

PROBABLE CAUSE STATEMENT FORM

Date: 04/10/2025

CRN: KC25021154

I, Kansas City Missouri Police Detective Brian Caniglia #5977
(Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 04/07/2025, at [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Donald Adamson
(County) (Name of Offender(s))

white/male, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

The Kansas City Missouri Police Department has been aware of numerous complaints related to Metro Tow and Transport over the past several years. Community members have complained that their vehicles have been towed and they have been charged large fees, in excess of municipal ordinance, or have been unable to retrieve their vehicles due to technicalities cited by employees of Metro Tow and they have ultimately lost the title to the vehicle as Metro Tow applies for the title through the Department of Revenue after having the vehicle categorized as "abandoned property." Metro Tow's Missouri Department of Revenue Form 4669 Abandoned Property Report has been called into question.

A 4669 Form is a legal document for tow companies to fill out and submit when towing any vehicle from a private parking lot. These documents are to be filled out on scene by one of the designated parties who are to be present when the tow company is on scene. The vehicle information is entered onto the 4669 Form along with the tow company name, address, phone number, and the tow drivers printed and signed name. This keeps tow companies from towing vehicles on private property from towing cars sight unseen from these responsible persons. Once the tow driver and responsible person fill the 4669 Form the tow driver has two hours to call the vehicle information to the records department of the agency it was towed from. This is a state statute and Kansas City Missouri ordinance to make vehicle owners aware of their car being towed and the location they are able to retrieve it from. The records department of the police agency will enter the information into NCIC, a national database with the tow company information. If a tow driver does not call the to have the vehicle entered in and send the 4669 Form in the state will not be able to keep track of where a vehicle is located at. The 4669 Form is a legal Missouri State document for checks and balances of the responsible signers, tow operators, and police agencies.

On 03/21/2025, Kansas City Missouri Police Detectives contacted [REDACTED], black/female, 12/24/1991, victim, about her 2015 Nissan Altima, [REDACTED], being towed on 01/31/2025 from [REDACTED] Kansas City, Jackson County, Missouri. She advised she parked her car at her boyfriend's apartment complex and was given her boyfriend's apartment tag to hang

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from her mirror. She said when she woke up in the morning her vehicle was gone and they called the tow company on the apartment complex sign. She was able to recover the vehicle the same day and paid \$300 in cash. Her vehicle is worth about \$15,000. [REDACTED] was very upset due to her vehicle being towed and parking at the apartment for months.

Detectives obtained [REDACTED]'s Missouri Department of Revenue Form 4669 Abandoned Property Report records sent to the police department from Metro Tow. On the Form 4669, LS Adamson is listed as the Owner, Lessee, or Property/Security Manager of the [REDACTED]. The Form 4669 has the same exact LS Adamson signature in the same place as other Form 4669's from Metro Tow and appears to be a copy rather than an actual signature as required by law. The 4669 Form was called into the Kansas City Missouri Records Unit on 01/31/2025 by Metro Tow.

Detectives contacted [REDACTED], white/male, [REDACTED], victim, about his 2015 Chevrolet Malibu, [REDACTED], being towed on 02/01/2025 from [REDACTED] St, Kansas City, Jackson County, Missouri. [REDACTED] lives at the listed address and has a parking pass given to him by the apartment. When he parked and came back to leave his car was no longer there. He called the tow company, Metro Tow located on signs in his complex. He was advised by the Metro Tow his parking pass sticker was missing and they towed his vehicle. He tried to pay the same day with a credit card but was turned down. He had to come back the next day and pay \$350 in cash. [REDACTED] said his apartment complex was notified by him and told him his vehicle should not have been towed. He had to pay for an Uber to the tow lot to retrieve his vehicle. [REDACTED] said his vehicle is worth about \$15,000.

Detectives obtained [REDACTED]'s Missouri Department of Revenue Form 4669 Abandoned Property Report records sent to the police department from Metro Tow. On the Form 4669, LS Adamson is listed as the Owner, Lessee, or Property/Security Manager of the [REDACTED]. The Form 4669 has the same exact LS Adamson signature in the same place as other Form 4669's from Metro Tow and appears to be a copy rather than an actual signature as required by law. The 4669 Form was called into the Kansas City Missouri Records Unit on 02/01/2025 by Metro Tow.

