

AFFIDAVIT OF DR. GRIGORY M. RODCHENKOV

I, **GRIGORY M. RODCHENKOV**, being duly sworn in accordance with United States law, deposes and says:

1. I am an individual witness and the former Director of the 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 Federation (“IOC”) Disciplinary Commission chaired by Denis Oswald (the “Oswald 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 Moscow Institute of Food Industry.

6. In March 2005, Viacheslav Fetisov appointed me as the Director of the Moscow Lab. I served as the Director until 2015 when I fled Russia. I left Russia because of 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 Organizing Committee for the Sochi Olympic Games and accredited by WADA for use during the 2014 Sochi Winter Olympic and Paralympic Games (officially known as the XXII Olympic Winter Games, and which were held in Sochi, Russia, from February 7 to February 23, 2014) (together, the “Sochi Games”).

8. The purpose of this Affidavit is to summarize the Russian state-sponsored doping program during the Sochi Games. I have not included each and every fact of which I have knowledge, as I understand that the Oswald Commission asked for (a) a brief summary of doping activities of the Russian Federation and (b) relevant information known to me concerning six (6) specific athletes. Where, herein, I describe discussions with other conspirators, I describe the discussions in sum and substance, rather than verbatim. I have selected 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 has extensive other evidence of the state-sponsored doping program, including (a) stored samples, (b) instrument data, (c) lab-information-management-system data, and (c) server and other electronic and back-up data for its laboratory equipment and information systems at the Moscow Lab, which would corroborate my testimony fully. The World Anti-Doping Agency (“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 information could be highly relevant to cases involving the McLaren evidence including potentially the six athletes referred to in this Affidavit, which the Commission requested for me to address. If Russia refuses to produce this evidence, I hope the Oswald Commission would reach an obvious conclusion: such refusal is further evidence of guilt.

10. I am aware of Russia’s history and practice of state-sponsored doping and cover-up of positive tests, including at other Olympic competitions and World Championships events and during the course of normal operations of its sporting federations in the Moscow Lab. This Affidavit will not address systematic doping or other doping at these other events or at times other than at or during the preparations for the Sochi Games.

11. In 2016, I was interviewed on three occasions by Professor Richard H. McLaren, the Independent Person appointed by WADA, concerning my knowledge of the manipulation of the doping control systems of Russia before, during, and after the Sochi Games (the “Sochi Plan”), which was orchestrated by then-Minister of Sports Vitaly Mutko and the then-Deputy Minister of Sports Yury Nagornykh, financed by the Ministry of Sports, and which was carried out by dozens of other Government and Russian Anti-Doping Agency (“RUSADA”) officials and employees (including me). This Affidavit will not detail the extensive evidence of Mutko’s and Nagornykh’s involvement, but I will submit such details to the IOC Commission chaired by Samuel Schmid (the “Schmid Commission”). I was fully candid and truthful with Professor McLaren, and his factual findings contained in his reports—dated of July 18, 2016 and December 9, 2016 (the “McLaren Reports”)—are accurate.

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

Relevant Persons

12. Vitaly Mutko. Mutko was appointed the Deputy Prime Minister of Russia in 2016. Between 2008 and 2016, Mutko served as the President of the Russian Football Union and Russian Ministry of Sports, Tourism and Youth Policy. In 2012, the Russian Ministry of Sports, Tourism and Youth Policy was reorganized as the Ministry of Sports.

13. Yury Nagornykh. Between 2010 and 2016, Nagornykh was the Russian Deputy Minister of Sports. Nagornykh was a member of the Russian Olympic Committee. He was removed from that position in 2016 in apparent response to the McLaren Reports.

14. 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.

15. Aleksei Velikodny. Velikodny was Nagornykh's assistant and second in command. Nagornykh appointed Velikodny to facilitate the day-to-day operations leading to Sochi Games.

16. 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 performance enhancing drugs ("PEDs") before and during the Sochi Games. Rodionova managed the process of coordinating collection of athletes' "clean" urine samples and distributing the Duchess Cocktail. She was assisted in developing a clean urine bank for use at Sochi by the FSB (former KGB).

