

AFFIDAVIT OF GEORGE HINCAPIE

I, George Hincapie, under penalty of perjury, declare and state:

1. I am thirty-nine (39) years old and was born on June 29, 1973. I have been a professional cyclist during the time period from late 1993 through this year.
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 investigations 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 am aware that should I fail to provide truthful information to USADA that I may lose any and all benefits of my cooperation with USADA.

8. I have also previously provided truthful information about doping on the U.S. Postal Service Cycling Team to the United States federal government in connection with a criminal investigation.

9. 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, as a former U.S. Olympic Team Member 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.

10. 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.

11. A brief history of my cycling career follows.

12. I began cycling when I was eight (8) years old and soon began competing in junior cycling races. When I was twelve (12) years old I won a national championship and a bronze medal at the junior World Championships.

13. In 1988 I was the National U-17 Road Race Champion.

14. In 1991 I was third in the pursuit at the World U-19 Track Cycling Championships. 1991 was the last year I competed as a junior.

15. In 1992 I competed in my first Olympics. My coach on the Olympic team was Chris Carmichael. While on the 1992 Olympic team I received what I understood to be vitamin B-12 injections from Angus Fraser. This was the first time I had ever been injected with any substance in connection with sport.

16. In 1993 I was contacted by Jim Ochowicz to turn professional and ride with the Motorola Cycling Team. I rode with the team at the end of the year in at least one race in Italy.

17. In 1994 Motorola was considered the top U.S. men's professional road cycling team and I was excited to be on it. My teammates on this team included Lance Armstrong, Frankie Andreu and Stephen Swart.

18. I got to know Frankie Andreu once I joined the team. Frankie and I roomed together for several years.

19. Prior to joining Motorola I knew that Lance Armstrong was on the team as I had met him several years prior when we had raced on the national team together.

20. Lance and I were friends from the start.

21. I won a couple of stages at the Tour of Luxemburg in 1994 and was first in the points classification in that race.

22. During 1994 I was given injections by the team's Belgian massage therapist. I asked what was in the injections and was told that the substances were legal products such as Vitamin C, Vitamin B-12 and liver cleaner.

23. In 1995 there appeared to me to be a major change in the peloton. It was becoming very difficult to keep up, and I learned that the reason was the widespread use of erythropoietin ("EPO"), a banned blood oxygen booster for which there was, at the time, no effective doping test. As the speed of the peloton increased we seemed to be confronted with the choice of using EPO or not performing well in races.

24. At this point in time people in the peloton were talking about EPO quite openly.

25. I recall that around this time Dr. Michele Ferrari, an Italian physician working with cyclists was quoted as saying that EPO was no more dangerous than orange juice.

26. I also recall talking with my teammate Stephen Swart who said everybody was taking EPO.

27. Around this time we got crushed in the Milan-San Remo race and coming home from the race Lance Armstrong was very upset. As we drove home Lance said, in substance, that, "this is bull shit, people are using stuff" and "we are getting killed." He said, in substance, that he did not want to get crushed any more and something needed to be done. I understood that he meant the team needed to get on EPO.

28. In 1995 and 1996 I lived in Como, Italy with **Rider-4**, Kevin Livingston, and Frankie Andreu.

29. Lance also lived in Como at the time but on his own and not with the three of us.

30. Eventually, I came to understand that Frankie Andreu had experimented with EPO, and he told me how I could obtain it in Switzerland. Kevin, **Rider 4** and I discussed using EPO at this time and my understanding was that we all began using it around this time.

31. I purchased EPO for the first time in 1996 at a pharmacy in Switzerland, which was only a one hour drive from Como. I injected it subcutaneously as I had previously injected vitamins. I began by using 2,000 international units every two to three days. I had made up my mind that if I wanted to be a professional cyclist I had to do this.

32. It soon became clear to me that most of the riders, if not everyone on the team, were using EPO. EPO needs to be kept cold and the guys began carrying around coolers and coffee thermoses with ice in them. I generally recall that almost everyone on our team had a thermos.

33. Our performance began to improve. Lance started to do better. **Rider 4** did very well at the Vuelta a España. We all routinely acknowledged that the improvements came about through use of EPO.

34. I understood that by 1996 Lance had also begun working with Dr. Ferrari.

35. In 1996 Customs seized EPO that I had with me when entering the U.S. I told them it was medicine, and I was allowed to retain it.

