



Preserving the integrity of competition. Inspiring true sport. Protecting the rights of athletes.

VIA ELECTRONIC MAIL

June 15, 2012

Robert D. Luskin
Patton Boggs, LLP
2550 M. Street, NW
Washington, DC 20037

Re: Your letters dated June 8 and June 13, 2012

Dear Mr. Luskin:

I write in response to your letters dated June 8 and June 13. Both are long on misleading rhetoric, short on accuracy, and are clearly intended to distract from the search for the truth about the USPS conspiracy.

Your request that Mr. Armstrong's doping case and matters related to the admissibility of evidence in that case be handled by the USADA Audit & Ethics Committee (the "A&E Committee") is a transparent effort to create a special set of procedures applicable only to Mr. Armstrong. To the contrary, the admissibility of evidence in Mr. Armstrong's case falls within the exclusive jurisdiction of the American Arbitration Association ("AAA") arbitrators pursuant to the Ted Stevens Olympic and Amateur Sports Act, the federal statute designed to ensure that the cases of all athletes are handled fairly, equally and under consistent rules.

USADA's mission is to protect sport and clean athletes against doping. When USADA discovers evidence of doping, which in the case of Mr. Armstrong and the other Respondents is overwhelming, USADA's obligation to the clean athletes which it protects is to bring the case forward. This is not a vendetta against Mr. Armstrong—USADA is simply doing its job. As the protector of clean athletes, we will not be intimidated by your threats and misguided accusations. If Mr. Armstrong desires the opportunity to testify under oath and confront the evidence against him in a fair and neutral forum as provided by federal law he will have that chance.

Before initiating the legal process under the USADA Protocol, as we did with other riders, we reached out to Mr. Armstrong and offered him the opportunity to meet with us and be truthful and honest regarding doping in cycling. Unlike other riders, he chose to continue being part of the problem rather than part of the solution to doping in cycling. Indeed, as your letter makes clear, there was no point in USADA meeting with Mr. Armstrong because he continues to insist

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that he has never doped. That is his right and he will have the opportunity to testify to that under oath should he wish to do so.¹

Rather than a meeting with Mr. Armstrong to get to the truth of doping in the sport of cycling, you instead demanded a meeting with us to pursue your claim that USADA has been given secret grand jury information. No such meeting was necessary or appropriate (nor would one be useful now) because USADA never received any grand jury information.

Mr. Armstrong and the other Respondents are entitled to a fair and impartial hearing before the AAA, which will protect their due process rights. Specifically, in the AAA hearing process, USADA's witnesses will be identified and Mr. Armstrong will be given the opportunity to confront and cross-examine them. The AAA process is consistent with the Ted Stevens Olympic and Amateur Sports Act; it has been approved by the USOC (including Mr. Armstrong's agent, Bill Stapleton, who was Chair of the USOC's Athlete Advisory Council and later Vice-Chair of the USOC Board of Directors when this process was discussed and approved); and it is the process that has been used by athletes and USADA for more than a decade. Mr. Armstrong is not above the rules that have been agreed to by, and applied to, all other athletes. There is great irony in Mr. Armstrong's current disparagement of the USADA hearing process. Indeed, when the federal government began investigating him, Mr. Armstrong publicly argued that the correct forum for determining whether he had doped was through proceedings before USADA. If Mr. Armstrong has nothing to hide, then he should welcome the opportunity to have a full and fair hearing before an independent AAA panel so that the question of whether or not he doped can be resolved once and for all.

The AAA hearing, not the Anti-Doping Review Board ("ADRB"), is the forum where the merits of whether Mr. Armstrong doped should be resolved. The ADRB considers only written submissions. The ADRB process does not include a hearing, and it is not intended, as you incorrectly claim, that the ADRB weigh the testimony of witnesses or charges that they are biased. Further, the rules are clear that no part of the ADRB process (including the submittals of the parties or the ADRB recommendation) is to be considered in the subsequent AAA hearing. You are also wrong in your assertion that the ADRB "authorizes" USADA to go forward with a case. Rather, the ADRB simply makes a "recommendation," which USADA is free to accept or reject. Indeed, in expedited cases, the ADRB step in the process can be eliminated entirely.

