

State of Michigan 55 th Judicial District 30 th Judicial Circuit	AFFIDAVIT IN SUPPORT OF COMPLAINT	Case No: District: Circuit:
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THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:

1. I, Affiant Detective Sergeant (D/Sgt.) Andrea Munford (Affiant), am currently employed with the Michigan State University Police Department in East Lansing, Michigan and have been for 20 years. I am currently assigned to the Special Victims Unit and investigate sexual assaults.
2. On August 29, 2016, I began a CSC investigation involving a former gymnast, Victim C, who reported being sexually assaulted by MSU Sports Medicine Dr. Lawrence Gerard Nassar. Prior to reporting to the police, Victim C participated in an interview with the Indy Star after reading an article they published about the cover up by USA Gymnastics of coaches that sexually abuse gymnasts. On September 12, 2016, the Indy Star and Lansing State Journal published an article which included Victim C's story as well as information provided by two victims that chose to remain anonymous.
3. Shortly after the article published, I began receiving phone calls from additional victims reporting Nassar had sexually assaulted them. The investigation, at the time of drafting this Affidavit for Search Warrant, includes 81 victims with reports of similar details of how they were assaulted.
4. As a result of the above-mentioned news stories, the MSU P.D. was contacted by the below-referenced Victims A, B, D, E, F, G (or their parents), who reported that they were also sexually abused by Dr. Larry Nassar while he treated them at either the MSU Sports medicine clinic offices or after-hours at his home in Holt, Michigan.
5. Defendant Lawrence Gerard "Larry" Nassar is a former associate professor at Michigan State University College of Osteopathic Medicine. Nassar was also the lead doctor for the USA women's gymnastics team during four Olympic Games and has been affiliated with the national organization for approximately thirty years. He also was a clinician seeing patients at the MSU Sports Medicine Clinic and served as the team physician for the MSU women's gymnastics team, women's crew team, and for a local gymnastics club, Gedderts' Twistars Gymnastics Club in Dimondale, Michigan. In the fall of 2016, MSU fired Nassar, relieving him of all of his academic, clinical and patient duties.
6. Victim A is now 16 years old and was forensically interviewed by law enforcement on September 21, 2016. Throughout her gymnastics career, Victim A sustained various injuries and was treated by Defendant multiple times, including at his sports medicine clinic office and at Gedderts' Twistars Gymnastics Club.
7. Victim A disclosed that she was 10 years old the first time she was sexually assaulted by Nassar. At Twistars, Nassar would come on Monday nights to treat the gymnasts. Nassar would use the back room at the gym to work. This particular Monday, Victim A signed up to see Nassar. Nassar was to readjust

her ribs. While pressing on her back, Nassar pulled her leotard up and touched her vagina. Victim A stated Nassar's bare hand and fingers went "in between the flaps" of her vagina. Victim A stated she felt "grossed out". Nassar did not wear gloves, did not tell her he would be vaginally penetrating her nor did he obtain consent from either Victim A or Victim A's parents.

8. Victim A was also treated by Nassar at his clinic at MSU, where on at least one occasion when she was under the age of 13, Nassar penetrated her vagina with his ungloved fingers. At age 11, near her 12th birthday, Victim A sustained a foot injury and saw Nassar at his office. Victim A's father accompanied her to the appointment. At the start of the visit, Victim A's father and a MSU student were in the treating room. Nassar explained that a leg massage would help her foot. Nassar had the MSU student leave and told Victim A's father that the massage would take time. Victim A's father stepped out into the waiting room.

9. Victim A stated Nassar had her change into baggy shorts. As she laid on the treating table, Nassar massaged her calf and thighs. He then put his hand on her inner thigh, close to her vagina. Victim A stated before she knew it, Nassar had his fingers in her vagina. He also was touching really hard on her clitoris. Victim A described that Nassar being really sweaty and into it. Victim A also remembers Nassar putting a lot of hand sanitizer on his hands and wiping it away. He did not wear gloves.

10. Victim A saw him three more times with her mother. With her mother present, Nassar did not sexually assault her. Victim A stated that Nassar followed her and other gymnasts on social media. Victim A stated she and the other gymnasts would talk about Nassar. They would discuss how he was "touchy". At the time, Victim A did not question Nassar because he was doing the same to other gymnasts she knew. Victim A stated that because she was so young, she really didn't know anything was wrong.

11. On September 15, 2016, I received a phone call from Victim B's mother, who stated her daughter, a gymnast, was a patient of Nassar. Victim B saw Nassar in the spring of 2011 for back related injuries she suffered as gymnast. At the time, Victim B was 11 years old.

