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APR 11 2025

Missouri Public  
Service Commission

*FORMAL COMPLAINT FORM*

*Attach extra pages as necessary.*

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Robert L. Davis Jr., Trustee of  
Musiqaa Rayiys Bey PLT

(Your name here)

Complainant,

v.

Spire Missouri Inc.,

(Utility's name here)

Respondent,

File No.

(PSC fills this in)

**FORMAL COMPLAINT**

1. Complainant resides at:

[Redacted Address]

(Address of complainant)

[Redacted City, State, Zip Code]

(City)

(State)

(Zip Code)

2. The utility service complained of was received at:

a. Complainant's address listed in paragraph 1.

b. A different address:

[Redacted Address]

(Address where service is provided, if different from Complainant's address)

[Redacted City, State, Zip Code]

(City)

(State)

(Zip Code)

3. Respondent's address is:

700 Market Street, 4th Floor

(Address of complainant)

St. Louis

(City)

Missouri

(State)

63101

(Zip Code)

4. Respondent is a public utility under the jurisdiction of the Missouri Public

Service Commission.

\$ (This is the total amount I have paid and am disputing based on the financial treatment and securitization of my account.)

5. The amount at issue is: \$

(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

\*\*\*See Attached Statement- Section 6\*\*\*

7. The relief requested is appropriate because Respondent has violated a

statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

\*\*\*See Attached Statement- Section 7\*\*\*



## **SUPPLEMENT TO FORMAL COMPLAINT - SECTIONS 6,7, and 8**

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**Complainant:** Robert L. Davis Jr., Trustee of Musiqaa Rayiys Bey PLT

**Respondent:** Spire Missouri Inc.

**Date:** April 7th, 20205

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### **SECTION 6: COMPLAINANT NOW REQUESTS THE FOLLOWING RELIEF**

The Complainant respectfully requests that the Missouri Public Service Commision order the following:

1. That Spire Missouri Inc. provides a **full accounting** and **disclosure** of how all Complainant's payments were applied, including whether such payments were monetized, securitized, or transferred to third parties.
  2. That Complainant's utility account be adjusted to **reflect the true financial treatment or payments** and **secured interests** disclosed by the IRS Form 1099-OID.
  3. That Spire Missouri Inc. **cease further billing** and **collection actions** based on any amount already satisfied through **financial offsets**.
  4. That Spire be directed to **remove any adverse claims** filed with the Secretary of State (UCC-5s) disputing Complainant's secured interest in utility-related accounts.
  5. That Spire be **ordered to cease any threat of service disconnection** while this complaint is pending review.
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### **SECTION 7 - THE RELIEF REQUESTED IS APPROPRIATE BECAUSE RESPONDENT HAS VIOLATED A STATUE, TARIFF, OR COMMISSION REGULATION OR ORDER, AS FOLLOWS:**

Spire Missouri Inc. has violated the following Missouri Public Service Commission rules and applicable laws:

1. **20 CSR 4240-13.050(4) and (6):** Spire disconnected Complainant's service on **November 12, 2024**, despite having received a formal **Notice of Adverse Claim** on **May 20, 2024** and issuing a disconnection notice on **June 18, 2024**, while a bona fide billing dispute was already in progress. This action violated protections against disconnection during an active dispute under both subsections (4) and (6).
2. **20 CSR 4240-13.015(1)(B):** Spire failed to provide transparent disclosures regarding billing and the financial treatment of consumer payments, including the potential securitization or monetization of such payments, and did not respond to Complainant's formal notices requesting clarification.
3. **20 CSR 4240-13.045:** Spire failed to make required billing adjustments after lawful financial instruments were submitted and recorded in accordance with Complainant's trust authority and Uniform Commercial Code filings.
4. **20 CSR 4240-2.070:** Spire ignored or failed to acknowledge Complainant's informal complaint filings and UCC-related records (UCC-1, UCC-3, and UCC-5), thereby obstructing the Commission's investigation process and denying access to information under its jurisdiction.
5. **Missouri Chapter 13 Billing Practices:** Spire failed to comply with accurate billing requirements by not disclosing whether customer payments were monetized, securitized, or otherwise converted to financial instruments. Despite receiving such value, Spire continued to reflect the amounts as unpaid, violating the expectation that customer accounts reflect actual balances due.
6. **UCC Article 9 (§ 9-509):** Spire contested Complainant's financing statements without presenting evidence that it did not benefit from financial instruments issued under the trust and secured party authority, despite receipt and processing of such instruments.

