

1 **AFFIDAVIT OF LYNN ROPER, Ph.D.**

2 STATE OF MICHIGAN     )  
3 County of Wayne         ) ss.

4 Lynn Roper, Ph.D., first duly sworn, under oath, states as follows:

5 1. I obtained my Bachelor of Science degree in physical education and health in 1989 from  
6 the University of Oregon. From 1989 to 1994, I taught high school physical education and health  
7 in Eugene, Oregon. I also was the head track coach at the school.

8 2. In 1994, my favorite nephew Scott died of a heart attack. It was devastating and a shock  
9 to the whole family, because Scott was only 16 years old, he played sports since he was a young  
10 boy, and he was in great physical shape. Scott always looked up to me and said that he wanted to  
11 follow in my footsteps and become a physical education teacher and coach.

12 3. I always pushed Scott to be the best athlete he could be in every sport. He always  
13 worked hard and excelled at every sport he played. I was very excited when Scott began playing  
14 linebacker for his high school's varsity football team. It was amazing how quickly Scott  
15 developed. He was bigger than anyone else on the team in no time at all, and he quickly became  
16 the star linebacker. I was so proud of all of Scott's hard work.

17 4. I'll never forget the fall afternoon in 1994 when I received a call from my sister, Scott's  
18 mother. I could tell immediately that something bad had happened, but nothing could have  
19 prepared me for what I was about to learn. I was absolutely floored when my sister told me that  
20 Scott collapsed at football practice and was dead. My disbelief turned to anger when the autopsy  
21 report came back several days later and revealed that Scott had been taking steroids. Although I  
22 had no clue that Scott was using steroids, I still feel guilty that I pushed him too hard and set the  
23 level of expectations too high. I decided that I needed to learn more about steroids, and I vowed  
24 to do whatever I could to hold accountable those who are responsible for encouraging steroid  
25 abuse.

26 5. I couldn't stand to coach anymore after Scott's death, so I quit my teaching and coaching  
27 positions and returned to graduate school at Oregon State University. I obtained my Master of  
28 Science degree in applied exercise physiology in 1995, and I obtained my doctorate in applied

1 exercise physiology in 1997. My doctoral dissertation was entitled “Juice Isn’t Just For Breakfast  
2 Anymore: The Use Of Anabolic Steroids By Amateur Athletes”. It focused on the use of  
3 stanozolol, which was the steroid found in Scott’s system.

4 6. In 1997, immediately after obtaining my Ph.D., I took a position as a researcher at the  
5 Human Performance Laboratory (“HPL”) in the Department of Kinesiology and Health Education  
6 in the College of Education at the University of Texas at Austin. Kinesiology is the scientific  
7 study of movement. One of the primary goals of the discipline is to understand the processes that  
8 control movement and the factors that affect the acquisition of motor skills. At the HPL, we  
9 studied oxygen consumption and cardiac output in humans.

10 7. In 2000, I accepted a position as the executive director of the Midwest Institute for  
11 Exercise Physiology in Michigan. The Institute is a private for-profit organization that studies all  
12 aspects of exercise physiology. Since my arrival, I have focused the Institute’s studies on the use  
13 of steroids by both amateur and professional athletes for two reasons. First, I have a deep  
14 personal interest in the subject. Second, as executive director, my most important responsibility  
15 is the bottom line. As everyone knows, the abuse of steroids is the hot issue in our field. As  
16 such, the Institute’s published studies have become very profitable.

17 8. One of the conditions of my accepting the Institute’s executive director position is that I  
18 am allowed to do consulting on the side. Since 2000, I have accepted around 10 outside  
19 engagements. I was contacted by the attorneys for Kelly Simon to provide expert testimony in  
20 Kelly’s case against Terry Swift and Eastside High School. I am charging my standard fee of  
21 \$500 per hour. I have not been paid yet, but I estimate that my total fee will be approximately  
22 \$10,000. I probably will donate half of my fee to the Scott Johnson Foundation, a non-profit  
23 organization that I established in memory of my nephew. The Foundation’s mission is to educate  
24 young amateur athletes about the dangers of steroid abuse and to do whatever possible to hold  
25 those who encourage steroid abuse responsible for the harm that they cause.

26 9. Steroids are not bad in and of themselves. In fact, steroids are hormones naturally  
27 produced by the human body. Naturally produced steroids help control: (i) the stress of illness  
28 and injury; (ii) immune functions; (iii) development of sexual characteristics; (iv) inflammation;

1 (v) metabolism; and (vi) salt and water balance. Synthetic steroids are chemically similar to  
2 natural steroids and duplicate their actions, and they can be prescribed by doctors for various  
3 legitimate medical treatments. Some of the synthetic steroids that are commonly prescribed  
4 include cortisone, hydrocortisone and prednisone. All three of these synthetic steroids often are  
5 used to suppress inflammation, and their use can alleviate the symptoms of inflammatory  
6 conditions such as arthritis and asthma.

7 10. Even the steroids that are used for legitimate medical purposes have serious side effects,  
8 such as: (i) bone thinning; (ii) high blood pressure; (iii) fluid retention; (iv) mood swings; (v)  
9 weight gain; (vi) muscle weakness and pain; (vii) nerve damage; and (viii) decreased resistance to  
10 infection. Because of the potential severe consequences, it is important that the use of steroids be  
11 monitored closely by a medical doctor.

