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IN THE FOURTH JUDICIAL DISTRICT COURT

UTAH COUNTY, STATE OF UTAH

STATE OF UTAH, Plaintiff, vs. LAETITIA ODUNZE DOB: 05/31/1953 AG CASE NUMBER 2022-205 Defendant.	Co-defendant: Amy Lauritzen INFORMATION Criminal No. Judge
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THE STATE OF UTAH TO THE ABOVE-NAMED DEFENDANT:

The undersigned Scott Richardson, of the Utah Attorney General's Office, Utah Medicaid Fraud Control Unit, upon a written declaration states on information and belief that the Defendant, LAETITIA ODUNZE, committed the crime of:

COUNT 1

AGGRAVATED ABUSE OF A VULNERABLE ADULT, a Third Degree Felony, in violation of Utah Code Ann. § 76-5-111.2(b)-(c) (2022, as amended), in Utah County, State of Utah,

from on or about January 26, 2022, thru on or about April 11, 2022, in that defendant, LAETITIA ODUNZE, a caretaker having the care or custody of a vulnerable adult, C.N. (initials used to preserve confidentiality), under circumstances likely to produce death or serious physical injury, recklessly caused or permitted C.N.'s person or health to be injured; or caused or permitted C.N. to be placed in a situation in which C.N.'s person or health was endangered.

Per Utah Code Ann. 76-5-111.2(3)(b), a violation of Subsection (2) is a third degree felony if done recklessly.

To wit: From on or about January 26, 2022, thru on or about April 11, 2022, Defendant, a licensed Health Facility Administrator (Utah License #265414-1501) worked as the Administrator at Hidden Hollow Care Center, an intermediate care facility located in Orem, Utah, and was responsible for care provided to C.N., a vulnerable adult with a diagnosis of schizophrenia.

On April 11, 2022, at approximately 0100 hours, C.N. was struck and killed by a vehicle in the parking lot of Hidden Hollow, where C.N. had been residing since approximately January 26, 2022. The driver of the vehicle was an employee of Hidden Hollow. The Orem Police Department investigated the accident and ruled it a suicide.

C.N. was known to have schizophrenia with suicidal ideation and prior suicide attempts. To treat C.N.'s schizophrenia, C.N.'s physician had prescribed a daily dose of 150 mg. of Clozapine, a prescription medication used to treat severely ill schizophrenic patients.

At the time C.N. moved into Hidden Hollow, C.N. did not have any Clozapine with him. Rather than scheduling appropriate medical evaluations so that C.N. could be officially admitted and receive proper medical treatment, Hidden Hollow's Director of Nursing (DON) administered

Clozapine to C.N. using a stash of discontinued medication saved from a prior patient(s). This borrowed medication was given to C.N. from approximately January 21, 2022, to April 1, 2022.

On April 7, 2022, C.N. streaked naked out of the facility and into the road. C.N. was overheard repeating that he needed to call 911 because he wanted to die. The corrective action noted in follow up to this event stated, "He was to call his brother and when [DON] arrived he was taken to see her for some meds." Again, on April 10, 2022, C.N. ran out of the facility, sat in the middle of the street and attempted to lay down. Defendant pulled C.N. to his feet by pulling up on his armpits and escorted him back to the facility. The corrective actions said, "Administrator ran after him, assisted him to get up and walked back to the building." Nothing was reported in the "Plan of Future Corrective Actions" section. During an interview, Defendant said no other action was taken than to observe him closely. Defendant left the facility at approximately 2030 hours on April 10th. Defendant did not warn employee who eventually struck and killed C.N. at approximately 0100 on April 11, 2022, nor implement emergency measures.

In her role as Administrator, Defendant was a caretaker who had the duty to care for C.N., a vulnerable adult. Instead, she permitted C.N.'s health to be endangered by failing to properly follow up on suicidal behaviors. Defendant failed to take emergency action, adequately warn staff, or put safeguards in place. In doing so, Defendant has met the elements of Aggravated Abuse of a Vulnerable Adult.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: SA Scott Richardson, Nick KB Nguyen, Jonathan Erbe, Clement Iddrisu Ali, Jesica Manuela de la Cruz, Misti Buck, Andrew J. Thorup

Pursuant to Utah Code §78B-18a-101 *et seq.*, I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 22nd day of June, 2023.

/s/ Scott Richardson
SA SCOTT RICHARDSON
Declarant

Authorized for presentment and filing this 22nd day of June, 2023.

SEAN D. REYES
Attorney General

By /s/ Nathan Purser
NATHAN PURSER
Assistant Attorney General