

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

COURT FILE NO.: _____

PROSECUTOR FILE NO.: 2119745

State of Minnesota,

Plaintiff,

v.

Jeffery Dale Trevino
(DOB: 01/27/1974)

570 Iowa
St Paul, MN ,

FELONY

CRIMINAL COMPLAINT

☐ Summons ☒ Warrant

☒ Order of Detention

☐ Amended

☐ Certified Juvenile

☐ EJJ

Defendant.

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

COUNT 1

On or about the 21st day of February, 2013 to the 22nd day of February, 2013, in Ramsey County, Minnesota, the defendant, **JEFFERY DALE TREVINO**, did unlawfully cause the death of K.K.T. with intent to effect the death of K.K.T.

Said acts constituting the offense of **Murder in the Second Degree** in violation of MN Statute: §609.19.1(1)
Maximum Sentence: 40 years

COUNT 2

On or about the 21st day of February, 2013 to the 22nd day of February, 2013, in Ramsey County, Minnesota, the defendant, **JEFFERY DALE TREVINO**, did unlawfully cause the death of K.K.T. without intent to effect the death of any person, while committing or attempting to commit a felony.

Said acts constituting the offense of **Murder in the Second Degree** in violation of MN Statute: §609.19.2(1)
Maximum Sentence: 40 years

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

On February 24, 2013, at 1025 hours, the defendant, **Jeffrey Dale Trevino**, DOB 01/27/1974, 570 Iowa Street, St. Paul, Ramsey County, Minnesota, called the St. Paul Police to report that his wife, K.K.T., DOB: 11/19/1982, is missing. He said that she left their home Friday morning, February 22, to run errands. She did not show up for her next shift at work at the Mall of America (MOA) on Saturday, February 23. He said that she has been having a "mid-life crisis," and has been leaving for 2-3 days at a time, staying with friends. He said that he just found out that she has been lying about where she has been staying. He said that she drives a 2006 Chevrolet Cobalt, white, MN Lic. XCG 572.

Later, on February 24, K.K.T.'s mother called the St. Paul Police and reported that K.K.T. and the defendant have been having problems. She expressed concern that the defendant may have harmed her. K.K.T. recently told her that the defendant has been checking into her bank accounts.

Police investigators conducted non-custodial interviews with the defendant. He reported the following. On Wednesday February 20, he and K.K.T. talked and agreed to try to work on their relationship. They planned a "date night" for Thursday. She worked at the MOA on Thursday until 1800. The defendant met her at MOA. They had dinner at a restaurant and then went bowling at Sky Deck. He walked her to her car at about 2120 hours. She left in her car and he traveled home in his vehicle. On the way home, he picked up a video. They watched a video together in the living room at 570 Iowa Street. She fell asleep during the movie. When the movie was over, they began to get ready for bed. She told him that she needed to get gas in the morning. He offered to put gas in her car and did so at the gas station near his home. He stated that he returned home and he and K.K.T. went to bed. On Friday morning, he and K.K.T. woke up and got ready for the day. She left home at 0830 hours in her Cobalt. K.K.T. told him that her day included working out at the LA Fitness in New Brighton; tanning at Darque Tan in Roseville; running errands; and going to work to make a bank deposit and to interview for new employees. He said that he last saw K.K.T. at 0830 hours that morning.

Wells Fargo Bank records show a debit card transaction on K.K.T.'s card at 0213 hours on February 22 from the gas station at the corner of Larpenteur Avenue and the entrances to I35E, near the defendant's home. This was the last time that her credit card was used. Surveillance video showed the white Cobalt as it arrived at the gas pumps at 0207 hours. The image is not clear enough to establish identity, but a male in gray pants and a gray hooded sweatshirt filled the car with gas and got back into the car. The car exited and went west toward the entrances to I35E, instead of east on Larpenteur, which is the most direct route to the defendant's home.

LA Fitness reported that K.K.T. last checked into the gym on Wednesday, February 20. Darque Tan confirmed that K.K.T. is a member and last used the facility on February 9. K.K.T.'s co-workers said that she did not come in to work on Friday, February 22, and that another employee was going to take care of the bank deposit that day. K.K.T. was scheduled to work next on Saturday, February 23, and she did not show for her shift, which is highly unusual.

Investigators interviewed K.K.T.'s family and friends, who provided consistent information regarding the marital problems between the defendant and K.K.T. They stated that she has been unhappy and had talked about moving out over the past few months. The last time any friends or family members heard from K.K.T. was 1800 hours on Thursday, February 21, when she left work.

Verizon Wireless confirmed that K.K.T.'s cell phone was not used after 2200 hours on Thursday, February 21.

On Monday, February 25, 2013, MOA security located K.K.T.'s car in the back corner of a parking lot at the mall. Police ordered the vehicle towed to the St. Paul Police impound lot. The tow operator saw a substance consistent with blood around the trunk opening of the car. Police also found the trunk liner a short distance from the car with apparent blood on the liner. The Minnesota Bureau of Criminal Apprehension (BCA) performed presumptive tests on several suspected blood samples taken from the car. The tests were positive for human blood.

