

**In the Circuit Court of the State of Oregon
For Multnomah County**

STATE OF OREGON

Court Nbr
Crime Report PP 20-681445

DA 2426789-1

Plaintiff,

v.

MICHAEL FOREST REINOEHL
DOB: 05/17/1972

BALLOT MEASURE 11

Information of District Attorney

ORS 163.115 (1)
ORS 166.220 (2)

Defendant(s).

The above-named defendant(s) is accused by this information of the crime(s) of COUNT 1 - MURDER IN THE SECOND DEGREE WITH A FIREARM, COUNT 2 - UNLAWFUL USE OF A WEAPON WITH A FIREARM, committed as follows:

COUNT 1

MURDER IN THE SECOND DEGREE WITH A FIREARM

The said Defendant(s), **MICHAEL FOREST REINOEHL**, on or about August 29, 2020, in the County of Multnomah, State of Oregon, did unlawfully and intentionally cause the death of Aaron Joseph Danielson, another human being, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

The state further alleges that during the commission of this felony, the defendant used and threatened the use of a firearm. This count is a part of the same act or transaction as the conduct alleged in the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument.

COUNT 2

UNLAWFUL USE OF A WEAPON WITH A FIREARM

The said Defendant(s), **MICHAEL FOREST REINOEHL**, on or about August 29, 2020, in the County of Multnomah, State of Oregon, did unlawfully attempt to use, carry with intent to use and possess with intent to use unlawfully against Aaron Joseph Danielson, a dangerous and deadly weapon, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

The state further alleges that during the commission of this felony, the defendant used and threatened the use of a firearm. This count is a part of the same act or transaction as the conduct alleged in the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument.

Dated at Portland, Oregon, in the county aforesaid, on SEPTEMBER 3, 2020.

JACKSON OSB 114240

MIKE SCHMIDT (084679)
District Attorney
Multnomah County, Oregon

By 
Issuing Deputy, OSB # 114240

Security Amount (Def - REINOEHL) NO BAIL + \$5,000
Uniform Complaint

AFFIRMATIVE DECLARATION

The District Attorney hereby affirmatively declares for the record, as required by ORS 161.566, upon the date scheduled for the first appearance of the defendant, and before the court asks under ORS 135.020 how the defendant pleads to the charge(s), the State's intention that any misdemeanor charged herein proceed as a misdemeanor.

Pursuant to 2005 Or Laws ch. 463 sections 1 to 7, 20(1) and 21 to 23, the State hereby provides written notice of the State's intention to rely at sentencing on enhancement facts for any statutory ground for the imposition of consecutive sentences codified under ORS 137.123 on these counts or to any other sentence which has been previously imposed or is simultaneously imposed upon this defendant.

INFORMATION OF DISTRICT ATTORNEY

1 approximately 2045 hours in the area of SW 3rd Avenue and SW Alder Street, City of
2 Portland, County of Multnomah, State of Oregon.

3

4 The facts and information set forth in this affidavit are based upon this affiant's
5 personal involvement in this investigation as the lead investigator, the review of police
6 reports documented under Portland Police case #20-681445 and in conversations with
7 law enforcement and non-law enforcement personnel assisting in this investigation.

8 This affidavit does not contain all facts known to me and other investigators, instead, it
9 contains sufficient facts that I believe establish probable cause. The facts establishing
10 probable cause for the above listed offenses are as follows:

11

12 On 8/29/20 at approximately 2114 hours, I was notified by Portland Police
13 Homicide Sergeant Joseph Santos (#29573) that a homicide occurred in the area of SW
14 3rd Avenue and SW Alder Street. I know this location is located in the City of Portland,
15 County of Multnomah, State of Oregon. The initial information indicated a male had
16 been shot and was deceased at the location and the incident was related to the ongoing
17 protests. I responded along with other investigators to conduct the investigation and
18 arrived at approximately 2210 hours.

19

20 Sergeant Santos briefed me on the available information and, in part, I learned
21 the following:

22

23 The shooting occurred on the west side of SW 3rd Avenue, just south of SW Alder
24 Street. Portland Police Rapid Response Team (RRT) members, who were assigned to
25 the ongoing protest activities, were several blocks away and responded to the area and
26 subsequently located the injured subject. Portland Fire Bureau Paramedics who were

1 with the RRT members provided aid, but the male was pronounced deceased at the
2 scene at approximately 2055 hours.

3
4 I personally examined the scene and observed the deceased male on the street
5 near the entrance to a parking garage located on the west side of SW 3rd Avenue.

6 Among other items at the scene, I observed the following:

7
8 1) One spent casing laying on the street located north of the deceased subject.

9 The spent casing was determined to be a Winchester brand, .380 caliber
10 casing and was documented as Placard #2.

11
12 2) A metal canister of "Bear Attack Deterrent" in the middle of SW 3rd Avenue
13 that was also north of where the deceased was located. Near the top of the
14 metal canister and below the plastic trigger housing of the spray, I observed a
15 large defect to the metal housing. The deformed metal appears consistent
16 with being struck with a bullet. The can of spray was documented as placard
17 #1.

18
19 3) Near the deceased was a black metal object which I recognized to be an
20 expandable metal baton which was documented as Placard #7.

21
22 In addition, I know that Portland Police Homicide Detective Travis Law (#42652)
23 responded and assisted in the scene investigation. Detective Law subsequently told me
24 he recovered a metal fragment of a bullet from SW 3rd Avenue, near the cross walk at
25 the intersection of SW Morrison Street. I know this location is south of where the
26 deceased was located.