7. **Fair Billing and Accounting Practices:** Payments made by Complainant were reported on a Form 1099-OID to the IRS, indicating a financial transaction occurred. Spire's continued billing after financial recognition of the same amounts constitutes double accounting and potential unjust enrichment.
8. **Securities and Exchange Commission (SEC) Filings:** Spire's monetization of utility receivables through securitization, as reflected in SEC disclosures, raises serious concerns under Missouri consumer protection and regulatory oversight, particularly where customers are unaware their accounts are being converted into financial assets.

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**SECTION 8 - THE COMPLAINANT HAS TAKEN THE FOLLOWING STEPS TO PRESENT THIS MATTER TO THE RESPONDENT:**

1. File a **Notice of Adverse Claim** to Spire and Regions Bank on **May 20th, 2024** and **December 4, 2024**, asserting financial interest and lien related to utility account payments (**Exhibit D & E**)
2. Filed a **Uniform Commercial Code Financial Statement (UCC-1)** with the Missouri Secretary of State on **March 17th, 2025**, naming Spire Missouri Inc. as debtor (**Exhibit C**) .
3. Submitted **IRS Form 1099-OID** showing Spire received financial instruments totaling \$ [REDACTED] and \$ [REDACTED], confirmed by IRS on **March 21st, 2024** (**Exhibit B**).
4. Filed an **informal complaint** with the Missouri PSC on **July 9th, 2024** and **January 27th, 2025**, which was closed despite unresolved financial issues and proof of securitization (**Exhibit H**).
5. Responded to Spire's UCC-5 Adverse Claims and filed UCC-3 to amend the original Financing Statement by adding Regions Bank as a debtor, not as a secured party, to reflect their relationship to the trust property and funds in dispute (**Exhibit C**).

6. Appeared in Jackson County Court in **Case No. 2416-CV22785**, which was dismissed without the Court addressing secured financial treatment or IRS confirmation.

**EXHIBITS INCLUDED WITH THIS COMPLAINT**

<b><u>Exhibit</u></b>	<b><u>Title/Description</u></b>	<b><u>Date</u></b>	<b><u>Purpose/Notes</u></b>	<b><u>Page No.'s</u></b>
<b>A</b>	Spire Utility Billing Statement	Most Recent Bill	Shows account number [REDACTED]	1-3
<b>B</b>	IRS Form 1099-OID (Tax year 2024)	Filed 03/2024	Filed by Trustee; shows OID claimed on payments to Spire Missouri Inc.	1
<b>C</b>	UCC Filing Chain Report	04/05/2025	Shows timeline and linkage of all filings below - <b><u>Total of 10 pages</u></b>	1-2
<b>C</b>	UCC-1 Financing Statement (Robert Davis Jr., Trustee)	03/17/2025	Filed with Missouri SOS establishes secured party interest	3-5
<b>C</b>	UCC-5 Info Statement (Filed by Spire's Counsel Nicholas Slovikoski)	03/24/2025	Dispute authorization of UCC-1	6
<b>C</b>	UCC-5 Info Statement (Filed by Spire's Counsel Nicholas Slovikoski)	03/28/2025	Legal rebuttal stating no agreement with complainant	7
<b>C</b>	UCC-5 Response (Filed by Complainant)	03/28/2025	Affirms UCC-1 validity under UCC 9-509(a)(1); secured interest in utility account	8
<b>C</b>	UCC-3 Amendment (Adds Regions Bank as Secured Party)	03/29/2025	Adds third party secured party; expands scope of trust interest	9 - 10
<b>D</b>	Notice of Adverse Claim to Spire Missouri Inc.	05/20/2024	Asserts claim on securitized financial transactions; supports UCC claim	1-11
<b>E</b>	Notice of Adverse Claim to Regions Bank	12/04/2024	Asserts claim on securitized financial transactions; supports UCC claim	1-3

<b>F</b>	Declaration of Trust (Musiqaa Rayiys Bey PLT)	03/29/2021	Identifies trustee and defines accounts as trust property <b>(Additional trust documents available upon request)</b>	1-7
<b>G</b>	Court Order of Dismissal (With Prejudice)	03/26/2025	Confirms dismissal of civil action	1
<b>H</b>	Missouri PSC Informal Complaint Closure Letter	02/24/2025	Shows informal complaint was filed, reviewed, and closed	1



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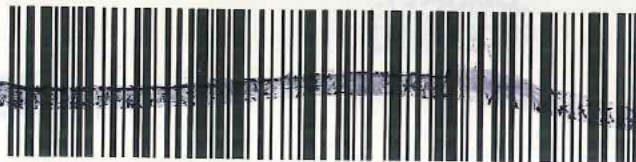
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