

testosterone/epitestosterone values. This submission should not be considered in any respect to be a complete recitation of the defenses that may be offered by or on behalf of Floyd Landis, and Floyd Landis specifically reserves the right to make any submission to any adjudication body in connection with these false charges. That being said, it is submitted that the documentation that has been provided to date does not meet the requisite positivity criteria as established by the World Anti-Doping Agency (“WADA”). Specifically, the following will be established:

1. The carbon isotope results do not satisfy the WADA positivity criteria, in that:
 - a. Only one of four metabolites tested clearly exceeds the 3‰ threshold provided by WADA;
 - b. The measurement value that is the best indicator of exogenous testosterone usage in urine proves that Floyd Landis did not use testosterone; and
 - c. All of the 5 α -Androstanediol ¹³C-values reported by LNDD are inaccurate.
2. Absent a positive CIR result, there is no case to answer under the WADA TECHNICAL DOCUMENT TD2004EAAS.

As such, there is no case to answer, and the proceedings should be dismissed by this Anti-Doping Review Board (“ADRB”).