

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:

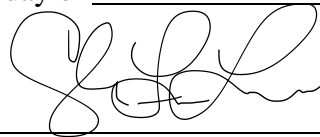
17
18
19 

20 _____
Travis W. Law, Affiant



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

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

22 
23

24 _____
Judge

25 **Hon. Angela F. Lucero**

26 8:18 PM, Sep 3, 2020