

**BEFORE THE AMERICAN ARBITRATION ASSOCIATION**  
**NORTH AMERICAN COURT OF ARBITRATION FOR SPORT PANEL**

United States Anti-Doping Agency,

Claimant,

v.

Floyd Landis,

Respondent

CASE NO. AAA No. 30 190 00847 06

**RESPONDENT'S WITNESS LIST AND  
SUMMARIES**

**A. JOHN AMORY**

Dr. John Amory is a medical doctor and a professor at the University of Washington. Dr. Amory is the attending Physician at the University of Washington Hospital and is Board Certified in Internal Medicine. Dr. Amory's research is primarily in the study of testosterone and testosterone replacement therapy. Dr. Amory will provide background information on testosterone such as the molecular make-up and testosterone metabolism. Also, Dr. Amory will discuss the various methods of administering synthetic testosterone, i.e, injection, oral and topical. The next area of testimony Dr. Amory will address is the effect of testosterone on the body. This includes information concerning how the administration of synthetic testosterone affects the production of endogenous testosterone production. In addition, Dr. Amory will address how synthetic testosterone affects a person's T/E ratio and will opine Floyd's T/E results. The next area of Dr. Amory's testimony is the physiological effects of testosterone, such as its effects on muscle, endurance, recovery, and time to see benefit. Dr Amory will also comment on the lab errors by LNDD, such as documentation errors and chain of custody breaks. Dr. Amory's general conclusion is that Mr. Landis' results are not reliable.

**B. SIMON DAVIS**

Simon Davis is the Technical Director of Mass Spec Solutions. Mass Spec Solutions is one of the only manufacturers of Isotope Ratio Mass Spectrometers in the world. He was previously a Stable Isotope Systems Engineer and a Project Manager at Micromass UK, Ltd. (the manufacturer of the IRMS equipment used by LNDD). He has a PhD in Stable Isotope Mass Spectrometry from Liverpool JMU, in Association with Cambridge University. He will testify regarding a brief summary of his experience and background; the principles and operation of an Isotope Ratio Mass Spectrometer; the principles and operation of the GC-C-IRMS test for exogenous testosterone; his review of the analytical reports of the testing conducted by LNDD on the urine sample(s) provided by Floyd Landis during the 2006 Tour de France, and the LNDD's interpretation of those results; his observation of the LNDD's GC-C-IRMS testing in April 2007; the re-processing of the GC-C-IRMS electronic data files of the urine sample(s) provided by Floyd Landis during the 2006 Tour de France; and his opinion regarding the accuracy and reliability of the analytical reports of the GC-C-IRMS testing conducted by LNDD

on the urine sample(s) provided by Floyd Landis during the 2006 Tour de France. His curriculum vitae will be provided.

**C. DAN GARRETT**

Dan Garret was a long time teacher and now is Magisterial District Judge in the Warwick school district township. Mr. Garrett is a character witness and has known Mr. Landis since was a teenager. Mr. Garrett will also discuss Mr. Landis' religious upbringing and the values of the religion. Mr. Garrett will also testify to Mr. Landis' good character and is his integrity.

**D. BRUCE GOLDBERGER**

Dr. Goldberger is a Professor at the University of Florida, Departments of Pathology, Immunology and Laboratory Medicine and Department of Psychiatry, University of Florida. He has an M.S. Degree in Forensic Toxicology from the University of Maryland School of Medicine, and is the current President of the American Academy of Forensic Sciences. He will testify regarding a brief summary of his experience and background; the proper operation and management of a laboratory; and the principles of GC/MS testing. He will testify to the numerous errors committed by the laboratory, the principles and operation of an GC/MS testing; his review of the analytical reports of the testing conducted by LNDD on the urine sample(s) provided by Floyd Landis during the 2006 Tour de France, and the LNDD's interpretation of those results; and his opinion regarding the accuracy and reliability of the analytical reports of the GC/MS testing conducted by LNDD on the urine sample(s) provided by Floyd Landis during the 2006 Tour de France. His curriculum vitae will be provided.

**E. DAN GARRETT**

Dan Garret was a long time teacher and now is Magisterial District Judge in the Warwick school district township. Mr. Garrett is a character witness and has known Mr. Landis since was a teenager. Mr. Garrett will also discuss Mr. Landis' religious upbringing and the values of the religion. Mr. Garrett will also testify to Mr. Landis' good character and is his integrity.

**F. ALLEN LIM**

Dr. Allen Lim has a PhD in exercise physiology and has extensive cycling coaching experience. Dr. Lim is an expert in the use of power data in training cyclists and assisted in the development of the PowerTap product. Dr. Lim will address how power data is commonly used in cycling training and why it is important. Dr. Lim will also testify about his experiences as Mr. Landis' coach and the use of power data in Mr. Landis' training. Dr. Lim will discuss his collection of power data from Mr. Landis' various rides over . Dr. Lim will then compare Mr. Landis' stage 17 performance to Mr. Landis' other performance. Dr. Lim will opine that Mr. Landis' performance during Stage 17 were not superhuman. Dr. Lim will also address Mr. Landis' strategy during Stage 17 and his strategy affected his performance.

**G. WOLFRAM MEIER-AUGENSTEIN, CCHEM, MRSC**

Dr. Wolfram Meier-Augenstein is a senior lecturer in Environmental Forensics at Queen's University in Belfast, Ireland. He is a well-recognized research scientist in the field of

carbon isotope ratio testing and mass spectrometry. Dr. Meier-Augenstein will testify on the theory of carbon isotope ratio testing and the reasons why the LNDD's single isotope criteria does not make sense and is inconsistent with good science. He will testify that the results of LNDD's carbon isotope ratio testing in this case, both as to the Stage 17 results and the retesting results, are unreliable and inconsistent. He will testify about the following errors: (1) the poor application and use of standards; (2) poor chromatography; (3) the lack of the use of a reference population; (3) the inconsistencies in the results of the various IRMS tests; (4) the impact of poor linearity and (5) incorrect mass balance equation. Further, Dr. Meier-Augenstein will rebut the contentions contained in USADA's prehearing brief as it relates to carbon isotope ratio testing, in particular, as to the value and correctness of its use of its internal standards, laboratory procedures with respect to IRMS, and application of interpretation of its chromatograms.

#### **H. EDDY MERCKX**

Eddy Merckx is a world-class cyclist and is an expert in cycling tactics. Mr. Merckx will testify that Mr. Landis' performance on Stage 17 was the result of strong tactics and was within the realm of possibility.

#### **I. FLOYD LANDIS**

Mr. Landis will testify on his own behalf. Mr. Landis will deny the use of synthetic testosterone. Mr. Landis will also testify about his general character including his religious upbringing. Moreover, Mr. Landis will testify. Lastly, Mr. Landis will also discuss his strategy and capabilities.

#### **J. PAUL SCOTT**

Mr. Paul Scott is the former director of clients for the University of California, Los Angeles Anti-Doping Laboratory. Mr. Scott was one of the observers at the LNDD when it conducted the further re-testing of Mr. Landis' remaining B samples from the Tour. To the extent that the Panel permits Mr. Landis' further B sample IRMS test results to be admitted, Mr. Scott will discuss the errors that occurred during this further testing. Mr. Scott will further discuss how LNDD and USADA did not permit himself, and Mr. Landis' other expert, Dr. Davis, were not permitted to fully observe the re-testing.

DATED: May 4, 2007

Respectfully submitted,

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