

BEFORE THE AMERICAN ARBITRATION ASSOCIATION
North American Court of Arbitration for Sport Panel

Justin Gatlin

Claimant,

v.

United States Anti-Doping Agency

Respondent.

AAA No. 30-190-00170-07

SECOND STIPULATION of UNCONTESTED FACTS and ISSUES BETWEEN
THE UNITED STATES ANTI-DOPING AGENCY AND JUSTIN GATLIN

The United States Anti-Doping Agency ("USADA") and Justin Gatlin hereby stipulate and agree for all purposes to the following:

1. Justin Gatlin, an elite track athlete, has provided a number of urine samples from 2001 through 2006 that were drug tested by the UCLA Olympic Analytical Laboratory, a WADA accredited laboratory as depicted on Attachment 1.
2. That screen results of the tests from Mr. Gatlin's samples on Attachment 1 show a low urinary T/E ratio.
3. That some individuals naturally have low T/E ratios based on urine screen results.
4. That when testosterone is administered to individuals who have naturally low urinary T/E ratios, their urinary T/E ratios may increase a few percentage points but not significantly. In such instances, however, a urine sample from such individual could produce a positive CIR test indicating use of synthetic testosterone or its precursors.
5. That Michelle Collins informed USADA in May 2004 that her former coach, Trevor Graham, told her to appear at track events with no drug testing and to use fast acting drugs to avoid detection.
6. That Ms. Collins last trained with Mr. Graham in 2001, which was before Justin Gatlin began training with Mr. Graham.
7. Justin Gatlin has no basis to determine whether her statement is accurate. Mr. Gatlin does not dispute that the statement was made nor does he dispute that USADA acted upon that statement in determining which track meets it would conduct testing.

8. That USADA considered this information provided by Michelle Collins and decided to test at the 2006 Kansas Relays, an event at which it had not previously tested.

9. That in late 2005, USADA notified USA Track & Field and thereafter the organizing authority for the Kansas Relays that it would be conducting drug testing at the 2006 Kansas Relays.

10. That Justin Gatlin was selected for testing at the Kansas Relays after his relay team won first place and he was the anchor leg of that relay. This selection was in accordance with USADA's routine selection criteria for track and field relay events.

11. That nothing in this Second Stipulation modifies or in any way changes the previously entered *Stipulation of Uncontested Facts and Issues Between the United States Anti-Doping Agency and Justin Gatlin* included at Gatlin Exhibit 1.

Stipulated and Agreed to:

By: John P. Collins

By: United States Anti-Doping Agency

Attorney for Justin Gatlin



Travis T. Tygart
USADA General Counsel

STEROID PROFILE FROM USADA AND IAAF TESTS
Justin Gallin

Bottle#	Collection	SG	pH	TE	[Test]	[Epi]	[Andr]	[Eio]	Andro/Etio	Andro/T	Lab
456500	6/16/2001	1.023	5.5	0.14	4.6	39.7	1843	2595	0.7	400.7	UCLA
456473	6/17/2001	1.028	5.0	0.15	5.4	41.2	1625	1582	1.0	300.8	UCLA
456990	1/9/2002	1.030	6.5	0.17	7.2	45.6	1578	1418	1.1	219.2	UCLA
454659	5/21/2002	1.021	5.5	0.16	5.7	40.0	2759	2071	1.3	484.1	UCLA
458989	6/5/2002	1.026	6.5	0.12	3.8	35.6	1856	1643	1.1	488.4	UCLA
469210	3/1/2003	1.028	5.5	0.16	3.5	26.2	1541	828	1.9	440.2	UCLA
473047	4/26/2003	1.027	5.1	0.18	4.4	24.7	2553	2133	1.2	580.2	UCLA
473327	12/9/2003	1.032	5.5	0.12	9.3	71.2	3199	4938	0.6	343.9	UCLA
476912	2/18/2004	1.026	7.0	0.11	2.8	27.8	2247	2469	0.9	802.3	UCLA
378292	3/12/2004	1.022		0.15	5.3	29.0	719	960	0.7	135.7	Montreal
480975	4/2/2004	1.029	5.5	0.14	5.2	43.6	1754	1639	1.1	337.3	UCLA
378223	4/22/2004	1.024		0.11	5.6	43.0	2187	2309	0.9	387.8	Montreal
481474	4/24/2004	1.014	5.5	0.19	2.4	13.4	1528	1411	1.1	635.7	UCLA
484343	7/11/2004	1.021	6.0	0.16	1.9	15.5	1200	1720	0.7	631.6	UCLA
484118	7/18/2004	1.017	5.5	0.17	3.0	28.8	1272	1126	1.1	424.1	UCLA
484187	7/18/2004	1.023	6.0	0.16	3.8	28.9	1625	1479	1.1	427.7	UCLA
461909	9/11/2004	1.028	6.0	0.13	11.6	123.3	4195	6288	0.7	361.7	UCLA
383843	1/18/2005	1.027		0.1	7.60	47.0	1934	2097	0.9	254.5	Montreal
476909	1/21/2005	1.023	6.0	0.12	5.8	42.3	1521	3619	0.4	279.5	UCLA
380479	4/28/2005	1.027		0.08	6.4	47.0	1873	1523	1.2	202.7	Montreal
380472	5/26/2005	1.028		0.06	4.8	39.0	1069	873	1.2	222.7	Montreal
486333	6/18/2005	1.022	5.5	0.13	3.8	34.6	1492	1341	1.1	302.6	UCLA
491725	6/25/2005	1.013	5.5	0.22	1.6	7.7	1054	770	1.4	651.5	UCLA
491689	6/26/2005	1.030	5.5	0.14	4.1	31.8	2503	1614	1.6	610.4	UCLA
514921	7/8/2005	1.024		n.d.			568	177	3.2	-	Kome
692476	8/7/2005	1.027		0.20	1.6	9.8	1490	1844	0.8	931.3	Heisinki
692633	8/11/2005	1.029		0.10	1.4	9.9	1373	2237	0.6	980.7	Heisinki
394990	2/8/2006	1.030		0.20	9.2	61.0	2248	2346	1.0	244.3	Montreal
496040	4/22/2006	1.017	5.5	0.19	5.3	28.3	2284	1986	1.2	431.0	UCLA
394995	4/28/2006	1.028		0.30	11.6	54.0	2674	1921	1.4	230.5	Montreal
495757	4/29/2006	1.028	6.5	0.15	4.7	36.7	2396	1511	1.6	509.8	UCLA
499864	5/18/2006	1.031	5.5	0.15	10.0	67.0	2811	2806	1.0	281.1	UCLA
495480	5/28/2006	1.016	5.5	0.15	1.7	11.9	793	1104	0.7	431.3	UCLA
499148	6/5/2006	1.015	6.5	0.39	3.1	9.1	830	1070	0.8	267.9	UCLA
496007	6/23/2006	1.028	5.5	0.17	5.2	33.4	2517	2629	1.0	484.0	UCLA
492155	11/9/2006	1.031	5.5	0.13	10.1	77.2	1601	2770	0.6	158.6	UCLA

ATTACHMENT 1