

FW: Sent a complaint again/ FORMAL ADMINISTRATIVE COMPLAINT: NOTICE OF REGULATORY VIOLATIONS AND DEMAND FOR ZERO-BALANCE ADJUSTMENT

FILED  
April 21, 2026  
Missouri Public  
Service Commission

From: Latrell Germany [REDACTED]

Sent: Friday, April 17, 2026 9:59 AM

To: [REDACTED]

**Subject:** Re: Sent a complaint again/ FORMAL ADMINISTRATIVE COMPLAINT: NOTICE OF REGULATORY VIOLATIONS AND DEMAND FOR ZERO-BALANCE ADJUSTMENT

Latrell Shonta Germany Trustee, Germany Family Trust [REDACTED]

[REDACTED]  
[REDACTED]  
April 17, 2026

Missouri Public Service Commission  
200 Madison Street, P.O. Box 360  
Jefferson City, MO 65102-0360  
Sent via Email

RE: FORMAL ADMINISTRATIVE COMPLAINT: NOTICE OF REGULATORY VIOLATIONS AND DEMAND FOR ZERO-BALANCE ADJUSTMENT

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Dear Jay,

I am filing this formal complaint against the investor-owned and municipal utility entities within your jurisdiction, specifically Spire Energy, Ameren Missouri, the [REDACTED] and the [REDACTED]. As the Trustee of the Germany Family Trust, I am reporting a coordinated failure of these entities to comply with Missouri Commercial Code and Public Service Commission regulations.

The subject property is a private residential estate held for the benefit of the Germany Family Trust. As the Trustee, I am asserting the Implied Warranty of Habitability as established in *King v. Moorehead*. Any interruption of essential services (Water, Gas, Electric, Sewer) constitutes a breach of the trust's right to maintain a habitable dwelling and a safe environment for its beneficiaries. Furthermore, under RSMo 441.234, any condition that detrimentally affects the sanitation or security of the trust's residential property is a violation of Missouri law.

#### Statement of Facts:

I have attempted on multiple occasions to resolve billing discrepancies and update my service accounts to the name of the Germany Family Trust. To facilitate this, I provided specific documentation to the utilities, which was neither acknowledged nor formally refused in writing. Furthermore, I have requested a complete Life of Account Ledger and verified billing information to audit current charges. As of this date, I have received no such information. Under 20 CSR 4240-13.020, these companies are required to provide accurate billing records. Their failure to do so has prevented me from verifying the debt they claim I owe.

#### 1. Commercial Conduct vs. Private Discretion (Trade & Commerce)

In our previous discussions, the matter of a company's "right to refuse" a tender was raised. I must clarify for the record that while a private individual may have the discretion to accept or deny a tender in a personal capacity, that standard does not apply to corporate entities operating within Trade and Commerce. As licensed utility providers, these companies are engaged in public commerce and are strictly governed by the Uniform Commercial Code (UCC) and Public Service Commission (PSC) mandates. They do not have the private individual's luxury of silence; they have a legal duty to respond, return instruments, and provide verified accountings.

#### 2. Administrative Negligence: Unlawful Retention of Property (RSMo 400.3-501)

I previously tendered a commercial instrument to each utility for the exchange of the debt. Under RSMo 400.3-501, if a company chooses not to accept an instrument for payment, they have a strict legal duty to return the original instrument to the sender. None of the utilities listed have returned my property, nor have they provided a formal Notice of Dishonor. By

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retaining my instrument while refusing to credit the account, they have engaged in unlawful silent acquiescence. I hereby demand the immediate return of my original documents.

### 3. Demand for Zero-Balance Adjustment (\$0)

Pursuant to RSMo 400.3-603(c), a refusal of a tender of payment discharges the obligation to pay interest and late fees. Furthermore, under the doctrine of Estoppel, a company cannot keep a payment instrument and continue to bill for the same debt. Because these companies have failed to respond or return the tender, I am demanding that the Commission order an adjustment of all account balances to \$0 as a remedy for this administrative negligence.

