

IN THE COURT OF ARBITRATION FOR SPORT

FLOYD LANDIS

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Appellant,

)

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V.

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CAS 2007/A/1394

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UNITED STATES ANTI-DOPING AGENCY

)

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Respondent.

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WITNESS STATEMENT OF CHRISTIANE AYOTTE

I, Professor Christiane Ayotte, of 531, boul. des Prairies, Laval, Québec, Canada will say as follows:

Introduction

1. I am Professor at the INRS - Institut Armand-Frappier and I am head of the WADA-accredited Laboratory in Montréal, Canada (“the Montréal Laboratory”). The Montréal Laboratory, created for the 1976 Olympic Games, was first accredited by the IOC and major International Federations and is now accredited by the World Anti-Doping Agency (“WADA”) to carry out the analysis of blood and urine samples in order to detect the presence of prohibited

substances and methods in the Prohibited List. It is also an accredited testing laboratory found to comply with the requirements of the norm ISO:IEC 17025:2005 by the Standards Council of Canada (Bureau de normalisation du Québec). As a laboratory that is regularly audited as part of the IEC:ISO 17025 and WADA audit and accreditation process, I am very familiar with that process. As my curriculum vitae (Exhibit 1) shows, I have been involved in anti-doping work since March 1984.

2. The Montréal Laboratory conducts approximately 15,000 doping control tests per year. It is appointed by the National Anti-Doping Organization for the Canadian domestic program (appr. 3,000 tests, 21%), by international testing authorities and by North American professional sport organizations, not signatories to the WADA Code (50% of our tests). The Laboratory received last year around 50 samples from the WADA out-of-competition testing program (0.31% of our tests).

3. The Montréal Laboratory utilizes routinely the combination of GC/MS and GC/C/IRMS techniques for the detection of prohibited “natural”/endogenous steroids such as testosterone, nortestosterone and their precursors.

4. My experience in the specific field of the detection of “natural”/endogenous steroids is as follows: I have directed research on the identification of characteristic metabolites of testosterone precursors and GC/MS and GC/C/IRMS profiling of urinary steroid metabolites. I have presented lectures, was invited to write book chapters and papers and to present our work on that topic in national and international forums. I am a member of WADA’s working group on the endocrinological module (urinary steroid profiling) of the Athlete’s passport (with Cologne scientist), of the working group responsible for drafting the technical document related to

guidelines for the detection of endogenous anabolic androgenic steroids and drafting the said document.

5. My knowledge of the World Anti-Doping Code International Standard for Laboratories (version 4) comes from my participation to its draft, since I was a member of the Laboratory Committee and Health Research & Medicine Committee of WADA at that period during which we also adopted related technical documents (criteria for identification, chain of custody, laboratory documentation package). My knowledge of the technical document, TD2004EAAS Reporting and Evaluation guidance for testosterone, epitestosterone, T/E ratio and other endogenous steroids, comes from the leadership that I exercised in its draft.

6. I have extensive experience in reviewing documentation supporting adverse analytical findings reported by other accredited laboratories. In my capacity of scientific expert for the International Association of Athletic Federations (IAAF) since 1995, I have reviewed and provided objective opinions on certainly more than one hundred cases, several of which involved an elevated T/E value and an IRMS analysis. I have experience in analysing longitudinal studies i.e. individual steroid profiles and since the inclusion of IRMS analyses, in evaluating evidences provided by that confirmatory technique.

7. I have on multiple occasions, provided objective opinions and witness statements in cases arising from findings reported by other accredited laboratories, most often in my capacity of scientific expert for the IAAF but also on some occasions, for other international organizations, and as a panel-appointed expert.

8. In this witness statement, I have been asked to give an opinion in connection to the adverse analytical finding reported by the Laboratory in Paris, LNDD for urine sample 995474

