

AFFIDAVIT OF DR. GRIGORY M. RODCHENKOV

I, **GRIGORY M. RODCHENKOV**, being duly sworn in accordance with U.S. law, deposes and says as follows:

1. I am an individual witness and the former Director of the World Anti-Doping Agency ("WADA") accredited Moscow Antidoping Centre ("Moscow Lab") in Moscow, Russia. I submit this Affidavit, based upon my personal knowledge, in support of the proceedings before an International Olympic Committee ("IOC") Disciplinary Commission chaired by Samuel Schmid (the "Schmid Commission").

Introduction

2. I am a citizen of the Russian Federation ("Russia"), but left Russia on November 17, 2015. I currently reside in the United States of America.

3. I was born on October 24, 1958.

4. My first language is Russian. However, I am fluent in both written and spoken English. I am not disadvantaged by providing this Affidavit in English.

5. In 1990, I received a Doctorate of Philosophy in Analytical Chemistry from the Moscow Institute of Food Industry.

6. In March 2005, Viacheslav Fetisov, Head of the Federal Agency of Physical Culture and Sports of Russia (in 2012 restructured to the Ministry of Sports), appointed me as the Director of the Moscow Lab. I served as the Director until November 9, 2015. On November 17, 2015, I fled Russia. I left Russia due to threats to my physical security and well-being.

7. In 2014, I served as the Director of the Sochi Lab, which was established by the Local Organizing Committee ("LOC") and the Ministry of Sports for the Sochi Olympic Games. The Sochi Lab was accredited by WADA for use during the 2014 Sochi Winter Olympics and

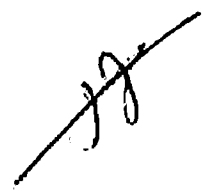


Paralympic Games (officially known as the XXII Olympic Winter Games), which were held in Sochi, Russia, from February 7 to February 23, 2014 (together, the "Sochi Games").

8. The primary purpose of this Affidavit is to summarize the Russian state-sponsored doping program during the Sochi Games. I have not described herein every fact and circumstance of which I have knowledge. Where, herein, I describe discussions with other conspirators, I describe the discussions in sum and substance, rather than verbatim. I have referenced herein some of the documentation I kept concerning the state-sponsored doping program at the Sochi Games, but I am in possession of other evidence.

9. In addition to the evidence in my possession, Russia possesses extensive other evidence of the state-sponsored doping program, including (a) stored samples, (b) instrument data, (c) laboratory information-management-system data, (d) server and other electronic and back-up data for its laboratory equipment and information systems at the Moscow Lab, and (e) doping control forms ("DCFs") and other doping control information of Russian athletes at the Sochi Games, which would corroborate my testimony fully. WADA has demanded that Russia produce this information before the Russian Anti-Doping Agency ("RUSADA") so that and the Moscow Lab can be re-certified under the World Anti-Doping Code. This evidence could be highly relevant to the Schmid Commission's work and ultimate conclusion. If Russia refuses to produce this evidence, I hope the Schmid Commission will reach the obvious conclusion: Russia withholds the evidence because it knows that the evidence would further corroborate the truth of my testimony.

10. I am aware of Russia's history and practice of state-sponsored doping and covering-up of positive tests, including at other Olympic Games and editions of World Championships events. This Affidavit will address systematic doping manipulation at some of these other events, although it is not a comprehensive description of all Russian doping schemes known to me.



11. In 2016, I was interviewed on three separate occasions by Professor Richard H. McLaren, the Independent Person appointed by WADA, and his colleagues, concerning my knowledge of the manipulation of the doping-control systems in Russia before, during, and after the Sochi Games (the “Sochi Plan”), which was (a) orchestrated by then-Minister of Sports Vitaly Mutko and then-Deputy Minister of Sports Yury Nagornykh, (b) financed by the Ministry of Sports, and (c) carried out by dozens of other government and RUSADA officials and employees (including myself). This Affidavit will detail some of the evidence of Mutko’s and Nagornykh’s involvement, including evidence available to Professor McLaren that he did not include in his reports. I was fully candid and truthful with Professor McLaren, and the factual findings contained in his reports—dated July 18, 2016, and December 9, 2016 (the “McLaren Reports”)—are accurate.

12. To be clear, I had many discussions about the doping program with Mutko and Nagornykh in the period between and including 2010 and 2015, including, but not limited to, discussions regarding (a) a large bribe paid by Russia to avoid doping detection, (b) a positive test for a banned substance from a premier Russian athlete (see paragraphs 181-185 and 225-236 below), (c) the investigation of new peptides for enhancing athletes’ performance without detection, (d) plans for ensuring that various athletes were protected and not detected for use of performance enhancing drugs (“PEDs”) before and during various events, (e) the challenges posed by the continued wide-spread use of erythropoietin (“EPO”) by Russian race walkers,¹ and (f)

¹ In fact, in July 2009, I wrote Mutko a memorandum discussing the consistent problems with sloppy doping practices among race walkers. I later updated this memo for Nagornykh, which I gave him in 2010, and which is included in Attachment 1A. I specifically called his attention to “the unmonitored use of both pharmaceuticals and low-quality underground erythropoietin in large doses.” I further advised him that the EPO problem “exists not only in athletics, but in skiing, bicycling and biathlon.” We had several meetings on this topic alone, as I tried to convince him

many other problems and challenges with the Russian doping program. Since I was contacted very recently to submit this Affidavit, I did not herein have the opportunity to catalogue all of my discussions and interaction with Mutko and Nagornykh. They knew about, and asserted control over, the state-sponsored system, which is exactly why they had a criminal investigation against me terminated on June 27, 2012, so I could continue my work in the Moscow Lab. Any suggestion that I would have risked operating a doping system without specific commands and approvals is absurd.

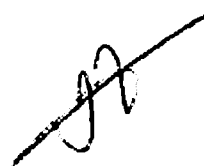
13. Throughout 2014, as I did every year since my teenage years, I kept a detailed, hand-written diary, which included the time period of the Sochi Games (the "Sochi Diary"). This diary reflects my main activities of each day, with many personal details and observations. I often note important meetings or discussions. The Sochi Diary also provides a detailed chronicle of my work on the state-sponsored doping manipulation program used during the Sochi Games. I refer to many entries in the narrative below.

14. I was assisted in the preparation of this Affidavit by my legal counsel, Jim Walden and Avni P. Patel of Walden Macht & Haran LLP, but all the recollections herein are my own.

15. My Affidavit is organized as follows:

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- d. Overview and Creation of the Sochi Plan: Page 15;
- e. First Objective (Pre-Sochi): The Three-Steroid Duchess Cocktail:

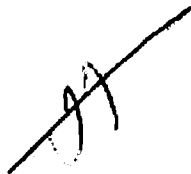
to force the race-walking coach, Victor Chegin, to reform and use safer doping practices with a lower chance of detection.



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Relevant Persons

16. **Vitaly Mutko.** Mutko was appointed the Deputy Prime Minister of Russia in October 2016. Between 2008 and October 2016, Mutko served as the President of the Russian



Football Union and Minister of Sports, Tourism and Youth Policy. In July 2012, the Russian Ministry of Sports, Tourism and Youth Policy was reorganized as the Ministry of Sports.

17. **Yury Nagornykh.** Between 2010 and 2016, Nagornykh was the Deputy Minister of Sports. Nagornykh was also a member of the Russian Olympic Committee. He was removed from those positions in 2016 in apparent response to the McLaren Reports.

18. In 2012, Mutko tasked Nagornykh with “success at Sochi” at any cost. Nagornykh put together the team that planned and executed the doping protocol for the Sochi Games.

19. **Aleksai Velikodny.** Velikodny was Nagornykh’s assistant and second-in-command. Nagornykh appointed Velikodny to facilitate the day-to-day operations leading to the Sochi Games.

20. **Irina Rodionova.** Rodionova was the Deputy Director of the Center for Sports Preparation (“CSP”). Rodionova was the medical doctor and coordinator of athlete doping preparations and facilitated distribution of PEDs before and during the Sochi Games. Rodionova managed the process of coordinating the collection of athletes’ “clean” urine samples, delivering them for analysis, and distributing a three-steroid cocktail. She was assisted in transporting the clean urine bank for use at Sochi by the Federal Security Service (“FSB”) (formerly the KGB). The bank was housed in an FSB Command Center on the Sochi Campus.

21. **Natalla Zhelanova.** Zhelanova was the head of the doping control section in the Ministry of Sports. Additionally, she oversaw and influenced the operations of RUSADA. She was also appointed as a special anti-doping Advisor to Mutko.

22. **Nikita Kamaev.** Kamaev was the Director of RUSADA. Kamaev oversaw athlete urine sample substitution at sample collection sites for pre-competition testing, but not during testing at the Sochi Games. Kamaev suddenly died in February 2016. Just before his death,



Kamaev told me during numerous telephone conversations that he was writing a tell-all book about the Russian state-sponsored doping program.

23. **Evgeny Antilsky.** Antilsky was the Manager of the Doping Control Station in the Polyclinics in the Sochi Olympic Village. All samples collected during the day were consolidated at this Doping Control Station for transportation to the Sochi Lab, including those identified for swapping.

24. **Evgeny Blokhin.** Blokhin was an FSB officer. He operated and controlled FSB access between the Sochi Lab and the FSB Command Center, which was adjacent to the Sochi Lab. He oversaw a team of FSB officers tasked with opening allegedly "tamper-proof" BEREK-KIT bottles, in which athletes' urine samples were stored after official urine collection.

25. **Evgeny Kudryavtsev.** Kudryavtsev was the head of reception, storage, and aliquotting section in the Sochi Lab.

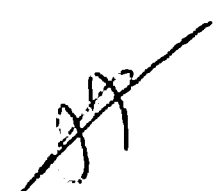
26. **Yury Chizhov.** Chizhov was my assistant and second-in-command in the Sochi Lab.

Important Context

27. To the best of my knowledge, Russia has had a state-sponsored doping program for decades.

28. Richard Pound, the former President of WADA, and the Chair of WADA's Independent Commission, noted on November 9, 2015, that the then-available evidence of Russia's doping program was just the "tip of the iceberg."² Inside Russia, we knew he was correct.

