

**STATE OF WISCONSIN                      CIRCUIT COURT      MILWAUKEE COUNTY**

**STATE OF WISCONSIN**  
**Plaintiff,**

**DA Case No.: 2023ML020776**  
**Court Case No.:**

vs.

**CRIMINAL COMPLAINT**

JINOR-RILEY, TIMOTHY X  
5125 NORTH 68TH STREET  
MILWAUKEE, WI 53218  
DOB: 05/30/2003

**Defendant(s).**

*For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY**

The above-named defendant on or about Friday, August 25, 2023, at 7035 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, did recklessly endanger the safety of J-RT, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

**Count 2: BAIL JUMPING (FELONY)**

The above-named defendant on or about Friday, August 25, 2023, at 7035 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, having been charged with a felony and released from custody under Chapter 969 of the Wisconsin Statutes, did intentionally fail to comply with the terms of his bond, contrary to sec. 946.49(1)(b), 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

**Count 3: BAIL JUMPING (FELONY)**

The above-named defendant on or about Thursday, February 9, 2023, at 949 N. 9th Street, Milwaukee WI, Milwaukee County, Wisconsin, having been charged with a felony and released from custody under Chapter 969 of the Wisconsin Statutes, did intentionally fail to comply with the terms of his bond, contrary to sec. 946.49(1)(b), 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

**Probable Cause:**

Complainant is a City of Milwaukee Police Department detective and bases this complaint on his personal knowledge of this investigation as well as on reports drafted by fellow members of the Milwaukee Police Department, a review of video footage and a review of the Wisconsin Circuit Court Access Program, all of which complainant has used in the past and knows to be reliable.

On August 25, 2023, members of the Milwaukee Police Department assigned to the FBI Violent Crimes Task Force were attempting to locate Ramon Trujillo, who had open arrest warrants in three criminal cases. Law enforcement had information that Trujillo was in the area of W. Greentree Road and N. Port Washington Road, Glendale, Milwaukee County. Members of MPD and the FBI Violent Crimes Task Force proceeded to that area and, ultimately, located a black Honda Accord with Texas license plates in the parking lot of the Fairfield Inn and Suites located at 7035 N. Port Washington Road, Glendale. Law enforcement knew this vehicle to be associated with Trujillo. Law enforcement set up surveillance in an effort to locate and arrest Trujillo.

As law enforcement waited, Trujillo was observed walking near the outdoor seating area of the hotel with a towel around his neck towards the Honda Accord. Trujillo was with an individual, who was later identified as defendant Timothy Jinor-Riley, and a third unnamed individual. All three individuals walked to the Honda Accord with Jinor-Riley getting in the driver's seat and Trujillo entering the front passenger seat. As Trujillo approached the Honda Accord, law enforcement moved in to arrest him. MPD Police Officer David Cabral and Police Officer JT-R were participating in the arrest operation and were in an undercover vehicle, a Chevy Silverado pick-up truck. PO Cabral was driving and PO JT-R was in the front passenger seat. PO Cabral and PO JT-R approached the Honda Accord from one direction as PO Richard Klarkowski and PO Kyle Veloz approached from the east in another undercover vehicle. PO JT-R opened the passenger side door of the undercover vehicle and officers were yelling "POLICE" at the occupants of the Honda Accord. PO Cabral stopped the undercover vehicle in front of the Honda Accord and PO JT-R exited the front passenger door. As PO JT-R did this, Jinor-Riley accelerated forward from a parked position, started to turn left and struck PO JT-R, pinning him against the undercover vehicle. PO JT-R discharged his firearm three times. PO JT-R was pinned between the front passenger door and the doorframe of the undercover vehicle. The undercover vehicle rocked back and forth from the force of the impact. Jinor-Riley continued to drive away.

The undercover vehicle sustained significant damage to the passenger side, with the front passenger door being rendered inoperable. There was paint transfer on the undercover vehicle from the front door to the back tire. The front bumper of the Honda Accord, along with a large amount of broken plastic and the headlight housing was laying on the ground around the undercover vehicle, having been ripped off during the impact.

After Jinor-Riley struck PO JT-R, he continued driving westbound in the parking lot and then turned to travel east out of the lot. MPD officers in a marked squad car were able to stop the Honda Accord. Jinor-Riley was arrested and Trujillo, who was in the front passenger seat, was arrested. Both Jinor-Riley and Trujillo sustained gunshot wounds.

A search of the Honda Accord revealed a Glock pistol under the front driver's seat.

Complainant reviewed surveillance footage that covered the front parking lot and front entrance of the Fairfield Inn and Suites. That footage shows the following: at approximately 11:56:15 am, three subjects exit the Fairfield hotel on the East side of the building. The three subjects walk south from the hotel into the parking lot. The three subjects are described as the following:

- #1 Hispanic male, thin build, wearing black shorts, gray t-shirt, with a white towel over his shoulders, later identified as Trujillo;
- #2 Black male, slim build, wearing white shoes, black pants, a white t-shirt, with a white towel wrapped around the top of his head, later identified as Jinor-Riley;
- #3 Black male, medium build, wearing gray shoes, black pants, and a black T-shirt.

