

**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**

**MOTION FOR LEAVE TO PROCEED AS TRUSTEE IN ADMINISTRATIVE  
CAPACITY AND SUPPLEMENTAL RECORD CLARIFICATION**

NOW COMES Robert L. Davis, Jr., Trustee of Musiqaa Rayiys Bey PLT, and respectfully moves this Commission for leave to proceed in his official administrative capacity as Trustee of a non-statutory, ecclesiastical, private trust. This Motion supplements the prior Response and Objection filed on **April 30, 2025**, and brings forward binding internal authority from the Trust's own governing instrument to eliminate any doubt as to the Trustee's lawful standing.

## I. PROCEDURAL POSTURE:

1. On **April 11, 2025**, Complainant submitted a formal complaint against Spire Missouri, Inc., citing financial offsets, improper billing, and nondisclosure of security-related instruments.

2. The Commission issued a Notice of Deficiency on the same date, alleging that a trustee must be represented by licensed counsel.
3. Complainant filed a Response and Objection on **April 30, 2025**, asserting his capacity to proceed under common law and ecclesiastical principles and contesting the applicability of *Collison v. Director of Revenue*, 621 S.W.3d 165 (Mo. banc 2021), to private, non-statutory trusts.
4. The Commission responded on **May 2, 2025**, denying reconsideration based on the assumption that all trusts must be treated as statutory entities subject to Missouri's attorney-representation rule.

## **II. BASIS FOR RELIEF AND CLARIFIED AUTHORITY:**

5. Complainant now moves for affirmative leave to proceed administratively as Trustee under the express, recorded terms of the trust instrument.
6. The full Declaration of Trust—attached hereto as **Exhibit J**—clearly designates Musiqaa Rayiys Bey PLT as a private, ecclesiastical, non-commercial trust. The governing instrument expressly authorizes the Trustee to:
  - Prepare, file, and maintain official records, registrations, and applications (Art. XIV, subsections (f), (g));
  - Engage in administrative actions to preserve trust assets and enforce rights (Art. XIV, (a), (e));
  - Act on behalf of the trust without outside delegation unless authorized by the Grantor (Art. XIV, (k));

- Handle trust-related matters without constituting a general agent or legal advocate of another person or entity (Art. XVI, NOTICE GIVEN UNDER TRUST).
7. These administrative duties are non-litigious in nature and do not constitute legal representation of a statutory person, business, or third-party. Complainant appears solely in ministerial capacity under trust law, as distinguished in *Restatement (Second) of Trusts* § 8 and § 175, and consistent with the Trustee's record-recognized fiduciary duties.
  8. The Trustee's actions are further protected by ecclesiastical autonomy under U.S. Const. Amend. I and Mo. Const. Art. I, § 5, which prohibits civil interference with the internal governance of religious organizations and non-chartered ecclesiastical trusts.

### **III. SUPPLEMENTAL RECORD:**

9. To eliminate ambiguity, Complainant submits the following complete exhibits:
  - **Exhibit J** – Full Declaration of Trust of Musiqaa Rayiys Bey PLT (replacing partial Exhibit F).
  - **Exhibit I** – IRS Confirmation of Employer Identification Number issued to the Trust, establishing distinct taxpayer identity as a separate non-personal entity.

### **V. PRAYER FOR RELIEF**

WHEREFORE, Complainant respectfully prays that the Commission:

1. **GRANT** this Motion for Leave to Proceed as Trustee under administrative capacity;
2. **ACKNOWLEDGE** that the Musiqaa Rayiys Bey PLT is not a statutory or commercial trust subject to Collison;

3. **RECOGNIZE** the Trustee's standing based on documentary authority and ecclesiastical governance;
4. **WITHDRAW or SUSPEND** the April 11, 2025, Notice of Deficiency; and
5. Permit this matter to proceed on its merits without further procedural obstruction.

Respectfully submitted,

/s/ Robert L. Davis Jr.

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

Email:

Phone:

Date: May 2, 2025

*Complainant*