² <https://www.theguardian.com/sport/2015/nov/10/athletics-doping-wada-russian-iaaf-tip-of-the-iceberg>



29. This should be no surprise to the IOC or WADA, given that Russia is consistently at the top of various lists for doping violations (despite Russia's secret activities to cover up the doping system), including those published by WADA itself.

30. WADA's 2015 Anti-Doping Rule Violations Report found that Russia was the top violator, with 176 violations and approximately 36% more violations than second-place Italy (with 129).³

31. WADA's 2014 Anti-Doping Rule Violations Report found that Russia was the top violator, with 148 violations and approximately 20% more violations than second-place Italy (with 123).⁴

32. WADA's 2013 Anti-Doping Rule Violations Report found that Russia was the top violator, with 225 violations and approximately 20% more violations than second-place Turkey (with 188).⁵

33. Of course, if Russia had *no* sophisticated system to conceal doping by its elite athletes, the above statistics would be much worse.

34. Russia consistently blamed the West for focusing on its doping despite the prevalence of doping everywhere. I still believe this is true, in part. However, the sad truth is (and this was a battle I fought inside Russia on so many occasions), many coaches do not know how to train *without* PEDs, and they lack information about—or even interest in—how to use them safely, to minimize the chances of detection.

³ https://www.wada-ama.org/sites/default/files/resources/files/2015_adrvs_report_web_release_0.pdf

⁴ https://www.wada-ama.org/sites/default/files/resources/files/wada-2014-adrv-report-en_0.pdf

⁵ <https://www.wada-ama.org/sites/default/files/resources/files/wada-2013-adrv-report-en.pdf>

35. It is quite obvious that the severe limitations on the powers of anti-doping authorities—when coupled with political influence and outright corruption—emboldened Russia in its efforts to cheat the system. After all, the world has long suspected what was actually happening within Russia.

36. For example, in July 2008, when the International Association of Athletics Federation (the “IAAF”) suspended seven Russian track and field athletes before the 2008 Beijing Olympic Games, the New York Times wrote: “The number of suspensions, and the varied events involved, raised troubling questions about possible ineptitude or corruption in Russian drug-testing procedures and also prompted concerns about whether a deliberate, systematic attempt was made by coaches or officials to undermine drug-testing protocols.”⁶ In those cases, the athletes were (not surprisingly) accused of tampering with urine samples.

37. The questions about the state-sponsored system have been consistently raised (and unaddressed) ever since. When Yelena Soboleva and Tatyana Tomashova (World Champions in middle distance running and part of the Russian National Team in track and field) were thrown out of the Beijing Games based on sample substitution at collection sites (a practice well-used within Russia for many years), the Chairperson of the IOC’s Medical Commission at the time (who was also Vice President of WADA), Arne Ljungqvist, said: “This does seem to be an example of systematic planned doping”⁷

38. Of course, it was. And Russian race walkers (coached by Victor Chegin) have been the most persistent doping violators.⁸

⁶ <http://www.nytimes.com/2008/08/01/sports/olympics/01doping.html>

⁷ <http://www.dailymail.co.uk/sport/olympics/article-1041882/Top-Olympic-official-accuses-Russian-athletes-systematic-planned-doping.html>

⁸ For example, in May 2008 during the IAAF World Cup in Cheboksary, we tested Chegin’s race walkers and found all 18 had taken EPO. All 18 positives were misreported as negative in the

39. So, doping in Russia is a fixture, and has been so for many years.

40. Thus, it was certainly no surprise to me (and should not have been a surprise to anyone) when—after the IOC finally re-tested stored urine sample from the Beijing Games—Russian athletes represented 36% of the new doping discovered in the reanalysis (16 of 44).⁹ As I discuss in more detail below (see paragraphs 237-245), I actually predicted this in a memorandum I wrote to Mutko in January 2015, which is included within Attachment 1B, that retesting of samples stored by IAAF from Osaka and Berlin would also result in disaster.¹⁰

41. The IAAF got even more serious about doping control before the 2012 London Olympic Games, suspending nine athletes, a third of them Russian: Svetlana Klyuka (who finished 4th in the 800m at the Beijing Olympics), Yevgenia Zinurova (the 2011 European Indoor Champion), and Nailya Yulamanova (marathon runner disqualified after 2012 London Olympics for numerous abnormalities in her Athlete Biological Passport (“ABP”).

Moscow Lab. Dr. Gabriel Dollè, from the IAAF, had ordered me to send these urine samples to the Lausanne laboratory, but sending samples abroad was legally prohibited. Dollè thus sent a doping-control officer to Moscow. Tiring of Chegin, I decided to help the officer find race walkers for surprise testing. He collected 5 samples and, with my help, smuggled them back to Lausanne. Not surprisingly, all five were found dirty for EPO. Dollè later demanded that we sequester 58 urine samples from Chegin’s race walkers and send them to Lausanne. Later, Dollè said I could destroy these samples.

⁹ <https://www.doping.nl/media/kb/4412/IOC-reanalysis-programme-final-eng.pdf>

¹⁰ I wrote several memoranda to Mutko about various problems with the doping program. By design, one would not address such sensitive materials to a high-level official using his name. This will afford Russia precisely what the system was designed to permit: plausible deniability. However, the language I used in this and the other memos I kept (some of which are included herein) was clearly directed at someone (a) with decision-making authority and (b) above me in the hierarchy. The reader can draw his or her own conclusions. But as Professor McLaren knows, I saved this memo with a file name specifically referencing its preparation for Mutko.

42. The IOC's re-analysis of stored samples from the London and Beijing Games demonstrated that Russia had 28% of the adverse-analytical findings (53 out of 190).¹¹ Again, given the information I have disclosed, this is not surprising at all.

43. I am certain that it is not lost on this Commission that—of all athletes (regardless of nationality) eventually disqualified based on the re-analyses of samples from the Beijing and London Games—many of them were medal winners.

44. The correlation between doping and winning cannot be seriously denied. This means that many athletes were wrongfully denied medals by cheating athletes at the London and Beijing Games. In the case of Russia, this is precisely what the state-sponsored system sought to ensure.

45. Although the majority of our athletes remained undetected through 2012, as the date for the Sochi Games drew near I believed our day of reckoning had come when the Daily Mail ran a special investigative report on July 6, 2013, disclosing for the first time that I had been investigated for 16 months for my alleged distribution of banned substances to athletes.¹²

46. The report led with an ominous line: "Russia's suitability to host the World Athletics Championships next month and the Winter Olympics in February has been plunged into doubt by allegations that Russian athletes are doping under instruction from coaches and are assisted by cover-ups at the country's main anti-doping laboratory."¹³

¹¹ <http://olympstats.com/2017/09/26/2008-12-OLYMPIC-DOPING-RE-TEST-AN-UPDATE-UPDATE/>

¹² As an aside, Mutko and Nagornykh knew of this situation with the criminal investigation quite well, as they and other high-level officials in the Kremlin were involved in ending the investigation when the IOC invited me to work within the Ad Hoc Doping Group working in Olympic Laboratory in Harlow during the London Games.

¹³ <http://www.dailymail.co.uk/sport/othersports/article-2357501/World-Athletic-Championships-rocked-Mail-Sunday-special-investigation-doping-Russia.html>

47. Amazingly, the report quoted a respected former Russian coach, Oleg Popov, who seemed to put the nail in our collective coffin. Recounting his own experiences as a Coach, he said: “The officials said you have to prepare with doping . . . Everyone had to go to [name withheld] and he was saying how the athlete had to prepare, what doping to take. They told me: ‘You have to pay 50,000 roubles for the preparation. If you pay she’ll get prepared.’”¹⁴

48. Popov even said he had written to Mutko and WADA directly to complain. Popov continued: “Not only does an athlete have to take illegal drugs, he also has to pay money in our anti-doping laboratory for substituting the samples.”¹⁵

49. The Daily Mail also quoted a prophetic anonymous official of a Russian Sporting Federation: “Believe me, you won’t hear about a single doping scandal involving Russians during the [Sochi] Olympics. Everything will be done so that Russia will definitely get the most medals.”¹⁶

50. Thus, even before the Sochi Games, Mutko was forced to publicly admit that I had been investigated for doping violations.¹⁷ I held my breath, wondering if the Kremlin would not find a fatal solution to the problem of me. But, given the role I was then playing as we prepared for major international competitions—and given the Kremlin’s thirst for “medals at any cost”—I remained safe. Mutko simply answered the Daily Mail by telling the press, in sum, that others are “jealous of Russian success.”¹⁸ This strategy is typical for the Kremlin: tell a lie a thousand times and it becomes the truth.

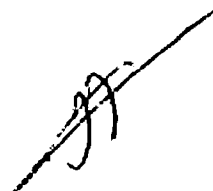
¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ <http://www.dailymail.co.uk/sport/othersports/article-2362722/Russia-doping-allegations-Country-fit-host-world-events-says-British-athletes.html>

¹⁸ *Id.*



51. And so, with my place secure, I was able to continue to help our doping system—under Nagornykh’s strict instructions, and reporting to Mutko as well—to become more sophisticated in its framework and execution, all culminating in the Sochi Plan.

Events Before the Sochi Games

52. For the purposes of this Affidavit, I focus on key milestones of Russia’s doping history leading to the Sochi Games.

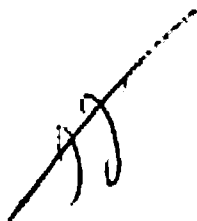
53. I was the Director of the Moscow Lab, so I was aware that many athletes had abnormal blood parameters, which are markers of EPO abuse (for which detection technologies were very weak at the time) and blood transfusions (commonly called “blood doping”).

54. One of the primary sources of clandestine EPO for the Winter Olympic team was Stanislav “Stasik” Dmitriev, a well-known PEDs distributor in Russia. The version of EPO he distributed was modified to remove molecules of sialic acid, which made the Russian EPO hardly detectable because of strict Identification Criteria set by WADA. However, as the number of athletes he was supplying grew, the quality-control over his EPO production failed with dire consequences.

