

1 BRANDON L. PHILLIPS, ESQ
Nevada Bar No. 12264
2 BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC
1455 E. Tropicana Ave., Suite 750
3 Las Vegas, NV 89119
4 P: (702) 795-0097; F: (702) 795-0098
blp@abetterlegalpractice.com
5 Attorney for Appellant, L. Bulen

Electronically Filed
Jan 22 2021 11:58 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

6
7 **SUPREME COURT OF NEVADA**

8
9 LAWRA KASSEE BULEN,

10 Appellant,

11 vs.
12

13 STEVE SANSON, an
14 Individual; ROB LAUER, an
15 Individual,

16 Respondent(s).
17

SUPREME COURT CASE

NO. 81854

DISTRICT COURT CASE NO.:

A-18-784807-C

18 **DOCKETING STATEMENT – CIVIL APPEALS**

19 1. Procedural History:

- 20 (a) Eighth Judicial District Court;
21 (b) Department 5
22 (c) County of Clark;
23 (d) The Honorable Trevor L. Atkin
24 (e) District Court Case No. A-18-784807-c

25 2. Attorney filing this docketing statement:

- 26 (a) Attorney: Brandon L. Phillips, Esq.
27 (b) Phone: 702-795-0097
28 (c) Firm: Brandon L. Phillips, Attorney at Law, PLLC
(d) Address: 1455 E. Tropicana Ave., Suite 750, Las Vegas, Nevada 89119

1 (e) Client: LAWRA KASSEE BULEN
2
3 3. Attorney(s) representing respondent(s):
4 (a) Attorney: Kory L. Kaplan
5 (b) Telephone: 702-381-8888
6 (c) Firm: SYLVESTER POLEDNAK
7 (d) Address: 1731 Village Center Cir., Las Vegas, Nevada 89134
8 (e) Respondent: LAS VEGAS METROPOLITAN POLICE DEPARTMENT,
9 TENANT, AND VOJAGAN
10 4. Nature of disposition:
11 (a) Dismissal: Final Order – Defendants’ Motion to Dismiss GRANTED.
12 5. This appeal does not raise issues concerning any of the following:
13 (a) child custody, (b) venue, and (c) termination of parental rights.
14 6. Pending and prior proceedings in the Eighth Judicial District Court.
15 (a) None.
16 7. Pending and prior proceedings in other courts.
17 (a) None.
18 8. Nature of Action. This action stems from the Complaint of the Plaintiff alleging
19 wrongful and discriminatory conduct by the Defendants in their stop and detainment of the
20 Plaintiff.
21 9. Issues on appeal. Appellant argues the following issues on appeal:
22 a. Whether the statute of limitations should have been tolled while the Plaintiff
23 first pursued all administrative remedies.
24 b. And if tolling was appropriate then did Plaintiff timely file his Complaint.
25 10. Appellant is not aware of any pending proceedings in this Court raising the same or
26 similar issues.
27 11. This appeal does not raise constitutional issues.
28 12. This appeal does not raise any issues addressing the following: (a) reversal of well-
settled Nevada law; (b) issues arising under the United States and/or Nevada Constitution; (d) and

1 issue of public policy; (e) an issue where en banc consideration is necessary to maintain
2 uniformity of this court's decisions; or (f) a ballot question.

3 13. Assignment to the Court of Appeal or retention in the Court of Appeal. It is
4 Appellant's position that this case should be assigned to the Supreme Court under NRAP 17
5 (b)(13).

6 14. The instant litigation was resolved by final order GRANTING Defendants' Anti-
7 SLAPP Motion to Dismiss.

8 15. Judicial Disqualification. Appellant does not believe judicial disqualification will be
9 necessary.

10 16. Date of entry of written judgment or order appealed: August 21, 2020, e-service.

11 17. The Respondents filed a Notice of Entry of Order on August 25, 2020, e-service.

12 18. There was no tolling by any post-judgment motion.

13 19. The Appeal was filed and e-served on September 24, 2020

14 a. This Appeal also appeals the Order and Notice of Entry of Order on
15 Respondents' Motion for Attorneys' Fees entered on December 18 and December 21, 2020,
16 respectively.