17. Natalia Zhelanova. Zhelanova was the head of doping control section in the Ministry of Sports. Additionally, she oversaw and influenced operations of RUSADA.

18. Nikita Kamaev. Kamaev was the Director of RUSADA. Kamaev oversaw athlete 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 he was writing a tell-all book about the Russian state-sponsored doping program.

19. Evgeny Antilsky. Antilsky was the Manager of the Doping Control Station 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.

20. Evgeny Blokhin. Blokhin is a Federal Security Service ("FSB") officer. He operated and controlled FSB access between the Sochi Lab and FSB Command Center, which was adjacent to the Sochi Lab. He oversaw a team of FSB officers tasked with opening allegedly "tamper-proof" Beregkit bottles, in which athletes' urine samples were stored after official urine collection.

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

22. Yury Chizhov. Chizhov was my assistant and second in command in the Sochi Lab.

Overview and Creation of the Sochi Plan

23. In the fall 2012, Russia began the planning process for the Sochi Games. The efforts were led by Mutko. 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.

24. Although described in more detail in Professor McLaren's reports, and in even greater detail in my forthcoming Affidavit for the Schmid Commission, the Sochi Plan had three primary objectives.

25. First Objective: The use of PEDs with a limited "wash-out" period, meaning that the PEDs undetectable in urine after a very short period of time.

26. 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, among many other, steps: (a) wide-scale collection of Clean Samples from Russian athletes who might qualify for the Sochi Games; and (b) the ability to open allegedly tamper-proof bottles

manufactured by Berlinger Special AG, which contained athletes' urine samples collected by Doping Control Officers ("DCOs").

27. Third Objective: The ability to hinder testing of Russian Olympic athletes by the IOC or WADA, and delivery of samples abroad.

28. Nagornykh managed all aspects of what became known as the Sochi Plan, and he said he would keep Mutko informed of all key milestones. I directly briefed Mutko three times during the Sochi Games on the progress of the Sochi Plan.

First Objective: The Three-steroid Duchess Cocktail

29. 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.

30. Prior to my development of the Duchess Cocktail, many Russian athletes were using Oral-Turinabol, an anabolic steroid, to boost performance and to speed their recovery times during training. Russian athletes, coaches and team doctors had believed that Oral-Turinabol had a short-detection window and that it was a good drug to ingest when preparing for athletic competition.

31. At the end of 2010, a lab analyst in Moscow, who also worked at the Sochi Lab, discovered during research and testing that Oral-Turinabol that use of Oral-Turinabol can be detected through identification of its long-term metabolites. He learned it is retained in an athlete's body for longer than expected and the detection window during urine analysis was enlarged: from approximately 1 week to up to approximately 5 months.

32. This created a problem for the doping program. Even with careful monitoring of wash-out periods, it would be difficult for any athlete to have a time period where their urine was

clean and would test negatively for PEDs. The “washout period” is the time it takes for a PED or its metabolites or markers become undetectable in an individual’s urine.

33. Another problem was the forthcoming reanalysis of 2008 Beijing samples. If the IOC re-tested Russian National Team samples from that competition, they would test positive because one or more long-term metabolites from Oral-Turinabol because they would have still been detectable in urine with new laboratory testing techniques to identify long-term metabolites.

34. When I learned of this issue, I knew it could be a disaster for Russian athletes at the 2012 London Olympics and the Sochi Games.

35. I always wanted to keep the Moscow Lab clean (meaning 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 Moscow or Sochi Lab’s accreditation.

36. 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.

37. 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 of the dangers that other anti-doping authorities would realize the long-term detectability of Oral-Turinabol, which could spur them to go back and test old, stored urine samples. 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 Olympics in 2012 and Minister Mutko urged me to find a similar doping product that could be used by Russian without risk of detection.

38. 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.

39. 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 directly and quickly be transmitted into their blood stream and target muscle tissues.

40. 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.

41. 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.

42. 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 on my urine sample 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.

43. 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.

Objective Two Prep, Part A: Clean Sample Collection

44. 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 Olympics. Thus, notwithstanding the short wash-out period, positive urines 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.

