

**IN THE CIRCUIT COURT  
OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

Police# 16-052421  
Prosecutor# 095433396  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Willie O. Zimmerli  
6950 Foxridge Apt. #409  
Shawnee Mission, KS 66202  
DOB: 07/11/1965; Race/Sex: W/M;  
SS# [REDACTED]  
Defendant.**

**Count I. False Impersonation Law Enforcement Officer (575.120-001Y19855099.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.120, RSMo, committed the **Class A Misdemeanor of False Impersonation**, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about July 20, 2016, in the County of Jackson, State of Missouri, the defendant falsely represented to Dany Alzubbi that he was a law enforcement officer, with the purpose to induce Dany Alzubbi to submit to his pretended official authority, in that the defendant initiated a traffic stop causing Dany Alzubbi to pull to the side of a highway in reliance upon defendant's pretended official authority.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

**THE STATE OF MISSOURI**

vs.

**Willie O. Zimmerli**

**Count II. Driving While Revoked/suspended - 1st Offense (302.321-003Y20115405.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 302.321, RSMo, committed the **Unclassified Misdemeanor of Driving While License Was Suspended**, punishable upon conviction under Sections 302.321, 558.011 and 560.016, RSMo, in that on or about July 20, 2016, in the county of Jackson, State of Missouri, the defendant operated a motor vehicle on a highway, I-70 and I-435, during a time when the defendant's operator's license was suspended under the laws of this state, and acted with criminal negligence with respect to knowledge of the fact knew or was aware that the defendant's operator's license was suspended.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

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Theresa E. Crayon (#41063)  
Assistant Prosecuting Attorney  
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TCrayon@jacksongov.org

**WITNESSES:**

Dany Alzubbi , Prosecuting Atty. Office, Kansas City, MO 64106  
DET Melinda L. Reno , 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 07-22-2016

CRN: 16-052421

I, Det. Jeffrey Mehrer #3244  
(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 07-20-2016, at I-70, west of I-435 in  
(Date) (Address)

Kansas City, Jackson Missouri Willie O. Zimmerli,  
(County) (Name of Offender(s))

W/M, 07-11-1965, [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

False Impersonation of a Police Officer  
Driving While Suspended

The facts supporting this belief are as follows:

On 07-20-2016, at approximately 0910 hours, the male victim was merging onto I-70 from Blue Ridge Cutoff, entering the highway westbound in Kansas City, Jackson County, Missouri. Approximately a quarter mile after he was on the highway, the victim looked in the rear view mirror and saw a silver colored Ford Crown Victoria (Crown Vic) swerving, weaving in and out of traffic behind him. The victim noticed the Crown Vic had red and blue flashing lights behind the rear view mirror in the windshield and they were activated. Initially, the victim didn't think that he was being pulled over, but noticed the Crown Vic was getting closer behind his car, and then realized he was being pulled over. The victim pulled all the way over to the right shoulder and the Crown Vic pulled over behind him. A white male suspect got out of the silver Crown Vic, and approached the driver's side of the victim's car. The victim noticed the suspect wasn't wearing a police uniform, just a black button up shirt with two white stripes on the shoulder. The victim noticed the suspect wore no utility belt, no holster, or handcuffs. The victim observed the suspect holding a gun in his right hand, either in his pocket or waistband, but not in a holster. The suspect stated, "I need you to slow it down for me buddy." The victim responded, "Are you a real police officer?" The suspect answered, "Yes," and the victim said, "What agency do you work for?" The victim noticed the suspect became upset and he responded with, "You don't need to worry about that, just hang tight." The suspect walked back to his car and the victim took off. The suspect followed the victim, doing about 80 mph. The victim was able to maneuver his car, forcing the suspect to pass him, and allowing the victim to obtain the license plate number. The suspect swerved all the way over to the right lanes, and took an unknown exit off of I-70. The victim followed behind him where the suspect ran a stop sign and went straight back onto I-70. The victim continued to follow him for another half a mile where he began video recording the suspect using his cell phone. The victim called the police and made a report in regard.

The victim's video indicates he began recording after the incident, just east of the Benton Curve on I-70 Westbound. The suspect is observed in the vehicle, with a device in his hand, being held to his mouth. The suspect's vehicle had a spotlight attached to the driver's side door frame, and an unknown object near the rear view mirror.

The vehicle's license plate responded to a male named Jagger Vanderpool. Jagger Vanderpool was interviewed and stated he saw a news report with his vehicle (the silver Ford Crown Vic) and responded to a police station to advise he was not the suspect. Vanderpool stated the suspect is his father, Willie O. Zimmerli. Vanderpool identified the silver Crown Vic as his, and indicated he owned the car because he wanted to open his own private security company. He stated he gave the car to his father about a year ago because his father didn't have a car. Vanderpool stated the vehicle has a spot light, and a CB radio, and denied it had any flashing lights. Vanderpool stated his father installed a camera device near the rear view mirror or visor. Vanderpool stated he contacted his father about the incident and his father told him he did not pull over the victim, they were "drag racing." Vanderpool was shown two still photograph's taken from the victim's video, and positively identified the driver as his father, Willie O. Zimmerli.

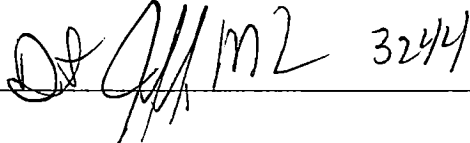
The victim was shown a photographic line-up, and identified Willie O. Zimmerli as the suspect who pulled him over.

PROBABLE CAUSE STATEMENT FORM

CRN 16-052421

On 07-21-2016, Willie O. Zimmerli was arrested by Mission, Kansas Police Officers in regard to a traffic warrant. After being given his Miranda Warning/Waiver, Zimmerli stated he observed the victim traveling on I-70 westbound, driving approximately 100-120 mph. He then observed the victim stopped in the #3 lane of traffic (the outside lane), with his flashers on. Zimmerli denied pulling the victim over, and said when he saw the victim with his flashers on, he pulled up next to the car, stopped in the #2 lane of traffic on I-70, rolled down his passenger window, and asked the victim if he was broke down. Zimmerli indicated both vehicles were stopped on I-70, and described the area near the Benton Curve. The victim asked if he was a cop and he told him no. The victim asked him what area or jurisdiction he worked out of, and Zimmerli told him he wasn't a cop. Zimmerli said he saw the victim using his cell phone and he became afraid, so he drove away. Zimmerli said he pretended to be talking on a CB radio using a hand held microphone because he was afraid and he didn't have a cell phone. Zimmerli denied exiting his vehicle, denied having a hand gun, and denied he presented himself as a police officer. Zimmerli admitted removing the spot light, and a CB radio from the vehicle after the incident and said he gave it back to his son because he didn't want the car to look like "a fucking police car." He denied having a camera or device near the rear view mirror or visor, and denied having any type of police lights. Zimmerli then invoked his right to not make any more statements.

Zimmerli's driving privileges were suspended in the State of Kansas on 08-07-2015, 02-15-2016, and again on 03-01-2016, and are currently suspended. Zimmerli has no driving privileges in the State of Missouri.

Printed Name Det. Jeffrey Mehrer #3244 Signature  3244

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.