

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

**Robert L. Davis Jr., Trustee of  
MUSIQAA RAYIYS BEY PLT**

Complainant,

VS.

**SPIRE MISSOURI, INC. d/b/a SPIRE**

Respondent.

**File No. GC-2025-0276**

## **RESPONSE AND OBJECTION TO NOTICE OF DEFICIENCY**

Comes now the undersigned, **Robert L. Davis, Jr., Trustee of Musiqaa Rayiys Bey PLT**, and respectfully submits this response to the Missouri Public Service Commission's Notice of Deficiency dated **April 11, 2025**, and states the following:

### 1. Trust Status and Fiduciary Capacity:

**Musiqaa Rayiys Bey PLT is a valid private express trust recognized by the Internal Revenue Service**, with Employer Identification Number (EIN) [REDACTED]. Attached hereto as ***Exhibit A*** is a true and correct copy of the IRS confirmation letter, naming the undersigned as the authorized trustee. **As trustee, I am not appearing on behalf of another person but rather in a fiduciary capacity as the legal titleholder** of the trust's property and interests.

## 2. Proper Standing and Non-Representation of Others:

The Commission's Notice incorrectly asserts that a trustee must be an attorney to file a complaint on behalf of a trust. However, I am not engaged in the unauthorized practice of law. I am asserting rights associated with financial property belonging to the trust, including billing offsets, credits, and reporting instruments issued by Spire Missouri Inc.

These actions are proper and authorized duties of a trustee under common law and are administrative in nature.

### **3. Regulatory and Legal Context:**

**Under Commission Rule 20 CSR 4240-2.040(5)**, a natural person may represent themselves. **A trustee is a natural person executing fiduciary duties**, and this rule does not exclude a trustee acting on behalf of a trust. The cited Missouri Supreme Court decision, *Collison v. Director of Revenue*, applies to statutory or corporate entities and is inapplicable here. This trust is not a statutory entity and does not operate as a corporate body.

### **4. Due Process and Administrative Access:**

**Denying this complaint based solely on the trustee's non-attorney status constitutes an unreasonable restriction on access to administrative relief and potentially violates principles of due process.** The trust has suffered financial harm due to actions taken by Spire Missouri Inc., and blocking redress based on technical standing misconstrues the intent of administrative justice.

## **PRAYER FOR RELIEF**

**WHEREFORE**, I respectfully request that the Commission:

- Reconsider and withdraw its Notice of Deficiency;
- Acknowledge the trustee's lawful standing to proceed with the complaint on behalf of Musiqaa Rayiys Bey PLT;
- Permit the matter to be adjudicated on its merits;
- And grant such other relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Robert L. Davis Jr.

Robert L. Davis Jr., Trustee of  
MUSIQAA RAYIYS BEY PLT

Email:

Phone:

*Complainant*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Response and objection to Notice of Deficiency**, including **Exhibit A** was served upon **Missouri Public Service Commission Staff** and **Spire Missouri Inc. Legal Representatives** via electronic mail on **April 11th, 2025**.

/s/ Robert L. Davis Jr.

Robert L. Davis Jr., Trustee of  
MUSIQAA RAYIYS BEY PLT

Email:

Phone:

*Complainant*