55. In the first week of February 2009, three Russian, high-profile biathletes—Albina Akhatova, Ekaterina Iourieva, and Dmitri Yaroshenko—tested positive in the Lausanne Laboratory for EPO. There was a resulting attempt by the FSB to discredit the results, and they worked with members of the Moscow Lab on that project. They failed.

56. Then, in July 2009, Yulia Chepalova and Evgeny Dementyev—both Olympic champions in cross-country skiing—were also disqualified for anti-doping violations.

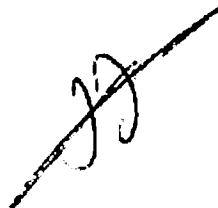
57. The difficulties of 2009 culminated in an even worse 2010. The Olympic Winter Games held in Vancouver were a disaster for Russia, as its athletes won only three gold medals.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

58. When the Russian Olympic Delegation returned, Leonid Tyagachev, then the President of the Russian National Olympic Committee, stepped down. The Deputy Minister of Sport, Tourism and Youth Policy, Gennady Aleshin, also stepped down and was replaced by Nagornykh. Later, Mutko tasked Nagornykh with a mandate to “turn around” our struggling sports program at any cost.

59. Then, at the end of 2010, a lab analyst in Moscow found other troubling news for our doping program: that Oral-Turinabol, another favorite PED for Russian athletes, can be detected through identification of its long-term metabolites. He learned it was retained in an athlete’s body for longer than expected and the detection window during urine analysis was enlarged from approximately 1 week to approximately 5 months.

60. Thus, before Nagornykh’s first Major Event, the 2012 Summer Olympics in London (“London Games”), he wanted to create a safer system for pre-departure testing, so that Russian doping violators would not get caught. Toward that end, he enlisted the help of Nikita Kamaev, who was then-Director of RUSADA, the agency responsible for conducting pre-departure testing for the London Games. I spoke about this directly with Nagornykh and Kamaev on many occasions and, from these discussions, learned how the system worked for athletes in track and field. By this time, Russian athletes had been instructed to maintain stores of “clean” urine. When called for testing, they brought bottles of their clean urine and literally poured it in the BEREG-KIT’s. This was possible because the Doping Control Officers (“DCOs”) from RUSADA and International Doping Tests & Management (“IDTM”) were corrupt and allowed urine substitution at collection sites. Despite this process, some samples sent to the Moscow Lab tested positive for the presence of PEDs, so Natalia Zhelanova from the Ministry of Sports instructed me to falsely report the positive tests as negative, which I did.

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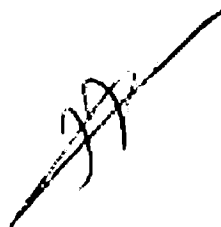
61. Then, in August 2013, the XIV IAAF World Championships served as an important “warm-up act” for our doping work at the Sochi Games. Although performed on a more-limited basis, top-level athletes were now taking a three-steroid cocktail (discussed in detail below, see paragraphs 67-76), which I had developed in 2010 based on the detectability of new long-term metabolites. When athletes’ urine was collected by IAAF/IDTM teams, the samples were sent to the Moscow Lab. This allowed me to test the contents in the “A” bottle and, if they were dirty (which only happened in a few cases), use the athletes’ clean urine, which Rodionova and Melnikov had delivered to the lab for all “protected” athletes. By this time, I could replace the “B” bottle contents with clean urine too, as Nagornykh had tasked the FSB with the job of finding a way to open the allegedly tamper-proof BEREG-KIT bottles, and the FSB succeeded.

Overview and Creation of the Sochi Plan

62. In the fall of 2012, Russia began the planning process for the Sochi Games. Mutko led these efforts. I first learned this during a discussion with Nagornykh in October 2012, during which he said Mutko had tasked him with the objective of ensuring success of the Russian National Team at the Sochi Games. Nagornykh said he and Mutko agreed that we needed a comprehensive system to shield athletes from testing positive for PEDs. Thus, Nagornykh said he would assemble a team to ensure the proper functioning to allow detection-free doping for Russia’s athletes. The Sochi Plan had three primary objectives.

63. **First Objective:** The use of PEDs with a limited “wash-out” period, meaning that the PEDs were undetectable in urine after a very short period of time.

64. **Second Objective:** The ability, during the Sochi Games, to swap the urine of doped athletes (“Dirty Samples”) for urine taken from that athlete before the athlete began taking PEDs (so-called, “Clean Samples”). This objective was complicated and required two primary steps,



among many other: (a) wide-scale collection of Clean Samples from Russian athletes who might qualify for the Sochi Games; and (b) the ability to open the BEREK-KIT Bottles, which contained athletes' urine samples collected by DCOs.

65. Third Objective: The ability to hinder both (a) the testing of Russian Olympic athletes scheduled by the IOC or WADA and (b) the delivery of samples abroad.

66. Nagornykh managed all aspects of what became known as the Sochi Plan, and he said he would keep Mutko informed of all key milestones.

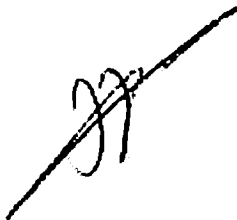
First Objective (Pre-Sochi): The Three-Steroid Duchess Cocktail

67. I developed the "three-steroid cocktail," which we referred to as the Duchess Cocktail ("Duchess Cocktail"). It was one of my most significant contributions to the doping program.

68. I always wanted to keep the Moscow Lab clean (that is, to minimize the risk of having Dirty Samples or having to manipulate data to cover-up doping) – I would have rather had athletes use PEDs with shorter retention times than to have to manipulate data results or store dirty urine samples in the lab and jeopardize the accreditations of the Moscow or Sochi Labs.

69. In late 2010, I informed Nagornykh and Rodionova that I was working on a solution. I asked Nagornykh and Rodionova to tell all athletes, coaches, and team doctors that it was no longer safe to use Oral-Turinabol. To my understanding, Rodionova conveyed this message to coaches and athletes throughout Russia.

70. In early 2011, I had additional conversations with Nagornykh in his Moscow office about the subject. I advised him that Oral-Turinabol should be excluded completely from any doping protocol. I advised him of the danger that other anti-doping authorities would realize the long-term detectability of Oral-Turinabol, which could spur them to go back and test old urine



samples stored by IOC and IAAF. Nagornykh agreed that Oral-Turinabol should be discontinued, but he urged me to find another solution to give Russian athletes an advantage. I had a similar discussion with Mutko after the London Games in 2012, and Mutko urged me to find a similar doping product that could be used by Russian athletes without risk of detection.

71. I began testing combinations of steroids to use as an alternative. I wanted to develop a combination that was safe, useful, and simple to prepare if the ingredients were available. Most importantly, I wanted to create a PEDs-cocktail that had a reliable and short wash-out period.

72. Thus, I created the Duchess Cocktail, which mixed combined alcohol extracts of three steroids: Oxandrolone (Anavar), Metenolone (Primobolan), and Trenbolone (Parabolan). I knew that, to create a reliable wash-out period, I would need to avoid a pill-form substance, which was less reliable given the differences between athletes' metabolisms. Athletes could take sips of the Duchess Cocktail or swirl the Duchess Cocktail in their mouth and the steroid would be transmitted, directly and quickly, into their blood stream and target muscle tissues.

73. The process for ingesting the Duchess Cocktail for each athlete was, of course, highly unusual in a training regime, and it is unlikely that anyone following this program could be unaware of its centrality to a doping program. There are no circumstances in which swirling whiskey in one's mouth and spitting it out would have any athletic or medical purpose.

74. Based on my discussions with Rodionova, I knew that she and Aleksei Kiushkin, Rodionova's assistant, had access to high-quality Oxandrolone (Anavar), Metenolone (Primobolan), and Trenbolone (Parabolan) in sufficient quantities to supply the Duchess Cocktail to all protected athletes. Kiushkin was responsible for making the cocktail that Rodionova distributed to coaches and athletes.

A handwritten signature in black ink, appearing to be 'JF', is written over a diagonal line that extends from the bottom left towards the top right of the page.

75. In or around July 2011, I tested the Duchess Cocktail on myself. I ingested the Duchess Cocktail and had a lab analyst conduct urine analysis for multiple consecutive days to determine the wash-out period. We determined that the wash-out period was reliably 3-5 days. Metenolone was the last-eliminated steroid if the cocktail was prepared carefully.

76. I explained to Rodionova and Kiushkin how to create the Duchess Cocktail. I knew, based on my discussions with Rodionova, that Kiushkin prepared the Duchess Cocktail and Rodionova distributed it to athletes and coaches to use in their doping protocols. Rodionova told me that she altered the formula, giving the mixture with whiskey to some athletes but using Martini vermouth for other athletes who could not tolerate whiskey.

Second Objective (Prep. Part A): Clean Sample Collection

77. In approximately March 2013, Rodionova, coaches, and team doctors directed approximately 75 Russian winter athletes to begin collecting clean urine, which would be used to swap for dirty urine if necessary during the Sochi Games. The Sochi Plan, to have maximum impact, would require some athletes to continue to use the Duchess Cocktail shortly before or during the Sochi Games. Thus, notwithstanding the short wash-out period, positive urine tests were possible, and we needed to address that risk. Thus, athletes were told to collect approximately 5 to 7 bottles of clean urine before starting use of the Duchess Cocktail.

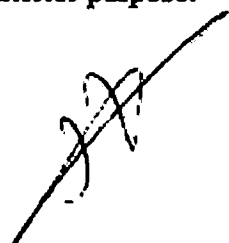
78. The Ministry of Sports, and in particular Deputy Minister Nagornykh, decided which athletes would be "protected" from doping-control threats or problems. These athletes were placed on an Excel spreadsheet, which was later referred to as the "Duchess List." Velikodny created this list of athletes based on information from Rodionova. Based on her work with athletes and coaches of the Russian National Teams, Rodionova aggregated a list of athletes who were to receive complete blanket protection and the doping protocol leading up to and at the Sochi Games.

Nagornyykh told me that Mutko had also reviewed and approved the Duchess List. On January 21, 2014, Velikodny sent me the Duchess List. A few days later, Velikodny sent me the Sochi Games Medal Table, which was a day-to-day event schedule for protected athletes. The list of “protected athletes” grew as we came nearer to the Sochi Games, including (for example) the entire women’s hockey team.

