

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF PROFESSIONAL LICENSING  
BOARD OF ATHLETIC TRAINERS  
DISCIPLINARY SUBCOMMITTEE

In the Matter of

LIANNA GAYE HADDEN, A.T.  
License No. 26-01-000722

Complaint No. 26-18-149886

ADMINISTRATIVE COMPLAINT

Attorney General Dana Nessel, through Assistant Attorney General  
Bridget K. Smith, on behalf of the Department of Licensing & Regulatory Affairs,  
Bureau of Professional Licensing (Complainant), files this complaint against  
Lianna Gaye Hadden, A.T. (Respondent), alleging upon information and belief as  
follows:

1. The Board of Athletic Trainers, an administrative agency established  
by the Public Health Code, 1978 PA 368, as amended, MCL 333.1101 *et seq*, is  
empowered to discipline licensees under the Code through its Disciplinary  
Subcommittee (DSC).

2. Respondent has been licensed to practice as an athletic trainer since  
2010 pursuant to the Public Health Code. At all times relevant to this complaint,  
Respondent worked as an athletic trainer at Michigan State University.

3. Section 16221(b)(vi) of the Code provides the DSC with authority to take disciplinary action against a licensee for lack of good moral character, defined in section 1 of 1974 PA 381, as amended; MCL 338.41 *et seq*, as the “propensity on the part of the person to serve the public in the licensed area in a fair, honest and open manner.”

4. Section 16226 of the Code authorizes the DSC to impose sanctions against persons licensed by the Board if, after opportunity for a hearing, the DSC determines that a licensee violated one or more of the subdivisions contained in section 16221 of the Code.

#### FACTUAL ALLEGATIONS

5. Respondent has been an athletic trainer at MSU since 2000. Respondent also worked as a student-trainer in 1999. During that time, Larry Nassar was a licensed doctor of osteopathic medicine at MSU’s Sports Medicine Clinic. In her role, Respondent worked with Nassar on a professional level, often providing athletic training services to athletes under Nassar’s medical care. In 2018, the Board of Osteopathic Medicine and Surgery’s DSC permanently revoked Nassar’s osteopathic license based, in part, on his criminal sexual conduct convictions involving conduct with MSU student athletes during medical appointments.

6. Student-1, an MSU female athlete, saw Nassar for treatment of a sports-related injury in 1999 and 2000. On multiple occasions, Nassar penetrated Student-1's vagina with an ungloved finger under the guise of medical treatment.

7. During that time, Student-1 told athletic trainers about Nassar's conduct, including Respondent.

8. Specifically, in the spring of 2000 Student-1 sought treatment from Respondent during one of the team's out-of-state trips. During the treatment with Respondent, Student-1 described Nassar's conduct in detail, including the vaginal penetration. According to Student-1, Respondent began crying and advised Student-1 that she needed to tell someone what occurred. Respondent also advised Student-1 that she would tell her supervisor.

9. Shortly thereafter, Student-2, another student athlete, advised Respondent that she was uncomfortable with Nassar's treatment and asked if there was a confidential way to report her discomfort. According to Student-2, Respondent advised that if she believed his conduct was criminal, she should file a complaint. Student-2 admits that she did not give Respondent any details but believed Nassar's use of inter-vaginal treatment was well known to the staff, including Respondent.

10. On June 11, 2018, Respondent was interviewed by Department of Attorney General Special Agents as part of the investigation into Nassar's conduct at MSU. During that interview, Respondent was advised that the interview was part of a police investigation.

11. During her interview, Respondent denied that Student-1 or any other student athlete had ever advised her of concerns with Nassar or his treatment. She also denied any knowledge that Nassar may have been performing inter-vaginal procedures.

12. When asked about Student-2 specifically Respondent indicated that she had absolutely no memory of that conversation and it would have been something she would remember.

13. Based on the information obtained throughout the investigation, Respondent's statements to the investigators on June 11, 2018 were untruthful.

#### COUNT I

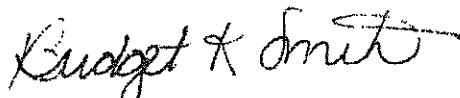
14. Respondent's conduct as described in paragraphs 10-13 regarding giving false statements to investigators evidences a lack of good moral character in violation of section 16221(b)(vi) of the Code.

THEREFORE, Complainant requests that this Complaint be served upon Respondent and that Respondent be offered an opportunity to show compliance with all lawful requirements for retention of the aforesaid license. If compliance is not shown, Complainant further requests that formal proceedings be commenced pursuant to the Public Health Code, rules promulgated pursuant to it, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 *et seq.*

RESPONDENT IS HEREBY NOTIFIED that, pursuant to section 16231(8) of the Public Health Code, Respondent has 30 days from receipt of this complaint to submit a written response to the allegations contained in it. Pursuant to section 16192(2) of the Code, Respondent is deemed to be in receipt of the complaint 3 days after the date of mailing listed in the attached proof of service. The written response shall be submitted to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan, 48909, with a copy to the undersigned assistant attorney general. Further, pursuant to section 16231(9) of the Code, failure to submit a written response within the 30 day-period shall be treated as an admission of the allegations contained in the complaint and shall result in transmittal of the complaint directly to the Board's Disciplinary Subcommittee for imposition of an appropriate sanction.

Respectfully submitted,

DANA NESSEL  
Attorney General



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Dated: February 19, 2019