Detectives contacted [REDACTED], black/female, [REDACTED], victim, about her 2008 Buick Lucerne, [REDACTED], towed on 02/01/2025 from [REDACTED], Kansas City, Jackson County, Missouri. [REDACTED] said she was visiting her sister and parked in an attached parking lot to her sister's apartment. She said she parked in the loading zone for a few minutes to talk meet with her sister. When she came back out her vehicle was gone. When she called Metro Tow to retrieve her vehicle they advised her she was towed due to parking in a Fire Lane. There are no designated Fire Lane signs or markings issued by a Fire Marshall at the apartment. A Fire Lane is a designated area by sign or markings on the ground issued legally by a Fire Marshall who has the legal authority per state to designate areas. If there are no signs or markings ground issued by the Fire Marshall then there would be no grounds to tow a vehicle in the Fire Lane. [REDACTED] vehicle was in a loading zone on private property. [REDACTED] had to get her vehicle the next day and pay \$350. She struggles with anxiety and this experience made it worse for her. [REDACTED] vehicle is worth about \$5,000.

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Detectives obtained [REDACTED] Missouri Department of Revenue Form 4669 Abandoned Property Report records sent to the police department from Metro Tow. On the Form 4669, LS Adamson is listed as the Owner, Lessee, or Property/Security Manager of the [REDACTED]. The Form 4669 has the same exact LS Adamson signature in the same place as other Form 4669's from Metro Tow and appears to be a copy rather than an actual signature as required by law. The 4669 Form was called into the Kansas City Missouri Records Unit on 02/01/2025 by Metro Tow.

On 04/07/2025, [REDACTED], victim, parked her black 2023 Chevrolet Malibu, bearing Missouri temporary tag [REDACTED], at the [REDACTED] located at [REDACTED], Kansas City, Jackson County, Missouri. She said she parked her vehicle at approximately 1930 hours and was at this location to meet a client for a hair appointment. She was at the apartment complex for about an hour and when she went to leave her vehicle was missing. [REDACTED] called the police and filed a stolen auto report. She was then advised by police that her vehicle was towed. [REDACTED] talked with the apartment about her vehicle being towed. The employees at the apartment advised that the tow company was not supposed to start towing vehicles until 2200 hours. An apartment employee told [REDACTED] that when she attempts to retrieve her vehicle to call and she can explain it to the tow company. The tow company is Metro Tow located at [REDACTED] Kansas City, Jackson County, Missouri. [REDACTED] was provided with their contact number and scheduled an appointment at 1030 hours on 04/08/2025 to pick up the vehicle.

On 04/08/2025, [REDACTED] said she went to the tow lot at 1030 hours. She called the apartment complex while she was at the tow lot but the person behind the desk would not talk with them. [REDACTED] was advised by a Metro Tow employee she would not be able to get her vehicle because her name was written on the bill of sale and not typed on the bill of sale. [REDACTED] asked if she could get her purse with her house keys and work keycard from her vehicle. The employee of Metro Tow told her she could, however only if she left the car keys with them. She did not give them the car keys and left the location without her vehicle. [REDACTED] said when she wanted to get her belongings from her car, they would not allow her to. [REDACTED] had to walk away from Metro Tow without her keys to her house and keycard to her work. When she spoke to detectives, she was very distraught and emotional. She did not know what to do or how she would get into her apartment. She also had to miss work since she did not have her keycard.

On 04/08/2025, Kansas City Missouri Police Detectives obtained the Missouri Department of Revenue Form 4669 Abandoned Property Report records sent to the police department from Metro Tow. On the Form 4669, LS Adamson is listed as the Owner, Lessee, or Property/Security Manager of the [REDACTED]. The Form 4669 has the same exact LS Adamson signature in the same place as other Form 4669's from Metro Tow and appears to be a copy rather than an actual signature as required by law.

On 04/08/2025, Kansas City Missouri Police Detectives contacted [REDACTED], employee from the [REDACTED]. [REDACTED] advised no one from the apartment complex authorized [REDACTED]'s vehicle to be towed last night. [REDACTED] did say they had a tow addendum for towing vehicles and Metro Tow is the company they use. She added that no employee of the apartment complex is present that would be authorized to sign the Form 4669, since their policy is to only tow vehicles after 2200 hours. [REDACTED] said when she gets to work in the morning Metro Tow emails all the vehicles they towed from the property using a website called Towbook.com. [REDACTED] stated Metro Tow provided her with a user name and password for Towbook.com.

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█████ logs into the website to view and verify the vehicles Metro Tow has towed or placed warning stickers on. █████ further stated that LS Adamson (Lannette S Adamson) is not an employee and does not have any authorization to represent in anyway the █████.

█████ said there were no signs saying she could not park in the parking lot. She also added that she was not parked at 11418 Blue Ridge Boulevard, as indicated on the Form 4669, but was parked in front of █████, █████, Kansas City, Jackson County, Missouri. The Form 4669 submitted by Metro Tow for █████'s vehicle documented location of the vehicle inaccurately.

