

**AFFIDAVIT OF MICHAEL BARRY**

I, Michael Barry, under penalty of perjury, declare and state:

1. I am thirty-six (36) years old and was born on December 18, 1975. I have been a professional cyclist since 1998.

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. 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 understand and agree that I am subject to the results management jurisdiction of USADA because USADA discovered violations of Article 2.2 of the World Anti-Doping Code and Article 21.2 of the Union Cycliste International Anti-Doping Rules that I committed during the period from spring 2003 through summer 2006.

9. A brief history of my cycling career is as follows:

10. From a very young age, it was always my goal to become a professional cyclist and race in the Tour de France. I was raised in a cycling family and entered my first bike races when I was no older than three- or four-years-old. I always enjoyed cycling but really started to train seriously when I was fifteen (15) years of age and was invited to participate in a national training camp. I regularly attended national team training camps for the next several years and had the opportunity to compete at the Junior World Championships when I was seventeen (17) (1993).

11. Even though I came from a family that appreciated cycling and supported my participation in the sport, it was important to my parents that I maintain a balanced life. As such, they were insistent that I continue with my studies after high school and attend university.

12. My national team coach was a retired cyclist named Denis Roux. Denis was from France and had contacts with a few amateur cycling clubs in France that would provide room and board to cyclists who competed for them. It had always been my goal to race in Europe so at his suggestion I traveled to Annemasse, France, to compete on the town sponsored amateur racing team. To compete overseas I put my studies on hold.

13. As I sat on the plane that would take me from Canada to Europe, I can remember thinking about how things might work out for me in France. I thought that I would either be

back in Canada within a couple weeks or remain in France the entire season. I ended up staying in France for the entire season, and then two more after that, racing for the Annemasse amateur team and, at times, the Canadian national team.

14. I had good results racing for Annemasse and attracted the attention of some professional teams for the 1997 season. I had been scouted by professional teams after the 1996 season as well but I did not think I was ready to consistently compete at that level and, among other reasons, was nervous about the prospect of being pressured to dope. At the end of 1997 I thought I might be physically mature enough to race professionally. Two bad crashes put an end to my hopes of signing with a professional team in 1997. The first crash, in May 1997, resulted in a broken femur. Unfortunately, the many doctors I consulted failed to properly diagnose the injury and allowed me to resume riding within weeks of the crash. The pain was terrible, but I managed to continue competing and actually finished in second place at the Canadian Nationals during the summer. I returned to Europe after Nationals and ended up crashing again. This time I fractured three vertebrae. Once again, my injury was misdiagnosed by a series of physicians and I failed to receive the proper medical care.

15. The doctors I consulted refused to order x-rays for me so I had to pay a radiology clinic out of pocket for the procedure. As I thought they would, the x-rays of my back and hip confirmed that I was seriously injured.

16. I returned to Canada for medical treatment after the full extent of my injuries was determined. I was placed in an orthopedic corset for three months and ordered not to do anything that might aggravate my injuries. When I asked my doctor when I would be able to resume my cycling career, he told me not to worry about riding a bike. He said that my injury

could have very easily resulted in paralysis from the waist down and that I was fortunate to still be able to walk.

17. In November of 1997, after three months in the corset, I was finally able to get on a bike again. I resumed my training, splitting time between Colorado, Ontario and South Carolina. The 1997 season was over so I focused on getting better in time for the start of the 1998 season. The hard work paid off and I was able to begin racing again in March of 1998.

18. I returned to Annemasse in early 1998 to participate in the team's training camp but grew frustrated with the limitations placed on me by my injuries and returned to Colorado a short time later in order to complete my recovery.

19. I competed in some North American races in March and April and then returned to France. I ended up winning a race shortly after returning to France. I remember that everybody was really excited about my victory, but I was disillusioned for a variety of reasons. I decided to move back to Canada. One of the reasons I decided to make this move was that I was fed up with the doping culture that was so prevalent in European cycling.

20. The Saturn cycling team offered me a contract a short time after I returned to Canada. Saturn was a good fit for me at the time and I ended up racing for the team from the middle of the 1998 season through the end of the 2001 season.

21. Over the three and a half seasons I rode for Saturn, I can only recall being offered a prohibited substance on one occasion. It occurred at the 1999 Tour of Langkawi. I placed well at the time and the team director, [REDACTED], offered me some Synacthen because I was doing well in the race. I was not familiar with Synacthen so I asked [REDACTED] questions about the product before he injected it in me. I felt pressured by [REDACTED] to take the product in order to improve my

chances of winning the race. I had told [REDACTED] at the start of that season that I was not interested in doping but he offered me the Synacthen anyway, and I accepted.

22. By the start of the 2001 season I had grown tired of racing exclusively in North America and decided to make one last push to get a contract with a European-based professional team. I vowed that I would quit cycling and return to university if I failed to reach my objective by the start of the following season.

