

<b>State of Michigan</b> 56 <sup>th</sup> Judicial District 56 <sup>th</sup> Judicial Circuit	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>Case No:</b> 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, Ingham County Victim C, who reported being sexually assaulted by MSU Sports Medicine Dr. Lawrence Gerard Nassar. Prior to reporting to the police, Ingham County 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 Ingham County 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 PD was contacted by Victims A, B and C, or their parents. Victim A, B and C reported that they were also sexually abused by Dr. Larry Nassar while he treated them when they were gymnasts at Geddert's Twistars Gymnastics Club in Dimondale, 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. As part of his contract with MSU, Nassar provided community service work and medical treatment to gymnasts at Geddert's Twistars. 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 least three times at Gedderts' Twistars Gymnastics Club in Dimondale.

7. Victim A disclosed that she was 10 year 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 under the age of 13, Nassar penetrated her vagina with his ungloved fingers.

9. 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.

10. Victim B was interviewed by MSU PD Officer Kimberly Parviainen on September 19, 2016. Victim B, now 21, was a longtime gymnast at Geddert's Twistars Gym. Victim B stated that she was sexually assaulted by Nassar "more times than she could count." Victim B began seeing Nassar for treatment when she was approximately 10 or 11 years old. At age 15, she suffered a broken lumbar in her back. This is when the sexual assaults began to happen more frequently after this injury and on at least three occasions before she turned 16 years old.

11. Victim B stated the sexual assaults would occur in the back room of Geddert's Twistars gym. Victim B would be laying on her side and Nassar would put a blanket over her. Nassar would stand behind her, vaginally and anally penetrating her with his fingers. Victim B stated that Nassar would get more comfortable each time. Nassar would add more movement with his fingers, massage longer, and the penetration would last longer. Nassar would use two or three fingers to penetrate her vagina and one finger to penetrate her rectum.

12. Neither Victim B, nor her parents, ever consented to vaginal penetration. Nassar did not wear gloves. He occasionally used lubricant. Victim B never disclosed the sexual assaults to her parents. Like all the victims, at the time, Victim B believed Nassar was using proper treatment techniques. Victim B stated she never had any pain relief from her sessions with Nassar. Nassar would ask if she felt better and she would respond "yes", just so he would stop the penetration.

13. Victim B stated that as a competitive gymnast, you would do anything to get yourself better and that the coaches were always pressuring them to get better. She said it was like you were always in trouble if you were hurt. At the time, she thought she had to submit to this treatment to get better and never told her parents because she had to get better. Victim B stated that she and all the gymnasts trusted Nassar and that he was like a god to the gymnasts. Nassar tried to connect with the gymnasts and they could talk to him when their coaches were being mean. At the time it was occurring, Victim B and a few of her teammates began talking about their experiences with Nassar and they realized they were all being penetrated by him during their appointments. Because it was happening to all of them, they thought it was normal.

14. On October 10, 2016, Victim C was interviewed by police after she was identified as a possible witness in Victim B's case. Victim C, now 22, was a gymnast at Geddert's Twistars Club from 2007 through 2011. She was a patient of Nassar from 14 years old until she was 17. Nassar treated her at

Twistars, his office, and his home. Victim C did not pay for any treatments that occurred at Twistars or his home.

15. At age 15, Victim C sustained a compression fracture in the middle of her spine. Victim C stated Nassar treated her for this injury in the Twistars training room. Victim C stated Nassar vaginally penetrated her with his fingers. Nassar would typically insert two or three fingers into her vagina. Victim C stated that sometimes he would insert his fingers all the way in, his fingers would get close to my cervix. Victim C stated Nassar also massaged inside and around her genitals and that sometimes it was intense. This occurred on multiple occasions and more than three times between the age of 15-16 year of age.

16. Victim C stated that sometimes, others would be in the training room as Nassar was penetrating her. However, Nassar positioned her body in way to hide the penetration.

17. Victim C stated Nassar never wore gloves and used lubricant. The penetration lasted for 5 to 6 minutes. Victim C stated Nassar did not inform her about vaginal penetration and she never would have consented to it. Her parents also did not consent to these acts. Victim C reported that Nassar told her “we don’t tell parents about this because they wouldn’t understand.” Victim C stated Nassar was referring to him vaginally penetration her when he made this statement.

18. Victim C stated that it was common knowledge among the gymnasts that Nassar was vaginally penetrating gymnasts. However, no one questioned Nassar because of his position and reputation. Victim C stated she viewed Nassar as a person of authority and well-respected in the gymnastics community.

Reviewed on: 2/21/2017

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Det./Sgt. Andrea Munford (Affiant)  
Michigan State University Police Department

Subscribed and Sworn before me on: \_\_\_\_\_  
Date

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**Honorable** \_\_\_\_\_  
Judge/Magistrate – 56A District Court