

# **EXHIBIT B**

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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
14

15 UNITED STATES OF AMERICA, )  
16 Plaintiff, )  
17 )  
18 v. )  
19 )  
20 BARRY LAMAR BONDS, )  
Defendant. )  
21 )  
22 )  
23 )

Criminal No. CR 07-0732 SI  
  
UNITED STATES' WITNESS LIST  
  
Trial: March 2, 2009  
Time: 8:30 a.m.  
Court: Hon. Susan Illston

24 The United States hereby provides notice to the Court and to the defendant of the  
25 witnesses it may call in its case-in-chief at the trial. This list is intended to be inclusive. The  
26 government may not call all of the witnesses on this list. The government reserves the right to  
27 supplement this list as trial preparations progress. The government will notify the defendant of  
28 any changes to its witness list.

1           1. Bell, Kimberly: Ms. Bell, the defendant's former girlfriend, will testify that  
2 the defendant told her that he was taking steroids prior to the 2000 Major League Baseball  
3 season. Ms. Bell will further testify to personal observations regarding changes in the  
4 defendant's body during the period of time beginning in the year 2000, including bloating, acne  
5 on the shoulders and back, hair loss, and testicle shrinkage. Ms. Bell will further testify to  
6 occasions in which she saw the defendant and Greg Anderson together.

7           2. Benard, Marvin: Mr. Benard, a former professional baseball player, will testify that  
8 he met Greg Anderson during Benard's tenure with the San Francisco Giants. He will also  
9 testify that he began working with Anderson in approximately 1999 and that Anderson assisted  
10 him in having his blood tested. Mr. Benard will testify about receiving performance enhancing  
11 substances from Anderson, about instructions from Anderson about how to administer the  
12 substances, about the schedule Anderson gave to him for administering the substances, and about  
13 what Mr. Anderson told him about the efficacy of those substances.

14           3. Bergland, Wendy: She will testify that she is a Special Agent with IRS-CID and that  
15 she transported the box of folders located by Mike Wilson to Special Agent Jeff Novitzky.

16           4. Larry D. Bowers, Ph.D., DABC: Dr. Bowers will testify that he is employed as  
17 the Senior Managing Director, Technical and Information Resources, for the United  
18 States Anti Doping Agency (USADA). Based on his training and experience, Dr. Bowers  
19 will also testify that certain items identified in the urine tests of the defendant were  
20 anabolic steroids and that it is illegal to distribute and obtain those without a legitimate  
21 medical condition requiring a prescription from a physician. Dr. Bowers will also testify  
22 to the side effects of steroid use, including effects on blood values, possible organ  
23 damage, and other side effects. Dr. Bowers will further testify to his opinion that test  
24 results for some blood samples provided by the defendant indicate organ damage and  
25 possible steroid use by the defendant

26           5. Catlin, Dr. Don: Dr. Catlin will testify that the UCLA Olympic Lab performed the  
27 testing on the urine sample collected from the defendant by Major League Baseball (MLB). He  
28 will testify to the results of those tests and their meaning, including the use and results of the

1 Carbon Isotope Ratio test. Dr. Catlin will testify that the results of the test were that he found  
2 exogenous testosterone, THG, and clomid in the 2003 sample. He will also testify that THG was  
3 never commercially available from any source (other than Patrick Arnold) during the time of the  
4 defendant's THG-positive urine samples. As such, Dr. Catlin's testimony also includes  
5 statements as a percipient witness.

6 6. Conte, Stan: Mr. Conte will testify that he is a licensed physical therapist and  
7 certified athletic trainer. He began working for the San Francisco Giants in 1992 and became  
8 their head athletic trainer in 2000. He will testify regarding his professional background and  
9 qualifications and his job duties with the Giants. Mr. Conte will also testify about certain  
10 interactions he had with the defendant, about statements by the defendant about Greg Anderson  
11 and the search warrant conducted on Anderson's residence in September of 2003, and about  
12 observations related to the defendant's physical appearance while working for the Giants. Mr.  
13 Conte will testify about his knowledge of the defendant's relationships with third parties, such as  
14 Steve Hoskins and Greg Anderson.

15 7. Estalella, Bobby: Mr. Estalella will testify that he was a professional baseball  
16 player and that he met the defendant as a result of being employed by the San Francisco Giants.  
17 Mr. Estalella will further testify that the defendant admitted using performance-enhancing drugs,  
18 and that they had several discussions regarding that topic.

19 8. Geter, Ana: Ms. Geter, a now-retired former Special Agent with Internal Revenue  
20 Service, Criminal Investigation will testify regarding her transport of the defendant's urine  
21 sample from its seizure at Quest Laboratories pursuant to search warrant to the UCLA Analytical  
22 Lab.