1 I know Portland Police Criminalist Jason Mills (#47777) responded to assist in
2 the scene investigation and submitted all of the recovered items into evidence, including
3 the following;

4
5 1) The .380 casing and bullet fragment on Property/Evidence Receipt #A000922

6
7 2) "Bear Attack Deterrent" on Property/Evidence Receipt #A000923

8
9 I was informed by Sergeant Santos that Portland Police Officer Joshua Dyk
10 (#58506) was part of the RRT squad that responded to the location and upon checking
11 on the deceased male, removed a holstered firearm from the waistband of the
12 deceased subject and surrendered it to fellow RRT member, Officer Brent Taylor
13 (#51250). I reviewed the report prepared by Officer Taylor who documents he was
14 present when medics cut off the deceased's clothing and observed a holstered firearm
15 at the waist area. Officer Taylor wrote that Officer Dyk removed the holstered firearm
16 and handed it to him. Officer Taylor said he maintained custody of the firearm and
17 surrendered it to personnel from the Forensic Evidence Division.

18
19 I later reviewed the report by Criminalist Mills who received the firearm from
20 Officer Taylor. Criminalist Mills documents he was informed the firearm had been
21 secured by removing a bullet from the chamber. I reviewed photographs taken by
22 Criminalist Mills depicting the firearm and the ammunition contained therein. The firearm
23 was determined to be a Glock Model 17, SN#BAZD944. One Hornady 9mm Luger red
24 tip round was contained and removed from the chamber. The magazine accompanying
25 the firearm has a stated capacity of 17 rounds, but the magazine had an extension that
26 generally accommodates two additional rounds. The magazine was determined to have

1 a total of 19 rounds contained therein. The rounds contained in the magazine were also
2 Hornady 9mm Luger red tips. Based on my experience and training and based on the
3 condition of the firearm and ammunition amount, affiant believes this firearm was not
4 fired during the encounter.

5

6 Multnomah County Medico-legal Death Investigator (DMI) Erin Patrick responded
7 to the scene. I was present when DMI Patrick examined the deceased subject. DMI
8 Patrick located a wallet in the right cargo pocket of the shorts. The wallet contained an
9 Oregon Driver's license #9986873 in the name of **Aaron Joseph Danielson** (Date of
10 Birth: 9/4/80). I compared the deceased subject with the driver's license photograph
11 and confirmed he was **Danielson**. DMI Patrick also located three fully loaded 9mm
12 magazines from the cargo pockets of Danielson's shorts.

13

14 I was briefed by several assisting detectives about their respective witness
15 interviews. In part, I learned the following;

16

17 Detective Meredith Hopper (#36239) interviewed a subject named Freedom
18 Thompson (Male, White, DOB: 11/25/95). Thompson said he was walking north on SW
19 3rd Avenue along the west sidewalk when he observed a group of individuals on the
20 east side of the street. Thompson said he observed a white male enter the ramp area of
21 the parking garage and peeked out before exiting and being joined by a second male.
22 Thompson described the white male as wearing a white shirt and a backpack with a
23 waist belt, oversized shorts, approximately 6'1" tall with medium blond colored hair.
24 Thompson described the second subject as a possibly Hispanic male, approximately
25 5'10" tall and 215 pounds with short dark hair and wearing a dark shirt. Thompson both
26 subjects approached the male who was shot (Danielson). Thompson said Danielson

1 sprayed pepper spray and then he heard two gunshots. Thompson stated he did not
2 see the shooter.

3

4 Detective Hopper (#36239) also interviewed a subject named Timothy Ryerson
5 (Male, White, DOB: 7/14/68) who purported to know the deceased subject as "Jay".
6 Ryerson said he was walking south on SW 3rd Avenue when he observed what he
7 described as three black males in the area. Ryerson said one of the black males was
8 the primary aggressor and stated, "Were going to fucking kill you". Ryerson said he
9 observed "Jay" pull out a can of mace and then heard two gunshots.

10

11 Detective Hopper also interviewed a subject named Jonathan Hartley (Male,
12 White, DOB: 11/12/90). Hartley said he was driving south on SW 3rd Avenue when he
13 stopped his vehicle for a subject who walked in front. Hartley described the subject as a
14 black male, 20-30 years old, wearing a black colored hooded sweatshirt and had short
15 dreadlocks. Hartley said the male turned to a second subject he believed was a black
16 male wearing a white shirt and stated words similar to "Hey there's the guy". Hartley
17 said he saw the male who was shot (Danielson) pull out a large can and spray it which
18 was followed by two gun shots. Hartley estimated Danielson was approximately fifteen
19 feet from the two subjects when the shots were fired.

20

21 Detective Brad Clifton (#37152) interviewed a subject named Justin Dunlap
22 (Male, White, DOB: 4/12/76). Dunlap said he was livestreaming to his Facebook
23 account when the shooting occurred and that he captured the incident. Dunlap said he
24 was walking south on SW 3rd Avenue and was at SW Alder Street when his attention
25 was drawn toward the individual who was subsequently shot (Danielson). Dunlap said
26 two subjects were approaching Danielson when one of them said words similar to, "You

1 wanna go". Dunlap said he observed Danielson fire a spray bottle which was followed
2 by two gunshots. Dunlap said one of the subjects was wearing a white shirt while the
3 other was wearing all black clothing. Dunlap identified his Facebook name as "Justin
4 Dunlap".