On Monday, February 25, 2013, Investigators executed a search warrant at 570 E. Iowa, St. Paul. Investigators observed several freshly washed towels in a basket in front of the clothes dryer. The Arkansas Razorback sweatshirt, which the defendant said he was wearing on February 21, was hanging, freshly washed and air dried near the washer and dryer. Police saw two bleach-stained towels on the kitchen counter near a bottle of bleach spray cleaner. A mop and bucket were in the hallway outside of the main floor bathroom. Close inspection revealed blood spatter in the master bedroom, where the defendant said he and K.K.T. slept on Thursday night and Friday morning. Testing established that the blood was human blood. Forensic examiners found blood on the floor, box spring mattress, bed frame, book shelf, closet door, baseboard trim and west wall. Forensic scientists found evidence of extensive cleanup efforts, with furniture moved to hide evidence. Chemical testing revealed copious amounts of blood evidence inside the bedroom on multiple surfaces, on the kitchen floor and the main floor hallway outside of the bedroom. The BCA crime lab cut out a large section of the carpet in the master bedroom to examine the underside of the carpet. This examination revealed a large stain in the shape of a human head and torso. The stain tested positive for blood. This stain is situated near the west wall and the corner of the bed where blood spatter evidence was recovered. The wooden frame of the box spring in this area proved to be broken. Further chemical testing revealed additional large amounts of blood evidence in the main floor living room, hallway and bathroom as well as the landing at the top of the basement stairs, on the basement stairs, the basement floor and floor in the front of the washing machine in the laundry area. Investigators also found a carpet cleaner in the home. Examination revealed blood evidence on the wheels; and in the area where the brushes rotate, scientists found a substance consistent with clotted blood or human tissue.

Based on training and experience, a forensic scientist with the BCA opined that the blood spatter evidence is consistent with more than one forceful blow to the victim. The victim had to be bleeding prior to a subsequent blow which caused the pre-existing blood to spatter.

On Wednesday, February 27, 2013, Bloomington Police recovered MOA video showing K.K.T.'s car entering the parking lot at the MOA at 0945 hours on February 22. The video is not clear enough to establish identity, but it showed a person at the back of the vehicle. This person threw an item consistent with the trunk liner. The person then walked to the Nordstrom's area and entered an Airport Cab. Investigation revealed that the cab had a GPS tracker, which established that the cab traveled from MOA to the 600 block of E. Iowa in St. Paul, less than a block from the defendant's home.

K.K.T.'s body has not been discovered. Based on the amount of blood found in her home and vehicle and based on the fact that it is highly uncharacteristic of her to be missing for nearly a full week without any contact with friends, family or coworkers, there is probable cause to conclude that she is dead.

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

COMPLAINANT'S NAME:

Paul Dunnom

COMPLAINANT'S SIGNATURE:

Subscribed and sworn to before the undersigned this _____ day of _____, 20_____.

NAME/TITLE:

SIGNATURE:

Being authorized to prosecute the offenses charged, I approve this complaint.

Date: 02/28/2013

PROSECUTING ATTORNEY'S SIGNATURE:

Name: Steven R. Pfaffe

Assistant Ramsey County Attorney

50 West Kellogg Blvd, #315

St. Paul, MN 55102

651-266-3222/gp

Attorney Registration #169274

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense.

☐ **SUMMONS**

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the ____ day of _____, 20__ at _____ before the above-named court at _____ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

☒ **WARRANT**

☐ *Execute in MN Only* ☐ *Execute Nationwide* ☐ *Execute in Border States*

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

☒ **ORDER OF DETENTION**

Since the above-named Defendant is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant continue to be detained pending further proceedings.

Bail: \$500,000.00

Conditions of Release:

This complaint, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this ____ day of _____, 20____.

JUDICIAL OFFICER:

NAME:

TITLE:

SIGNATURE:

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF RAMSEY
STATE OF MINNESOTA

Clerk's Signature or File Stamp:

STATE OF MINNESOTA

Plaintiff,

vs.

JEFFERY DALE TREVINO

Defendant.

RETURN OF SERVICE

I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant herein named.

Signature of Authorized Service Agent:

FINDINGS OF FACT

Probable cause found that defendant committed the offenses charged.

Ordered defendant's motion to dismiss denied.

Plea of not guilty to all counts entered.

Trial and hearing on all issues set.

Dated: _____

JUDGE OF DISTRICT COURT

DEFENDANT DATA / CHARGE SHEET – ATTACHMENT A

DEFENDANT NAME: JEFFERY DALE TREVINO

DOB: 01/27/1974

Defendant alias name(s):

Alias DOB(s):

Defendant last known address: 570 Iowa
St Paul, MN

State ID: MN13FZ8271

Fingerprint ID: 296215

FBI ID: 933446TD4

St. Paul PD ID:

Offender ID:

OTHER DEFENDANT / CASE IDENTIFIERS:

Fingerprinted? ☐ No ☐ Yes

Handgun permit? ☐ No ☐ Yes (Issuing Agency:)

Location of violation:

IF DRIVING OFFENSE:

Driver's License Number:

Issuing State:

License Plate Number:

Issuing State:

Accident Type: ☐ No injury/no damage
check all that apply ☐ Personal Injury

☐ Property Damage
☐ Fatality

Blood Alcohol Concentration (BAC):

FELONY WARRANT AND ORDER OF DETENTION COMPLAINT

CT NO	OFFENSE DATE	STATUTE TYPE	STATUTE NBR	STATUTE DESCRIPTION	OFFENSE LEVEL	MOC	G O C	AGENCY ORI CN NBR FUNCTION
1	02/21/2013 to 02/22/2013	Charge	609.19.1(1)	Murder - 2nd Degree - With Intent-Not Premeditated	F	H2051	N	St. Paul Police Dept. ORI - MN0620900 CN - 13037403 Charging
2	02/21/2013 to 02/22/2013	Charge	609.19.2(1)	Murder - 2nd Degree - Without Intent - While Committing a Felony	F	H2801	N	St. Paul Police Dept. ORI - MN0620900 CN - 13037403 Charging