45. The Ministry of Sport, 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 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 and the Russian National Team, Rodionova created a list of athletes that were to receive complete blanket protection and doping protocol leading up to and at the Sochi Games. Nagornykh told me that Mutko had also reviewed and approved the Duchess List.

46. On January 21, 2014, Velikodny sent me the Duchess List.

47. The swapping policy was an insurance policy for all athletes on the Duchess List. If their coaches stopped having them ingest the cocktail more than 5 days before 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.

48. 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 test clean, either because they were not taking PEDs or because the sample was collected far after their washout period.

49. 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. As such, athletes collected urine in Coca Cola, juice, baby nutrition, and other commercial unofficial bottles after strenuous training sessions. Again, this would be extremely unusual for an athlete, as urine is generally collected in medically-approved containers. For an athlete to place urine in soda and baby bottles would be a tell-tale indication to the athlete knew that the urine was being collected for an ulterior purpose.

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

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

52. Lab Analysts in the Moscow and Sochi Labs, and I, carefully tested 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.

53. My staff catalogued all athlete samples, logged all samples and passed them to Rodionova to store in the CSP until they were transported to the FSB building in Sochi, which we referred to as the “Command Center.” The CSP equipped the Command Center with freezers and refrigerators to handle the storage of urine. The Command Center was located 100 meters from the Sochi Lab. Blokhin was in charge of all operations within the Command Center, which was the location where the FSB Magicians were opening Beregkit bottles during the week before and during the Sochi Games.

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

55. On February 1, 2014, Blokhin, Chizhov, and I visited the 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.

Objective Two Prep, Part B: Opening the Beregkit Bottles

56. The FSB was solely responsible for opening the Beregkit bottles before and during the Sochi Games. The team was supervised by Blokhin, and we internally referred to this team as the “Magicians.”

57. Blokhin had a variety of Beregkit bottles 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 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.

58. I never observed firsthand any bottle being opened or de-capped. Therefore, I do not know the precise method the FSB used to open the Beregkit bottles. 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 removal of the caps, I did not observe any changes when the bottles and caps were returned.

59. On January 13, 2014, I provided Blokhin with additional Beregkit bottles, which would be used at the Sochi Games. I kept a note of this in my contemporaneous diary, which reflected my daily activities before, during, and after the Sochi Games. A copy of this entry is included as Attachment A.

Objective Two, Main Goal: Urine Swapping

60. The following describes the step-by-step process of the Sochi Urine Swapping Scheme. The steps include: (1) process of urine collection and documentation of the Doping Control Form (“DCF”); (2) daytime preparations at the Sochi Lab for nighttime urine swapping; (3) daytime preparations at the Olympic Village and Doping Control Stations; and (4) the nighttime urine swapping process.

61. I carried out nighttime urine swapping during the entire Sochi Games pursuant to a system devised to evade scrutiny from WADA's Independent Observer and observers from the IOC and other countries. I was assisted by Blokhin and others. These actions are accurately described in the McLaren Reports, and will be further detailed in my forthcoming Affidavit for the Schmid Commission.

Objective Three: Limiting Independent Testing

62. Russia had to have the ability to respond to any unexpected visits by WADA or the IOC missioned DCOs before and leading up to the Sochi Games.

63. 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 were sent abroad for testing or (2) they were 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 testing abroad as we could control matters if samples were tested in our labs in Russia.

64. Nagornykh solved this dilemma. If the samples were 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.

65. If the samples were sent to me at the Moscow Lab, I would swap the urine using the athlete's frozen clean urine reserve.

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

67. To escape 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 this during a meeting on January 20, 2014, with Nagornykh, Zhelanova, and Ramil Khabriev, the Director General of 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 diary I kept during the Sochi Games. The relevant entry is attached as Attachment B.

Sochi Olympics: Effectiveness of the State-Sponsored System

68. 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 nine Bronze Medals.

69. During the Sochi Games, our Sochi Lab did not identify a single “dirty” Russian athlete, which was the obvious purpose of the Sochi Plan.