36. In 1997 I began riding for the U.S. Postal Service Cycling Team.

37. Pedro Celaya was the team doctor for the U.S. Postal Service Team and I received EPO from him beginning in 1997. Dr. Celaya provided me EPO on several occasions in 1997, and I used EPO in completing my first Tour de France that year.

38. In 1998 Dr. Celaya continued as the team doctor. I recall getting human growth hormone (hGH) from Dr. Celaya in 1998. I may also have gotten hGH from Dr. Celaya in 1997.

39. I recall that in 1998 at the Tour de France the team staff was very afraid of police attention given to doping as a result of the Festina team having been caught with doping substances. I understood from conversations with some of the soigneurs that drugs were dumped overboard when the ferry carrying the team was making the passage from Ireland where a portion of the Tour had been run.

40. Later during that Tour, I was in the team camper when team staff flushed drugs down the toilet of the team camper.

41. During the Tour that year I recall using testosterone pills and hGH to recover after stages of the race and using EPO.

42. One of the soigneurs on the team at this time was Emma O'Reilly. I considered her to be trustworthy. While I do not recall discussing performance enhancing drugs with her, I do recall that on at least one occasion I gave her some drugs in a package and, without telling her what was in the package, asked her to bring it for me to the next race.

43. In 1998 I was the U.S. National Road Race Champion.

44. In 1999 Johan Bruyneel became the new team director for the U.S. Postal Service Team.

45. Johan brought Dr. Luis Garcia del Moral to the team as the team doctor and brought in Jose "Pepe" Marti as the team trainer.

46. Johan brought about several additional changes to the team. He was more involved in my training and kept track of my blood parameters. He typically knew my hematocrit level (the percentage of red blood cells in my blood) and generally called me if he had a concern about my hematorcrit level, such as if it was close to the fifty percent cut off level over which we could not race.

47. My hematocrit was relatively high, so when using EPO I had to be concerned about crossing the fifty percent threshold at which I would be kept out of races. Dr. del Moral provided saline infusions on many occasions during each year from 1999 through 2003 in order to keep my hematocrit level below the threshold.

48. Dr. del Moral also provided testosterone to me from time to time. For instance, he provided a testosterone pill to me in the 1999 Tour de France.

49. I also received from Dr. del Moral a testosterone product known as the "oil" which was testosterone mixed with olive oil. Many on the team carried around little vials or bottles with this testosterone olive oil mixture.

50. I was generally aware that Lance was using testosterone throughout the time we were teammates. For instance at a race in Spain in 2000 Lance indicated to me he had taken testosterone. Lance told me that he was feeling good and recovered, that he had just taken some "oil." When I heard that drug testing officials were at the hotel, I texted Lance to warn him to avoid the place. As a result, Lance dropped out of the race.

51. Johan knew about my drug use and from time to time he facilitated it by providing drugs to me.

52. For instance, after the Tour of Valencia in 1999 Johan Bruyneel provided hGH to me at my request. I paid Johan for the hGH.

53. Lance told me that he stopped using hGH after his cancer. I understand, however, that he used hGH before he contracted cancer.

54. Pepe Marti provided me testosterone and EPO in 1999. On more than one occasion, he delivered EPO to my residence, and I paid him for it.

55. In 1999 I used EPO in the lead up to the Tour de France. This EPO was provided by Pepe Marti who lived about 3 hours from where I lived in Girona, Spain. I lived in Girona for parts of the year from 1997 through 2010.

56. I was aware that Lance Armstrong was using EPO in 1999.

57. During the 1999 Tour de France I knew that Tyler Hamilton and Kevin Livingston were using EPO.

58. I also observed Frankie Andreu being injected with EPO by Dr. del Moral in 1999.

59. "Po" was a slang term I recall being used for EPO during my time on the U.S. Postal Service Team. I recall hGH being referred to as "Giaca."

60. In 2000 while on a training ride I asked Lance Armstrong about Dr. Michele Ferrari. I felt that I had been putting in a great deal of work but not getting the results that I should have been able to achieve. Lance told me that he would contact Dr. Ferrari on my behalf.