23 9. Giambi, Jason: Mr. Giambi will testify that he is a professional baseball player and  
24 that he met Greg Anderson through the defendant. He will also testify that he began working  
25 with Anderson in approximately November 2002 and that Anderson assisted him in having his  
26 blood and urine tested through Balco. Mr. Giambi will testify about receiving performance  
27 enhancing substances from Anderson, about instructions from Anderson about how to administer  
28 the substances, about the schedule Anderson gave to him for administering the substances, and

1 about what Mr. Anderson told him about the efficacy of those substances.

2 10. Giambi, Jeremy: Mr. Giambi will testify that he was a professional baseball player  
3 and that his brother, Jason Giambi, introduced him to Greg Anderson shortly after Jason began  
4 working with Anderson in approximately November 2002. He will also testify that he provided  
5 blood and urine samples to Anderson to be tested through Balco. Mr. Giambi will also testify  
6 about receiving performance enhancing substances from Anderson, about instructions from  
7 Anderson about how to administer the substances, about the schedule Anderson gave to him for  
8 administering the substances, and about what Mr. Anderson told him about the efficacy of those  
9 substances.

10 11. Hoskins, Kathy: Ms. Hoskins will testify that she was hired by the  
11 defendant as a personal shopper and assistant. She will further testify that she observed  
12 interactions between the defendant and Greg Anderson, including Anderson giving the defendant  
13 an injection.

14 12. Hoskins, Steve: Mr. Hoskins will testify that he was childhood friends with the  
15 defendant and that in approximately late 1992 or early 1993, he began working for the defendant  
16 as his assistant. Mr. Hoskins will testify regarding the nature and extent of his working  
17 relationship with the defendant, which included handling many of the defendant's personal  
18 errands and scheduling, as well as managing the defendant's promotional activities related to his  
19 baseball career. During their relationship, Mr. Hoskins became aware that the defendant was  
20 using steroids with the assistance of his personal trainer, Greg Anderson. In this regard, he will  
21 testify how he learned of the defendant's steroid use through, among other things, the defendant's  
22 own admissions to Hoskins. Mr. Hoskins will also testify about other aspects of his relationship  
23 with the defendant.

24 13. Izzo, Larry: Mr. Izzo will testify that he was a professional football player and that  
25 he first contacted Greg Anderson by phone in approximately January 2003. Mr. Izzo will also  
26 testify that he first met Anderson in person in approximately May 2003 at Balco and submitted a  
27 urine sample at Balco at Anderson's request. Mr. Izzo will also testify that submitted additional  
28 urine samples to Anderson at later times as well. Mr. Izzo will also testify about receiving

1 performance enhancing substances from Anderson, about instructions from Anderson about how  
2 to administer the substances, about the schedule Anderson gave to him for administering the  
3 substances, and about what Mr. Anderson told him about the efficacy of those substances.

4 14. Joseph, Dr. Jean: Dr. Joseph will testify regarding CDT's records related to the  
5 urine sample the defendant produced to CDT in 2003 pursuant to MLB's testing protocol. Df

6 15. Kennedy, Dale: Mr. Kennedy will testify to the process of collecting urine  
7 samples from the defendant in 2003 for testing pursuant to Major League Baseball's drug testing  
8 program.

9 16. Novitzky, Jeff: Agent Novitzky, currently a Special Agent with the Food and  
10 Drug Administration's Office of Criminal Investigations (FDA-OCI), and formerly a Special  
11 Agent with the Internal Revenue Service – Criminal Investigation Division (IRS-CID), will  
12 testify regarding the IRS-CID investigation for which the defendant was subpoenaed to the grand  
13 jury in 2003, i.e. the criminal investigation into the conduct of Balco Laboratories, Victor Conte,  
14 and Greg Anderson, among others. Agent Novitzky will testify to observations he made during  
15 the execution of search warrants at Balco and Anderson's residence in September 2003 and the  
16 role that those observations played in the investigative decision to subpoena the defendant to the  
17 grand jury. He will also testify about the manner in which the defendant's false statements in the  
18 grand jury influenced the criminal investigation of Conte and Anderson.

19 17. Qaqish, Amjad: Special Agent Qaqish, an agent with Internal Revenue Service-  
20 Criminal Investigation, will testify regarding his identification, seizure, and disposition of  
21 documents taken from Anderson's residence during the September 3, 2003 search, including  
22 calendars and handwritten notes.

23 18. Rios, Armando: Mr. Rios will testify that he was a professional baseball player and  
24 that he met Greg Anderson during Rios's tenure with the San Francisco Giants. He will also  
25 testify that he began working with Anderson in 2001 and that Anderson assisted him in having  
26 his urine tested after Rios left the Giants for another team in 2002. Mr. Rios will testify about  
27 receiving performance enhancing substances from Anderson, about instructions from Anderson  
28 about how to administer the substances, about the schedule Anderson gave to him for

1 administering the substances, and about what Mr. Anderson told him about the efficacy of those  
2 substances.