12. According to her mother, Victim B saw Nassar for five appointments at his office, MSU Sports Medicine Clinic. Each appointment would last 45 minutes to an hour. Nassar would assess Victim B's back motion. Nassar told Victim B to lie on her stomach on the treating table. He would pull her shorts to the side and say "I'm going to massage you now." Nassar never told Victim B's mother that he was touching or penetrating Victim B's genitalia and no consent was given. Her mother would be the only person present in the room. There was never a nurse present. Victim B's mother stated that Nassar was always facing away from her so she could not see much of him.

13. Victim B, who is now 17, was interviewed by MSU PD. She stated that all of her appointments with Nassar were at the end of the day when no one else was in his office. During the appointments, she would be wearing a shirt, bra, and underwear. Victim B stated her mother would sit in front of her. Nassar would massage her buttocks, hamstrings, and IT bands. As Nassar massaged Victim B, he would put his fingers in her vagina and thumb in her anus. Victim B stated that one time, he "wiggled" his finger in her vagina. Nassar would penetrate her vagina and anus during the entire appointment, which was about a half hour. Victim B was under the age of 13 at the time of each of these assaults. Victim B stated Nassar did not wear gloves and used cream to put on his fingers. This occurred at each appointment. Nassar never told her he was going to penetrate her. On her last appointment with Nassar, he gave her a green MSU leotard. Victim B believes it was because Nassar "felt guilty".

14. Victim C, now 32, was the first victim to file a criminal complaint against Nassar. In 2000, Victim C was a gymnast at the Kalamazoo Gymnastic Club. Victim C suffered from back, wrist, and ankle injuries. Victim C was referred to Nassar by an upper level gymnast. Victim C described Nassar's reputation as the "gold standard" for conditioning.

15. Victim C was 15 years old when she was treated by Nassar. Victim C's first appointment with Nassar was on February 2, 2000. Nassar evaluated Victim C. Nassar told her that her back muscles were not "firing properly", causing extra back pressure. Nassar suggested myofascial release and osteopathic sports massage. While she was standing, Nassar inserted two fingers into her vagina. Victim C reported she was aware of inter-vaginal treatment, but didn't know what it looked like. Nassar did not wear gloves and did not obtain consent from Victim C or her mother.

16. On February 23, 2000, Nassar checked Victim C's alignment. Again, Nassar told Victim C he wanted to perform myofascial release and massage. Victim C reported Nassar put two fingers up to his knuckle into her vagina. Victim C stated the penetration lasted for twenty to thirty minutes. Victim C stated that his fingers were thrusting and sweeping inside her vagina. Nassar also massaged her external genitalia and inserted his thumb in her rectum.

17. Victim C stated that on either March 3rd or March 8th, 2000, Nassar removed her shorts and underwear. He draped a sheet over her and vaginally penetrated her. Victim C stated her mother was present, however, she could not see what Nassar was doing. Victim C reported that the vaginal penetration lasted for thirty to forty minutes.

18. On Victim C's fifth visit, April 18, 2000, Nassar vaginally and anally penetrated her. Toward the end of the session, Nassar removed her bra. He then cupped her exposed breast and nipple. Victim C stated that she noticed Nassar's visible erection protruding from his pants. Victim C stated Nassar was breathing heavily and his face was flushed. Victim C said, "there was absolutely no therapy going on at that moment". Victim C reported Nassar often commented on her physical appearance and clothing. Nassar would hug and touch her.

19. Victim C stated that since coming forward, she feels physically ill and anxious. She does not see physical contact as innocent. Victim C has difficulty seeking routine medical treatment. Victim C struggles with trust and intimacy. She often has nightmares.

20. Victim D, age 15, was forensically interviewed on September 23, 2016 by law enforcement. Victim D saw Nassar in 2014 for injuries related to her hamstring, back, ankle, and hip. She was 13 years old.

21. During her first visit, Nassar massaged her back, calves and legs. Victim D's mother was in the room. Victim D laid on the treating table facing away from her mother. Victim D stated Nassar massaged her vagina underneath her underwear and put his hand inside her vagina. Nassar did not use gloves or lubricant. Victim D and her mother were never told by Nassar that he would be vaginally penetrating her nor did they consent.

22. Victim D stated Nassar often made her uncomfortable. Nassar always massaged her feet and cracked her toes. Victim D told Nassar she didn't like it, but he continued. Victim D stated that Nassar made her feel weird and disgusted. She talked to her mother after the sexual assault, but did not give any details. Once the allegations were made public, Victim D told her mother what happened. Victim D is still competing as a high level gymnast and considered Defendant an authority figure.