61. Thereafter, Dr. Ferrari came to a training camp in Austin, Texas in late 2000 or early 2001.

62. This training camp is the first that I recall working with Dr. Ferrari. Others present at the camp included Tyler Hamilton, Christian Vande Velde, Roberto Heras and Chechu Rubiera.

63. At this training camp there was a discussion about blood doping. I asked about the benefits of blood doping, and Dr. Ferrari said that it improved performance. Thereafter, at that camp I personally discussed with Johan Bruyneel and Pepe Marti my beginning a blood doping program for the upcoming season. Johan explained how the program would work, how blood would be taken out and re-infused and that hiring Dr. Ferrari was part of the program. I was told that it would cost me \$15,000 to hire Dr. Ferrari for the season. I agreed to hire Dr. Ferrari, and Johan and I made the decision that I would begin on a blood doping program supported by the team. I understood that there was no test that could detect blood doping.

64. Following this training camp I met with Dr. Ferrari and thereafter I worked with him until 2006.

65. Dr. Ferrari told me that the team doctors would assist me with the blood doping and they did.

66. Later, I was told by Johan that I needed to travel to Belgium where my blood would be extracted. In Belgium I met Dr. del Moral and blood was extracted from me in a hotel room.

67. On other occasions I met Dr. del Moral in Valencia, Spain to have my blood extracted. Dr. del Moral continued to assist me with blood transfusions through his tenure with the team which ended in 2003.

68. In 2004 Pedro Celaya was re-hired as the team doctor and he assisted me with blood doping in 2004 and 2005.

69. Pepe Marti also assisted with the blood doping program, helping me with the extraction and re-infusion process from 2001 through 2005.

70. In addition to the involvement of Johan, Pepe, Ferrari, del Moral and Celaya in the blood doping program, I understood that **Other-3** (known as **Other-3**) was involved in transporting blood to riders.

71. I spoke with Lance in 2001 about beginning on the blood doping program.

72. As part of the blood doping program my blood was be re-infused into me at the hotel during a stage race. On several occasions I was present when other riders were having their blood re-infused. For instance, I recall seeing **Rider-5** Floyd Landis, **Rider-6** and **Rider-7** having their blood re-infused. On another occasion **Rider-8** and I laid side by side while team staff assisted with the re-infusion of our blood.

73. After having our blood re-infused the team physicians and staff disposed of the blood transfusion paraphernalia, including needles and blood bags. The riders were told to wear long sleeve shirts to cover the needle marks.

74. In 2003 Lance Armstrong contacted me about needing to do something private at my apartment in Girona because he had guests at his apartment. I agreed and Lance came to my apartment with Dr. del Moral. Lance and Dr. del Moral went into my bedroom and Dr. del Moral was carrying what I thought was a blood bag. He asked to borrow a coat hanger and Lance and Dr. del Moral closed the door behind them. They were in the room about 45 minutes to an hour which is about the time it generally takes to re-infuse a bag of blood. I know from experience that when blood is re-infused a common practice is to tape the blood bag to a coat hanger and hang the hanger on the wall to facilitate transfer of the blood into the vein. Although we did not discuss the incident, I believed that Dr. del Moral was re-infusing blood for Lance as Dr. del Moral had followed a similar procedure when re-infusing my blood on prior occasions.

75. While blood was re-infused during competitions in order to enhance performance, blood was also periodically re-infused at other times in order to keep the blood fresh.

76. After a stage during the 2004 Tour de France blood transfusions were given on the team bus to most of the riders on the team.

77. On another occasion during the Tour de France in 2003 or 2004 Lance said to me, "I am going to be 500 grams heavier today." I understood this to mean he had received a blood transfusion.

78. From my conversations with Lance Armstrong and experiences with Lance and the team I am aware that Lance used blood transfusions from 2001 through 2005.

79. Dr. Ferrari's training plans included notations for when I was to take EPO, blood transfusions and testosterone. He also placed a dot on some days and a circle on other days to indicate the amount of EPO to be taken.

80. Dr. Ferrari was present on occasion when I received injections of EPO.

81. Dr. Ferrari instructed that EPO should be injected directly into the vein to reduce the risk of detection. I understood from Dr. Ferrari that if taken this way that EPO should clear the system and not be detectable within 12 hours.

82. Shortly before the 2005 Tour de France I was in need of EPO and I asked Lance Armstrong if he could provide some EPO for me. Lance said that he could, and he gave me two vials of EPO while we were both in Nice, France.