70. Following the Sochi Games, I was awarded the Order of Friendship, which was presented to me by the current Minister of Sports, Pavel Kolobkov.

71. Although many athletes enjoyed the protections of the Sochi Plan, the Oswald Commission has asked for my information concerning the six athletes below.

72. If asked, I could provide specific information regarding violations of the World Anti-Doping Rules pertaining to many other Russian athletes, including other medal winners from the Sochi Games.

Alexander Legkov

73. Alexander Legkov is a male Russian National Team Cross Country skier.

74. Legkov was part of the Russian National Team that competed in the Sochi Games.

75. Legkov was an athlete protected by the state-sponsored doping program. As such, he was included on the Duchess List used to indicate which athletes were protected during the Sochi Games.

76. Leading up to the Sochi Games, Rodionova directed Legkov to collect and freeze clean urine to use for swapping protocol during the Sochi Games. Additionally, Rodionova collected Legkov's clean urine and delivered it to the Moscow Lab, where my team and I conducted the analysis. I have a specific recollection of this. When we analyzed the urine, we confirmed that the urine was clean, fit for the Sochi Games swapping protocol, and returned the sample to Rodionova to store in CSP.

77. In fall 2013, I had numerous conversations with Rodionova about athletes who she wanted to protect. During these conversations, Rodionova said she considered Legkov as her "special project." She said she wanted to take great care to ensure Legkov was "protected" leading up to and during the Sochi Games.

78. Additionally, also in fall 2013, I was part of a conversation with Rodionova and Nagornykh in Nagornykh's office at the Ministry of Sports. During this conversation, Rodionova told Nagornykh that Legkov was responding well to the Duchess Cocktail and his training and performance was better with the benefit of it.

79. Starting in summer 2013 until the Sochi Games, Rodionova brought me numerous urine samples of Legkov's to test to confirm that the sample was fit for the Sochi Plan. Moreover, Rodionova brought me samples for washout testing. When Rodionova brought me the samples, we had conversations about her instructions to Legkov and his training. Based on these conversations, it was clear to me that Legkov knew that he was providing urine samples to pre-test

and use for swapping at the Sochi Games. It was also clear that he knew he was testing his washout windows to use the Duchess Cocktail in a way that would be undetectable at the Sochi Games.

80. On February 23, 2014, I swapped Legkov's urine sample at the Sochi Games. I remember this, because it was the night leading into the Sochi Games Closing Ceremony and I joked with Blokhin, Kudryatsev and Chizhov that we also had the closing ceremony of our swapping scheme with Legkov's sample. On that night, we completed our last important swapping session for the Sochi Games and protected Legkov.

81. I referred to this day in the diary I kept during the Sochi Games. Specifically, I referred to Legkov's superior performance leading to a Gold Medal in my diary on February 23, 2014. The relevant entry is attached as Attachment C.

82. The reason I referred to Legkov's success was because I remember that Legkov had previously lost major competitions in the last minutes or seconds of a race. When Legkov won a Gold Medal at Sochi and finished a strong race, I attributed it, in part, to the success of my Duchess Cocktail, which Legkov was using as part of his doping protocol.

83. Additionally, on April 2, 2014, I emailed Aleksey Velikodny, who is Rodionova's assistant, to inform him of a urine sample collected during the 2014 Russian National Championship that tested positive for budesonide. The email correspondence is annexed hereto as Attachment D. During that correspondence, I asked Velikodny to check the identity of the athlete to which it belonged. This was our usual protocol. I would send a sample number with test details and Velikodny would respond and indicate whether I should "Save" or "Quarantine" the athlete. If Velikodny indicated "Save," I would falsely report the result as negative in the Anti-Doping Administration & Management System ("ADAMS"), a database management system developed by WADA. If Velikodny indicated "Quarantine," then I would report the result

accurately however it tested – if the test was positive, I would accurately report it as positive with an Adverse Analytical Finding (“AAF”) in ADAMS. Velikodny replied to my email, saying “Legkov” and to “save.”