23. I performed well in 2001 but as we closed in on the final race of the season, the inaugural San Francisco Grand Prix, I had several offers but had yet to secure a contract with a European team for the following year.

24. The San Francisco Grand Prix was organized by Tailwind Sports, the same company that managed the U.S. Postal Service Cycling team. I felt fantastic during the race and ended up getting into a late breakaway with U.S. Postal Service rider George Hincapie. George ended up winning the race, but I was a very close second.

25. After the race, Mark Gorski, the U.S. Postal Service team manager, came up to me and said that the U.S. Postal Service team was interested in talking to me about riding for them during the 2002 season.

26. I ended up having conversations with a few other European teams after my strong showing at the San Francisco Grand Prix, but I quickly determined that the U.S. Postal Service team would be the best fit for me. Within weeks of my second place finish at the San Francisco Grand Prix, I had signed a contract to ride for the U.S. Postal Service team for the 2002 season.

27. My introduction to the U.S. Postal Service team occurred at a training camp in December of 2001. The training camp took place in Austin, Texas.

28. I was assigned to a room with Victor Hugo Peña. In the first few days of the camp Victor showed me pictures from a training camp that he had participated in with Lance Armstrong and Dr. Michele Ferrari.

29. I remember thinking that U.S Postal had some of the elements of a fraternity.

30. The U.S. Postal Service team director, Johan Bruyneel, attended the training camp in Austin. My only contacts with the team prior to the training camp were with Mark Gorski and Dan Osipow, so the training camp represented my first opportunity to meet Johan in person as well.

31. On the final day of training camp I was introduced to Dr. Ferrari. The introduction was made by Christian Vande Velde at the team dinner.

32. One of the veteran riders told me that in previous camps Dr. Ferrari had been more involved in group activities but he thought Ferrari was keeping a lower profile after his association with Lance Armstrong was the subject of criticism in the media.

33. During my time on the U.S. Postal Service team, I learned that a number of riders on the team were working with Dr. Ferrari. In addition to Lance and Victor Hugo Peña, I understood that Dr. Ferrari also worked with Christian Vande Velde, George Hincapie, Chechu Rubiera, Floyd Landis and Tom Danielson.

34. I never worked with Dr. Ferrari or received training advice from him. I did see him on occasion working with other U.S. Postal Team riders after I moved to Girona, Spain, in early 2002.

35. My second training camp with the U.S. Postal Service team took place after the New Year in Javea, Spain. After the training camp, Christian invited me to stay at the apartment

he shared with [REDACTED] in Girona. He explained that they had a spare room available because Jonathan Vaughters had recently moved out of the apartment.

36. I had been contemplating moving back to Annemasse, France, but ultimately decided to move in with Christian and [REDACTED] because there were several U.S. Postal Service riders living in Girona, and none living in Annemasse.

37. Christian and [REDACTED] took me to their apartment and showed me to my new room. The room had not been cleaned out since Jonathan left, so I got to work clearing it out. I remember finding used syringes and empty ampules under the bed. I was shocked and unsettled by the fact that Jonathan had moved out of the room without disposing the syringes and ampules, but I did not know what specifically they had been used for. I gathered everything up and threw it in the garbage.

38. My roommates were initially cautious and tried to shield their doping from me. For instance, when I first moved into the apartment, Christian would make up a reason to go to George Hincapie's apartment almost every night. He would claim that he had to go to George's in order to borrow something, but I suspected that he was making excuses for his frequent visits because he was not comfortable with me knowing about his doping activities. At some point that season I found vials of EPO, the banned oxygen booster, stored in a coffee bag in the apartment's refrigerator, as well as Geref.

39. As my roommates got more comfortable with me being around, they stopped hiding their activities from me. On one occasion I witnessed [REDACTED] purchase testosterone patches from the pharmacy. On another occasion I noticed that Christian had chemical burn marks from testosterone patches on his body.

40. From my previous experiences as an amateur, I knew that doping was much more prevalent in the European peloton. Still, it took me a while to get accustomed to the semi-open use of doping products in my presence.

41. One of the other things I had to get used to while riding for the U.S. Postal Service team was the injection of a product called “recovery” that was administered throughout the season. I received my first recovery injection in March of 2002, during the Tour of Valencia. After one of the stages, Dr. Luis del Moral walked into my room and told me to hold out my arm for a shot. When I asked him what was in the syringe he explained that it contained vitamins that would assist in my recovery.

42. The “recovery” shots varied in appearance from race to race. Sometimes the “recovery” was yellow and at other times it was clear, dark red or other colors. My understanding was that the color changed based on the vitamin or other supplement within the shot. Dr. del Moral explained to me that the “recovery” was modified to meet the rider’s changing recovery needs.