5

6 In addition to the above, I also know Portland Police Homicide Detective Shay
7 Samora (#51733) conducted a recorded interview of a subject named Chandler Pappas
8 (Male, White, DOB: 4/29/93). I later reviewed the transcript of the interview and, in part,
9 learned the following:

10

11 Pappas identified the deceased individual as a friend he knew as "Jay". Pappas
12 stated he and "Jay" had been drinking earlier in the evening and had gone to the
13 downtown area to see what was going on. Pappas said he and "Jay" were walking on
14 SW 3rd Avenue toward the Justice Center. Pappas said he and "Jay" turned back
15 toward the intersection of SW 3rd Avenue and SW Alder Street and recalled seeing two
16 subjects. Pappas said he and "Jay" were facing off with the two subjects. Pappas said
17 he then heard two gun shots and described the shooter was the subject to his right,
18 stating, "It was the guy on the fucking right who fired". Pappas stated the shooter was
19 "right-handed" and recalled seeing the shooter putting his arm down when he turned to
20 run.

21

22 Pappas said he could not recall the exact clothing of the shooter, but stated, "It
23 wasn't all black". Pappas further described the shooter by stating, "He was a white guy",
24 subsequently adding, "And I'm fairly certain it was a white guy. I'm in shock, I don't
25 remember. Like all that stuff". Pappas added he could not describe the second subject
26 who was with the shooter.

1 I subsequently met with Portland Police Officer Matt Miller (#31884) who is
2 assigned to the Portland Police Criminal Intelligence Unit. Officer Miller said he heard
3 the broadcast regarding the shooting and subsequently began reviewing open source
4 livestream videos on the internet. Officer Miller said he learned that a subject named
5 Justin Dunlap posted a livestream video to his Facebook account. Officer Miller said
6 the video was acquired and I was provided a thumb drive that contained the video
7 obtained from the following Facebook account URL:
8 (<https://www.facebook.com/justin.dunlap.92/videos/10221132149871196>). The video
9 will hereinafter be referred to as the "Dunlap Video".

10
11 I reviewed the Dunlap video and determined the recording is twenty-one minutes
12 and twelve seconds in length. Dunlap is walking around the area while livestreaming the
13 ongoing activities. The following are the relevant times in the recording;

14
15 At approximately twelve minutes into the recording, Dunlap is at the corner of SW
16 3rd Avenue and SW Washington Street. While at the location, Subject #1, a male
17 dressed in a white shirt, light and dark colored vest with multiple pockets, dark baseball
18 style hat, dark three-quarter length pants and Subject #2, a male wearing a dark colored
19 hooded sweatshirt and dark pants, are loitering at the northeast corner of the
20 intersection.

21
22 At approximately sixteen minutes into the video, Subject #2 begins walking south
23 on SW 3rd Avenue with a white female. Subject #1 joins and all three individuals
24 continue south toward SW Alder Street.

1 At approximately eighteen minutes Dunlap is standing at northeast corner of SW
2 3rd Avenue and SW Alder Street and his camera is oriented toward the southwest
3 corner of the intersection. The video captures audio of several males speaking loudly.
4 Based on clothing and positioning, a subject I believe to be Danielson, is standing in the
5 west most lane of traffic on SW 3rd Avenue and facing south and walking away from
6 Subject #1. Subject #1 is north of Danielson and is walking west across the lanes of
7 traffic of SW 3rd Avenue prompting vehicular traffic to stop. Male voices can be heard
8 yelling at this time.

9

10 As Subject #1 reaches the west most lane of traffic, Danielson turns around and
11 appears to walk towards Subject #1. Subject #1 then pivots and turns to his left and
12 faces Danielson in what this affiant believes is consistent with a “shooters stance”. This
13 affiant’s assessment is based on hours of personal and professional experience with
14 firearms training. Specifically, Subject #1 is facing Danielson with his feet apart and
15 squared toward Danielson. The arms of Subject #1 are not visible from the vantage
16 point of the video. Affiant believes this is consistent with Subject #1 holding both arms
17 out in front while holding a firearm with both hands. See below Exhibit 1 which is a still
18 frame capture from the Dunlap video.

19

20 //

21

22 //

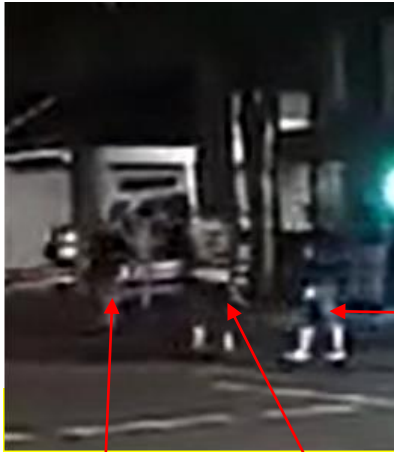
23

24 //

25

26 //

1 **EXHIBIT 1**



8

9

10

11 Danielson

11 Subject #1

11 Uninvolved subject on skateboard

12

13 After the first gun shot is heard, an explosion of what appears to be a gaseous

14 substance occurs, which is quickly followed by a second gunshot. Affiant believes the

15 gaseous substance was from the can of “Bear Attack Deterrent” that was being held by

16 Danielson and which exhibited damage consistent with being struck by a bullet.

17

18 Based on my review, I believe Subject #2 is standing to the right and slightly

19 forward of Subject #1 and is obscured from the camera view. However, after the shots,

20 Subject #2 is seen immediately running to the north. Subject #1, steps back while still

21 facing Danielson with his right arm up and extended toward Danielson before turning

22 north and running off camera view. See below Exhibit 2 which is a still frame capture

23 from the Dunlap video immediately after the shots.

24

25 //

1 **EXHIBIT 2**



11 On 8/31/20, I attended the post-mortem examination of Danielson conducted by

12 Oregon State Medical Examiner, Dr. Michele Stauffenberg. Dr. Stauffenberg

13 determined the cause of death to be a gunshot wound to the chest. Dr. Stauffenberg

14 described the gunshot wound entrance was at the right upper chest. Dr. Stauffenberg

15 described the wound track as being front to back and right to left. Dr. Stauffenberg

16 subsequently recovered a bullet from the left back area. Dr. Stauffenberg ruled the

17 manner of death as Homicide.