3 19. Sample, Dr. Barry: Dr. Sample will testify regarding the records of Quest  
4 Diagnostics as well as to the methodology utilized to test urine samples and to certain lab test  
5 results.

6 20. Santiago, Benito: Mr. Santiago will testify that he was formerly a professional  
7 baseball player for several teams, including the San Francisco Giants in 2001, 2002, and 2003.  
8 While playing for the Giants, Mr. Santiago met Greg Anderson and ultimately received  
9 performance enhancing substances from Anderson. Mr. Santiago will also testify about the  
10 process of providing urine samples to Greg Anderson for testing for the presence of steroids. Mr.  
11 Santiago will also testify about schedules or calendars Greg Anderson made for him in  
12 connection with the performance enhancing substances regimen Anderson designed for Mr.  
13 Santiago.

14 21. Ting, Dr. Arthur: Dr. Ting will testify that he was the defendant's  
15 orthopedic surgeon and will testify as to his physical observations of the defendant as well as his  
16 observations of the defendant's interactions with Greg Anderson. Dr. Ting will also testify that  
17 he drew blood from the defendant for testing, and that he gave the specimens to Greg Anderson  
18 to deliver.

19 22. Valente, Jim: Mr. Valente, the former vice-president of Balco Laboratories, will  
20 testify to his observations as an employee at Balco responsible for maintaining certain business  
21 records, including log sheets reflecting the receipt of urine samples from athletes, the assignment  
22 of codes to those samples, the referral of those samples to outside labs, and the receipt of test  
23 results for those samples. Valente will testify that Greg Anderson provided him with blood and  
24 urine samples for a number of athletes, including the defendant, and Valente would record the  
25 names of those athletes on a log sheet and assign each sample a number in order to keep track of  
26 the sample's testing referral date and results. Valente will specifically testify that the entries  
27 "Barry B" on Balco internal documents reference the urine samples and results he entered for the  
28 urine samples Greg Anderson submitted to Balco on behalf of the defendant.

1           23. Velarde, Randy: Mr. Velarde will testify that he was a professional baseball player  
2 and that he met Greg Anderson during his tenure with the Oakland Athletics. Mr. Rios will  
3 testify about receiving performance enhancing substances from Anderson, including anabolic  
4 steroids.

5           24. Wilson, Mike: He will testify that he is a Special Agent with IRS-CID and that he  
6 located a box of folders during the execution of a search warrant at a storage locker belonging to  
7 Balco Laboratories.

8           25. Anderson, Greg: Mr. Anderson has been served with a subpoena that requires him  
9 to testify at trial. As of this date, it is unknown whether Mr. Anderson will refuse to comply with  
10 the subpoena.

11           26. Lab One Records Custodian: Melissa Duncan will testify regarding Lab One's  
12 maintenance of business records reflecting its routine receipt and testing of blood samples.  
13 Among the records to be admitted through this witness's testimony will be records reflecting the  
14 receipt and test results for blood samples provided by the defendant.

15           27. Specialty Labs Records Custodian: A records custodian witness for this blood lab  
16 will testify regarding Specialty Labs' maintenance of business records reflecting its routine  
17 receipt and testing of blood samples. Among the records to be admitted through this witness's  
18 testimony will be records reflecting the receipt and test results for blood samples provided by the  
19 defendant.

20           28-39. Witnesses from UCLA Olympic Lab: The government may call some or all of the  
21 following witnesses regarding the chain of custody maintained by the UCLA Lab in handling and  
22 processing the steroids test for the defendant's urine sample – Brian Bishop, Borislav Starcevic,  
23 Dr. Catlin, Yvonne Chambers, Todd McGauley, Stephen Kauffman, Brian Aherns, Javier

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1 Ceballos, Holly Daley, Ronald Gonzalez, Anabela Leung, Feresthteh Delshad, and Yu-Chen  
2 Chang.

4 DATED: February 13, 2009

Respectfully submitted,  
JOSEPH P. RUSSONIELLO  
United States Attorney

7 \_\_\_\_\_ /s/  
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9 JEFFREY D. NEDROW  
10 JEFFREY R. FINIGAN  
11 Assistant United States Attorneys

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12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
14

15  
16 UNITED STATES OF AMERICA, )  
17 Plaintiff, )  
18 v. )  
19 BARRY LAMAR BONDS, )  
20 Defendant. )  
21 \_\_\_\_\_ )

Case No. CR 07-0732 SI

**UNITED STATES' EXHIBIT LIST**

Trial: March 2, 2009  
Time: 8:30 a.m.  
Court: Hon. Susan Illston

1 The United States may offer the exhibits set forth on the attached list at the trial of this  
2 case. The United States reserves the right to revise the list before and/or during trial.