Maksim Vylegzhanin

84. Maksim Vylegzhanin is a male Russian National Team Cross Country skier.

85. Vylegzhanin was part of the Russian National Team that competed in the Sochi Games.

86. Vylegzhanin was an athlete protected by the state-sponsored doping program. As such, he was included on the Duchess List used to indicate which athletes were prepared for and protected during the Sochi Games.

87. As part of the Duchess List of protected athletes, Vylegzhanin was instructed to collect and freeze clean urine to use for swapping protocol during the Sochi Games. According to our protocol, Rodionova was supposed to deliver Vylegzhanin’s urine to the Moscow Lab before the Sochi Games, where my team and I conducted an analysis to confirm that the urine was clean and fit for the Sochi Games swapping. The clean urine samples were then returned to Rodionova to store at CSP until the end of January 2014 when they were transported to the FSB Command Center before the Sochi Games.

88. In 2013, during our conversations in my Moscow office leading up to Sochi Games, Rodionova told me that Vylegzhanin was using the doping protocol.

89. I remember seeing Vylegzhanin’s name on clean urine bottle inventory slips at the Sochi Games. I do not remember which day I saw his name, but it was on the documentation that was included in the plastic bags that contained plastic bottles full of collected clean frozen athlete urine used for swapping.

90. Before the Sochi Games, on January 10, 2014, I exchanged email correspondence with Aleksey Velikodny regarding a sample taken from Vylegzhanin at a training camp. The sample showed the presence of trimetazidine, which was added to the prohibited list on January 1, 2014. Trimetazidine was prohibited only in-competition. The email correspondence is annexed hereto as Attachment E.

91. Velikodny told me to “Save” the sample (meaning that I should not report it as dirty). However, as stated above, trimetazidine is not prohibited during out-of-competition testing; it is only prohibited for in-competition testing. It is still a concern when athletes use this substance because, if they do not stop before competition, it will create problems during in-competition testing. As such, there was nothing to “Save” because it did not implicate an Anti-Doping Rule Violation. I indicated to Velikodny that Vylegzhanin (and Legkov, who I knew was training with Vylegzhanin with the same coach) needed to be warned personally as soon as possible to stop using the substance because the Sochi Games were about to start.

Evgeny Belov

92. Evgeny Belov is a male Russian National Team Cross Country skier.

93. Belov was part of the Russian National Team that competed in the Sochi Games.

94. Belov was an athlete protected by the state-sponsored doping program. As such, he was included on the Duchess List used to indicate which athletes were prepared to and protected during the Sochi Games.

95. As part of the Duchess List of protected athletes, Belov was instructed to collect and freeze clean urine to use for swapping protocol during the Sochi Games. Additionally, according to our protocol, Rodionova was supposed to deliver Belov’s urine to the Moscow Lab before the Sochi Games, where my team and I conducted analysis to confirm that the urine was

clean and fit for the Sochi Games swapping. The clean urine samples were then returned to Rodionova to store at CSP until the end of January 2014, when they were transported to the FSB Command Center before the Sochi Games.

96. I have no specific recollections about Belov's urine with respect to either collection or swapping.

Aleksei Petukhov

97. Aleksei Petukhov is a male Russian National Team Cross Country skier.

98. Petukhov was part of the Russian National Team that competed in the Sochi Games.

99. Petukhov was an athlete protected by the state-sponsored doping program. As such, he was included on the Duchess List used to indicate which athletes were prepared to and protected during the Sochi Games.

100. As part of the Duchess List of protected athletes, Petukhov was instructed to collect and freeze clean urine to use for swapping protocol during the Sochi Games. Additionally, according to our protocol, Rodionova was supposed to collect and deliver Petukhov's urine to the Moscow Lab before the Sochi Games, where my team and I conducted analysis to confirm that the urine was clean and fit for the Sochi Games swapping. The clean urine samples were then returned to Rodionova to store at CSP until the end of January 2014, when they were transported to the FSB Command Center before the Sochi Games.