23. On September 27, 2016, Victim E, was interviewed by Det. Ester Ray of the Michigan State University Police Department. Victim E, now 17, saw Nassar from 2011 through 2015. She was referred to Nassar by her gym for her back pain. For the first few years, Victim E saw Nassar twice a year and then annually. Victim E's father took her to every appointment. She saw Nassar at his sports medicine clinic office.

24. Victim E believed the sexual assault occurred in 2013 or 2014. She was 14 or 15 years old. Victim E stated that at one appointment, Nassar gave her a pin from the London 2012 Olympics. Dr. Nassar told her "I saw this and thought of you. I made sure you got one."

25. Victim E clearly remembered the appointment that Nassar sexually assaulted her. Nassar had Victim E change into a pair of baggy shorts. Victim E's father was in the room. However, Victim E was positioned in a manner that he couldn't see what was happening.

26. Victim E stated that Nassar told he was performing myofascial release on her. During the procedure, Nassar went underneath the shorts and her underwear and penetrated her vagina. Nassar moved his fingers inside her vagina for more than ten minutes. He was not wearing any gloves. Neither Victim E nor her parents were told by Nassar that he would penetrate Victim E's vagina and they did not consent.

27. After the appointment, Victim E told her parents that Dr. Nassar had done something "really weird" to her. She did not give them any details until the media reports in September 2016.

28. On September 15, 2016, Det. Andrea Munford interviewed Victim F. Now 21 years old, Victim F was a patient of Nassar from age 13-19. She suffered back injuries from gymnastics and competitive dance. From January 2008 through May 2008, Victim F saw Nassar on a weekly basis. Over the next several years, she saw him monthly. Victim F stated she had at least 30 appointments with him.

29. At her first appointment, Nassar told Victim F and her mother that he knew an "Australian technique", which he did not explain. Nassar then put his fingers in Victim F's vagina. Neither Victim F nor her mother gave their consent.

30. Victim F stated that when her mother was in the room, Nassar covered her with a sheet. If her mother stood up to see what was happening, Nassar stopped penetrating her. Victim F stated that the penetration became more aggressive and invasive over time. During her appointments, she would grit her teeth to prevent from yelping in pain. Nassar would anally and vaginally penetrate her for approximately 45 minutes. Nassar would also touch her breasts. Victim F stated that at times, Nassar would have one hand in her vagina with the other on her breast.

31. Victim F stated Nassar never used gloves and put massage cream on his fingers. Nassar would not vaginally penetrate her if she was on her period. Victim F also saw Nassar with a noticeable erection. During one appointment, he told her to shave her pubic hair. On another occasion, while penetrating her, he talked about "fingering his ex-girlfriend in the same way." On her last appointment, Nassar told Victim F that she was so flexible inside her vagina, he could put his whole hand in there.

32. Victim F came forward after reading the Indy Star article. Victim F stated she trusted Nassar and the two became friends. Victim F believes Nassar twisted treatment into having parents watch their children get molested.

33. On September 22, 2016, Victim G, 21, was interviewed by Det. Kimberly Parviainen. Victim G was also a Twistars gymnast. Nassar treated Victim G from the age of 9. However, the penetration began when she was 13 or 14 years old.

34. Victim G stated she suffered from back pain and Nassar treated her at his home. Victim G reported she saw Nassar weekly. Victim G stated she was vaginally penetrated during most of these appointments. Victim G stated she would take off her t-shirt and Nassar would pull down her shorts and underwear. Nassar would then vaginally penetrate her.

35. Victim G stated Nassar got more comfortable as time went on. Nassar would move his fingers more and rub her clitoris. Victim G reported that Nassar never wore gloves, but used hand sanitizer. On occasion, Nassar used body butter, which he rubbed into her clitoris, vagina and rectum. Victim G stated Nassar used two fingers to penetrate her for approximately 10 minutes.

36. Victim G also reported that Nassar treated her at his office approximately twenty times. During six of those appointments, Victim G recalls being penetrated. Nassar told Victim G that the penetration was a “medical thing” and there was “supported medical research”. Victim G stated that all the gymnasts trusted Nassar, and therefore, she did not tell her parents.

Reviewed on: 2/21/2017

Angela M. Povilaitis

Angela M. Povilaitis, P58430
Robyn Liddell, P68287
Assistant Attorneys General
3030 W. Grand Blvd.
Detroit, MI 48202
(313) 456-0180

Det./Sgt. Andrea Munford (Affiant)

Michigan State University Police Department

Subscribed and Sworn before me on: _____
Date

Honorable
Judge/Magistrate – 55th District Court