During a review of Missouri 4669 Forms filed by Metro Tow with the Kansas City, Missouri Police Department's Stolen Auto Report Desk, the name LS Adamson is listed as the Owner, Lessee, or Property/Security Manager on over approximately 250 out of 329 forms. LS Adamson lists her company name Mokan Property Services on most 4669 Forms. The name appears to be photocopied or digitally affixed to each document. There are several different versions of the LS Adamson signature on numerous 4669 forms for the months of January and February, 2025. The document requires the Owner, Lessee, or Property/Security Manager to be physically present to sign the 4669 Form and authorize a tow from private property. Based on the timing and wide variety of locations, it is difficult, if not impossible for LS Adamson to have been physically present for all of the tows that list LS Adamson as the Owner, Lessee, or Property/Security Manager. The Kansas City, Missouri Police Department has been contacted by numerous individuals whose vehicles have been towed when they believed they were legally parked. Based on a review of several complaints and the associated 4669 Forms, it appears that Metro Tow often misrepresents the location that the vehicle was actually towed from.

LS Adamson was identified as Lannette ADAMSON, white/female, 12/31/1958. The owner of Metro Tow & Transport located at █████ is **Donald Adamson, white/male, 07/16/1981**. Lannette ADAMSON is an employee of Metro Tow and claims a security service on 4669 Forms of the Mokan Property Services.

Between March 8 and 9, 2025, a pole camera was installed near █████ to assist with the investigation of vehicles being improperly towed and/or stolen by Metro Tow and its employees and subsidiaries. On March 22, 2025 at approximately 6:22 AM, the camera was shot down. Footage revealed a black pickup truck consistent with a 1996-2006 Chevy Silverado was observed approaching from Gardner Avenue, which is in close proximity to the tow lot. The truck drove past the pole camera and then came back to and fired several rounds were fired into the camera, disabling it. Five spent shell casings were recovered, and employees and/or the owner of Metro Tow are suspected of shooting the camera out. There is an ongoing investigation into felony property damage as the value of the camera was over \$5000.

On 04/09/2025, Kansas City Missouri Tactical Response Team, Kansas City Missouri Police Detectives, and Kansas City Missouri Police Officers executed a search warrant at Metro Tow, █████, Kansas City, Jackson County, Missouri. While on scene Lannette ADAMSON and Donald ADAMSON were taken into custody for stealing and fraud/forgery. They were transported to the Kansas City Missouri Metro Patrol Station and placed on an investigative hold.

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While serving the search warrant at Metro Tow's property Detectives found numerous 4669 Forms prefilled with LS Adamson signature and name on the owner line with no car information entered in. Some of these documents were found in folders labeled with the tow driver name and original MOKAN KCPD. These documents were observed to have LS Adamson signature in ink with other copied 4669 Forms behind the original. These same signed documents were similar if not the same as other collected 4669 Forms from January and February of 2025.

Detectives found two stolen vehicles on Metro Tow's lot. A 2011 Toyota, [REDACTED] (KC25021433) and a 2016 Kia Optima, [REDACTED] (KC25021407). Also found on the lot was the vehicle belonging to [REDACTED]. If a stolen vehicle is on Metro Tows lot they are supposed to call a police agency to verify the vehicle is stolen and have it removed from the system as stolen. This was not done on either vehicle. There were 20 other vehicles located on the lot with various discrepancies on being towed or filing for titles incorrectly.

On 04/09/2025, Kansas City Missouri Police Detectives escorted Lannette ADAMSON into an interview room where she was read the Standard Miranda Warning and Waiver. She understood her rights and talked with Detectives.

ADAMSON was asked how the tow companies work where she is at. ADAMSON said she works the titles for Metro Tow but also owns a business called MOKAN Property Services. This is a security company she runs for parking lots to tow vehicles. ADAMSON said she does not work for the companies she runs the parking lots for. She gets paid by the tow company for the \$25 admin fee. She was asked if she would be on any payrolls for the companies and she said not. She has the companies sign agreements to patrol the parking lots. ADAMSON said she signs all the 4669 Forms when vehicles are being towed and she is present when she signs them. Regarding her role at Metro tow, ADAMSON said she has an office on the north side of Metro tow in the 1036 North Agnes Avenue building. She works on Metro Tows titles and when the people at the front desk have issues she walks over and helps. She may correct documents or help with people at the window. ADAMSON is present most days if not all days at Metro Tow.