18

19 During the investigation I received numerous tips from community members who

20 were reviewing open source information from various social media platforms. The

21 information provided referenced or links to the Dunlap video. Other tips provided images

22 or videos of Subject #1 who is dressed in the same manner and who was observed

23 earlier in the evening prior to the shooting as well as at other protest activities. See

24 below Exhibits 3, 4 and 5.

25

26 //

1 **EXHIBIT 3**



13 The above still frame is from an open source video that was posted online which

14 appears to depict Subject #1 in downtown Portland earlier in the evening of 8/29/20.

15 Subject #1 is depicted reaching toward a pocket or pouch on left side of his vest.

16 Subject #1's unique attire and positioning appear consistent with the subject depicted in

17 the Dunlap video and in surveillance video described below.

18

19 //

20

21 //

22

23 //

24

25 //

1 **EXHIBIT 4**

EXHIBIT 5



10

11 The above still frames were obtained from open source videos that were posted
12 online. I viewed the video related to exhibit 4 and recognized the location as being in
13 Camas, Washington. Exhibit 4 depicts Subject #1 at a Camas, Washington protest.
14 Subject #1 appears in the video to be wearing the same vest and clothing that is in the
15 Dunlap video. Subject #1 also appears to have bandaging around his right arm and a
16 distinctive fist tattoo on the right side of his neck.

17

18 Exhibit 5 is a still frame from an interview posted by “Bloomberg Quick Take
19 News” on YouTube on 7/27/20. In the interview, the subject identified himself only as
20 “Michael” and says he is “48 years old”. The subject stated he had been shot in the
21 right upper arm and displayed the bandaging around the purported gunshot injury.
22 Affiant believes the still frames depict the same distinctive tattoo on the right side of his
23 neck. The tip included information indicating the subject’s possible name is “Michael
24 REINOEHL”.

25

26 //

1 I checked the name of Michael REINOEHL in the Portland Police Bureau
2 Regional Justice Information Network (Regjin) and located a **Michael Forest**
3 **REINOEHL (Male, White, DOB: 5/17/72)**. The date of birth indicates he is 48 years
4 old. I learned REINOEHL was arrested and identified by Portland Police on 7/5/20
5 during protest related activities and documented on PPB case #20-680889. I reviewed
6 the report prepared by Officer Troy Fultz (#59125). I learned REINOEHL was charged
7 possessing a loaded firearm in public, resisting arrest and interfering with a public safety
8 officer. I also learned a Walther 9mm semi-auto handgun was seized from REINOEHL
9 during his arrest. I also viewed an arrest photograph of REINOEHL and observed
10 REINOEHL was wearing the same type of three-quarter length dark colored pants as in
11 the Dunlap video, Exhibit 4, and the surveillance video to be described below.

12

13 I reviewed the Oregon Department of Motor Vehicles driver's license record for
14 **Michael Forest REINOEHL (Male, White, DOB: 5/17/72)** and noted that while his neck
15 is partially covered by a mask, I did observe the top portion of a tattoo on the right side
16 of his neck which I believe is the same tattoo depicted in the above described
17 photographs. See below image. REINOEHL'S address on his license is listed as 2820
18 NE 92nd Avenue #B, Portland, OR 97220. I also noted REINOEHL'S license was issued
19 on 7/27/20.

20

21

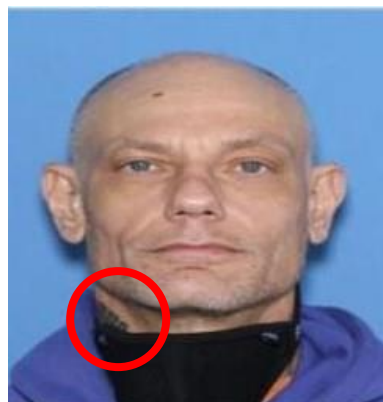
22

23

24

25

26



1 Based upon the above information, I have probable cause to believe Subject #1
2 is **Michael Forest REINOEHL (Male, White, DOB: 5/17/72)**. Subject #2 remains
3 unidentified.

4
5 On 9/2/20, I spoke with Clackamas County Deputy Shauna Woodward (#54571).
6 Deputy Woodward told me a coworker had seen open source postings regarding the
7 homicide and notified her because she had recently conducted a criminal investigation
8 of REINOEHL'S son (Devin) which is documented on CCSO case #20-070206. Deputy
9 Woodward stated she contacted me because she learned of information in her
10 investigation that could be relevant to this homicide investigation. Deputy Woodward
11 said that during her investigation, she obtained consent from Devin, to seize his phone
12 data which included text messages. Deputy Woodward said that among the texts was
13 the following from a contact labeled "Dad" on 8/7/20:

14
15 ***"Sell me the gun for a quarter pound of weed and \$100 i'm getting tired of***
16 ***this shit I need a piece now"***

17
18 Deputy Woodward said she arrested Devin on 8/12/20. Deputy Woodward said
19 she later went Devin's address, located at 2820 NE 92nd Avenue, City of Portland, and
20 observed REINOEHL at the location.

21
22 During the investigation, Portland Police Detective Cory Stenzel (#45663) of the
23 Portland Police Bureau's Digital Forensic Unit obtained video surveillance from the
24 Moda Tower, located at 601 SW 3rd Avenue. I reviewed surveillance footage from a
25 camera above the garage entry located on the east side walk of SW 3rd Avenue, just
26 south of SE Alder Street. The field of view of the camera looks north along the east

1 sidewalk of SW 3rd Avenue and captures the intersection of SW 3rd Avenue and SW
2 Alder Street. I noted the following actions of REINOEHL during my review;

3

4 **8:44:05**—REINOEHL is at the northeast corner of the intersection waiting to
5 cross southbound on SW 3rd Avenue.

