

1 ROB BONTA
 Attorney General of California
 2 Lance Winters
 Chief Assistant Attorney General
 3 Johnette Jauron
 Senior Assistant Attorney General
 4 Dorian Peters
 Supervising Deputy Attorney General
 5 ROBERT ROMERO
 Deputy Attorney General
 6 State Bar No. 272221
 1300 I Street, Suite 125
 7 P.O. Box 944255
 Sacramento, CA 94244-2550
 8 Telephone: (916) 210-7253
 Fax: (916) 322-2368
 9 E-mail: Robert.Romero@doj.ca.gov
Attorneys for the People of the State of California

FILED
Clerk of the Superior Court

JUL 01 2024

By: V. Garcia Barron
Central Division

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 12 COUNTY OF SAN DIEGO
 13 CRIMINAL DIVISION

15 **THE PEOPLE OF THE STATE OF**
16 **CALIFORNIA,**

17 Plaintiff,

18 v.

19 **BRANDON THOMAS ZOECKLER,**
20 **(DOB: [REDACTED])**

21 Defendant.

Case No. CD304029

FELONY COMPLAINT

FOR ARREST WARRANT

22
23 The Attorney General of the State of California accuses the above-named Defendant of the
24 following offenses, which are connected to each other in their commission:

25 **COUNT 1**

26 On or about August 21, 2021, in the County of San Diego, the crime of ATTEMPTED
27 LEWD ACT UPON A CHILD AGE 14 OR 15 in violation of PENAL CODE SECTIONS
28 664/288(c)(1), a Felony, was committed by BRANDON THOMAS ZOECKLER, who did

1 willfully, unlawfully, and lewdly attempt to commit a lewd and lascivious act upon and with the
2 body and certain parts and members thereof of victim, who was 14 years old, with the intent of
3 arousing, appealing, appealing to, and gratifying the lust, passions, and sexual desires of the said
4 defendant, who was at least 10 years older than victim.

5 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code
6 Section 290, et seq. Willful failure to register is an additional and separate crime.

7 **COUNT 2**

8 On or about August 21, 2021, in the County of San Diego, the crime of MEETING MINOR
9 FOR LEWD PURPOSES in violation of PENAL CODE SECTION 288.4(b), a Felony, was
10 committed by BRANDON THOMAS ZOECKLER, who did unlawfully, and motivated by an
11 unnatural and abnormal sexual interest in children, arrange a meeting with victim, a minor, or a
12 person defendant believed to be a minor, for the purpose of exposing the genitals and pubic and
13 rectal area of victim and defendant, and to engage in lewd and lascivious behavior, and did go to
14 the arranged meeting place at and about the arranged time.

15 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code
16 Section 290, et seq. Willful failure to register is an additional and separate crime.

17
18 Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to
19 any felony offense, including any attempt to commit the offense, charged in this complaint or
20 information is required to provide buccal swab samples, right thumbprints and a full palm print
21 impression of each hand, and any blood specimens or other biological samples required pursuant
22 to the DNA and Forensic Identification Database and Data Bank Act of 1998 and Penal Code
23 section 296, et seq. Willful refusal to provide the samples and impressions is a crime.

24
25 It is further alleged as to count(s) 1 and 2, that the above offenses are offenses requiring
26 registration pursuant to Penal Code section 290(C), and that custodial time imposed for the above
27 offenses are to be served in state prison pursuant to Penal Code section 1170(h)(3).
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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Investigator Dustin Lloyd of the Department of Consumer Affairs, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant BRANDON THOMAS ZOECKLER: Attempted Lewd Act Upon A Child Age 14 or 15 in violation of Penal Code sections 664/288(c)(1) and Meeting Minor for Lewd Purposes in violation of Penal Code section 288.4(b).

Therefore, you are commanded to arrest BRANDON THOMAS ZOECKLER, and to bring said Defendant before any magistrate in San Diego County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ _____.