101. Around 2009, Petukhov made the Russian National Team in skiing.

102. In approximately September 2009, I had a discussion with Mutko about Petukhov. Specifically, Mutko said Petukhov was concerned about the pressure to use PEDs. In a discussion with Mutko, which Mutko relayed to me, Petukhov described the training camps as full of "doping

mayhem.” I have no personal knowledge of whether Petukhov actually used PEDs, and Mutko did not comment on this.

103. I later saw Petukhov’s name on the Duchess List as a protected doping athlete. I remember this because, recalling my discussion with Mutko, it surprised me that Petukhov apparently had been converted into a doping athlete.

Evgenia Shapovalova

104. Evgenia Shapovalova is a female Russian National Team Cross Country skier.

105. Shapovalova was part of the Russian National Team that competed in the Sochi Games.

106. Shapovalova was an athlete protected by the state-sponsored doping program. As such, she was included on the Duchess List used to indicate which athletes were prepared to and protected during the Sochi Games.

107. As part of the Duchess List of protected athletes, Shapovalova was instructed to collect and freeze clean urine to use for swapping protocol during the Sochi Games. Additionally, according to our protocol, Rodionova was supposed to collect and deliver Shapovalova’s urine to the Moscow Lab before Sochi Games, where my team and I conducted analysis to confirm that the urine was clean and fit for the Sochi Games swapping. The clean urine samples were then returned to Rodionova to store at CSP until the end of January 2014, when they were transported to the FSB Command Center before the Sochi Games.

108. In 2009, I gave a lecture to coaches and athletes regarding doping control and Athlete Biological Passports in Ostrov, Russia. I saw Shapovalova at the lecture.

109. At the Sochi Games, I recall seeing Shapovalova’s name either on the clean-urine-bank inventory or on a DCF form. When I saw her name, it reminded I had seen her in Ostrov.

Julia Ivanova

110. Julia Ivanova is a female Russian National Team Cross Country skier.

111. Ivanova was part of the Russian National Team that competed in the Sochi Games.

112. Ivanova was an athlete protected by the state-sponsored doping program. As such, she was included on the Duchess List used to indicate which athletes were prepared to and protected during the Sochi Games.

113. As part of the Duchess List of protected athletes, Ivanova was instructed to collect and freeze clean urine to use for swapping protocol during the Sochi Games. Additionally, as part of our protocol, Rodionova was supposed to collect and deliver Ivanova's urine to the Moscow Lab before the Sochi Games, where my team and I conducted analysis to confirm that the urine was clean and fit for the Sochi Games swapping protocol. The clean urine samples were then returned to Rodionova to store at CSP until the end of January 2014, when they were transported to the FSB Command Center before the Sochi Games.

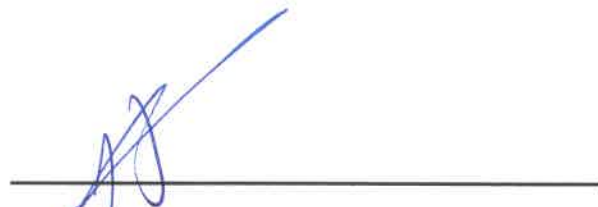
114. In January 2014, Rodionova and I discussed the Duchess List and athlete potential to win medals while in my Moscow office. During that discussion, Rodionova told me she was hopeful that Ivanova would win a medal at the Sochi Games because of her doping protocol and preparations.

Conclusion

115. As noted above, additional information related to these and other athletes should be sought by obtaining the samples and electronic data at the Moscow Lab, which is required to be turned over by the WADA Roadmap and what should serve as a rich source of additional information concerning doping by specific athletes in the Russian state-sponsored doping program.

116. Further, I recommend that all athletes on the Duchess List be interviewed because the practices engaged in by these athletes are so unusual that additional relevant information is likely to be obtained by athlete interviews. If athletes on the Duchess List deny giving clean urine in unusual containers and stored in plastic bags to coaches or Rodionova, as instructed, their false denial constitutes evidence of guilty knowledge. If they acknowledged this process in clean urine, they can be questioned regarding who asked them to do this, for what purpose they were asked to do it, and why they believed they were collecting and providing clean urine. Each of these athletes should also be asked about the unusual manner in which the Duchess Cocktail was ingested.