ADAMSON was shown documents from the past four months with similar signatures or exact copies of 4669 Forms with her signature on them. She said she used to pre-fill her signature into 4669 Forms and give them to tow drivers to tow vehicles. She said in the past few months she stopped this practice and now comes to the address to verify the vehicle to be towed. ADAMSON said for the past 2-3 years she was sometimes on scene but other times not on scene and let tow drivers use the pre-filled 4669 Forms without her present. ADAMSON was shown folders from her office with pre-filled 4669 Forms. These 4669 Forms had tow drivers' names and her signature pre-filled. She said those were the old documents and she no longer uses those.

ADAMSON was asked about [REDACTED]'s vehicle being towed from the apartment. She said she had an agreement with the apartment they could tow vehicles starting at 1900 hours. She said she was present at the apartment to sign off on the 4669 Form. When asked why the address was input incorrect on the 4669 Form she said the normal practice is to use the main building even if there are others at the apartment. She then stated the document should have been filled out with the building it was towed in front of. She was shown her signature and a signature appearing to be a copy form another 4669 Form. She pointed out the difference and said it

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should have been signed in blue. These were documents Metro Tow fax over and the signatures appeared to be printed copies.

When ADAMSON was asked about the tow laws she said a security manager could sign. She was informed the security manager had to be a full-time employee paid by the company the vehicle is being towed from. ADAMSON did not agree they had to be paid to be a full-time employee.

ADAMSON was escorted back and released to detention personnel.

On 04/09/2025, Kansas City Missouri Police Detectives escorted **Donald ADAMSON** into an interview room where he was read the Standard Miranda Warning and Waiver. He understood his rights and talked with Detectives.

DONALD was asked what his reasons company Metro Tow, tows vehicles for. He said he has contracts with apartments or parking lots and will tow for fire lanes, handicapped, and stuff like that. He said they are able to immediately tow. ADAMSON told Detectives by law the managers or representatives has to sign for the car to be towed.

DONALD was asked about the 2023 Malibu towed illegally. He reviewed the 4669 Form and said there was no note about the vehicle being stolen. **DONALD** said his mom (Lannette Adamson) was on the scene and signed to tow the car. He said his mom has a contract with that apartment complex. **DONALD** told Detectives it was late so the property manager was probably not on scene at the time. He said there was a contract with the apartment. Detectives advised he did not have a car blanche to tow anything from the lot but he disagreed. He said if MOKAN has a contract as the parking manager that they can sign for anything at any time. He told Detectives he had his lawyer write the contracts to cover him and MOKAN properties.

He was asked about his mom pre-filling 4669 Forms and giving them to his tow drivers. He said he does not know her to do that. **DONALD** was reference with a folder from his mom's office with tow driver's name and pre-filled 4669 Forms with her name on it. He said he has not towed in months then changed his story he tows when he needs to. He said his mom will bring him pre-filled 4669 Forms and give them to him while she is on scene. He was told his mom admitted to providing documents pre-filled with her signature to his tow drivers and her not present when they towed the vehicle.

DONALD was asked about a stolen 2016 Kia Optima located on his lot and he said it must have been a [REDACTED] recovered. He was asked about the vehicles on his lot with rolled back odometer readings and he did not know anything about it.

The interview was completed and **DONALD** was returned to the detention unit.

Criminal History

On 05/03/1999, in Gladstone Police Department, **DONALD** was convicted of Local Ordinance Off Against Property and sentenced to 1-year probation (9900962).

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On 08/31/2004, in Missouri Highway Patrol Troop A, **DONALD** was convicted of Felony Resist Arrest by Fleeing and sentenced to 5 years' probation (7CR10400303501).

On 03/12/2013, in Platte County Sheriffs Officer Platte City, **DONALD** was convicted of Misdemeanor Assault 3rd Degree and sentenced to 2 years' probation (12AECR01002).

DONALD has been listed in 26 Kansas City Missouri Police Reports including Assault, Aggravated Assault, Theft from Auto, Property Damage, and Stolen Auto. In the past four months at Metro Tow, there have been a number of disputes and disturbances between **DONALD** and victims trying to recover their vehicles. Victims are questioning the legitimacy of their tow and the lengthy and almost impossible tasks of retrieving their vehicles out of the tow lot. The documents obtained show a clear pattern of not following local tow ordinances and state statutes on towing vehicles. These patterns show the vehicles are towed illegally and the state 4669 Form being filled out fraudulently all under **DONALD's** business Metro Tow.

Printed Name Detective Brian Caniglia #5977 Signature /s/ Det. Brian Caniglia #5977

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.