

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

DEMAND FOR IMMEDIATE ADMINISTRATIVE DETERMINATION AND
NOTICE OF ESTOPPEL BY SILENCE

NOW COMES Complainant, Robert L. Davis Jr., Trustee of Musiqaa Rayiys Bey PLT, and hereby files this formal demand compelling immediate administrative response, based on constitutional due process principles, administrative fairness, and the legal doctrine of estoppel by silence.

I. FACTUAL GROUNDS

1. On May 2, 2025, Complainant filed a Motion for Leave to Proceed as Trustee in Administrative Capacity and Supplemental Record, duly supported by:

- **Exhibit I** - IRS Confirmation of EIN
- **Exhibit J** - Full Declaration of Trust (ecclesiastical, private, non-statutory)
- Cited constitutional, statutory, and administrative rules distinguishing fiduciary administration from legal advocacy.

2. As of date of this filing, the Commission has **not issued any ruling, order, or acknowledgement** of said motion.

II. LEGAL NOTICE OF ESTOPPEL

3. A failure to respond, rebut, or issue a ruling within a reasonable time constitutes procedural prejudice, violating principles of:
 - **Due Process under the Missouri and U.S. Constitutions**
 - **Missouri Administrative Procedure Act (RSMo § 536 et seq.)**
 - **Estoppel by Silence:** When a body with duty to respond remains silent in the face of a lawful demand, it forfeits its right to object later.
4. The Missouri Public Service Commission, being an administrative tribunal, has a ministerial duty to either **grant, deny, or acknowledge** filings affecting a party's standing. Silence on jurisdictional and procedural matters constitutes **constructive agreement or waiver**.

III. DEMAND FOR DETERMINATION

Complainant demands that the Commission:

- **Issue a written ruling on the pending May 2, 2025 Motion for Leave to proceed;** or
- **Acknowledge the sufficiency of the trust's private status and the trustee's administrative duties,** consistent with the Missouri Constitution, RSMo §456.8-816(24), and controlling trust law doctrines.

IV. CLOSING NOTICE

The Commission is further placed on notice that continued delay or silence may constitute:

- **Tacit consent** under estoppel principles;

- **Denial of access to redress**, actionable under constitutional and federal due process claims;
- Grounds for invoking higher jurisdictional review or mandamus if administrative relief is withheld.

Respectfully submitted,

/s/ Robert L. Davis Jr.

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

Email:

Phone:

Date: June 3, 2025

Complainant