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



Dr. Grigory Rodchenkov

Dated: October 27, 2014

Attachment A

January 13, 2014

Blokhin came. We went over the scheme. I gave him the new Bereg-kit set that was to be used in Sochi.

[redacted area]

Kiushkin came with tons of news. He also brought freshly-made Martini. I took it right away.

Attachment B

January 20, 2014

I came to the Ministry. I was there with Khabriev and Zhelanova, discussing sample collection. These Norwegians pick up our athletes at arrival and bring them to me, but I have to analyze EPO and perform IRMS.

[redacted area]

I went back to the Ministry in the freezing cold. Bilyaletdinov and Konov sat with me at Nagornykh's. Irina Rodionova is totally inadequate...

Attachment C

23

Februar
Février
Febbraio
February

Son
Dim
Domenica



Feb Fév Feb Feb
Mo Lu Lu Mo
Di Ma Ma To
Mi Me Me We
Do Je Je Th

2014

3	10	17	24
4	11	18	25
5	12	19	26
6	13	20	27
7	14	21	28
1	8	15	22
2	9	16	23

Mär Mär Mär Mär

3	10	17	24
4	11	18	25
5	12	19	26
6	13	20	27
7	14	21	28

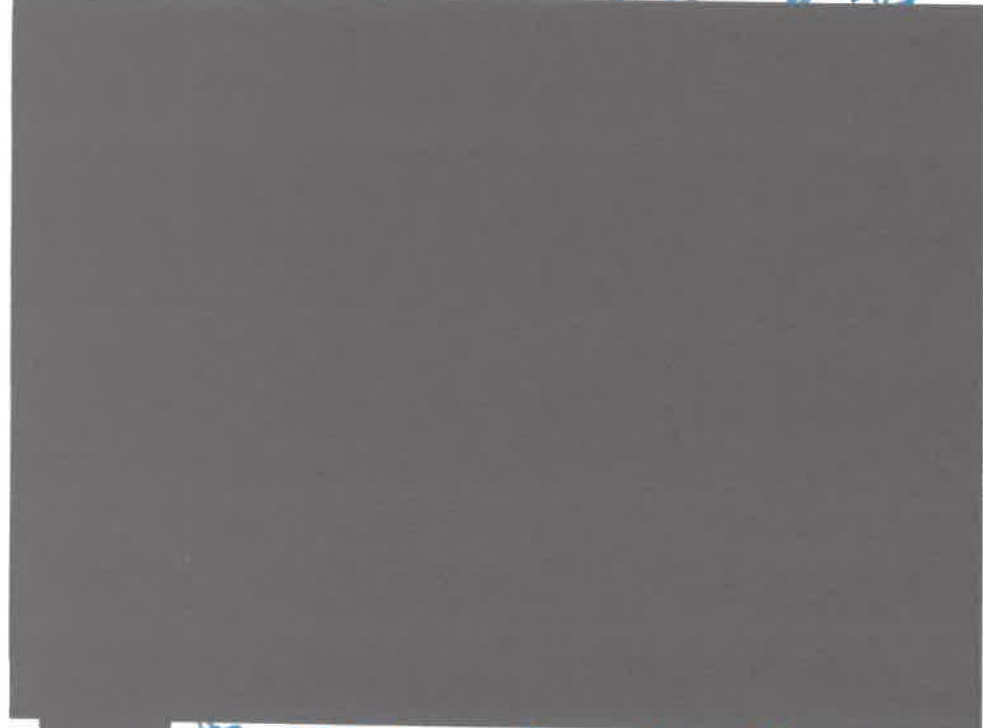
Montag
Lundi
Lunedì

Februar
Février
Febbraio

24

Анаэри. 50 км в Вегурхалк -

9.00 *такси спассавей Лекков-золото / 20 км. лер.*
9.30 *манит с 40 км. совенк средно - 10 км. лер.*



20.00 *20. жавон - мамма камбура в*
20.30 *Гублер Вегурхалк золото / у Ровенн*
21.00 *в золотых негалеи и черное место*
в Сенакдон гониме



February 23, 2014

I watched 50 km men – Legkov is such a stud – gold! Vylegzhanin and Chernousov – silver and bronze.