43. David Zabriskie, [REDACTED] and I often questioned Dr. del Moral when he would come around to administer our injections. Dr. del Moral would answer our questions but he was clearly irritated with our constant inquiries. Sometimes Dr. del Moral would act offended and ask, “Don’t you trust me?” Other times he would respond more brusquely and say something like, “You guys ask too many fucking questions.”

44. David Zabriskie had joined the team a year earlier than me and was still an outsider when it came to the doping program. Nonetheless, having spent an extra season on the team David was able to provide some additional insight based on his observations into the doping activities of our teammates and the doping practices of the U.S. Postal Service team.



45. As the season progressed, it became more evident to me that several members of the U.S. Postal Service team were engaged in doping activities. The doping was especially evident at the 2002 Vuelta a España.

46. The Vuelta was an eye-opening experience for me. I had performed well earlier in the season and my results were good enough that the team opted to re-sign me just before the start of the Vuelta. I was confident in my abilities going into the race but the Vuelta was at an entirely different level. The speed of the peloton was incredible. David and I were struggling to hold on to the back of the peloton. It got so bad that David was literally in tears on the team bus because it was so difficult. I ended up withdrawing from the race after getting hit by a motorcycle during the eighth stage, but my experiences during that first week made me question whether it was even possible to compete in a race like that without doping.

47. Several of my teammates used performance enhancing drugs during the race. My roommate during the Vuelta, [REDACTED], had chemical burns on his body from his use of testosterone patches. I also heard that the U.S. Postal Service team doctors gave [REDACTED] cortisone to help him get through the race after a crash during the first road stage. There were also reports that the team was in a panic because [REDACTED] had been traveling with his own supply of human growth hormone (“hGH”) and accidentally forgot it in his hotel room. From what I heard, the team management was especially upset with [REDACTED] because he was using hGH on his own without their prior knowledge or approval.

48. The crash at the Vuelta ended my 2002 season, but I was still able to take part in the team training camps in December and January and fully recovered by the start of the 2003 season.

49. Prior to the start of the 2003 season, I moved out of the apartment I had shared with Christian Vande Velde and [REDACTED] during the 2002 season and into an apartment that had been vacated after the 2002 season by Jonathan Vaughters. Just like the prior year, Jonathan had failed to clear out the apartment prior to moving out. There were empty EPO vials, used testosterone patches in Crédit Agricole team bags, and used syringes under the bed and in the closet. Fortunately, Christian was available to help me clear out all of Jonathan's things and get moved into the apartment.

50. By the start of my second year on the U.S. Postal Service team I had become friends with, and sometimes trained with, George Hincapie. During an early season training ride George told me he thought I was a talented rider and suggested that I consider using EPO and testosterone. He told me the products would make me feel better and that I would not need to use a lot of either substance in order to see results.

51. I valued George's advice but was unsure about whether doping was the right decision. [REDACTED] was the staff doctor at an early season race I was entered in, the Vuelta a Murcia, so I decided to ask him whether he thought it was a good idea for me to use EPO and testosterone. [REDACTED] told me it might be worth it, but that it was not his decision to make. From his response, I understood [REDACTED] to mean that Dr. del Moral or Johan Bruyneel would have to make the call about whether or not I would be put on a doping program.

52. In May of 2003, after my conversation with [REDACTED], David Zabriskie and I were asked to meet with Dr. del Moral and Johan Bruyneel in a central parking area in Girona, Spain. I understood that the point of the meeting was to discuss my use of EPO.

53. By the time the meeting took place, I had already resigned myself to the fact that I would need to start doping in order to be competitive. Still, I was surprised by the tenor of the

meeting. I always thought that if and when the doping discussion took place, it would be a conversation, but Johan and Dr. del Moral seemed rushed and in a hurry to be on their way. We met near a café in a central parking area and, after a brief discussion, we walked the short distance to my apartment.

54. David and I asked some questions and Dr. del Moral quickly explained how EPO worked and how to take it properly. He told us that we should inject it into the vein because it would clear our systems faster than if injected subcutaneously and that we should use it in the evening so that it would be out of our systems by the morning. Dr. del Moral and Johan also told us not to tell anybody that we were using EPO and provided us with the basic essentials on how not to get caught. At this time Dr. del Moral injected me and David with EPO.

55. Johan and Dr. del Moral left us with some vials of EPO and syringes. Dr. del Moral said that he would send us a text message with dosage instructions for the EPO and explained that the instructions would be coded to protect against detection. As I recall, the code was something simple related to intervals like "1 minute interval = 100 international units of EPO."

56. I used EPO and testosterone off and on from 2003 until 2006. I also used cortisone on one occasion in 2003 and experimented with hGH on one occasion in 2004. I obtained doping products from the U.S. Postal Service team doctors and staff and from fellow athletes.