Now is not the stage in the process where USADA is required to provide the names of its witnesses. That will occur pursuant to AAA rules and the orders of the AAA panel. Your insistence on getting the names of witnesses who will testify against Mr. Armstrong now is nothing more than a transparent attempt to further bully and intimidate them. You have already done this in your public comments accusing these individuals (who you don't know) of having

¹ Your claim that USADA was "well aware that Lance left the country shortly before you made the demand" is untrue. In fact, if Mr. Armstrong did leave the country before USADA requested a meeting with him, then he did so without updating his whereabouts information as he is required to do as a member of the USA Triathlon out-of-competition testing pool. Further, if Mr. Armstrong's planned travel was an issue for you, you could have advised me on our call Tuesday morning, but you did not do so.

entered into a "corrupt bargain" and having been "bought and paid for by USADA." These tactics are simply part of Mr. Armstrong's continuing effort to attempt to intimidate anyone who has anything bad to say about him and just the most recent example of the pattern of intimidation and "omerta" that has made the USPS conspiracy successful in covering up doping for so long.

In your letter dated June 8, 2012, you invited USADA to consider Mr. Armstrong's "decades-long record" of past test results. Your public statements reference "over 600" alleged doping control tests by Mr. Armstrong, and Mr. Armstrong's press release alleged he has had "over 500" doping tests. As Mr. Armstrong knows, USADA has only collected a small fraction of the doping controls claimed by Mr. Armstrong. Accordingly, while Mr. Armstrong's testing information is not necessary for the ADRB process, USADA is interested in reviewing the basis for your claims and those of Mr. Armstrong regarding the hundreds of doping controls for which USADA does not have records. Accordingly, I have enclosed a form by which Mr. Armstrong can provide his consent for USADA to obtain past test results from other sports and anti-doping organizations. I would appreciate you promptly returning a signed copy of this consent form, and, in any case, would ask that you please obtain Mr. Armstrong's signature on the consent.

In relation to your assertion that Mr. Armstrong has never had a positive test, you have asked for the longitudinal data related to blood collections performed on Mr. Armstrong in 2009 and 2010 described in our notice letter. Again, this information is not necessary to the Review Board process as there is more than a sufficient basis to proceed to a hearing based on the other evidence described by USADA. However, as a courtesy, USADA is providing to you charts setting forth the blood parameters data sets obtained by USADA from Mr. Armstrong's test results in 2009 and 2010. At the AAA hearing, this information will be supplemented and include expert testimony regarding doping established by the data. While you and Mr. Armstrong continue to repeat that he has never had a positive test, as I'm sure you are aware, significant variations in the longitudinal profile of otherwise negative individual tests can be used to establish the use of prohibited substances and methods.

Finally, let me be clear that USADA has not provisionally suspended Mr. Armstrong. Under our rules, he is free to participate in competition until he has had the opportunity for a hearing before the AAA. As our Protocol and the World Anti-Doping Code require, USA Triathlon and the World Triathlon Corporation ("WTC") (the governing body for Ironman competitions) were notified of this matter because, at the request of USA Triathlon, Mr. Armstrong has been included in USADA's Registered Testing Pool due to his continued participation in Ironman events. In this regard, Mr. Armstrong was treated just like other athletes who have ties to multiple sports. If Mr. Armstrong has a problem with the fairness of WTC's provisional suspension decision, he should take that up with WTC. USADA will certainly agree to expedite the AAA hearing to occur before the Ironman World Championships, if that becomes necessary.

June 15, 2012

Page 4

If Mr. Armstrong is in fact innocent of doping, then he should be eager to cut through all of the legal posturing and manipulation by his high-priced public relations consultants and get to the truth in a AAA hearing, which, after all, is what he has previously publically asked for.

Kind regards,

A handwritten signature in black ink, appearing to read "William Bock, III". The signature is written in a cursive style with a large, prominent initial "W" and "B".

William Bock, III
General Counsel

Attachments

Consent to Disclosure of Testing Data

I, Lance Armstrong, hereby consent to disclosure to the United States Anti-Doping Agency (USADA) for anti-doping purposes under the World Anti-Doping Code all information and data related to urine and blood testing and blood parameters measurement and reporting performed upon any sample or biological material provided by me.