79. The substitution and swapping program was an insurance policy for all athletes on the Duchess List or added thereafter. If their coaches stopped having them ingest the cocktail more than 5 days before the Sochi Games, they would have little risk of a positive test (and little danger from possible retesting later), but swapping would eliminate *any* risk, allowing them to benefit from the Duchess Cocktail freely during pre-Olympics training. For those athletes who felt it necessary to take the Duchess Cocktail shortly before or during the Sochi Games, the swapping system would protect them against a positive test.

80. Rodionova had her team—which consisted of Kiushkin, Velikodny, and others—collect athletes’ clean urine while at training sites and during periods where their urine should have tested clean, either before the doping protocol or because the sample was collected far after their washout period.

81. Rodionova directed coaches and athletes to deposit samples in any variety of acceptable plastic bottles or cans. The only requirement was that the bottle was airtight and labeling was water-proofed. As such, athletes collected urine in Coca-Cola, juice, baby nutrition, and other commercial bottles after strenuous training sessions. Again, this would be extremely unusual for an athlete, as urine is generally collected in medically-appropriate, single-use containers. For an athlete to place urine in soda and baby bottles would be a tell-tale indication to the athlete that the urine was being collected for an ulterior purpose.



82. Athletes were instructed to freeze urine before sending it to Rodionova in Moscow. Athletes were instructed to deliver bottles in double plastic bags.

83. In the period between March 2013 and the Sochi Games, Rodionova or Velikodny transported these urine bottles to me in the Moscow Lab.

84. Lab Analysts in the Moscow and Sochi Labs, and I, carefully tested the samples delivered to ensure that they would test negative or "clean." At that time, athletes and coaches did not know which athletes would make the Russian National Team to participate at the Sochi Games. Therefore, it was necessary for athletes to collect and prepare clean urine in the event that they participated and needed their urine swapped. This required us to test allegedly clean urine for approximately one hundred athletes, who might have to be added to the Duchess List in the run-up to the Sochi Games.

85. My staff catalogued all athlete samples, analyzed them for clean grade, and passed them to Rodionova to store in the CSP until they were transported to the FSB building in Sochi ("FSB Command Center"). The FSB Command Center was equipped with freezers to handle the storage of urine. The FSB Command Center was located 100 meters from the Sochi Lab. Blokhin was in charge of all operations within the FSB Command Center, which was the location where Blokhin's team, who we referred to as the "Magicians," opened BEREK-KIT bottles during the week before and during the Sochi Games.

86. Blokhin placed urine samples into freezers at the FSB Command Center. To the best of my knowledge, approximately 500 urine samples were sent to the FSB Command Center during this process.

87. On February 1, 2014, Blokhin and I visited the FSB Command Center and inspected the freezers containing clean urine samples. I personally observed that the urine was

stored in various, unofficial, commercial plastic bottles contained in plastic bags. This visit was specifically arranged by Deputy Minister Nagornykh.¹⁹

Second Objective (Prep. Part B): Opening the BEREK-KIT Bottles

88. The FSB was solely responsible for opening the BEREK-KIT bottles before and during the Sochi Games. The team of Magicians was supervised by Blokhin.

89. Blokhin had BEREK-KIT bottles from different batches, some of which I supplied to him, so that his team could try to open them without damaging the caps. In February 2013, Blokhin reported that his team had succeeded. I gave him two samples, which were “dirty” and which I feared would be subject to retesting. After 3 or 4 days, he returned them with the caps opened. I reported this important development to Nagornykh, who in turn reported it to Mutko.

90. I never observed firsthand any bottles being opened or de-capped. Therefore, I do not know the precise method the FSB Magicians used to open the BEREK-KIT bottles, although (due to Blokhin’s inadvertence) I saw a table with instruments that resembled a dentist’s tools. I do know, based in part on my discussions with Blokhin, that the FSB replaced toothed rings and springs within the caps. However they accomplished the removal of the caps, I did not observe any changes when the bottles and caps were returned.

91. On January 13, 2014, I provided Blokhin with additional BEREK-KIT bottles, which would be used at the Sochi Games. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 2. When Blokhin was there, he allowed me to take a photograph of him, which I used in his contact for my telephone. The photograph is included in Attachment 3.

¹⁹ In an earlier Affidavit, I mistakenly wrote that Chizhov was present at this meeting. That was incorrect. He came to Sochi the next day.

Second Objective (Main Goal): Urine Swapping

92. The following describes the planned step-by-step process of the Sochi Urine Swapping Scheme. The steps included: (1) the process of urine collection and documentation of the Doping Control Form ("DCF"), and the transmission of sample numbers and DCFs; (2) the daytime preparations at the Sochi Lab for nighttime urine swapping; (3) the daytime preparations at the Olympic Village and Doping Control Stations; and (4) the nighttime urine swapping process.

Step One – Doping Control Station

93. The athlete arrived at the Doping Control Station accompanied by a team physician or coach when selected for in-competition testing.

94. The Doping Control Station had a security entrance guarded by security officers.

95. At the entrance, the athlete displayed his/her testing notification and Olympic accreditation.

96. Security officers checked in the athlete and accompanying person(s).

97. The athlete notified the Doping Control Manager when ready to provide sample.

98. The athlete was directed to a specific table where DCOs instructed the athletes on the sampling procedures.

99. The DCO filled out the DCF.

100. The athlete selected BEREG-KIT bottles and a plastic cup for urine collection.

101. The DCO documented the BEREG-KIT identifying code number on the DCF.

102. The athlete deposited the urine sample in the collection cup while being observed by the DCO.

103. The athlete was led to the back collection area. The DCO recorded the total volume of urine provided on the DCF. The athlete opened the kit box and inspected the "A" and

"B" BEREG-KIT bottles, removed the wrap and red ring, and then the urine from the collection cup was split into the "A" and "B" bottles.

104. The athlete must have deposited approximately 30 ml in the "B" sample to be sufficient. This volume was marked with a line on the blue label.

105. The athlete must have deposited approximately 60 ml in the "A" sample to be sufficient. This volume was marked with a line on the red label.

106. If any urine remained in the collection cup, it was divided between the "A" and "B" bottle until only approximately 5-10 ml remained. This remaining urine was used to measure for specific gravity.

107. The athlete then sealed both the "A" and "B" bottles with caps and passed them to the DCO for a final secure tightening and leak check.

108. The DCO poured the leftover urine over an Asahi densitometer and measured its specific gravity. The DCO recorded the sample's specific gravity on the DCF.

109. The DCFs were completed and signed, and the athlete left the doping control station with his or her copy of the DCF.

110. The DCF documented the total volume of urine deposited into the collection cup. The DCF did not specify the exact volume poured into the "A" or "B" bottles. The sum of the volume in the "A" and "B" bottles did not match the total amount of urine given by the athlete and noted on the DCF, because a certain volume was left in the collection cup for specific gravity measurement and then disposed.

111. The athlete or accompanying person took a photograph of the DCF with their cellular phone.



112. The DCO or corrupt personnel at the Doping Control Station took a photograph of the remaining copies of the DCF to transmit as a second source of information.

113. The athlete or a member of their entourage texted a photograph of the DCF to Rodionova.

114. Rodionova forwarded a photograph of the DCF via text message to me, called me at the Sochi Lab, and confirmed which athletes gave urine that day to Doping Control.

115. Back-up coordinators at the 15-16 Doping Control Stations texted photographs of athletes' DCFs to Chizhov, Blokhin, and my secretaries.

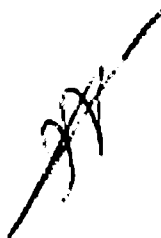
Step Two – Preparations at the Sochi Lab

116. Based on the DCF screenshot photographs sent to Chizhov, Blokhin, and my secretaries, I knew the number of Russian athletes' samples our swapping team would need to swap each night. The screenshots also provided the sample code numbers and sports.

117. I prepared a "Catch of the Day" table with names, code numbers, specific gravity measurements, and the volumes needed to fill in the "A" and "B" bottles, which was the total amount of urine collected and indicated on the DCF. The amounts in each separate bottle were unknown, but I only needed to know the total amount to ensure that we procured enough clean stored urine.

118. Chizhov and I met with Blokhin to discuss which plastic bags with athlete's clean urine were needed from the Command Center storage freezer. These were the samples we needed delivered to the Sochi Lab that day.

119. Blokhin retrieved the plastic bags containing frozen clean urine for the athletes listed on the Catch of the Day table and brought them to the Sochi Lab, Room No. 124 for thawing.



120. The bags of frozen clean urine were left in Room No. 124 to defrost. The door was locked during the day.

121. Once the urine samples thawed, Chizhov worked to prepare the samples for that night's swapping. Chizhov worked during the day, well before the swapping occurred at night.

122. Chizhov poured urine samples into 250 ml glass beakers. Chizhov marked each beaker to match the athlete's number on the Catch of the Day table. Chizhov measured specific gravity using the Asahi densitometer, which was the same model used at the Doping Control Stations in Sochi.

123. Chizhov manipulated samples to adjust the specific gravity to match the DCF. If the specific gravity of any clean urine was lower, sodium chloride was added to the sample to increase the specific gravity. If the specific gravity of any clean urine was higher, distilled water was added to adjust the specific gravity. If the specific gravity matched or differed within .002 points, then the sample was left as is.

Step Three – Additional Preparations in the Olympic Village

124. When the Doping Control Station finished a collection session, DCOs completed Chain of Custody forms. They packed up samples in bags that were then sealed and sent to a temporary storage zone at the Olympic Village.

125. Antilsky received samples at the Doping Control Station in the Olympic Village. Antilsky held the samples at this location until approximately 1:00 a.m.

126. At approximately 1:00 a.m., Antilsky called the Sochi Lab and informed us that the ambulance car carrying athletes' collected urine samples was headed to the Sochi Lab, and to expect the samples to arrive shortly.



127. Chizhov and I made a round inside of the Sochi Lab to ensure that all foreigners and observers had left and that it was clear for urine swapping.

Step Four – Urine Swapping

128. When the ambulance car brought samples to the Sochi Lab, they were transported at the special door reserved for DCOs.

