to dope or, in the case of Lance, been provided with doping materials by each of the riders on the list.

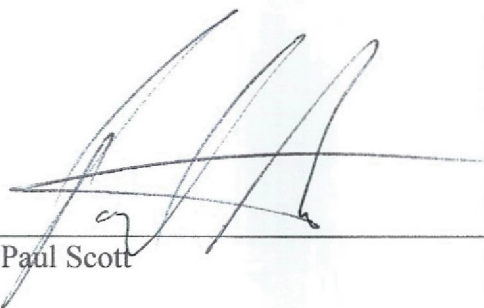
23. I also told Daniel about Floyd's relationship with Dr. Ferrari and that Dr. Ferrari was very involved with Floyd's doping program while Floyd was riding for the U.S. Postal Service team. I specifically remember telling Daniel that Dr. Ferrari's standard fee to work with a rider was ten percent (10%) of the rider's annual contracted salary.

24. After the April 12 meeting, I was present, at Floyd's request, during a meeting among, Floyd, Daniel and USADA CEO Travis Tygart in Los Angeles, California, on April 20, 2010. During the April 20 meeting, Floyd relayed all of the above mentioned information, and additional information regarding his experiences and personal knowledge of doping in cycling, directly to Travis and Daniel.

25. 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<sup>th</sup> day of October, 2012.

  
\_\_\_\_\_  
Paul Scott

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

Subscribed and sworn to before me by \_\_\_\_\_ on this \_\_\_\_\_ day of 2012.

Witness my hand and official seal.

My commission expires: \_\_\_\_\_  
Notary Public  
Address: \_\_\_\_\_  
\_\_\_\_\_

*See Attached*

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

GOVERNMENT CODE § 8202

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1 Paul Scott  
 2 \_\_\_\_\_  
 3 \_\_\_\_\_

4 \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_  
 Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

State of California  
 County of Los Angeles

Subscribed and sworn to (or affirmed) before me  
 on this 9 day of OCT, 2012  
Date Month Year

by PAUL SCOTT  
Name of Signer



proved to me on the basis of satisfactory evidence  
 to be the person who appeared before me (.) (,)  
 (and

(2) NA  
Name of Signer

proved to me on the basis of satisfactory evidence  
 to be the person who appeared before me.)

Signature [Signature]  
Signature of Notary Public

Place Notary Seal Above

**OPTIONAL**

*Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.*

**Further Description of Any Attached Document**

Title or Type of Document: AFFIDAVIT

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

**RIGHT THUMBPRINT OF SIGNER #1**  
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**RIGHT THUMBPRINT OF SIGNER #2**  
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