

**CONFIDENTIAL: SUBJECT TO ATTORNEY CLIENT PRIVILEGE  
AND WORK PRODUCT DOCTRINE**

July 27, 2004

**VIA FACSIMILE (without enclosures)**  
**ORIGINAL BY OVERNIGHT MAIL**

Mr. Ian Galloway  
Director  
McLarens Young International  
11 Broadway, Suite 1115  
New York, NY 10004

RE: SCA Contract #31122; Request for Investigation in Anticipation of Litigation.

Mr. Galloway,

This letter serves to formally engage McLarens Young to perform an investigation related to claims past and present that have been made and are expected to be made under the above referenced contract. We request this investigation in anticipation of litigation related to the foregoing.

Recent publicity related to possible use by Lance Armstrong of performance enhancing substances and/or processes causes SCA to be concerned with respect to the integrity of the contest for which SCA contracted to assume risk. This concern requires us to perform the due diligence necessary to protect not only our interests, but also the interests of our insurers.

In performing your investigation, we ask that you attempt to obtain the following information:

- 1) Any and all written, electronic, or verbal communication or documents ("Communications") related in any manner whatsoever to the actual or suspected use of performance enhancing substances or processes by Lance Armstrong. This request applies to Communications between and among any of the respective employees, representatives, or agents of Lance Armstrong, US Postal Service Racing Team, the Tour De France, Amaury Sports, Discovery Channel, Tailwind Sports Corporation, and Disson Furst & Partners. Please consider this request to encompass any Communications regarding the testing of Lance Armstrong for the purpose of establishing the use or non-use of performance enhancing substances or processes.

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identification of testing personnel and laboratories, as well as results of any and all actual tests performed.

- 2) To the extent that it may be available, please locate any records contained within a complete medical history of Lance Armstrong from 1988 forward. Please consider this request to encompass a complete list of treating physicians as well as any records related to advice sought by, or given to, Lance Armstrong pertaining to performance enhancing substances or processes. Further information sought in this area includes records of nurses, nutritionists, trainers, masseuse, physical therapists, and/or any support members of the US Postal Service Racing Team.
- 3) Please attempt to locate any and all written or oral evidence, including but not limited to witnesses, invoices, receipts, shipping manifests, bills of lading, etc., of the acquisition or use by Lance Armstrong of substances or devices, including, but not limited to syringes, transfusion equipment, blood packs, actual or synthetic hemoglobin, drugs, nutritional supplements, or inhalers.
- 4) Any evidence of the receipt or sending, by any person associated with the US Postal Service Cycling Team (including any employee of Tailwind Sports Corp., Disson Furst & Partners, or ESIX Entertainment & Sports), any pharmaceutical substance, nutritional supplement, or medical device within twenty-four hours of the mountain stage of the Tour de France. Please consider this to include the receipt or sending of any unidentified packages during the period by any member of the aforementioned entities.
- 5) Any evidence of the possession by any person associated with the US Postal Service Cycling Team (including any employee of Tailwind Sports Corp., Disson Furst & Partners, or ESIX Entertainment & Sports) of any syringe, inhaler, transfusion equipment, or blood pack during the Tour de France.
- 6) Any and all information related to the Italian trial of Dr. Michele Ferrari. Examples of what we are looking for in this area are: the court, the charges or causes of action, the date of trial and a list of witnesses therein, and any transcripts of testimony that might be available now or in the future.

Enclosed find various articles related to Lance Armstrong, publicity surrounding the Tour de France, and Lance's possible use of performance enhancing substances and processes. In performing your investigation, we ask that you contact and interview the following individuals who are referred to in the articles:

- 1) David Walsh, chief sportswriter for the *Sunday Times* and author of *L.A. Confidential: The Secrets of Lance Armstrong*.

- 2) Ms. Emma O'Reilly, Irish woman who is Armstrong's former masseuse who insinuated in *L.A. Confidential* that Armstrong used EPO before the 1999 Tour de France.
- 3) Dr. Michele Ferrari, Sports doctor who helped train Armstrong and who is on trial in Italy for allegations of giving riders performance enhancing substances.
- 4) Tyler Hamilton, former rider on Armstrong's team and now a member of the Phonak Cycling Team.
- 5) Jean Le Blanc, race director for the Tour de France.
- 6) Gilbert Simeoni, Italian rider who worked with Ferrari and later collaborated with police by admitting to usage of performance enhancing substances at the direction of Ferrari.
- 7) Greg and Kathy LeMond, retired cyclist (first American to win the Tour de France) who has publicly expressed doubts about Armstrong's denials of using performance enhancing substances; his wife Kathy was quoted in *L.A. Confidential* as saying that Armstrong called LeMond and tried to persuade him to admit to using performance enhancing substances.
- 8) Dr. Prentis Stefan, former doctor for the USPS Team who was fired in November 1996 for allegedly refusing to participate in doping.

Additionally, find enclosed a copy of the contract between Tailwind Sports Corporation and Lance Armstrong.

We recognize that we have requested a complex investigation that may prove time consuming and expensive. Please prepare a one-page outline of projected fees and expenses for our review.

Please feel free to contact me with any questions you may have regarding this matter.

Very truly yours,

Chris Compton  
Attorney, SCA Promotions Inc.

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