6

7 **8:44:16**—REINOEHL crosses SW Alder with a white female in a white t-shirt and
8 shorts. REINOEHL and the female are staring east down SW Alder Street. Subject #2
9 and another white female are following a few steps behind.

10

11 **8:44:23**—The female in the white t-shirt stops walking and stands against the
12 wall as REINOEHL continues. Danielson and Chandler Pappas are seen rounding the
13 corner from the east and turning south onto SW 3rd Avenue. REINOEHL looks back
14 toward Danielson and Pappas, but continues walking and begins reaching toward his
15 waist band.

16

17

18

19

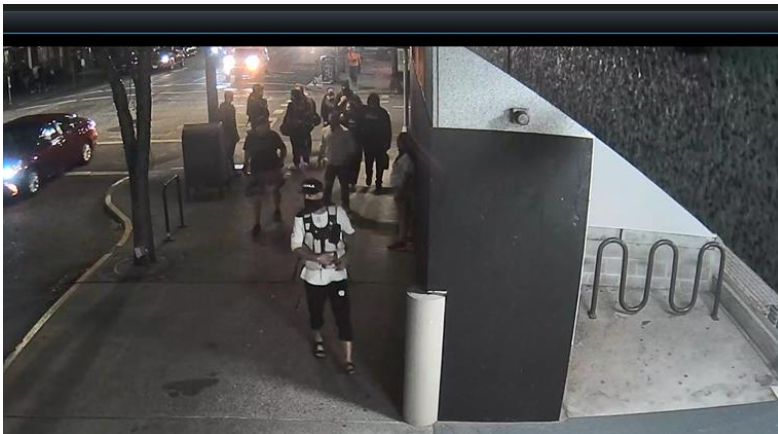
20

21

22

23

24



25

26

8:44:26—REINOEHL turns into the garage entry and reaches toward his left
front waist area. REINOEHL conceals himself, waits, and watches as Danielson and

1 Pappas continue walking by. Danielson and Pappas do not appear to interact or
2 communicate with anyone and continue southbound on SW 3rd Avenue. Danielson
3 appears to be holding a can in his right hand and what appears to be an expandable
4 baton in his left hand.

5

6

7

8

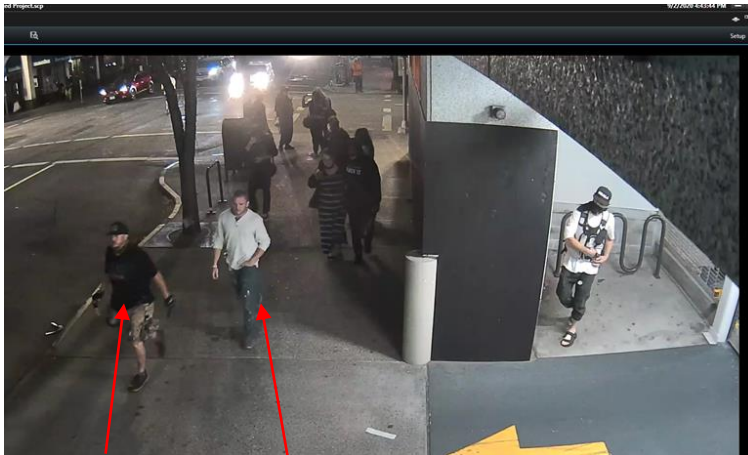
9

10

11

12

13



14

DANIELSON PAPPAS

15

16

17

18

19

20

8:44:33—After Danielson and Pappas walk by, REINOEHL begins to emerge
from garage while still reaching toward the pocket or pouch on his waistband. Subject
#2 looks back toward REINOEHL. Danielson and Pappas cross westbound across SW
3rd Avenue and REINOEHL and Subjects #2 follows them. The shooting occurs shortly
thereafter and is not captured on the surveillance video.

21

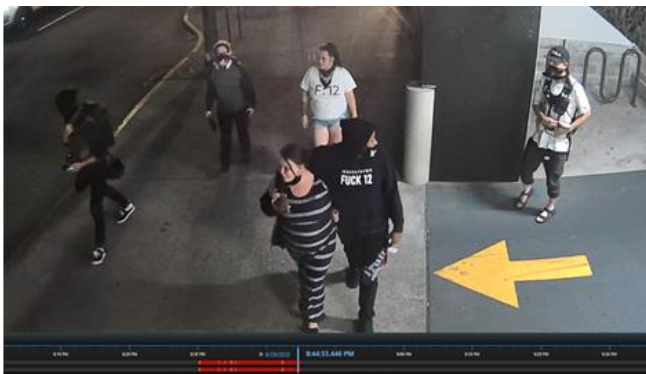
22

23

24

25

26



1 8:44:57—After the shooting, REINOEHL is observed backing into view while in the west
2 most lane. REINOEHL'S right arm is raised as he is facing toward Danielson. Subject
3 #2 has already turned and is running away. REINOEHL then turns and runs north then
4 east on SW Alder Street while appearing to manipulate the same area of his vest with
5 his hands.



Subject #2 running

REINOEHL

6
7
8
9
10
11
12
13
14
15
16 Based on the above information, I believe probable exists that, **Michael Forest**
17 **REINOEHL (Male, White, DOB: 5/17/72)**, previously referred to in this affidavit as
18 Subject #1, committed Murder in the Second Degree with a Firearm as defined in
19 Oregon Revised Statute 163.115 and Unlawful Use of a Weapon with a Firearm as
20 defined in Oregon Revised Statute 166.220 in the shooting and murder of **Aaron**
21 **Joseph Danielson (Male, White, DOB: 9/4/80)** at SW 3rd Avenue and SW Alder Street,
22 City of Portland, County of Multnomah, State of Oregon.