129. Kudryavtsev checked the samples at the reception area. Samples were re-coded, the volume of the A and B bottles was measured, and the Chain of Custody was documented. This data was automatically downloaded to the Laboratory Information Management System upon arrival.

130. Chizhov, Blokhin, and I moved to the Operational Room, No. 124.

131. At reception, Kudryavtsev split the “A” and “B” bottles into different carts.

132. Kudryavtsev wheeled the “B” bottles to a locked storage room with freezers in the designated long-term storage zone.

133. Kudryavtsev then took the “B” bottles of athletes listed on the Catch of the Day table whose urine needed to be swapped, and slipped them into his lab coat. He left the remaining “B” bottles in a designated long-term storage zone.

134. Kudryavtsev returned to the reception room, where he wheeled the “A” sample cart to the Aliquotting Room, No. 125, which was next door and shared a wall with the Operational Room, No. 124. Room No. 124 was not inside the security-controlled reception and storage zone.

135. Once in the Aliquotting Room, No. 125, Kudryavtsev crushed the “A” bottle caps. Kudryavtsev selected the matching “B” bottle from the group he took from the “B” bottles cart.

136. There was a circular hole (the “Mousehole”) in the wall that adjoined Rooms Nos. 124 and 125. The hole was large enough to pass BEREK-KIT bottles through. To avoid detection,

the Mousehole was covered by a circular plastic cap to give it the appearance of an inoperative power outlet. Photographs of the Mousehole from both sides of the wall are included in Attachment 4.

137. In the fall of 2013, Chizhov had the Mousehole drilled through the wall. Chizhov showed me the hole during an inspection trip to Sochi in October 2013.

138. During the Sochi Games, my team and I kept a piece of furniture in front of the Mousehole to conceal its existence. My team and I moved the furniture when operating through the Mousehole at night.

139. Kudryavtsev passed both the "A" and "B" bottles through the Mousehole to the Operational Room, No. 124.

140. Denis Kulyako, lab staff, guarded the Aliquotting Room door and corridor during swapping and when Kudryavtsev was passing bottles through the Mousehole to the Operational Room.

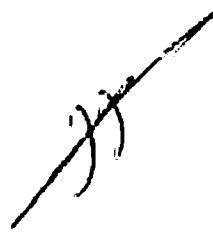
141. Chizhov received the "A" and "B" bottles through the Mousehole into the Operational Room.

142. I confirmed that the "A" and "B" bottles received had correct and matching code numbers. On the Catch of the Day table, I recorded the volumes of the "A" and "B" bottles.

143. I handed the "B" bottles to Blokhin, who was also in the Operational Room. Blokhin returned to the FSB Command Center to have the FSB Magicians remove the caps.

144. During the Sochi Games, Chizhov used the thawed clean urine to prepare the required volume of urine needed to be swapped. He prepared the urine in 250 ml glass beakers.

145. Chizhov and I checked the specific gravity of the prepared and thawed urine.



146. Chizhov dumped out the content of the "A" bottle and thoroughly washed the "A" bottle and a stopper.

147. My team and I waited for Blokhin to return from the FSB Command Center with the opened "B" bottles.

148. Blokhin returned with "B" bottles. The "B" bottles now had unattached bottle caps. The originals for the number etched in the top of the caps corresponded to the number etched on the "B" bottles.

149. The FSB team inserted new metal parts inside the plastic cap of the "B" bottle because the metal teeth ring inside the plastic cap was scratched when the FSB opened the bottles. The team had a storage of unused rings from the crushed caps of the "A" bottles.

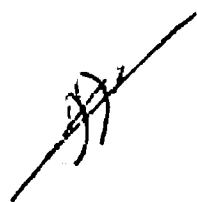
150. Chizhov dumped out the "B" bottles' contents and thoroughly washed out the "B" bottles.

151. Blokhin collected plastic bags with the remaining clean urine containers and left the room. Blokhin returned any athletes' unused clean urine to the FSB Command Center to return to the storage freezer. Athletes' clean urine storage was maintained through the Sochi Games, regardless of swapping, in the event that any athlete was subject to repeat testing and their clean urine was needed again.

152. Certain members of the female hockey, bobsled, biathlon, and skiing teams were tested multiple times during the Sochi Games.

153. Using cotton-tipped sticks and distilled water, I sanitized the inside of the "B" bottles' plastic caps while Chizhov washed the "B" bottles.

154. I paired the cleaned out "A" and "B" bottles with correct corresponding caps for "B" bottles and stoppers for "A" bottles on a lab table in the Operational Room. I carefully



checked all the numbers, names, volumes, and specific gravity measurements against the Catch of the Day table.

155. Chizhov and I checked the specific gravity of each sample again before pouring them into clean bottles.

156. I poured clean urine into the "A" and "B" bottles. I made sure that the volumes matched those listed in the Catch of the Day table.

157. I returned the "A" bottles' crushed caps to the bottles and sealed the "B" bottles with the intact caps. I tightened the caps and checked for leaks.

158. Chizhov passed the "A" and "B" bottles back to the controlled Aliquotting Room, No. 125, through the Mousehole to Kudryavtsev on the other side of the wall.

159. Kudryavtsev left the "A" bottles in the Aliquotting Room and took the "B" bottles to the designated long-term storage zone.

160. I destroyed the Catch of the Day table and deleted all the DCFs in my phone. I instructed my secretaries and Chizhov to delete any DCFs from their phones as well.

161. I called Rodionova and informed her that the swapping was complete.

162. I carried out nighttime urine swapping during the entire Sochi Games pursuant to this system devised to evade scrutiny from WADA's Independent Observer team and scientists and observers from the IOC and other countries. I was assisted by Blokhin and others. These actions are accurately described in the McLaren Reports.

Objective Three: Limiting Independent Testing

163. Russia had to have the ability to respond to any unexpected visits by WADA- or IOC-commissioned DCOs in the lead-up to the Sochi Games.



164. There were two possibilities for where urine samples for unannounced testing visits would be tested. Either (1) the samples collected during a WADA inspection or pre-competition urine testing would be sent abroad for testing or (2) they would be sent to me at the Moscow Lab for testing. Obviously, for the Sochi Plan to work, we needed to minimize the possibility of samples being taken away and tested abroad, as we could control matters if the samples were tested in our labs in Russia.

165. Nagornykh tried to solve this dilemma. To address when samples were to be sent abroad, Nagornykh worked with the FSB to create a system to intercept the samples at the border. I was not involved in the details of this part of the scheme.²⁰

166. If the samples were sent to me at the Moscow Lab, I would swap the urine using the athletes' frozen clean urine reserves.

167. Before the Sochi Games, a decision was made that the DCOs of RUSADA would conduct out-of-competition testing for Norwegian athletes (in Switzerland), and Norwegian anti-doping authorities would conduct pre-competition testing for Russian athletes.

168. To minimize the possibility of being caught "dirty," Natalia Zhelanova, an anti-doping "adviser" within the Ministry of Sports, decided that skiers should try to travel to Switzerland, where RUSADA would collect the urine samples, deliver the samples to the Sochi Lab, and hide the results. I learned about doping problems in skiing during a meeting on January 20, 2014, with Nagornykh, Zhelanova, and Professor Ramil Khabriev, the General Director of

²⁰ This same tactic has been used in several other cases. For example, in August 2008 just before the start of the Beijing Games, Dr. Gabriel Dollé sent someone from IDTM (a private company used for sample collection) to collect urine samples from four race walkers, including Olga Kamiskina and Valery Borchin, who went on to win gold medals in Beijing. Victor Chegin learned that the IDTM employee collected the samples and asked the FSB to intercept them. A Customs Officer, acting at the direction of the FSB, succeeded.

RUSADA. I did not learn which skiers successfully made it to Switzerland (although I trust international travel records must exist). I made a note of this meeting in the Sochi Diary I kept during the Sochi Games. The relevant entry is included in Attachment 5.

Financing of the Sochi Plan

169. The Sochi Plan required substantial additional expenditures, including for the under-the-table testing prior to the Sochi Games, compensation to lab personnel for overtime work to conduct analysis of under-the-table and washout samples, additional lab supplies, and reagents.

170. The Ministry of Sports was the source of funding for the Sochi Plan.

171. The funding was established through “research” grants. Nagornykh approved them with authority from Mutko. Nagornykh authorized 5 Grants.

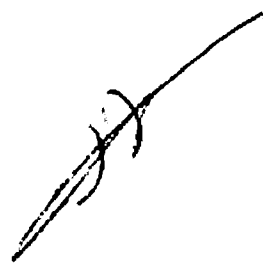
172. The following contracts were signed, approved, and passed electronic bidding on August 13, 2013:

- a. State Contract No. 262 for the amount of 9 million roubles.
- b. State Contract No. 263 for the amount of 16 million roubles.
- c. State Contract No. 264 for the amount of 8 million roubles.
- d. State Contract No. 265 for the amount of 7 million roubles.

173. The following contract was signed, approved, and passed electronic bidding in October 2013: State Contract No. 399 for the amount of 16 million roubles.

174. I submitted an Annual Antidoping Centre Report to the Ministry of Sports regarding lab financials. In April 2014, my report included a list of contracts documenting the total sum, name of scientific grant, and state contract number, as it was in 2013.

175. All Contracts referred to the XXII Olympic Games—the Sochi Games—in the title of the Scientific Grant Research purpose.



176. My 2013 Annual Report, which refers to each of the aforementioned State Contracts and was granted in 2013 to use for the Sochi Games, is included in Attachment 6.

177. I submitted a Report to WADA in June 2014 regarding the aforementioned Scientific Research Grants resulting in the State Contracts. My Report to WADA, where the five 2013 Contracts are listed, is included in Attachment 7.

178. In a contract dated December 23, 2010, the Sochi LOC was contracted to pay the Moscow Lab 43 million roubles for the services of the Sochi Lab for the 2014 Olympics Games. The contract is included in Attachment 8.

Execution of the Sochi Plan

179. Before, during, and after the Sochi Games, I had numerous conversations and meetings with Russian officials and individuals to discuss the execution of the Sochi Plan. Below, I try to give a very detailed description of key events, often on a day-by-day basis, to confirm the complexity and organization required to accomplish this scheme. I will not herein describe every event.