83. Lance had previously provided EPO to me on another occasion following a training camp in Santa Barbara, California. Lance and I had stayed after the camp a few days to train and I asked him if he had any EPO I could use. Lance thereafter provided me with EPO.

84. EPO use was common on the U.S. Postal Service and Discovery Channel teams during the period from 1999 through 2007 and I discussed EPO use with other riders on the team.

85. I used the “oil,” the product described in paragraph 49 above, on occasion between 1999 and 2005.

86. I am also aware that cortisone was used by riders on the U.S. Postal Service and Discovery Channel Team although they did not have a valid medical excuse to use the substance.

87. I recall Lance Armstrong testing positive for a corticosteroid at the 1999 Tour de France. When it came out that he had tested positive Lance and the team said that he had tested positive because he had taken a cream for a saddle sore. I assumed this excuse was made up and remember not believing it because cortisone injections were so frequently given by the team doctors to assist the riders with their performance.

88. After the 2000 Tour de France I understood that French law enforcement had commenced an investigation regarding “medical waste” dumped by U.S. Postal Service team staff. I read in press accounts that one of the products found in the medical waste was a substance known as Actovegin. While I was on the Postal Service Team Actovegin was used by riders and injected by the medical staff because it was believed to improve circulation and enhance performance. Dr. del Moral promoted the use of Actovegin by riders on the team and in 2000 my understanding was that most of the riders on the U.S. Postal Service Team were using Actovegin. Actovegin would generally be injected the night before a race. It was not used to treat road rash, although I knew that this false claim was made to the media and others during the course of the French investigation.

89. Lance retired after the Tour de France in 2005. I returned to Girona but Lance did not. Shortly after the Tour Johan called me up and asked me to go over to Lance’s apartment to

go through the apartment and the closets to make sure that there was nothing there. I understood that Johan wanted me to make sure that there were no doping materials in the apartment. I went over to the apartment and texted Johan back that I had not found anything to worry about.

90. After Lance retired I began to think about my involvement in doping and that it was time to try to stand up for change in the sport. I was tired of the doping, and I thought if I talked with other riders perhaps I could influence a change in our sport. As I talked with other riders, most approved of this approach.

91. In 2006 I talked with Dr. Ferrari about wanting to use fewer performance enhancing drugs and blood transfusions. In 2006 I had some blood extracted but did not have it re-infused. I used some testosterone pills and patches in 2006, but by the end of the year had stopped using any banned products. 2006 was the last year that I worked with Dr. Ferrari.

92. I have not used any banned drugs or methods since 2006.

93. At the 2010 Tour de France I had a conversation with Lance Armstrong about the U.S. federal government investigation into doping on the U.S. Postal Service Team, and I told Lance that government investigators wanted to talk to me. Lance said that maybe I should stay in Europe a little longer; I understood by this that he wanted me to stay off the government's radar and was asking me to avoid testifying as long as I could.

94. I road for Team High Road in 2008 and 2009 and for BMC Racing Team in 2010 through 2012. I am not aware of any doping occurring on those teams.

95. This affidavit is not an exhaustive summary of my testimony; however, it fairly and accurately sets forth information within my personal knowledge, information and belief.

96. In making this statement I have endeavored above all things to be truthful and accurate. Although I know that my testimony is painful for some, including myself, it is not made with any animosity and, in fact, is made with some regret.

97. While I ultimately came to the conclusion that I needed to be fully truthful and transparent with USADA, I continue to hold many with whom I cycled, including Lance Armstrong, in very high regard.

98. I continue to regard Lance Armstrong as a great cyclist, and I continue to be proud to be his friend and to have raced with him for many years.

99. I have witnessed many important things that Lance has done for his fellow man through battling cancer and being a role model for many. My testimony is not intended to take away from, or diminish those things.

100. Lance and I, and our teammates, raced on the Motorola Team, on the U.S. Postal Service Team and on the Discovery Channel Team during a time period when our sport was inundated with performance enhancing drugs. The doping controls were not very good and we came to believe that we needed to use banned substances to compete at the very highest levels.

101. While I understand that the choices we made were wrong, I understand why we made them and why, at the time, we felt justified in making them. I do not condemn Lance for making those choices and I do not wish to be condemned for the choices I made.

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