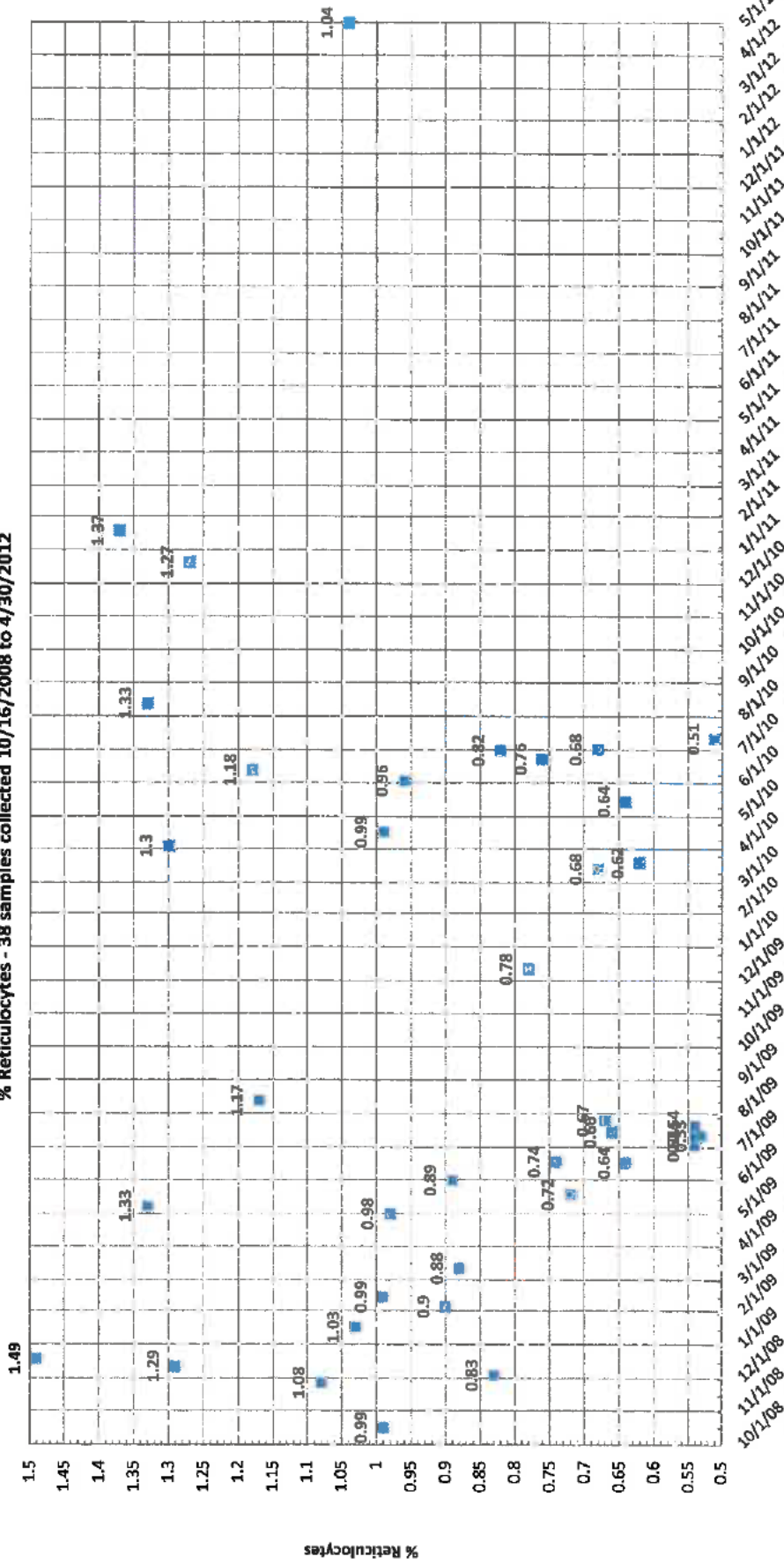
This consent and request to provide such data to USADA extends to the Union Cycliste Internationale (UCI), Amaury Sport Organization (ASO), Agence Française de Lutte contre le Dopage (AFLD), Du Laboratoire Antidopage de Châtenay-Malabry (the French Anti-Doping Laboratory), Laboratoire Suisse d'Analyse du Dopage (the Lausanne Anti-Doping Laboratory), the World Anti-Doping Agency (WADA), any other sports testing laboratory or other laboratory to which my samples were sent, any other Anti-Doping Organizations, and to Capital Sports & Entertainment, Inc., Tailwind Sports Corp., CTS, the U.S. Postal Service, Discovery Channel, Astana and RadioShack Cycling Teams and any and all current or former team doctors, employees, consultants or others, whether employed directly by me or by teams on which I have competed, including Dr. Rasmus Damsgaard, Dr. Don Catlin, Dr. Michele Ferrari, Dr. Pedro Celaya and Dr. Luis Garcia del Moral and to any agents, employees, consultants or related companies of the foregoing.

This request covers the time period from 1995 to the present and includes, but is not limited to, all doping control forms, sample code numbers, test results, reports of analyses, laboratory documentation packages, densitometry results, electropherograms, carbon isotope ratio results, reported levels for hematocrit, hemoglobin, reticulocytes or other blood markers or parameters and urine markers including urinary steroid levels, and other such information.