23
24 Therefore, I request a warrant of arrest be issued for **Michael Forest REINOEHL**
25 **(Male, White, DOB: 5/17/72)** for the charge of Murder in the Second Degree with a
26 Firearm as defined in Oregon Revised Statute 163.115 and Unlawful Use of a Weapon

1 with a Firearm as defined in Oregon Revised Statute 166.220.

2

3 I know from my training and experience, once a perpetrator of a crime has been
4 made aware they are the target of a criminal investigation, they and their associates or
5 family members, are likely to attempt to conceal, destroy or discard evidence. Based on
6 the foregoing, I request you authorize this warrant to be executed at any time of the day
7 or night.

8

9 I know from my training and experience that the premature disclosure of the
10 contents of this affidavit, warrant and District Attorney Information would jeopardize the
11 investigation because it would disclose information known only to law enforcement.
12 This disclosure could preclude law enforcement from confirming or verifying the
13 accuracy of information provided by witnesses and suspects and create a flight risk for
14 the defendant. Based on the foregoing, I request the contents and information
15 contained in this affidavit, warrant and District Attorney Information be sealed until
16 further ordered by the court.

17

18

19

20

21

22

23

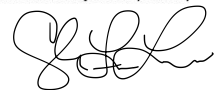
24 SUBSCRIBED AND SWORN TO before me this ____ day of ____.

25

26

I hereby declare that I administered an oath telephonically to the officer swearing to the truth of the above statement, as provided in ORS 133.545(8)(a), and that this declaration is made for use as evidence in court and is subject to penalty for perjury.

Judge Signature, Date and Time:



Hon. Angela F. Lucero
4:49 PM, Sep 3, 2020

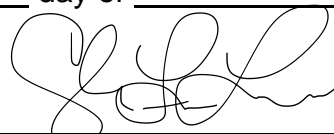


Detective Rico Beniga

Affiant

Portland Police Bureau #36906

Administered by Telephone



Multnomah County Judge
Hon. Angela F. Lucero

4:50 PM, Sep 3, 2020

1 IN THE CIRCUIT COURT OF THE STATE OF OREGON

2 FOR MULTNOMAH COUNTY

3 STATE OF OREGON,

4 Plaintiff,

5 v.

6 MICHAEL FOREST REINOEHL

7 MALE, WHITE, DOB: 5/17/72 Defendant.

Court NO.

DA NO. 2426789-1

Police No. 20-681445

WARRANT OF ARREST

8 IN THE NAME OF THE STATE OF OREGON
9 TO ANY POLICE OFFICER IN THE STATE OF OREGON, GREETINGS:

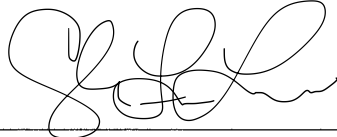
10 Information upon oath having been this day laid before me, charging the above-named with the offenses of Murder in the
11 Second Degree with a Firearm as defined in Oregon Revised Statute 163.115 and Unlawful Use of a Weapon with a Firearm as
12 defined in Oregon Revised Statute 166.220. The court finds that probable cause has been established for the above requested
13 arrest warrant;

14 **YOU ARE HEREBY COMMANDED** to arrest the above-named defendant forthwith and bring said defendant before me,
15 or, in case of my absence or inability to act, before the nearest or more accessible magistrate in this county, or if no magistrate is
16 available, to deliver said defendant into custody of the Jailer of this county.

17 (x) You are hereby authorized to enter premises in which you have probable cause to believe that the above-named
18 defendant is present, in execution of this warrant, day or night.

19 Security Amount: NO BAIL

20 Issued in the above county on September 3, 2020

21 

Hon. Angela F. Lucero

4:52 PM, Sep 3, 2020

22 Circuit Judge for Multnomah County

23 RETURN OF SERVICE

24 The undersigned Peace Officer hereby returns that he/she has executed the within WARRANT by arresting the within
25 named defendant on _____.

26 /s/ _____

Name: _____

(Type or Print)

Agency: _____

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR MULTNOMAH COUNTY**

3 DANIELSON, who was shot and killed on August 29, 2020 near the intersection of SW 3rd
4 Avenue and SW Alder Street, within the City of Portland, County of Multnomah, and State
5 Oregon. That investigation is documented under Portland Police Bureau case number 20-
6 681445;

7
8 That I have spoken with Detective Beniga regarding his investigation of the murder of
9 AARON JOSEPH DANIELSON, and I have reviewed Detective Beniga’s affidavit in support of
10 arrest warrant for suspect MICHAEL FOREST REINOEHL, a male with a date of birth of May
11 17, 1972, which was approved by Multnomah County Circuit Court Judge Angela Lucero on
12 September 3, 2020 at 1649 hours. Subsequently, Judge Lucero issued an arrest warrant for
13 MICHAEL FOREST REINOEHL for violation of the crimes of Murder in the Second Degree
14 with a Firearm, as defined in Oregon Revised Statute 163.115, and Unlawful Use of a Weapon
15 with a Firearm, as defined in Oregon Revised Statute 166.220;

16
17 That Detective Beniga’s affidavit in support of arrest warrant for MICHAEL FOREST
18 REINOEHL is attached to this addendum affidavit and marked as Exhibit A, and is incorporated
19 herein by reference. Exhibit A provides details of the investigation to support this application for
20 a search warrant;

