

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI,
AT KANSAS CITY**

GAIL MCCANN BEATTY,)	
ASSESSOR,)	
JACKSON COUNTY,)	Case No.
MISSOURI, <i>et al.</i>,)	
Petitioners/Relators,)	
v.)	
STATE TAX COMMISSION OF)	
MISSOURI,)	
Respondent.)	

**SUGGESTIONS IN SUPPORT OF WRIT OF MANDAMUS, WRIT OF
PROHIBITON, WRIT OF QUO WARRANTO,
AND WRIT OF CERTIORARI**

Petitioners bring the following suggestions in support of their petition for writ of mandamus, writ of prohibition, writ of quo warranto, and writ of certiorari:

“Where-ever law ends, tyranny begins, if the law be transgressed to another’s harm; and whosoever in authority exceeds the power given him by the law, and makes use of the force he has under his command, to compass that upon the subject, which the law allows not, ceases in that to be a magistrate; and, acting without authority, may be opposed, as any other man, who by force invades the right of another.” John Locke.

The sentiment expressed by this statement is embedded within the

foundation of Missouri law. If a court or a quasi-judicial body like the State Tax Commission issues an order without authority and without providing a person affected by the order notice and an opportunity to be heard, the person may oppose the order and request that it be declared void.

As detailed in the petition, and incorporated herein, the State Tax Commission of Missouri brought a lawsuit without evidentiary support and without providing Petitioners notice and opportunity to be heard. Then, when the lawsuit was going poorly, the State Tax Commission decided to unilaterally command Petitioners to take the same actions it was asking a court to order. This action violates the most basic and fundamental principles of Missouri law.

For this reason, Petitioners oppose the State Tax Commission's August 6, 2024, order, and respectfully request that the Court grant Petitioners' petition for writ of mandamus, writ of prohibition, writ of quo warranto, and writ of certiorari and declare the order unlawful, void and unenforceable.

Respectfully submitted,

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