At approximately, 11:56:47 am, the three subjects walked to a black in color sedan that was parked on the lot, facing north. The vehicle was parked just out of camera view. Due to the angle of the camera only the front driver side tire and hood of the vehicle are visible. Jinor-Riley walked to the driver side of the vehicle, while Trujillo and the third subject walked to the passenger side of the vehicle. The three subjects now are out of camera view. As the three subjects walked to the black in color sedan, the unmarked police vehicle, a Chevy Silverado pick-up truck, driven by PO CABRAL with PO JT-R in front passenger seat, approaches. The Chevy Silverado drove west through the parking lot, and then turned to drive back east towards the black in color sedan

At approximately, 11:56:54 am, the unmarked Chevy Silverado continued to drive east through the parking lot until it stopped directly in front of the black in color sedan. As the Chevy Silverado came to a stop, the front seat passenger, PO JT-R opened his door and exited the vehicle. As PO JT-R exited the vehicle, the black in color sedan drove forward, directly at PO JT-R. At approximately 11:57:02 am, the black in color sedan then drove forward and collided into PO JT-R and the Chevy Silverado truck. When the black in color sedan collided with PO JT-R and the Chevy Silverado, PO JT-R was pinned between both vehicles. The Chevy Silverado rocked to the side after the collision. The black in color sedan then turned north/west and drove around the Chevy Silverado. At approximately 11:57:06 am, the black in color sedan drove west through the parking lot, and then turned back east. At this point, several plain clothes officers then run in the direction of the black in color sedan. The plain clothes officers then approached the vehicle. The black in color sedan stopped outside of camera view.

This complaint is further based on a *Mirandized* interview of Jinor-Riley who stated that he had been staying at the Fairfield hotel with Trujillo for the preceding 4 nights. Jinor-Riley stated that he knew something was “fishy” because he saw two white guys taking pictures as he and Trujillo were walking out of the hotel. Further, that he noticed a lot of vehicles in the area and he thought that was odd. Jinor-Riley stated that he got halfway into the vehicle when he heard, “don’t move, don’t move!” Jinor-Riley stated that he knew it was the police and that he knew that he had a bench warrant. Jinor-Riley stated that he did not want to go to jail so he continued to get into the vehicle and fled. Jinor-Riley stated that Trujillo was in the front passenger seat. Jinor-Riley stated that there was a truck in front of him and that he side swiped it. Jinor-Riley stated that he knew it was the police when he decided to flee. Jinor-Riley stated that the vehicle was Trujillo’s. Jinor-Riley stated that he did not see an officer standing outside the truck when he struck the vehicle nor was he trying to hit the vehicle. Jinor-Riley stated that he didn’t see another route to flee. Jinor-Riley denied knowing that the gun was under the driver’s seat but did admit to touching it a few days prior. Jinor-Riley was asked if he could go back,

knowing the outcome now, if he still would have fled. Jinor-Riley stated that he would flee again because he did not want to go to jail for his bench warrant.

This complaint is further based on a review of the Wisconsin Circuit Court Access Program, which reveals that Jinor-Riley was charged in Milwaukee County case 22CF4979 on December 23, 2023, with the felony offense of Possession with Intent to Deliver Marijuana (200-1000 grams), as a Party to a Crime in violation of Wisconsin Statutes sections 961.41(1m)(h)2 and 939.05. Jinor-Riley made his initial appearance on February 3, 2023, where he was subjected to terms and conditions of bond pursuant to Wisconsin Statutes Chapter 969. Those conditions of bond included that he appear at all future court appearances and that he commit no further crimes. On February 3, 2023, Jinor-Riley's case was set for preliminary hearing, located at 949 N. 9<sup>th</sup> Street, Milwaukee, on February 9, 2023. On February 9, Jinor-Riley failed to appear in court and a bench warrant was issued for his arrest. At the time of his arrest on August 25, 2023, Jinor-Riley still had an active warrant for his arrest and was still subjected to the terms and conditions of bond imposed on him. A certified copy of the bail bond form, criminal complaint and judgment roll in that case have been requested and will be e-filed and incorporated herein when available.

\*\*\*\*End of Complaint\*\*\*\*

**Electronic Filing Notice:**

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Megan M. Newport.  
ADA Assigned Email Address: [megan.newport@da.wi.gov](mailto:megan.newport@da.wi.gov)

Subscribed and sworn to before me on 08/29/23  
Electronically Signed By:  
Megan M. Newport  
Deputy District Attorney  
State Bar #: 1064837

Electronically Signed By:  
Detective Michael FEDEL  
Complainant