[redacted area]

Oh, I forgot: our four-man bobsleigh team won gold! Russia has 13 gold medals and has the top overall medal count.

Attachment D

From: [REDACTED]
Sent: 03/04/2014 07:43:02
To: Алексей Великодный [avsochi2014@gmail.com]
CC: Григорий Михайлович Родченков [grodchen@yandex.ru]
Subject: Re:

понятно. почему он себе разрешение на ТИ не оформит?

дело-то плевое..

[REDACTED]
03 апр. 2014 г. 9:39 пользователь "Алексей Великодный" <avsochi2014@gmail.com> написал:

Сохранить

2870442, **A0467** лыжные гонки, чемпионат РФ | 14, RU Тюмень, отбор 2014-03-28
будесонид (метаболит > 30)

From: Алексей Великодный [avsochi2014@gmail.com]
Sent: 03/04/2014 07:49:07
To: [REDACTED]
Subject: Re:

Разбираемся! Оно у него есть, почему-то не указал в протоколе!

3 апреля 2014 г., 11:43 пользователь [REDACTED] написал:

понятно. почему он себе разрешение на ТИ не оформит?

дело-то плевое..

[REDACTED]
03 апр. 2014 г. 9:39 пользователь "Алексей Великодный" <avsochi2014@gmail.com> написал:

Сохранить

2870442; **A0467** лыжные гонки, чемпионат РФ | 14, RU Тюмень, отбор 2014-03-28
будесонид (метаболит > 30)

From: Dr. Grigory Rodchenkov [mailto:grrod@wada-ru.com]
Sent: 03/04/2014 10:56:54
To: [REDACTED]; Алексей Великодный [avsochi2014@gmail.com]
Subject: Re:

спасли козла **A0467**

Dr. Grigory Rodchenkov

Director,

Moscow Antidoping Centre, WADA Accredited Laboratory

Elizavetinsky per. 10, Moscow 105005 Russia

Tel. +7499 267 7320, +7499 261 9943

Cell phone +7985 969 7344

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03.04.2014, 11:43, [REDACTED]

понятно. почему он себе разрешение на ТИ не оформит?

дело-то плевое..

03 апр. 2014 г. 9:39 пользователь "Алексей Великодный" <avsochi2014@gmail.com> написал:

Сохранить

2870442, **A0467**, лыжные гонки, чемпионат РФ | 14, RU Тюмень, отбор 2014-03-28
будесонид (метаболит > 30)

Attachment E

From: Алексей Великодный [avsochi2014@gmail.com]
Sent: 10/01/2014 12:20:13
To: Grigory Rodchenkov [grodchen@yandex.ru]; [REDACTED]

СОХРАНИТЬ

2870234, **A0228** керлинг, УТС, Новогорск,
отбор 2014-01-06, T/E = 7.7
9-13 января МС, Швейцария

2866326, **A0958** лыжные гонки, УТС, Сочи, отбор 2014-01-05
триметазидин
11-12 января КМ, Чехия

From: Dr. Grigory Rodchenkov [grodchen@yandex.ru]
Sent: 10/01/2014 12:23:01
To: Алексей Великодный [avsochi2014@gmail.com]; [REDACTED]
Subject: Re: (Без темы)

A0958 ЛИЧНО предупредить как можно скорее

и **A0467** с **A1105** ТОЖЕ

по **A0228** - где ее предыдущие номера?

ее профиль в АДАМСе должен быть, и мы должны быть уверены, что они чистая с таким профилем

керлинг еще гемorroем обрачивается..

10.01.2014, 16:20, "Алексей Великодный" <avsochi2014@gmail.com>:

СОХРАНИТЬ

2870234, **A0228**, керлинг, УТС, Новогорск,
отбор 2014-01-06, Т/Е = 7.7
9-13 января МС, Швейцария

2866326, **A0958**, лыжные гонки, УТС, Сочи, отбор 2014-01-05
триметазидин
11-12 января КМ, Чехия