180. By January 2014, the Moscow Lab had a serious problem. On the one hand, I was in the midst of helping to plan the most elaborate and carefully-crafted doping ploy Russia had ever used in its long doping history. However, by this time, I was required to institute protocols to prove that the Moscow Lab was in compliance with WADA's standards, and in particular, quality control assurance, after the discovery of deficiencies during a series of WADA inspections in 2012 and 2013 and a WADA Disciplinary Committee hearing held in Johannesburg on November 13, 2013.²¹

²¹ This was another point at which I believed our day of reckoning had come. Two failed inspections led to a Disciplinary Commission hearing, which was likely going to result in the

181. Our preparation for Sochi, and our difficulties with accreditation, were complicated by another significant problem. On January 6, 2014—just the first day after starting the inspection—we began analyzing out-of-competition samples from race-walkers coached by Viktor Chegin. One famous race-walker, Yelena Lashmanova, was a presumptive positive for GW 1516 (a banned PED) after Initial Testing Procedures. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 9. At the time, we did not have access to the DCF for the sample, so we did not know it pertained to Lashmanova.

182. I immediately notified Nagornykh and advised him of the positive sample. I told him we had to run a confirmatory analysis with another aliquot taken from the “A” bottle. I told Nagornykh that if the result was confirmed, I would have to drop it in to WADA’s Anti-Doping Administration & Management System (“ADAMS”). He advised me to follow that procedure. The confirmatory analysis was positive, and the result dropped immediately in the ADAMS system.

183. On January 7, 2014, I spoke to Aleksey Melnikov, the State Coach for Athletics. He told me he had learned of a positive sample based on a report from a corrupt DCO, who had already been contacted by the IAAF about the positive result. Melnikov knew what I did not: the sample belonged to Lashmanova. Melnikov said Lashmanova was called to give a sample by IDTM. At the time, Victor Chegin, her coach, feared a positive result for Dexamethasone, and thus he submitted what he thought was clean urine from the freezer to the DCO (the DCO was corrupt and allowed urine substitution). However, the sample was not subject to pretesting and proved to be “dirty.” Melnikov was extremely upset and told me to “save her.” I told him I could

Moscow Lab losing its accreditation. This was another critical moment when the endemic corruption should have been recognized, but we escaped it.

not, and that the result was already dropped to ADAMS. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 10.

184. On January 8, 2014, I was called by Nagornykh, who wanted to discuss Lashmanova and the Sochi Games preparations. During the Sochi discussion, which lasted for two hours, we discussed (among other topics) the forthcoming Final Accreditation stage being conducted in the Sochi Lab by Dr. Olivier Rabin, WADA's Scientific Director, and the difficulty of doing this while preparing for the Sochi Games. Also during that conversation, I expressed to Nagornykh and Rodionova that we would face extreme time constraints during the Sochi Games given the amount of time in which we could safely swap urine samples during the night without any foreigners or observers present in the Sochi Lab. I said we needed an efficient way to know ahead of time which athletes were protected and which protected athletes gave urine each day so that we could prepare their samples ahead of time for swapping. I asked Nagornykh and Rodionova to provide me with (a) the number of protected Russian athletes for whom the Sochi Lab should expect to swap urines and (b) how many samples each athlete was expected to provide. The collection of this information led to the creation of what is now known as the Duchess List. The Duchess List was created by Alexey Velikodny based on information provided by Rodionova. It listed the Russian athletes protected by the Russian state-sponsored doping program. At the meeting, we also discussed what to do about Lashmanova. After much debate, we decided to defer the issue until after the Sochi Games, as I already had much work to do. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 11.

185. On January 9, 2014, Nagornykh called me, as he was still considering Lashmanova's case. He asked me about the reliability of GW 1516 detection. I informed him that the method for GW 1516 detection was "water-tight," and was the result of our joint research with

the WADA laboratory in Cologne. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 12.²²

186. On January 11, 2014, I received the Sochi Games-edition BEREG-KITs at the Sochi Lab. Oliver Rabin was on a visit to the Sochi Lab, and, on this date, he signed the Certificate of Accreditation for the Sochi Lab. I called Nagornykh with the good news, and he planned to brief Mutko. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 13.

187. On January 13, 2014, I discussed the Sochi Plan and urine-swapping with Blokhin. I provided Blokhin with sample Sochi Games-edition BEREG-KIT bottles, so that he and his team could work on the difficult technical tasks of opening that particular bottle edition without detection. This was the FSB's main contribution to the Sochi Plan. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 2.

188. On that same day, Kiushkin brought me the Duchess Cocktail (Martini version) to test on myself. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 2.

189. On January 15, 2014, I met with Alexander Kravtsov (Director of the CSP), then met Nagornykh in the Ministry of Sports to discuss the Sochi Plan. The concern of this meeting was about the biathlon team, specifically that half was under Rodionova's control and half was under Stasik Dmitriev's control, and he was a prominent source of EPO. I expressed concern

²² In fact, we interrupted our discussions about Lashmanova at this stage to focus on Sochi preparations. Thus, I will conclude the discussion about Lashmanova in paragraphs 225-236 below.

about the two of them controlling all doping carefully. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 14.

190. On January 16, 2014, I met with Rodionova and Kiushkin. After Kiushkin left, Rodionova and I discussed the consolidation of the clean urine bank and its transportation from CSP to the FSB Command Center. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 15.

191. On that same day, I also met with Blokhin to discuss the last details of the urine-swapping logistics. Blokhin and I also discussed the details of clean urine storage and transportation from Moscow to Sochi, because Blokhin had FSB authorization to access protected doors and perimeters. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 15.

192. On January 20, 2014, I met with Nagornykh, Professor Khabriev, General Director of RUSADA, and Natalia Zhelanova at the Ministry of Sports to discuss urine sample collection. A team of Norwegian DCOs had been assigned to collect urine samples from skiers within Russia. There was a great danger of catching skiers before their washout period had finished. The Norwegian DCOs were very aggressive. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 5.

193. On this date, I also met with Nagornykh, Rodionova, Zinatulla Bilyuletdinov, State Coach of Men's Ice Hockey, and Valery Konov, Team Doctor of Men's Ice Hockey. Both Konov and I were strongly against distributing the Duchess Cocktail to their team. I was against distributing the Duchess Cocktail to the men's hockey team because they were unregulated and I knew they would not administer the Duchess Cocktail and protocol as directed. As such, including them on the list was a risk because there was no guarantee that they would stop using the Duchess

Cocktail according to the plan. I feared that if a men's hockey player became injured or unable to compete, they would leave Russia and be subject to doping control abroad (many played in the NHL), and the Duchess Cocktail would be detected. Bilyuletdinov, Konov and I met separately and agreed to continue our opposition. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 5.

194. On January 21, 2014, I received a version of the Duchess Table from Velikodny, who also later sent me the Medal Table.

195. I later learned that Rodionova then supplied the Duchess Cocktail to the Women's Hockey Team and included them as protected athletes. That is why the Women's Hockey Team was not included in the original Duchess List created in January 2014 (see Attachment 16). Rodionova later added them to the "protected" list, although we had never tested their urine patterns before competition.

196. On January 22, 2014, I continued my conversations with Rodionova and Velikodny about swapping details. Rodionova agreed to drop three athletes from the Duchess List because they had been training in the United States. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 17.

197. On January 26, 2014, I called Rodionova. During that call, I made sure she understood that she needed to personally assure that she delivered all clean urine samples for all protected athletes. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 18.

198. On January 27, 2014, RUSADA delivered athletes' urine samples to the FSB Command Center for storage. It was also the first day of the Sochi Lab accreditation, which meant it was the first day it could receive samples. The set included 22 samples from Norwegian skiers



and biathletes brought by RUSADA DCO Andrey Prokofiev. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 19.

199. On January 28, 2014, I met with Alexey Slautin, from the Sochi LOC, and Veronika Popova, from RUSADA, to discuss the Olympic test distribution plan ("TDP"), which listed the schedule of testing for the Sochi Games. Slautin provided us with information regarding IOC testing plans each day, both pre- and in-competition testing. Most importantly, this information allowed Rodionova and the Russian athletes to know which athletes would be subject to doping control each day, allowing us to better plan the swapping procedure. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 20.

200. On the same day, I met with Davyd Yakovlev and Blokhin at the FSB Command Center to discuss permission for me, my car, and other Lab workers to have access through Olympic checkpoints at any time. We needed such permission to allow overnight access for the swapping procedure. He granted the permission. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 20. Blokhin allowed me to take his picture inside the Command Center, which is included in Attachment 21.

201. Later that night, I received a call from Alexander Kravtsov, Chief of Russia's Olympic delegation, who informed me that two female biathletes who had qualified for the Sochi Games – Ekaterina Iourieva and Irina Starykh – failed an EPO test based on samples collected during out-of-competition testing in December in Austria. This was a disaster so close to the Sochi Games. Sergey Kushchenko sent me their relevant Laboratory Documentation Packages. I kept

a note of this in the Sochi Diary. A copy of this entry is included as Attachment 20. Both athletes were disqualified from the Sochi Games on the basis of this test.²³

202. On January 29, 2014, I spoke to Rodionova about Iourieva and Starykh. Her main question was whether a method existed to discredit the analysis. Since it did not occur in the Moscow Lab, I told her it was impossible. She said that Mutko was furious and blamed the Biathlon Union, which caused “mayhem” and was “careless.” I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 22.

203. On January 31, 2014, Slautin brought me an Asahi densitometer, which measures specific gravity in urine, to use to test urine during the swapping process, ensuring that the inputted urine was acceptable. The Asahi densitometer was the same model as used at the Doping Control Stations. Having this instrument was critical to the swapping scheme, as we had to match Clean Samples with the specific gravity noted on the DCF. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 23.

204. On that same day, I called Nagornykh, saying that I needed to meet him for an in-person discussion. I met him at the Azimut Hotel later. I reported that everything was set for the Sochi Plan. Nagornykh indicated to me that he would report the same to Mutko – that everything was all set for the Sochi Games. I told him that, as a final precaution, I needed to inspect the storage facility of clean urine at the FSB Command Center. He agreed to call the FSB to make sure I got access. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 23.