21
22 That from reviewing Exhibit A, I learned that Detective Beniga determined MICHAEL
23 FOREST REINOEHL’s address is listed as 2820 NE 92nd Avenue #B, within the City of
24 Portland, County of Multnomah, and State of Oregon;

25
26 That Detective Beniga has advised me that at the time of this affidavit, neither the firearm

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR MULTNOMAH COUNTY**

3 used by MICHAEL FOREST REINOEHL in the murder of AARON JOSEPH DANIELSON nor
4 MICHAEL FOREST REINOEHL's clothing from that incident have been recovered;

5
6 That during this investigation, I read an official report written by Sergeant Joseph Santos,
7 DPSST #29573 of the Homicide Detail, regarding his interview of NICK YODER, a male with a
8 date of birth May 23, 1983, who is the owner of 2820 NE 92nd Avenue, and I learned the
9 following: NICK YODER stated he rents the basement of 2820 NE 92nd Avenue (#B) to
10 MICHAEL FOREST REINOEHL, and that MICHAEL FOREST REINOEHL and his son
11 "Deavin" have been living there since January of 2020. NICK YODER further stated that the
12 upstairs living area of 2820 NE 92nd Avenue (#A) is rented to separate tenants;

13
14 That the Court should be advised that on September 3, 2020, at approximately 1910
15 hours, Detective Beniga informed me he was notified that MICHAEL FOREST REINOEHL was
16 shot and killed by law enforcement at a residence located in Lacey, Washington;

17
18 That Officer James Townley, DPSST #49848, of the Portland Police Bureau, told me he
19 personally observed the residence located at 2820 NE 92nd Avenue, and describes it as follows:
20 2820 NE 92nd Avenue is a two-story residence located on the east side of NE 92nd Avenue
21 between NE Russell Street and NE Hill Way. The residence is yellowish in color with white
22 trim. The numbers "2820" are dark in color and affixed horizontally to the siding above the two-
23 car, attached garage, which is located on the north side of the residence. There is a man-door
24 located to the right side of the garage doors, which is white in color. The front door of the
25 residence is brown in color, faces west, and is at the top of a flight of stairs, on the second story
26 of the dwelling. There is a white metal railing leading up the stairs from the driveway. There

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR MULTNOMAH COUNTY**

3 are two mailboxes to the right of the front door at the top of the stairs; one is marked with the
4 letter “A” and other is marked with the letter “B,” although neither door on the front of the
5 residence is individually marked. 2820 NE 92nd Avenue #B encompasses the ground-level living
6 space of the residence. I know that 2820 NE 92nd Avenue #B is located within the City of
7 Portland, County of Multnomah, and State of Oregon;

8
9 That I know based on my training and/or experience, persons who commit crimes such as
10 Homicide, often attempt to conceal evidence of their involvement in such crimes. Persons who
11 commit these types of crimes will conceal such evidence, including, weapons, clothing, cellular
12 phones, and other trace evidence, in areas both familiar and immediately accessible, such as
13 residences and vehicles, or if they are transient, upon their person and in their possessions;

14
15 That I know based on my training and/or experience, written correspondence such as mail
16 or letters, as well as other documents such as receipts and sales slips or other written materials
17 are often left or kept inside possessions, and that such documentation can assist in the
18 identification of owners, and/or other occupants of those possessions;

19
20 That from my training and/or experience, I know that residences used by homicide
21 suspects in addition to locations where a homicide occurs, more often than not reveal evidence
22 that can identify the perpetrator and/or victim of the homicide or the circumstances leading to
23 and/or following the homicide. Such evidence includes, hair, fibers, blood, body fluids,
24 weapons, firearms and firearm accessories, including holsters, shell casings, ammunition,
25 fingerprints, photographs, videos, recording equipment, written material, clothing, or other
26 biological materials or trace evidence. I also know from my training and experience that such

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR MULTNOMAH COUNTY**

3 trace evidence can be transferred or transported by persons involved in such crimes on their
4 persons or clothing and may easily be transferred from their persons and clothing to other
5 surfaces. Further, I know that biological evidence, including blood, semen, and other bodily
6 secretions can be collected, tested, identified, and compared to evidence at the scene of the crime
7 using DNA analysis;

8
9 That I know based on my training and/or experience, electronic devices, such as cellular
10 phones, computers, or other electronic devices, have inherent evidentiary value due to significant
11 amount of information they contain, including information regarding the possessor of the device,
12 the historical geographical locations of the device, and the communications between the
13 possessor of the device and others;

14
15 That I know from my training and/or experience that forensic scientists with the Oregon
16 State Police Forensics Laboratory are capable of conducting a direct comparison between
17 recovered firearms, cartridge casings and bullets to determine if a particular firearm was used in
18 a shooting;

19
20 That, in reviewing all the above-listed information and Exhibit A, I have probable cause
21 to believe evidence of the crimes of Murder in the Second Degree with a Firearm, as defined in
22 Oregon Revised Statute 163.115, and Unlawful Use of a Weapon with a Firearm, as defined in
23 Oregon Revised Statute 166.220, will be found inside the residence, including the curtilage,
24 located at 2820 NE 92nd Avenue #B, within the City of Portland, County of Multnomah, and
25 State of Oregon;

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR MULTNOMAH COUNTY**

3 That I therefore ask the above-entitled court issue a search warrant authorizing the
4 seizure and search of residence, including the curtilage, located at 2820 NE 92nd Avenue #B,
5 within the City of Portland, County of Multnomah, and State of Oregon;

6
7 To search for, and seize instrumentalities, and evidence of the crimes of Murder in the
8 Second Degree with a Firearm, as defined in Oregon Revised Statute 163.115, and
9 Unlawful Use of a Weapon with a Firearm, as defined in Oregon Revised Statute
10 166.220, and to authorize the processing, testing, and/or searching of this evidence by me
11 and other Detectives with the Portland Police Bureau, and Criminalists from the Portland
12 Police Bureau Forensic Evidence Division, and/or other Forensic Investigators with the
13 Oregon State Police Forensics Laboratory;

