

1 RONALD J. FREITAS
2 District Attorney, County of San Joaquin
3 State Bar Number 135885
4 By: Donald Vaughn, SBN 232955
5 Deputy District Attorney
6 222 E. Weber Avenue, First Floor, Room 101,
7 P.O. Box 990
8 Stockton, California 95201

9 Telephone: (209) 468-2400

10 Attorneys for Plaintiff

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN
12 STOCKTON BRANCH

13 THE PEOPLE OF THE STATE OF CALIFORNIA,

14 Plaintiff,

15 vs.

16 BRANDON WOLFF,

17 Defendant(s).

No. SO23-00560
SAN JOAQUIN COUNTY
SHERIFF'S OFFICE CASE
DA Case: 0935626

Complaint No: 202302061340

COMPLAINT

18 I, the undersigned, say, on information and belief, that in the County of SAN JOAQUIN, State
19 of California:

20 **COUNT 1: Code Section PC 502(C)(1)(A) ALTER/ETC COMPUTER SYSTEM FOR**
21 **ILLEGAL USE**

22 On or about January 1, 2023 to January 31, 2023, in the County of San Joaquin, California,
23 BRANDON WOLFF did commit the crime of COMPUTER ACCESS AND FRAUD, in
24 violation of Section 502(c)(1)(A) of the Penal Code, a FELONY, who at the time and place last
25 aforesaid, did willfully and knowingly access and without permission alter, damage, delete,
26

1 destroy, or otherwise use any data, computer, computer system, or computer network in order
2 to devise or execute any scheme or artifice to defraud, deceive, or extort.

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4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

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7 **COUNT 2: Code Section PC 502(C)(2) UNAUTHORIZED COPY/USE COMPUTER**
8 **DATA**

9 On or about January 1, 2023 to January 31, 2023 in the County of San Joaquin, California,
10 BRANDON WOLFF did commit the crime of UNAUTHORIZED COPY/USE COMPUTER
11 DATA, in violation of Section 502(c)(2) of the Penal Code, a FELONY, who at the time and
12 place last aforesaid, did willfully and knowingly access and without permission take, copy, or
13 make use of any data from a computer, computer system, or computer network, or take or copy
14 any supporting documentation, whether existing or residing internal or external to a computer,
15 computer system, or computer network.

16
17 If the above-named defendant(s) is/are presently on probation in San Joaquin County, any
18 evidence presented at a preliminary hearing in the instant case will be used not only as a basis
19 for a holding order in this case but also as evidence of a violation of probation and, at any
20 formal hearing on that violation of probation, the People will move the transcript of the
21 preliminary hearing into evidence as a basis for the violation.

22
23 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
24 defendant and their attorney disclose to the People all information and materials described in
25 Penal Code Section 1054.3.

1 I declare under penalty of perjury that the foregoing is true and correct except for those things
2 stated on information and belief and those I believe to be true.

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4 Executed on February 6, 2023, at Stockton, California.

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DONALD VAUGHN
Deputy District Attorney

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DV/mm

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