²³ I later learned from Rodionova that Starykh was planning to publicly disclose that Stasik allegedly advised her to inject herself with EPO while she was training abroad. Rodionova told me that Mikhail Prokhorov, the President of Russian Biathlon Union, paid Starykh millions of roubles to stay silent.

205. On February 1, 2014, pursuant to Nagornykh's instructions, Blokhin took me to the FSB Command Center, where I inspected the freezers and the clean urine samples to make sure everything was in order. As I had anticipated, the samples were very disorganized. I completed a full inventory of the samples. I told him he had to have them reorganized, separating the samples on the shelves of the freezer by sport, and then alphabetically by athletes' last names. I said in strong words that I had to report to Nagornykh that "nothing is ready," and he agreed to immediately reorganize the samples. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 24.

206. On February 3, 2014, I met with Mutko and Nagornykh at the LOC Headquarters in Sochi to discuss the ongoing Sochi Plan. Before the meeting, Nagornykh asked me to print the Duchess List for Mutko the Medal Table, which anticipated Olympic testing for those athletes on the Duchess List. When I met Nagornykh at Mutko's office, I gave him the materials I printed, including the Duchess List and the Medal Table. When we began the meeting with Mutko, Nagornykh handed the papers to Mutko. I told Mutko certain details about the doping scheme during this meeting, including: (a) my concern about our ability to do "under-the-table testing" in the Moscow Lab with so much WADA scrutiny on that lab, which is why we were trying to move that operation to Sochi; and (b) my work in developing other performance-enhancing schemes with use of peptides, which could help evade detection. Mutko asked whether, to further develop the program, we needed to keep the Sochi Lab in operation after the Sochi Games concluded. I said it would be fantastic to keep it. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 25.

207. On February 5, 2014, late in the evening, I returned to hotel room only to learn (via a series of texts messages) that bobsledders had been called by DCOs to give urine. I immediately

returned to the lab, and Blokhin was there too, having received the same texts. We worked very late swapping the bobsledders' urine through the night. I returned home at 3:30 am. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 26.

208. On February 6, 2014, WADA inspected the Sochi Lab. WADA's Independent Observer—Andy Parkinson (the Head of WADA's Independent Observer Team) and Thierry Boghosian (Laboratory Accreditation Manager)—did not find the Mousehole.

209. On this date, we also had a swapping session, when I experienced problems with the DCF and chain-of-custody forms. There were fewer samples to swap this night. However, it was still a difficult night. The DCOs were not trained well and had failed to complete all fields in the DCFs fully. So, it took us longer than it should have, and I worked until 5:30 am. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 27.

210. The Sochi Games started on February 7, 2014. That night, we had a swapping session for the Women's Hockey team.

211. On February 8, 2014, I got a surprise call from Nagornykh, saying that I had to go to the Azimut Hotel to meet with Mutko. After a few days of swapping, I assumed (but Nagornykh did not say) that Mutko wanted to know whether our plan was succeeding. I assume Mutko wanted to "look me in the eyes." The meeting would have been visible to members of the media, as we were on a balcony separated by a glass wall and some security. Mutko spent the first approximately 30 minutes talking about the Opening Ceremony. After that, Mutko referred back to our earlier discussion about the preservation of the Sochi Lab to further enhance the doping program, and he instructed me to write a letter to him justifying the continued existence of the lab. Otherwise, he asked me nothing about the urine-swapping, which surprised me. I kept a note of



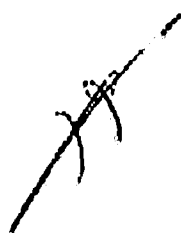
this in the Sochi Diary. A copy of this entry is included as Attachment 28. A copy of the memorandum is included as Attachment 29.

212. On February 11, 2014, Sir Craig Reddie, the President of WADA, visited the Sochi Lab. I was present with him and gave him a tour of the Sochi Lab, although I did not take him to the reception and Aliquotting Room. Reddie posed for a photograph with the entire staff, which is included at Attachment 30. For two nights, Thierry Boghosian, the WADA Independent Observer, stayed late in the lab. Thankfully, on those nights we were not required to swap urine samples. But, when I reported this to Nagornykh and Blokhin, they were furious.

213. During this period, I usually wrote diary entries in my office, where I kept it. Blokhin saw me writing and became concerned. He suggested that I refrain from writing any "critical details," so I thereafter tried to limit the detail concerning swapping specifically. I did not follow this carefully, as other entries exist.

214. On February 15, 2014, I met with Rodionova to discuss Alexander Tretyakov, who won the gold medal in skeleton racing. He was an important "client" of Rodionova's and a participant in the doping protocol. Rodionova was very concerned that, somehow, his dirty urine would be discovered, so she asked whether there was any risk. I assured her that the swapping went according to plan. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 31.

215. That night was a heavy night of urine swapping. Chizhov and Blokhin were running back and forth to prepare and execute urine swapping in a timely manner. They had difficulty keeping up the pace. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 31.



216. On February 17, 2014, I met with Mutko and Nagornykh in the Olympic Village. They called on me without any prior announcement. I could not come when they were ready, as I was reporting to the IOC Medical Commission and also had a personal medical examination. They waited for me. When I arrived, we ate lunch. As the meal ended, Nagornykh said: "show your performance tonight." I took this as a reference to the urine-swapping process and Nagornykh's desire that it run smoothly. I shook their hands and left. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 32.

217. On February 17, 2014, it was another busy night of urine swapping. I got home at 5 am. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 32.

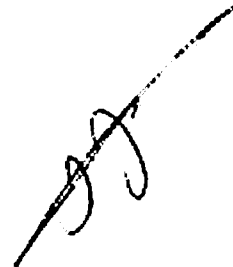
218. On February 19, 2014, I removed all texts and photos related to swapping and athlete-identifying code numbers from my telephone. I directed Diachenko and Chizhov to do the same. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 33.

219. On February 20, 2014, I met with Aleksey Kozhanov, a FSB officer and reported to him that the urine swapping was a huge success at Sochi. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 34.

Sochi Games: Effectiveness of the State-Sponsored System

220. As a result of the Sochi Plan, Russia achieved historic results at the Sochi Games: a total of 33 medals, with 13 Gold Medals, 11 Silver Medals, and 9 Bronze Medals.

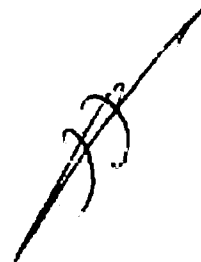
221. During the Sochi Games, our Sochi Lab did not identify a single dirty Russian athlete, which was the obvious purpose of the Sochi Plan. If asked, I could provide specific information regarding violations of the World Anti-Doping Rules pertaining to many other Russian athletes who competed at the Sochi Games, including medal winners.



222. Although during the Sochi Games we did not (by design) identify a single Russian athlete as having tested dirty for banned substances, we did find positive reports for non-Russian athletes. We published a report on our findings on October 13, 2014, which showed 38 adverse analytical findings, which led to 8 anti-doping rule violations. No one seemed to notice that we caught other cheaters, but not a single Russian athlete.

223. We did not try to spike PEDs into clean urine for foreign competitors, although Nagornykh previously made that suggestion. I had a discussion with Nagornykh in early April 2013—when he learned that we were able to de-cap the “B” bottle. He asked me whether we had the ability to make a Clean Sample dirty, to disqualify innocent athletes. He was particularly concerned with Ukrainian female biathletes, who posed the most serious challenge to Russia’s relay team during the Sochi Games. At this time, a competition in Moscow—The Biathlon Champions Race—was ongoing, so we had a sample from the Ukrainian team leader, Vita Semerenko. Nagornykh asked me to “make the sample dirty.” I convinced him to drop this idea, explaining that a reanalysis would show the PEDs were spiked into the sample, since they would not be accompanied by metabolites (showing that the PEDs passed through a human body). This explanation was not completely true for all PEDs, but I could not have done this to an innocent athlete. During my career, I reported hundreds of Dirty Samples as clean, but never the other way around.

224. Despite not having identified a single Russian athlete as dirty during the Sochi Games, and in my view because of that fact, I was awarded the Order of Friendship, which was presented to me by the current Minister of Sports, Pavel Kolobkov. Included at Attachment 35 is a photograph of the award and an accompanying certificate signed by President Vladimir Putin.

A handwritten signature in black ink, appearing to be 'V. Putin', written diagonally across the page.

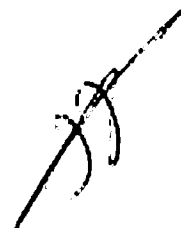
Post-Sochi Events: Lashmanova

225. After the conclusion of the Sochi Games (including the Paralympic Games, where we also used a swapping protocol on a smaller scale), it was time to revisit what was to be done with Lashmanova's dirty test for GW 1516.

226. As noted above, on January 6, 2014, the Moscow Lab was analyzing five out-of-competition samples collected by IDTM. One tested positive for a banned substance, GW 1516. We subsequently realized that the sample belonged to Lashmanova. I spoke to Melnikov, who asked me to save her. As noted above, Melnikov blamed Chegin for the situation. According to Melnikov, Lashmanova was called for testing by a corrupt DCO. Chegin knew that Lashmanova was being treated with a corticosteroid, Dexamethasone, and thus believed she would test dirty. Chegin did not realize that, in an out-of-competition period, corticosteroids are permitted. Thinking her dirty, Chegin substituted with a stored sample but, unbeknownst to him, it was dirty. Thus, Melnikov protested that Lashmanova should be protected from Chegin's stupidity.

227. On March 14, 2014, I received a call on my cellphone from Minister Mutko. My phone "powered down," so I ran back to my car to charge my cellphone and waited for Mutko to call again. In the ensuing discussion, he expressed extreme anger with me for allowing a Dirty Sample on Lashmanova to be reported to ADAMS. Although I tried to explain, he would not listen. I gave him my promise that I would try to think of a way to "save" her, although I knew this was not possible. I believed Mutko's anger was caused by Chegin blaming me and not taking responsibility for being more careful in his doping preparations. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 36.

228. On March 21, 2014, I dined with Melnikov and Chegin at a steakhouse in Sochi. Again, they pressed me to "save" Lashmanova. I said it was not possible and would lead to



extreme difficulties for the Moscow Lab. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 37.