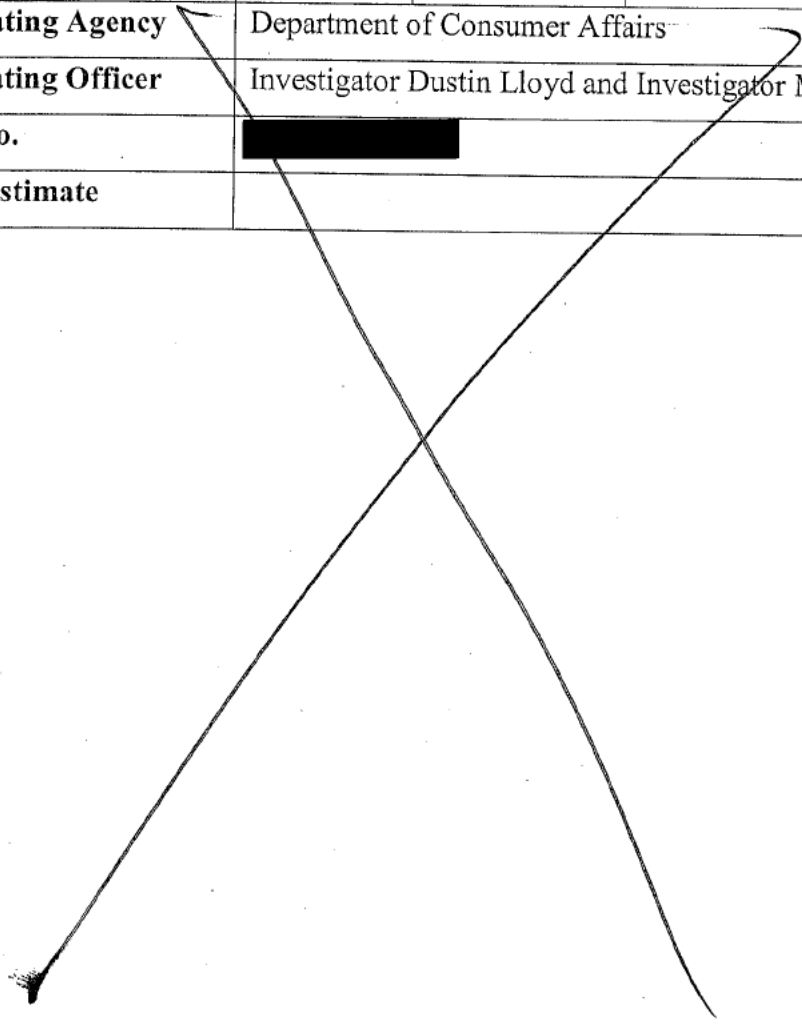
Dated: _____

Time Issued: _____ (am/pm)

JUDGE OF THE SUPERIOR COURT
State of California, County of San Diego

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Defendant	DOB	CII	DMV	Bail Requested
ZOECKLER, Brandon Thomas	[REDACTED]			\$
Investigating Agency	Department of Consumer Affairs			
Investigating Officer	Investigator Dustin Lloyd and Investigator Mayra Esparza			
Phone No.	[REDACTED]			
Prelim Estimate				



Order Holding To Answer – Felony Complaint (P.C. § 872)

It appearing to me that the offenses in the complaint have been committed and there is sufficient cause to believe the defendant guilty thereof, I order that the defendant be held to answer for the following:

(Strike out or add as applicable)

Defendant	Count No.	Charge	Range
Brandon Thomas Zoekler	1	PC 664/288(c)(1)	6-12-18 m
"	2	PC 288.4(b)	2-3-4 y

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

Brandon Thomas Zoekler \$ _____

And that said defendant be committed to the custody of the Sheriff until such bail is given. The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate Date
Superior Court of California

1 **IN THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO**

2 THE PEOPLE OF THE STATE OF CALIFORNIA)
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Plaintiff,

vs.

Zoeckler, Brandon
Defendant

**DECLARATION IN SUPPORT
OF ARREST WARRANT**

COURT No.: CD304029

DA No.:

I, Dustin Lloyd, ID# 439, do on oath make complaint, say and depose the following on this 13 day of June, 2024: that I am an Investigator employed by the Department of Consumer Affairs – Division of Investigation.

During the course of my duties, I have learned the following information based upon my discussions with the named witnesses or by having read the reports of or talked with other officers and investigators, who have spoken directly with the named witness. All references to dates refer to the current calendar year unless otherwise stated. All events referred to herein occurred in San Diego County unless otherwise stated.

On 07/14/2022, the California Board of Optometry (Board) received a complaint from Cody Mattingly (Mattingly), of People Vs. Predators, against licensed optometrist Brandon Zoeckler (Zoeckler) alleging Zoeckler went to San Diego to meet a minor for sex.

Investigator Esparza was assigned the investigation. Investigator Esparza conducted interviews and obtained documents relevant to the investigation.

The investigation revealed that on or about 08/21/2021, Zoeckler communicated on-line with an individual (Mattingly) who identified himself as being a 14-year-old boy. During this communication, Zoeckler provided the minor with photos of himself, including nude photos exposing Zoeckler’s penis. Zoeckler requested the minor send pictures of himself, showing both his face and genital area. Zoeckler described, in detail, sexual acts he wanted to perform with the minor, including “blowjobs” and “I want to cum inside your ass.” Additionally, Zoeckler stated in the messages being aware his actions were against the law stating “...but remember this is highly illegal lol.” Zoeckler then drove from Riverside County to a Food 4 Less, located in San Diego

1 County, to meet the minor for sex. Zoekler was, unknowingly, communicating with Mattingly, of
2 People Vs. Predators. Mattingly recorded Zoekler at the Food 4 Less when he attempted to meet
3 with the 14-year-old boy. During his interview with Investigator Esparza, Zoekler confirmed the
4 authenticity of the messages sent.

5 The defendant is described as a white male, approximately 42 years old, with a date of birth
6 of [REDACTED] being about 5'11" in height and 140 pounds in weight, with Brown hair and Brown
7 eyes.

8 Wherefore, your Declarant prays for the issuance of a felony arrest warrant for the above named
9 defendant for the specific crimes of:

- 10 1. 664/288(c)(1)-PC - Attempted Lewd and Lascivious Acts with a minor
11 2. 288.4(b) PC - Meeting with a minor for a lewd purpose

12 I declare under the penalty of perjury that the foregoing is true. Executed in San Diego
13 County, California, on this 24th day of June, 2024

14 
15 Declarant - Dustin Lloyd

16 Bail Recommendation: \$100,000

17
18 Reviewed for legal sufficiency by Deputy ^{Attorney General} District Attorney Robert Romero

19
20 Declaration read; Probable cause to arrest is found;

21 Warrant to issue.

22 Defendant to be admitted to bail in the sum of \$ 100,000.

23
24 Robert F. O'neill 7/2/2024
25 Judge of the Superior Court

DEFENDANT/WITNESS

26 07/02/24
(DATE)

WARRANT ISSUED, BAIL \$ 100,000

NO BAIL ()

27 Vanya Pan B
DATA ENTRY CLERK
28