### 4. Habitability and Public Policy (King v. Moorehead)

Human Right vs. Contract: While the utility has a contract, the state has a Public Policy to protect life and health.

Essential Services: Access to water and heat is tied to the Police Power of the state (the power to protect public health).

The Result: If a company denies these services arbitrarily or ignores a valid dispute, they are violating the public policy that ensures a home remains "habitable."

### 5. Violation of the Recurring Consumer Charges Act (HB 3512)

Many of these utilities have applied recurring "protection plans" or "service riders" without my affirmative consent. Under the 2026 Recurring Consumer Charges Act, unauthorized recurring charges are legally classified as an "unconditional gift" to the consumer. I demand these fees be removed and the accounts adjusted accordingly.

### 6. Negligence and Hardship:

Due to my current status as an unemployed individual, I have sought to settle these accounts through alternative commercial means. The companies' failure to provide a timely written response or a formal refusal of my tender of payment has allowed balances to accumulate to an unmanageable level. This constitutes negligence for failing to mitigate damages and failing to "promptly and thoroughly" investigate a registered dispute as required by 20 CSR 4240-13.045.

### Relief Requested:

Pursuant to the Commission's authority under Section 393.140, RSMo, I am requesting the following:

1. Immediate Zero-Balance Adjustment (\$0) on all accounts to reflect the negligence of the providers.

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2. Immediate Restoration of Services: That all essential services be restored while this billing dispute is under investigation.
3. Immediate Return of all original instruments/documents previously mailed to these companies.
4. Account Update: That the Commission order the utilities to update the account holder of record to the Germany Family Trust.
5. Full Disclosure: That the Commission compel each utility to provide a certified accounting ledger for the history of these accounts immediately.

I am ready to cooperate with a Commission specialist to resolve these matters. I look forward to your prompt response and the initiation of a formal investigation.

Sincerely,  
Latrell Shonta Germany  
Trustee/Authorized Representative, Germany Family Trust

I will be following up with certified mail to  
Chair Hahn in a few day's

On Wed, Apr 15, 2026, 5:49PM Latrell Germany [REDACTED] wrote:  
Dear [Recipient Name],

I am writing to file an informal complaint against the utility providers [Utility Names] regarding a persistent lack of transparency and a failure to fulfill their regulatory duties under 20 CSR 4240-13.

#### Statement of Facts:

I have attempted on multiple occasions to resolve billing discrepancies and update my service accounts to the name of the Germany Family Trust. To facilitate this, I provided specific documentation to the utilities, which was neither acknowledged nor formally refused in writing.

Furthermore, I have requested a complete Life of Account Ledger and verified billing information to audit current charges. As of this date, I have received no such information. Under 20 CSR 4240-13.020, these companies are required to provide accurate billing records. Their failure to do so has prevented me from verifying the debt they claim I owe.

Negligence and Hardship:

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Due to my current status as an unemployed individual, I have sought to settle these accounts through alternative commercial means. The companies' failure to provide a timely written response or a formal refusal of my tender of payment has allowed balances to accumulate to an unmanageable level. This constitutes negligence for failing to mitigate damages and failing to "promptly and thoroughly" investigate a registered dispute as required by 20 CSR 4240-13.045.

Relief Requested:

Pursuant to the Commission's authority under Section 393.140, RSMo, I am requesting the following:

1. Immediate Restoration of Services: That all disconnected services be restored while this billing dispute is under investigation.
2. Billing Adjustment: That the balances be adjusted to reflect the negligence of the providers in failing to respond to previous correspondence.
3. Account Update: That the Commission order the utilities to update the account holder of record to the Germany Family Trust.
4. Full Disclosure: That the Commission compel each utility to provide a certified accounting ledger for the history of these accounts immediately.

I am ready to cooperate with a Commission specialist to resolve these matters. I look forward to your prompt response and the initiation of a formal investigation.

Best regards,

Latrell Germany

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