Lance Armstrong

Date

Armstrong, Lance: Longitudinal Blood Data Profile
 % Reticulocytes - 38 samples collected 10/16/2008 to 4/30/2012



Sample Code	Rcd blood cells RBC: 10 ⁶ /uL	Hemoglobin HGB: g/dL	Hematocrit HCT: %	Mean Corpuscular Volume MCV: fL	Mean Corpuscular Hemoglobin MCH: pg	Mean Corpuscular Hemoglobin MCHC: g/dL	Ret%: %	Reticulocyte percentage RET#: 10 ⁶ /uL	Off-Score	Test Date
40847	4.4	14.3	39.3	89.3	32.5	36.4	0.99	0.00336	83.3	18-Oct-08
40123	4.74	15	42.8	90.3	31.6	35	1.08	0.00512	87.6	26-Nov-08
757189	4.36	14.4	41.8	86.2	33	34.2	0.83	0.00362	88.85	3-Dec-08
75537	4.41	14.3	39.4	89.3	32.4	36.3	1.29	0.00589	74.9	11-Dec-08
755097	4.73	15.4	42	88.8	32.6	36.7	1.49	0.00705	80.8	18-Dec-08
45804	4.39	14.1	41.1	88.8	32.1	34.3	1.03	0.00452	60.1	18-Jan-09
758720	4.87	15.2	43.1	82.3	32.8	35.3	0.9	0.0042	95.1	4-Feb-09
759149	4.84	15	42.7	92	32.3	35.1	0.99	0.00469	90.3	13-Feb-09
759769	4.35	14.5	40.1	92.2	33.3	36.2	0.88	0.00383	89	11-Mar-09
758865	4.6	14.9	41.3	89.8	32.4	36.1	0.88	0.00461	69.6	30-Apr-09
758052	4.86	14.8	43.5	93.5	31.8	34	1.33	0.00618	78.3	7-May-09
755592	4.19	13.6	40	95.5	32.5	34	0.72	0.00302	85.1	18-May-09
278664	4.1	13	38.2	93.2	31.7	34	0.89	0.00365	73.4	31-May-09
765581	4.94	16	45.7	92.5	32.4	35	0.64	0.00316	112	16-Jun-09
765569	4.84	16	45	91.1	32.4	35.6	0.74	0.00366	108.4	17-Jun-09
285085	4.57	14.3	42.8	83.7	31.3	33.4	0.64	0.00247	88.9	2-Jul-09
285246	4.4	14	41.3	93.9	31.8	33.9	0.54	0.00238	95.9	10-Jul-09
282895	4.33	13.7	40.7	94	31.6	33.7	0.83	0.00229	83.3	11-Jul-09
262924	4.57	14.4	43.1	94.3	31.5	33.4	0.66	0.00302	95.3	14-Jul-09
282894	4.42	14	41.7	94.3	31.7	33.6	0.54	0.00239	95.9	20-Jul-09
281267	4.58	14.5	43	94.3	31.8	33.7	0.67	0.00306	88.9	25-Jul-09
1660156	5.02	16.1	43.8	87.3	32.1	36.8	1.17	0.00597	96.1	12-Aug-09
287437	4.77	15.5	43.1	90.4	32.5	36	0.78	0.00372	102	11-Dec-09
771468	4.57	14.8	42.8	95.7	32.4	34.8	0.68	0.00311	86.52	13-Mar-10
764104	4.77	15.1	44.2	92.7	31.7	34.2	0.62	0.00296	103.6	19-Mar-10
772845	4.33	13.9	40	92.4	32.1	34.8	1.3	0.00683	70.6	3-Apr-10
1860366	4.31	13.9	38.2	91	32.3	36.5	0.99	0.00427	79.3	16-Apr-10
1860827	4.38	14.1	40.1	91.6	32.2	35.2	0.64	0.0028	83	14-May-10
771731	4.54	14.3	42.1	92.7	31.5	34	0.96	0.00496	84.2	2-Jun-10
432537	4.41	13.9	41.5	94.1	31.5	34	1.18	0.0052	73.8	12-Jun-10
437134	4.4	14.1	41.8	96	32	33.7	0.76	0.00334	86.59	22-Jun-10
426342	4.56	14.5	42.2	92.5	31.8	34.4	0.82	0.00374	90.7	30-Jun-10
436487	4.54	14.2	43	84.7	31.3	33	0.88	0.00309	92.5	1-Jul-10
436409	4.29	13.6	40.8	94.6	31.7	33.5	0.81	0.00219	93.2	11-Jul-10
1691327	4.81	15.6	43.9	91.3	32.4	36.5	1.33	0.0064	86.8	12-Aug-10
287583	4.87	15.9	43.4	88.1	32.6	36.8	1.27	0.00618	87.4	20-Dec-10
445037	4.73	14.8	42.9	90.7	31.3	34.5	1.37	0.00649	77.77	13-Jan-11
1863870	4.61	14.9	42	91.1	32.3	35.5	1.04	0.00479	87.8	30-Apr-12