



3. Complainant responded on April 30, 2025, disputing the applicability of attorney-only restrictions to non-statutory, ecclesiastical trust's distinct legal form and non-corporate status.
4. On May 2, 2025, the Commission issued an **Order Denying Reconsideration**, again refusing to acknowledge the trust's distinct legal form and non-corporate status.
5. On June 3, 2025, Complainant submitted a **Demand for Immediate Administrative Determination and Notice of Estoppel by Silence**, placing the Commission on formal notice of constructive consent and exhaustion of administrative remedy.
6. On June 3, 2025, the Commission issued a final Order to Remedy Deficiency, reasserting its position and threatening dismissal unless a licensed attorney enter's appearance by June 17, 2025.

## II. RECORD OF LAWFUL TRUST STATUS

7. Complainant now places the Commission on final administrative notice that the following documents have been submitted into the EFIS record:
  - **Exhibit I** - IRS EIN Confirmation for Musiqaa Rayiys Bey PLT
  - **Exhibit J** - Full Declaration of Trust of Musiqaa Rayiys Bey PLT
  - **Exhibit K - Amended and Superseding Declaration of Trust**, recorded May 30, 2025, with Jackson County Recorder of Deeds as Instrument No. 2025E0037233
8. **Exhibit K** supersedes and replaces the 2021 trust record, affirming the Trust's Status as:
  - Ecclesiastical, private, and non-adverse
  - Revocable-in-part and organized under ministerial, not statutory, authority

- Not subject to attorney-only gatekeeping under Chapter 456 RSMo or Collison v. Dir. of Revenue, which applies only to statutory or corporate entities
- Empowered to operate administratively, including filing of affidavits, trust records, and protective claims

9. The Trust document is **duly recorded** and carries **constructive notice** to all parties, including state agencies, per Missouri real property and private recordation statutes.

### **III. NOTICE OF GATEKEEPING AND BAD FAITH**

10. The Commission's continued refusal to:

- Acknowledge the submitted evidence
- Distinguish ecclesiastical trust administration from unauthorized legal practice
- Address the complaint on its merits despite standing being properly declared

Constitutes:

- Procedural obstruction
- Administrative bad faith
- Violation of rights secured under the U.S. and Missouri Constitutions

11. This pattern of gatekeeping now demonstrates prejudicial classification bias and failure to discharge public duty under color of law. By refusing to engage with a duly recorded, ecclesiastical trustee and dismissing filings without hearing, the Commission risks:

- **Abuse of discretion**
- **Constructive fraud**
- **Denial of equitable access**

#### IV. FINAL DECLARATION OF DEFAULT AND PRESERVATION OF RIGHTS

12. This serves as **final notice of administrative default** by the Missouri Public Service Commission.

13. No further opportunity will be extended to correct errors unless the Commission:

- **Withdraws its Deficiency Order**
- **Acknowledges the trustee's right to proceed in ministerial capacity**
- **Restores the complaint to the merits docket for adjudication**

14. Failure to act within **7 calendar days** of this notice shall result in:

- Filing of complaint for administrative misconduct with the Missouri Attorney General.
- Civil and constitutional rights claim to be lodged with the U.S. District Court for the Western District of Missouri.
- Publication of all material for national public awareness and accountability.

15. **Nothing herein waives any rights**, remedies, or immunities of the trust or trustee, who now reserves:

- The right to compel administrative equity.
- The right to file outside of Commission jurisdiction.
- The right to pursue declaratory and injunctive relief in any forum of competent jurisdiction.

Respectfully submitted,

**/s/ Robert L. Davis Jr.**

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

**Email:** [REDACTED]

**Phone:** [REDACTED]

**Date:** June 5, 2025

***Complainant***

**Attachments:**

*Exhibit K -  
Amended & Recorded Declaration of Trust  
(Instrument No. 2025E0037233)*