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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SANTA CLARA
11

12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

14 Plaintiff,

15 v.

16 **Lavinia Fotuaika,**

17 pfn: [REDACTED], cen 2 [REDACTED]

18 **Segia Poti Jackson,**

19 pfn: [REDACTED], cen [REDACTED]

20 Defendants.

Case No. **C2503671**

FELONY COMPLAINT

AG Case No. SF2024305217

21 The People of the State of California hereby allege that in the County of Santa Clara, State
22 of California, before the making of this criminal complaint, the above-named defendants,
23 LAVINIA FOTUAIKI (DOB [REDACTED]) and SEGIA POTI JACKSON (DOB [REDACTED]) committed
24 the following different criminal offenses all connected together in their commission, and being
25 two or more different offenses of the same class of crimes or offenses, under separate counts:
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COUNT 1
Penal Code § 368(b)(1) – Felony
Elder Abuse and Neglect
2, 3, or 4 years

On or about or between September 14, 2022, and September 3, 2024, in the County of Santa Clara, and elsewhere, defendants LAVINIA FOTUAIKI and SEGIA POTI JACKSON did, under circumstances and conditions likely to produce great bodily harm and death, knowingly and willfully cause and permit the victim, R [REDACTED] M [REDACTED], an elder and dependent adult, to suffer, or inflicted thereon, unjustifiable physical pain and mental suffering or, having the care and custody of said victim, willfully caused and permitted him to be placed in a situation in which his health was endangered, and reasonably knew and reasonably should have known that said person, R [REDACTED] M [REDACTED], was an elder and dependent adult, in violation of section 368, subdivision (b)(1) of the Health and Safety Code, a felony.

It is further alleged, pursuant to sections 368(b)(2)(B) and 12022.7(a) of the Penal Code, that said victim, age 80 years and older, suffered great bodily injury.

COUNT 2
Penal Code § 368(b)(1) – Felony
Elder Abuse and Neglect
2, 3, or 4 years

On or about or between April 1, 2023, and March 11, 2025, in the County of Santa Clara, and elsewhere, defendants LAVINIA FOTUAIKI and SEGIA POTI JACKSON did, under circumstances and conditions likely to produce great bodily harm and death, knowingly and willfully cause and permit the victim, J [REDACTED] I [REDACTED], an elder and dependent adult, to suffer, or inflicted thereon, unjustifiable physical pain and mental suffering or, having the care and custody of said victim, willfully caused and permitted him to be placed in a situation in which his health was endangered, and reasonably knew and reasonably should have known that said person, J [REDACTED] I [REDACTED], was an elder and dependent adult, in violation of section 368, subdivision (b)(1) of the Health and Safety Code, a felony.

1 It is further alleged, pursuant to section pursuant to sections 368(b)(2)(A) and 12022.7(a) of
2 the Penal Code, that said victim, age 68 years and older, suffered great bodily injury.

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4 **COUNT 3**
5 **Penal Code § 368(b)(1) – Felony**
6 **Dependent Adult Abuse and Neglect**
7 **2, 3, or 4 years**

8 On or about or between January 1, 2022, and March 11, 2025, in the County of Santa Clara,
9 and elsewhere, defendants LAVINIA FOTUAIKI and SEGIA POTI JACKSON did, under
10 circumstances and conditions likely to produce great bodily harm and death, knowingly and
11 willfully cause and permit the victim, P [REDACTED] L [REDACTED], a dependent adult, to suffer, or inflicted
12 thereon, unjustifiable physical pain and mental suffering or, having the care and custody of said
13 victim, willfully caused and permitted him to be placed in a situation in which his health was
14 endangered, and reasonably knew and reasonably should have known that said person, P [REDACTED]
15 L [REDACTED], was a dependent adult, in violation of section 368, subdivision (b)(1) of the Health and
16 Safety Code, a felony.

17 **COUNT 4**
18 **Penal Code § 550(a)(5) – FELONY**
19 **Fraud – 2, 3 or 5 years**

20 On or about and between December 27, 2023 through September 30, 2024, in the County of
21 Santa Clara, and elsewhere, defendant LAVINIA FOTUAIKI did willfully, knowingly, and
22 unlawfully make and cause to be made a writing, with the intent to present it in support of a false
23 and fraudulent claim, in violation of section 550(a)(5) of the Penal Code, a felony.

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1 **SPECIAL ALLEGATION OF CIRCUMSTANCES IN AGGRAVATION**
2 **Penal Code § 1170(b)(2)**

3 As to Counts 1 through 3, it is further alleged pursuant to section 1170, subdivision (b)(2)
4 of the Penal Code that the following circumstances in aggravation as defined in section 4.421 of
5 the California Rules of Court apply and justify the imposition of the upper term of imprisonment
6 for defendants LAVINIA FOTUAIKI and SEGIA POTI JACKSON:

7 (a)(1) The crime involved . . . acts disclosing a high degree of . . . callousness;

8 (a)(3) The victim was particularly vulnerable.

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10 I declare under penalty of perjury, on information and belief, pursuant to the laws of the
11 State of California, that the foregoing is true and correct.

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13 Dated: March 12, 2025

14 Respectfully Submitted,

15 ROB BONTA
16 Attorney General of California

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18 ED GRUBAUGH
19 State Bar #280220
20 Deputy Attorney General
21 *Attorneys for the People of the State of*
22 *California*

1 **REQUEST FOR DISCOVERY**

2 Pursuant to Penal Code § 1054.5, subdivision (b), the People request from defendants and
3 defense counsel all materials and information required to be disclosed to the prosecution by the
4 defense under the authority of Penal Code § 1054.3, including the following:

5 1. The names and addresses of persons, other than the defendants, whom the
6 defendants intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a).]

7 2. Any relevant written or recorded statements of persons whom the defendants
8 intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a).]

9 3. Any reports of the statements of persons whom the defendants intend to call as
10 witnesses at trial. [Pen. Code § 1054.3, subd. (a).]

11 4. Any reports or statements of experts made in connection with the case. [Pen. Code
12 § 1054.3, subd. (a).]

13 5. Any results of physical or mental examinations, scientific tests, experiments or
14 comparisons which the defendants intend to offer in evidence at the trial. [Pen. Code § 1054.3,
15 subd. (a).]

16 6. The opportunity to view any real evidence which the defendants intend to offer in
17 evidence at the trial. [Pen. Code § 1054.3, subd. (b).]

18 This is a continuing request for the above information. If the information becomes available
19 at a future time, the prosecution, by this request, asks that it be immediately disclosed to the
20 prosecution.