57. In 2003 I obtained EPO from Dr. del Moral, Pepe Marti, Floyd Landis and a doctor George Hincapie introduced me to in South Carolina named [REDACTED].

58. During the 2003 Vuelta a España Drs. del Moral and [REDACTED] provided me and other U.S. Postal Service team riders with a testosterone product known as the "oil" (a mixture of andriol and olive oil). The doctors administered the "oil" by squirting it into the mouths of the riders. The U.S. Postal doctors also provided me with testosterone patches during the 2003 season.

59. U.S. Postal team doctor [REDACTED] provided me with a cortisone pill during a race in 2003.

60. In 2003 I witnessed [REDACTED] use EPO, testosterone and hGH on several occasions, while he stayed as a guest at my apartment.

61. Following the 2003 season Dr. del Moral left the team and Dr. Pedro Celaya became the primary team doctor for the U.S. Postal Service team.

62. In 2004 I obtained EPO from Pepe Marti and split a shipment of EPO obtained by [REDACTED] and professional mountain biker [REDACTED] from a contact they had learned of from doctor [REDACTED].

63. In 2004 Dr. Celaya provided me with testosterone patches.

64. In 2004 Christian Vande Velde provided me with half a vial of hGH. I had always deliberately avoided hGH because I thought it posed more health risks than EPO and testosterone and could lead to undesirable side-effects. At Christian's suggestion I injected a small amount of hGH under my skin. I immediately regretted my decision and never used hGH again.

65. In 2005 I obtained EPO from Pepe Marti and U.S. Postal Service team doctor Dr. [REDACTED].

66. David Zabriskie told me about a time Floyd Landis had to babysit bags of Lance Armstrong's blood while Lance was out of town to make sure the blood did not go bad.

67. In 2006 I obtained testosterone patches from George Hincapie and EPO from Tom Danielson and Levi Leipheimer. My understanding was that Levi gave me his EPO because he was nervous about the Operación Puerto scandal and did not want to have it in his house when he was gone. I accepted the EPO from Levi but ended up destroying it because I had quit doping. I did not tell Levi that I had no use for the EPO because I was not yet ready to admit to other riders that I had stopped using performance enhancing drugs. I obtained EPO from Tom Danielson for use in training prior to the 2006 Tour of California.

68. I made the decision to stop doping after getting involved in a bad crash at the Tour of Flanders. From what I've been told, the crash looked bad enough that a lot of people questioned whether or not I would survive.

69. I woke up in a hospital room to somebody asking me if I could move my toes. I had a concussion, three broken vertebra and absolutely no idea what I was doing in the hospital.

70. The people who saw the crash feared the worst but nobody from the Discovery Channel team (in 2005 Discovery Channel assumed sponsorship of the former U.S. Postal Service team) came to the hospital to be with me. I was all alone. That is when I realized that I was competing and taking risks for people who did not care about my health or value my well being.

71. The crash was a big turning point for me.

72. When I got out of the hospital I went home to complete my recovery. When I was healthy, I resumed racing for the Discovery team but mentally started to disassociate myself from the team and looked to change environments.

73. As time passed I became more vocal and outspoken about the need to change the culture of cycling. I even went so far as to write articles and conduct interviews advocating clean cycling.

74. My efforts to push for a cleaner sport were not always well received.

75. Some of my teammates and several members of the peloton reacted negatively and some claimed that I was making cycling look bad by campaigning so enthusiastically for change.

76. One of the riders who publicly supported my efforts was George Hincapie.

77. Despite his past use of prohibited substances, George recognized that the cycling doping problem had gotten way out of control and that a change had to be made.

78. I left the Discovery Channel team after the 2006 season in order to ride for T-Mobile.

79. I rode for T-Mobile/High Road for three seasons before joining Team Sky in 2010.

80. I joined T-Mobile and Team Sky in large part because of both teams' stated goal of fielding a clean team and their commitment to creating an infrastructure where riders are not tempted to dope.

81. I have not used any prohibited substances since 2006, my final season with the Discovery Channel team.

82. In 2010, after Floyd Landis made public his allegations about widespread doping on the U.S. Postal Service team, I received an email from Lance Armstrong asking me if I would be willing to testify that there was no systematic doping on the Postal or Discovery teams.

83. I told him that his lawyers could contact me.

84. A short while later I received an email from Lance's lawyer, Sean Breen, but I never spoke with him regarding Lance's request.

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

Dated this 8<sup>th</sup> day of October, 2012.

  
Michael Barry

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

Subscribed and sworn to before me by MICHAEL BARRY on this 8<sup>th</sup> day of October, 2012.

Witness my hand and official seal.


My commission expires: (No DATE).

ANDREU GARRIGA PRADAS

Notary Public

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