229. On March 24, having returned to Moscow, I had a meeting with Nagornykh, who confirmed that Chegin continued to press his case with Mutko and Nagornykh to “save” Lashmanova by falsely reporting the test on her “B” bottle as clean. I felt incredible pressure, as Nagornykh said Mutko seemed to be siding with Chegin. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 38.

230. On April 21, 2014, I decided to prepare a memorandum, in table format, of the “pros” and “cons” for attempting to save Lashmanova (the “Pro-Con Analysis”), which is included in Attachment 39. Rodionova and I went to see Nagornykh. As we waited, we saw Melnikov and Alexsey Desinov (a doctor on Chegin’s team) leaving Nagornykh’s office. When we met Nagornykh, I presented the information from the Pro-Con Analysis. Eventually, Nagornykh agreed. He approved the Pro-Con Analysis and called to Mutko to make an appointment. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 40.

231. In the Pro-Con Analysis, I described the risks for Lashmanova, and for Russia, of reporting the “B” sample as positive or negative for banned substances. Among other reasons for truthfully reporting a positive (dirty) result was that “[t]here is no need to conduct retrospective analysis of Russian athletes’ samples.” On the flip side, I advised that the possible ramifications for falsely reporting her sample as clean: Any samples stored at Moscow Lab may be sent to Lausanne for reanalysis on WADA’s request, which can lead to disqualification due to targeted application of the new analysis methods. I further advised that, “IAAF will venture to do the retrospective analysis of samples from Osaka (2007) and Berlin (2009), which will result in up to twenty positive samples.” (Emphasis in original). Quite obviously, I wrote this because Mutko

and Nagornykh both knew fully about the Russian doping program and the likelihood that re-testing of the stored samples would cause many dirty athletes to be exposed. One must appreciate that, after an "A" bottle tests positive for banned substances, it is quite impossible that the "B" sample would test clean, and this would have been a major "red flag" to the IOC and WADA that we were manipulating the test. As I mention in the Pro-Con Analysis, I was aware of only one time it happened in the case of an Olympic champion, in the case of Marion Jones, who was later proved to be guilty of doping herself.

232. However, later in the day on April 21, 2014, I met with Mutko and Nagornykh. When we arrived, Nagornykh gave Mutko a copy of my "Pro-Con" analysis. Although Mutko was still angry about the positive test result for GW 1516, he listened carefully as I described the risks of falsely reporting her urine in the "B" bottle as clean. I told Mutko something he did not know, which was a turning point in his thinking: that Chegin had actually substituted Lashmanova's urine with his own hands. I further told him that Chegin did not have to do this, because Lashmanova had only been taking a permitted substance at that time. Mutko became enraged, but thankfully not with me. He said he would call Chegin and Balakhnichev for further explanation. Mutko directed that I should schedule the "B" bottle analysis. I went back to the laboratory and sent an email to Thomas Capdivielle, IAAF, to advise that the "B" bottle analysis would take place on April 24. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 40.

233. Also on April 21, I wrote Melnikov an email, providing a copy of the "Pro-Con" analysis I had prepared for Mutko and Nagornykh. In the email, I tried to strongly state my objections to falsifying a report on the "B" bottle: "We will be buried for her . . . The situation is not as before . . . appreciation of Russia has been changed, Sochi success cannot be absorbed . . .

A handwritten signature in black ink, appearing to be 'J. J.', is written over a diagonal line that extends from the bottom right towards the center of the page.

I had written to Nagornykh explicitly . . . For me does not matter anymore who is firing me – Mutko or WADA.” A copy of this email is in Attachment 41.

234. On April 23, 2014, I met again with Mutko, Nagornykh, Melnikov, and Chegin. Mutko, again, had my “Pro-Con” analysis in front of him. Although Chegin berated and attacked me, Mutko now understood it was an impossible decision. He directed that I conduct an actual test of the “B” bottle and drop the results to ADAMS, no matter what the findings. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 42.

235. Just before the opening of “B” sample, Melnikov and Aleksei Desinov, a doctor from Chegin’s group, came to my office and demanded to see me. Together, they tried to influence me—despite Mutko’s orders—to find Lashmanova’s “B” sample clean. They offered me a bribe of €300,000 to “save” her. I refused. Desinov in particular went on at length about my patriotic obligations. I ignored them. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 43.

236. A lab analyst conducted the analysis of Lashmanova’s “B” sample on April 24, 2014. As I anticipated, the “B” sample confirmed the presence of GW 1516. We dropped the report to ADAMS. I kept a note of this in the Sochi Diary. A copy of this entry is included as Attachment 43. Not surprisingly, although Chegin’s training center was supposed to pay the lab for the “B” analysis, he refused.

Crisis Caused by Documentary Aired on German Television

237. On December 3, 2014, a documentary aired on a German television station, ARD, which made accusations about the Russian state-sponsored doping program. Among other evidence, the documentary included secretly recorded discussions by other whistleblowers. This documentary sent shockwaves internally within the Moscow Lab and the Ministry of Sport.

238. In January 2015, I was then contacted by my FSB supervisor, and asked to write a memorandum discussing the dangers posed by this documentary to Russia's National Teams.

239. I wrote that memo, which is attached as Attachment 44, which predicted that—if the IOC ordered re-analysis of stored urine samples—many Russian athletes would be revealed as having taken banned substances. I made suggestions for how to address this concerning issue.

240. Later, I got a call from Nagornykh. He told me that Mutko had learned of my submission to the FSB and was livid that I informed them without getting his permission. I later spoke to Blokhin. According to him, the FSB deemed the memorandum as a "secret" and would not give it to Mutko, although they apparently told him of its existence. I decided to revise the memorandum and submit to Mutko.

241. I revised the memorandum, a copy of which is in Attachment 45. I gave it to Nagornykh to submit to Mutko. I also gave a copy to Blokhin.

242. On December 9, 2014, I received a WADA letter from Dr. Olivier Rabin stating that WADA anticipated visiting the Moscow Lab. WADA visited the Moscow Lab on December 17-18, 2014. I knew that WADA would likely seized stored urine samples, many of which would have tested positive for PEDs. I consulted with Nagornykh about how I should proceed to avoid detection of positive urine samples kept at the lab which were previously reported as negative in ADAMS. I told Nagornykh that we would have to swap 30 urine samples and destroy the approximately 8,000 paired samples retained at the Moscow Lab that were dirty samples in order to evade WADA. Nagornykh agreed. Accordingly, I and others at the lab swapped and destroyed the samples over the course of two days, December 13, 2014 and December 14, 2014. My Moscow Lab acquired two large trash bins and discarded the bottles. The bins were taken by our contracted trash collector to remove the trash bins and remove them from Moscow, Russia to the trash

polygon. Nagornykh actually visited the lab both days and oversaw the process to make sure it was complete.

243. On December 12, 2014, Mutko called me and indicated that he was pleased with my work to cover-up positive urine samples stored in the Moscow Lab before the WADA inspection.

244. On November 10, 2015, Mutko directed me to resign as Director of the Moscow Lab.

245. On April 1, 2015, Mutko responded to the crisis by appointing a new "anti-doping adviser," Natalia Zhelanova, who had been (unbeknownst to the world), deeply involved in the Russian doping program, as discussed above.²⁴ In making the announcement, Mutko said: "In the future, I want to have a deputy who will look after questions regarding education, science and the fight against doping. The appointment of Natalia Zhelanova is a move in that direction."

Conclusion

246. As noted above, I hope the Schmid Commission will specifically require Russia's cooperation by disclosing all evidence, including (a) stored samples, (b) instrument data, (c) lab-information-management-system data, (d) server and other electronic and back-up data for its laboratory equipment and information systems at the Moscow Lab, and (e) doping control forms and other doping control information of Russian athletes at the Sochi Games which would corroborate my testimony fully. WADA has demanded that Russia produce this information before RUSADA and the Moscow Lab can be re-certified under the World Anti-Doping Code. This evidence could be highly relevant to the Commission's work and ultimate conclusion.

²⁴ <http://uk.reuters.com/article/uk-doping-russia/russia-appoints-anti-doping-adviser-idUKKBN0N11SP20150410>.

247. But, putting aside the evidence Russia apparently refuses to disclose, I hope the Schmid Commission will consider all the other evidence available in deciding whether to credit my account of the state-sponsored doping system within Russia:

- a. Russia has topped WADA's list of doping violators for the past three years, amassing a total of 549 violations;
- b. Retesting of samples from the London and Beijing Games demonstrates that 28 percent of new doping violations are from Russian athletes;
- c. Analysis of the BEREK-KIT bottles has revealed marks and scratches consistent with my account;
- d. The evidence outlined in the report by the WADA Independent Commission on November 9, 2015;
- e. The evidence outlined in the amended, second report by the WADA Independent Commission on January 27, 2016;
- f. The evidence outlined in the report by the WADA Independent Person, Richard McLaren, on July 18, 2016;
- g. The additional evidence in the second report by the WADA Independent Person, Richard McLaren, on December 9, 2016;
- h. The evidence presented in the ARD Documentaries.
- i. This summary requires us to recall the words of the WADA Independent Commission's Report of November 9, 2015: "[W]hen considering future actions and previous patterns of conduct in regard to the Moscow laboratory, it is important to draw upon the experiences and patterns of previous violations."

248. I am aware that my credibility is being attacked, primarily from officials and athletes within Russia. Russia has apparently accused me of "abusing my position" in a criminal indictment. I understand they also presented a warrant to Interpol, either for the "abuse" charge or something related to the shuttered 2011 investigation. I hope the Schmid Commission sees this for what it is: Russia trying to silence me and other whistleblowers, and further evidence of its guilt.

249. That said, I know I have disappointed many friends and colleagues with my duplicity while serving as Director of the Moscow Lab. Without excusing my actions, I hope all can understand the system in which I was operating. I hope my cooperation with the Schmid Commission, the Oswald Commission, WADA, and Professor McLaren can serve as a form of repentance and absolution.

250. Everything said above is true and accurate to the best of my recollection.



Dr. Grigory Rodchenkov

Dated: November 2, 2017