14
15 To include:

16
17 Evidence of the crimes of Murder in the Second Degree with a Firearm, and Unlawful Use of a
18 Weapon with a Firearm, including, hair, fibers, blood, urine, body fluids, weapons, a .380 caliber
19 handgun, .380 caliber ammunition, shell casings, holsters, fingerprints, photographs, written
20 material, clothing, including a white shirt, a light and dark colored vest with multiple pockets, a
21 dark colored baseball-style hat with light colored lettering on the front, dark (three-quarter
22 length) pants, dark sandals, a dark mask, cellular phones, and other biological materials or trace
23 evidence, including DNA swabs, and evidence of ownership, including mail and receipts;

24
25 That I further request, specifically regarding cellular phones, this affidavit and warrant
26 only authorizes the seizure of those items, with any search and analysis to be conducted pending

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR MULTNOMAH COUNTY**

3 further affidavits specifically authorizing the search and analysis of cellular phones;
4

5 That, based on my training and experience, I know once a suspect in a violent crime has
6 been made aware s/he is the target of a criminal investigation, attempts by the suspect, or others
7 close to the suspect, are likely to be made to conceal any incriminating evidence. Based on this,
8 I further request you authorize this warrant to be executed as soon as possible and at any time of
9 the day or night.
10

11 That I know from training and experience that premature disclosure of the contents of this
12 affidavit would jeopardize the investigation because it could release information known only to law
13 enforcement. This could allow information to be released that could otherwise be used to check the
14 accuracy of information given by witnesses and suspects;
15

16 Based on the foregoing, I request the affidavit be sealed until further ordered by the court.

I hereby declare that I administered an oath telephonically to the officer swearing to the truth of the above statement, as provided in ORS 133.545(8)(a), and that this declaration is made for use as evidence in court and is subject to penalty for perjury.

Judge Signature, Date and Time:

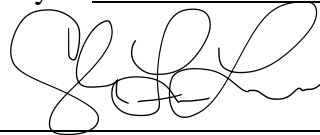


Travis W. Law, Affiant



Hon. Angela F. Lucero
8:18 PM, Sep 3, 2020

21 SUBSCRIBED AND SWORN TO before me this ____ day of ____.



Judge

Hon. Angela F. Lucero

8:18 PM, Sep 3, 2020

1 **County of Multnomah**

2 **IN THE NAME OF THE STATE OF OREGON**

3 **TO ANY PEACE OFFICER IN THE STATE OF OREGON, GREETINGS:**

4
5 You are hereby commanded to search the residence, including the curtilage, located at 2820 NE
6 92nd Avenue #B, within the City of Portland, County of Multnomah, and State of Oregon. That
7 residence is described as follows:

8
9 2820 NE 92nd Avenue is a two-story residence located on the east side of NE 92nd Avenue
10 between NE Russell Street and NE Hill Way. The residence is yellowish in color with white
11 trim. The numbers “2820” are dark in color and affixed horizontally to the siding above the two-
12 car, attached garage, which is located on the north side of the residence. There is a man-door
13 located to the right side of the garage doors, which is white in color. The front door of the
14 residence is brown in color, faces west, and is at the top of a flight of stairs, on the second story
15 of the dwelling. There is a white metal railing leading up the stairs from the driveway. There
16 are two mailboxes to the right of the front door at the top of the stairs; one is marked with the
17 letter “A” and other is marked with the letter “B,” although neither door on the front of the
18 residence is individually marked. **2820 NE 92nd Avenue #B only encompasses the ground-**
19 **level living space of the residence.**

20
21 To:

22
23 Search for and seize any item that is evidence of the crimes of Murder in the Second Degree with
24 a Firearm, as defined in Oregon Revised Statute 163.115, and Unlawful Use of a Weapon with a
25 Firearm, as defined in Oregon Revised Statute 166.220, to include:

1 Evidence of the crimes of Murder in the Second Degree with a Firearm, and Unlawful Use of a
2 Weapon with a Firearm, including, hair, fibers, blood, urine, body fluids, weapons, a .380 caliber
3 handgun, .380 caliber ammunition, shell casings, holsters, fingerprints, photographs, written
4 material, clothing, including a white shirt, a light and dark colored vest with multiple pockets, a
5 dark colored baseball-style hat with light colored lettering on the front, dark (three-quarter
6 length) pants, dark sandals, a dark mask, cellular phones, and other biological materials or trace
7 evidence, including DNA swabs, and evidence of ownership, including mail and receipts.

8

9 You, other Detectives with the Portland Police Bureau, Criminalists from the Portland Police
10 Bureau Forensic Evidence Division, and/or Forensic Investigators with the Oregon State Police
11 Forensics Laboratory are further authorized to process, test, and/or search for the above
12 evidence.

13

14 You are further directed to make return of this warrant to me within five (5) days after execution
15 thereof.

16

17 It is further ordered that the contents of this search warrant and affidavit be sealed until further
18 ordered by the court. This warrant may be executed at any time of the day or night.

19

20 ISSUED over my hand on _____ at _____ a.m. / p.m.

21

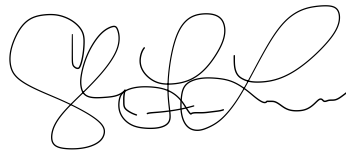
22

23

24

25

26



Signature of Magistrate

Hon. Angela F. Lucero

8:19 PM, Sep 3, 2020

Title of Magistrate