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FILED
NORTHCOUNTY DIVISION

2026 JAN 26 A 9:49

CLERK-SUPERIOR COURT
SAN DIEGO COUNTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 COUNTY OF SAN DIEGO

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

14 Plaintiff,

15 v.

16 **JOSEPH ANTHONY ZYBURT,**

17 Defendant.

Case No. CN475150

**FELONY COMPLAINT
FOR ARREST WARRANT**

18
19 The undersigned is informed and believes that:

20 **COUNT 1**

21 **POSSESSION OF CHILD OR YOUTH PORNOGRAPHY**

22 **(16 MOS-2 YEARS-3 YEARS PRISON) (DESKTOP COMPUTER)**

23 On or about September 11, 2025, in the County of San Diego, JOSEPH ANTHONY
24 ZYBURT knowingly possessed or controlled matter, the production of which involved the use of
25 a person under 18 years of age, knowing that the matter depicted a person under 18 years of age
26 personally engaging in or simulating sexual conduct, in violation of Penal Code Section 311.11,
27 subdivision (a)(1), a felony.

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COUNT 2

POSSESSION OF CHILD OR YOUTH PORNOGRAPHY

(16 MOS-2 YEARS-3 YEARS PRISON) (CELLULAR PHONE)

On or about and between June 7, 2025, and September 11, 2025, in the County of San Diego, JOSEPH ANTHONY ZYBURT knowingly possessed or controlled matter, the production of which involved the use of a person under 18 years of age, knowing that the matter depicted a person under 18 years of age personally engaging in or simulating sexual conduct, in violation of Penal Code Section 311.11, subdivision (a)(1), a felony.

COUNT 3

ATTEMPTED POSSESSION OF CHILD OR YOUTH PORNOGRAPHY

(8 MOS-12 MOS-18 MOS PRISON) (ATTEMPTED PURCHASE)

On or about and between October 3, 2024, and January 6, 2025, in the County of San Diego, JOSEPH ANTHONY ZYBURT knowingly attempted to possess or control matter, the production of which involved the use of a person under 18 years of age, knowing that the matter depicted a person under 18 years of age personally engaging in or simulating sexual conduct, in violation of Penal Code sections 311.11, subdivision (a)(1), and 664, a felony.

FIRST SPECIAL ALLEGATION
CIRCUMSTANCES IN AGGRAVATION

It is further alleged as to Defendant JOSEPH ANTHONY ZYBURT, as to Counts 1 through 3, pursuant to Penal Code section 1170, subdivision (b)(2), and within the meaning of California Rules of Court, Rule 4.421, that there exist circumstances in aggravation, including the following factors:

1. The crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness (Rule 4.421(a)(1));
2. The manner in which the crime was carried out indicates planning, sophistication, or professionalism (Rule 4.421(a)(8); and,
3. Any other factors statutorily declared to be circumstances in aggravation or that reasonably relate to the defendant or the circumstances under which the crime was committed, to wit: Defendant committed the charged offenses while occupying a position of trust and while he had routine contact with minor children (Rule 4.421(c)).

DECLARATION

Further, attached and incorporated herein are official reports, documents, and/or a declaration of a law enforcement agency which the undersigned believes establish probable cause for the arrest of Defendant JOSEPH ANTHONY ZYBURT for the above-listed crimes. Wherefore, a warrant of arrest is requested for said Defendant.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
CORRECT AND THAT THIS COMPLAINT CONSISTS OF 3 COUNT(S).

Executed at VISTA, County of SAN DIEGO, on January 26, 2026.

Declarant and Complainant

1 Dated: January 26 2026

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Respectfully submitted,

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NATASHA HOWARD
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