

ORIGINAL

GRAND JURY

NORTHERN DISTRICT OF CALIFORNIA

GJ INVESTIGATION NO. 2002R01596)

CONFIDENTIAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

TESTIMONY OF

TIM MONTGOMERY

AT UNITED STATES DEPARTMENT OF JUSTICE

450 GOLDEN GATE AVENUE

SAN FRANCISCO, CALIFORNIA 94102

THURSDAY, NOVEMBER 6, 2003; 10:38 A.M.

FOR THE GOVERNMENT:

KEVIN V. RYAN, UNITED STATES ATTORNEY

BY: JEFF NEDROW, ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DEPARTMENT OF JUSTICE

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1 but it just seems like why would you be taking stuff
2 from -- why would you potentially be working with, like,
3 Trevor Graham who's not your coach to potentially take
4 something?

5 THE WITNESS: He was his wife's coach. And
6 Trevor Graham is -- he wanted to be known as the master
7 mind in chemistry also. So, before they had this real
8 chemist, Trevor Graham was the chemist, he was the
9 person that provided --

10 GRAND JUROR: Had the stuff.

11 THE WITNESS: That had the stuff. And C.J.'s
12 coach didn't, because everyone is not going to be
13 willing to give you stuff or able to get the stuff. But
14 Trevor had a connection to get the stuff. So, C.J. had
15 a relationship with Trevor from -- Trevor coaches
16 sprinters, not shot put.

17 GRAND JUROR: What do you think Trevor Graham's
18 connection to getting the stuff was before he knew
19 Victor Conte? Because if he hadn't had a relationship
20 with Victor --

21 THE WITNESS: It was Memo had sent -- a guy
22 named Memo out of San Antonio.

23 BY MR. NEDROW:

24 Q. And when you say Memo, that's what you knew him
25 as, M-e-m-o; is that correct?

1 A. Yes.

2 Q. Do you know anything else about him besides
3 that?

4 A. No.

5 Q. And you say San Antonio -- San Antonio, Texas?

6 A. Yes.

7 Q. And how do you know that Memo was the
8 connection for Mr. Graham?

9 A. Because I traveled out to San Antonio, Texas
10 myself.

11 Q. And did you meet Memo?

12 A. Yes, I did.

13 Q. What does he look like?

14 A. Heavy-set Mexican guy.

15 Q. And based on your trip out there, did you get
16 any information about where Memo would get whatever this
17 stuff was that would come through to Trevor and then be
18 given to the athletes?

19 A. Yes. His daddy was a -- a horse doctor at a
20 university. He was a teacher at the university over in
21 Mexico. And he was -- he was over the horses. He was,
22 I guess, a veterinarian for the university or something.
23 And so most steroids people use them on horses. And so
24 he would get it from Mexico, bring it over, send it to
25 Trevor. And that's how it was.

1 A. No.

2 Q. Don't recognize that at all?

3 A. No.

4 Q. Did Mr. Conte ever give you or talk to you

5 about norbolothone?

6 A. No.

7 Q. Did you ever hear --

8 A. I heard a name, but he never said that he had

9 made a new thing. All I know about is the trenbolone.

10 Q. Did Mr. Conte ever provide you with human

11 growth hormone?

12 A. Yes, he did.

13 Q. Okay. And how -- approximately how often or

14 how many times did he give you human growth hormone?

15 A. He would send you four vials a month.

16 Q. Okay.

17 A. Each vial would last you one a week.

18 Q. Okay. And approximately how many months --

19 four vials a month. Did he give you human growth

20 hormone every month that you were working with

21 Mr. Conte, the whole time?

22 A. Yes, he did.

23 Q. And so the totality of that time frame is

24 about -- let's see, you said --

25 A. Maybe eight months.

1 Q. Maybe eight months?
2 A. Times --
3 Q. Four?
4 A. No.
5 Q. No, I'm sorry.
6 A. Times about 16.
7 Q. Okay. So, eight times 16 would be the number
8 of vials of human growth hormone you got from him?
9 A. Yes.
10 Q. Okay. All right. So, eight times --
11 A. Sixteen --
12 Q. So, eight times 16 would be approximately 120,
13 is that right? Whatever that would be, anyway.
14 A. Yeah, you right, 120 -- 102, like that.
15 You got it.
16 GRAND JUROR: I got 108 -- 128.
17 MR. NEDROW: Is that it? In any event, we can
18 figure it out.
19 BY MR. NEDROW:
20 Q. Does that seem be about right?
21 A. Yes.
22 Q. Okay. Good.
23 And the human growth hormone again is the
24 banned stuff that's injected with a syringe actually in
25 your body; correct?

1 A. Yes, it is.

2 Q. And did you take that?

3 A. Yes, I did.

4 Q. What about this EPO stuff, did he give you that

5 stuff?

6 A. No. We had -- we had decided that sprinters

7 wouldn't need EPO due to the fact that you're not

8 running as far. If I was running 200, then it may be

9 good for me. But my hematocrit was already good. So,

10 he decided -- so, he decided. He had sent it and I sent

11 it back to him because we decided not to do it.

12 Q. Okay.

13 A. Because I had heard somewhere that EPO could

14 cause you to have a heart attack. And I got a small

15 murmur and it may affect that right there.

16 Q. Right. So, you didn't want any part in that?

17 A. Yeah, yeah.

18 Q. Did Mr. Conte ever talk to you about getting

19 someone to right prescriptions for stimulants and things

20 of that sort?

21 A. Yes, he did.

22 Q. What did he tell you about that?

23 A. He said: "I can get you anything you want when

24 it come to a prescription like Clomid." They use Clomid

25 to stretch out the Clear.