3  
4 Dated: February 13, 2009

Respectfully submitted,

5 JOSEPH P. RUSSONIELLO  
6 United States Attorney

7 /s/  
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9 MATTHEW A. PARRELLA  
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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 Case No.: CR 07-0732 SI Date: March 2, 2009

4  
5 United States of America vs. Barry L. Bonds

6  
7 **GOVERNMENT'S EXHIBIT LIST**

8 **(X) Plaintiff**

**( ) Defendant**

9

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
10 1			Balco Log Sheets (26 p.)
11 2			2 Balco Letters (5/30/03; 6/6/03) (4 p.)
12 3			BLB Quest Documents (10 reports; 38 p.)
13 4			Balco Letter (7/3/03) (2 p.)
14 5			Other Athlete Quest Documents (14 reports, 30 p.)
15 6			Specialty Lab & Fedex Documnets (2 p.) (1/19/01)
16 7			B, B Specialty Lab Results (20 p.)

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Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
8			Balco Balco Blood Test Log Books 2001-2003 (8 pgs.)
9			Balco BLB Blood Tests (1/19/01; 4/12/01; 2/5/03) (13 p.)
10			LabOne Blood Test Fedex Documents (4 p.) (1/8/02; 4/12/02)
11			BLB Nutritional Program (2 p.)
12			Other Athlete Balco & Specialty Blood Tests (38 p.)
13			LabOne Tests (1) & BLB Calendars (11) (12 p.)
14			Brown Portfolio
15			B. Santiago Invoice
16			A. Rios Fedex Receipts (3 p.)
17			R. Estalella Documents (11 p.)
18			L. Izzo Documents (10 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
19			Jason Giambi Documents (23 p.)
20			Jeremy Giambi Documents (19 p.)
21			Misc. Notes re Other Athletes (7 p.)
22			HGH Kit
23			Syringes
24			Clear & Cream Vials (8 total)
25			Clear & Cream (shown to BLB in GJ)
26			HGH Kits Syringes
27			BLB CDT Document (6/4/03)
28			Envelopes located with cash (13 p.)
29			Handwritten Note
30			HGH Vials (9 vials)
31			Handwritten notes & Fedex Rect-Other Athletes (3 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
32			BLB Handwritten Note
33			Calendars, BLB Tests, Quest, and LabOne in folder labeled "B" (37 p. & Folder)
34			A. Rios File (22 p. & Folder)
35			Home Run List & Floppy Disc (4 p.)
36			BLB Article (3 p.)
37			R. Velarde File (11 p. & Folder)
38			"Greg Anderson 25" File - Lab One & Quest Documents w/ BLB DOB (4 p. & Folder)
39			B. Estalella File (15 p. & Folder)
40			B. Santiago File (26 p. & Folder)
41			Jason Giambi Document & Fedex Rect. (4 p.)
42			Valente Plea Agreement
43			Dr. Ting Steroid Research Document (6 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
44			Recording of conversation (Hoskins-Anderson) Transcript (7 p.)
45			Quest Documents 100121 (58 p.)
46			Quest Documents 100145 (2 p.)
47			Quest Documents 100155 (104 p.)
48			Quest Documents 100321 (58 p.)
49			Quest Documents 100404 (59 p.)
50			Quest Documents 100424 (43 p.)
51			Quest Documents 100545 (39 p.)
52			Quest Documents 100552 (41 p.)
53			Quest Documents 100572 (41 p.)



Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
54			Quest Documents 100573 (38 p.)
55			Quest Documents & Vials 51015032 - 0085157 (2 vials, 2 p.)
56			Quest/IRS/UCLA Documents 51015032 - 0085157 (2 p.)
57			UCLA Documents 51015032 - 0085157 (22 p.)
58			UCLA Documents 51015032 - 0085157 (28 p.)
59			LabOne Blood Tests Barry Bonds (44 p.)
60			Specialty Lab Tests
61			Photo-Balco Ext
62			Photo Log Sheets-Balco
63			Photo - HGH Kit-Anderson Residence
64			Photo Athlete Folders From Closet-Anderson Residence

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
65			Photos - drawer w/ Barry note & drugs-Anderson Residence
66			Photo - Safe open-Anderson Residence
67			Photo - Safe w/ \$ & note-Anderson Residence
68			Photo - Quest form re BLB MLB-Anderson Residence Urine Collection 6/4/03
69			Photo - box w/ syringes & pills-Anderson Vehicle
70			Photo - Brown Portfolio-Anderson Vehicle
71			Magazine Article - Anderson, Conte, and BLB- Located in BALCO trash
72			Magazine Article - BONDS and Balco - Located in BALCO trash
73			Magazine Article - Anderson-Conte and BLB - Located at Conte Residence
74			Bonds GJ Transcript w/ exhibits
75			Bonds Immunity Order
76			Player Testing Protocol Acknowledgment, (4 p.)