12 11. Most people who think of steroid abuse are thinking of anabolic steroids. Anabolic  
13 steroids are chemically related to testosterone. Although anabolic steroids can be prescribed to  
14 treat certain growth and other disorders, they are less commonly prescribed than cortisone,  
15 hydrocortisone and prednisone. Anabolic steroids are commonly used by athletes illegally either  
16 orally or by injection to increase muscle mass and strength by allowing athletes to recover from a  
17 hard workout more quickly. Some athletes also like the aggressive feelings caused by anabolic  
18 steroids.

19 12. Anabolic steroids have serious side effects, many of which aid in determining whether  
20 somebody is abusing steroids. Males may develop prominent breasts, baldness, a higher voice,  
21 shrunken genitals and infertility. Females may develop a deeper voice, enlarged genitals,  
22 increased body hair, baldness and increased appetite. Both males and females may experience:  
23 (i) severe acne; (ii) liver problems; (iii) increased bad cholesterol and decreased good cholesterol;  
24 (iv) aggressive behavior; (v) depression; (vi) distractibility and irritability; (vii) extreme mood  
25 swings; (viii) paranoid jealousy; and (ix) impaired judgment stemming from feelings of  
26 invincibility. Indeed, there are several documented incidents of anabolic steroid abuse causing  
27 young athletes to commit suicide.

28 13. Erythropoietin (“EPO”) is a glycoprotein hormone that is naturally produced by the

1 kidneys. It stimulates the bone marrow to make red blood cells. The rise in red blood cells  
2 increases the oxygen-carrying capacity of the blood. It is possible for the body to produce too  
3 much EPO on its own.

4 14. In 1985, EPO was produced synthetically for the first time. Synthetic EPO, which is  
5 very expensive, is injected as a medical treatment for certain types of anemia. It also can be  
6 given prior to surgery to patients who cannot receive a blood transfusion for medical or religious  
7 reasons to counteract expected blood loss during the surgery.

8 15. Endurance athletes, such as cyclists, long-distance runners, speed skaters and cross-  
9 country skiers, often misuse synthetic EPO to increase their endurance. This often is called  
10 “blood doping”. The abuse of EPO is difficult to detect, however, because the available tests  
11 cannot distinguish between naturally produced EPO and synthetic EPO.

12 16. Elevated levels of EPO can be extremely dangerous, especially when combined with  
13 vigorous exercise, because it increases the viscosity (or thickness) of the blood. The thicker  
14 blood has trouble passing through the thin capillaries. One common side effect of abusing EPO is  
15 recurring nosebleeds. Another side effect is that a person abusing EPO becomes ill more often,  
16 because the EPO lowers the white blood cell count, resulting in a failure of the immune system.  
17 More significantly, when an athlete who uses EPO sleeps, the athlete’s heart beats very slowly,  
18 increasing the risk for a heart attack or stroke.

19 17. It is difficult to know precisely how many student athletes are abusing steroids, because  
20 most of the studies rely on surveys of the student athletes themselves. It is clear, however, from  
21 studies by the Centers for Disease Control and Prevention that the abuse of steroids by students is  
22 on the rise--and the age at which student athletes begin to use steroids is going down.

23 18. The World Anti-Doping Agency (“WADA”) was established in 1999 to promote and  
24 coordinate the international fight against doping in competitive sports. It was set up as a  
25 foundation under the initiative of the International Olympic Committee with the support and  
26 participation of intergovernmental organizations, governments, public authorities and other public  
27 and private bodies fighting against doping in sports. WADA generates a list of prohibited  
28 substances each year. WADA’s list has become the standard in competitive sports. Accordingly,

1 I stay familiar with and can testify regarding WADA's list. EPO is on WADA's list of prohibited  
2 substances.

3 19. I always believed that mandatory testing of athletes was an invasion of the right to  
4 privacy guaranteed by the Constitution. When Scott died, however, I realized how wrong I was  
5 and changed my mind. Designating a steroid as a prohibited substance does not do any good  
6 unless the athletes are tested for prohibited substances. Accordingly, I believe that random  
7 testing of high school athletes should be mandatory. Unfortunately, no state has yet adopted  
8 mandatory random testing, but lawmakers in Florida and Michigan are trying to do so.

9 20. Although no state requires mandatory random testing, I believe that individual school  
10 districts and schools should institute mandatory random testing programs--and several have.  
11 Most school districts, however, do not have random testing programs because of the cost.  
12 Although the initial test is only \$80 per student athlete, it costs significantly more to conduct a  
13 second round of tests to confirm a positive initial test.

14 21. Although mandatory testing programs are a good deterrent, mandatory testing programs  
15 are not 100% effective, primarily because steroid abusers come up with ways to mask steroid  
16 tests. Accordingly, even where mandatory testing programs are used, it is important that athletic  
17 directors and coaches be vigilant in (i) watching their student athletes for signs of steroid abuse,  
18 and (ii) counseling their student athletes against using steroids, especially where signs of steroid  
19 abuse are present. In this regard, I believe that all high school athletic directors and coaches  
20 should attend a six-hour course regarding steroid abuse taught by a certified instructor. In  
21 addition, they should attend an annual refresher course to stay abreast of the constant changes that  
22 occur with respect to steroid abuse by athletes.

23 22. High school athletes are vulnerable and under a lot of pressure. This is especially so  
24 with athletes who are looking to gain the edge necessary to compete at the next level.  
25 Accordingly, high school coaches need to be careful not to say or do anything that their student  
26 athletes could construe as encouraging the use of steroids.

27 23. I have reviewed all of the affidavits and all of the exhibits in this case. These are the  
28 type of documents that I typically review in my consulting engagements, depending on the type