17 20. NRAP 4(a) sets forth the time limits for filing of the notice of appeal.

18 21. This Court has authority to hear this matter under NRAP 3A(b)(1) and (3). This
19 appeal timely follows the final order entered by the District Court.

20 22. The parties involved in this matter and on appeal are as follows:

21 (a) Plaintiff/Appellant – Lawra Kasse Bulen

22 (b) Defendant/Respondent – Steven Sanson and Rob Lauer

23 23. The Appellant filed Complaint with the District Court asserting multiple causes of
24 action surrounding the wrongful arrest of the Plaintiff/Appellant, those claims are (a) defamation,
25 (b) defamation per se, (c) invasion of privacy: false light, (d) invasion of privacy: unreasonable
26 publicity given to private facts, (e) intentional interference with prospective economic advantage,
27 (f) intentional infliction of emotional distress, (g) negligence per se, (h) concert of action, (i)
28 NRS 42.005 request for exemplary and punitive damages.

1 24. The Judgment entered by the District Court adjudicated ALL claims raised in the
2 Complaint.

3 25. The following exhibits are attached hereto:

4 (a) Complaint Filed November 20, 2018;

5 (b) Default Entered on February 27, 2019;

6 (c) Order and Notice of Entry of Order Granting Defendants' Motion to Dismiss.

7 (d) Order and Notice of Entry of Order Granting Defendants' Motion for
8 Attorneys' Fees.

9 Dated this 21st day of January, 2021.

10 BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC

11 /s/ Brandon L. Phillips

12 BRANDON L. PHILLIPS, ESQ

13 Nevada Bar No. 12264

14 1455 E. Tropicana Ave., Suite 750

15 Las Vegas, NV 89119

16 (702) 795-0097, (702) 795-0098 fax

17 blp@abetterlegalpractice.com

18 Attorney for Appellant
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28

1 **PROOF OF SERVICE**

2 This is to certify that on the 21st day of January, 2021, I caused to be served
3 **APPELLANT'S DOCKETING STATEMENT**, by the method indicated below,
4 and addressed to the following:

5 **Document Served: Motion**

6 **Person(s) Served:**

7 ADAM J. BREEDEN, ESQ.
8 Nevada Bar No. 008768
9 BREEDEN & ASSOCIATES, PLLC
10 376 E. Warm Springs Road, Suite 120
11 Las Vegas, Nevada 89119
12 Phone: (702) 819-7770 Fax: (702) 819-7771
13 Adam@Breedendandassociates.com

14 Attorneys for Respondents

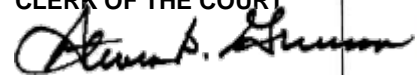
15 ☐ Via Facsimile:
16 ☐ Mail
17 ☐ Personal Delivery
18 ☒ Electronic Notice

19 /s/ Brandon L. Phillips

20 An employee of BRANDON L. PHILLIPS,
21 ATTORNEY AT LAW, PLLC
22
23
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25
26
27
28

EXHIBIT A

EXHIBIT A



COM

RENA MCDONALD, ESQ.

Nevada Bar No. 8852

MCDONALD LAW GROUP, LLC

203 S. Water Street, Suite 300

Henderson, NV 89015

(702)448-4962

Fax (702)448-5011

rena@mcdonaldlawgroup.com

Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

A-18-784807-C

LAWRA KASSEE BULEN an individual,

Plaintiff,

vs.

ROB LAUER, an individual, STEVE SANSON, and
individual, and DOES, I through X; and ROE
CORPORATIONS I through X, inclusive.

Defendant.

CASE NO. :
DEPT. NO. : Department 18

COMPLAINT

COMES NOW, Plaintiff, Lawra Kassee Bulen, (hereinafter referred to as "Plaintiff") by and through her attorney of record Rena McDonald, Esq. of the McDonald Law Group, LLC, and hereby complains against Defendant, Rob Lauer, an individual (hereinafter referred to as "Defendant") and alleges and avers as follows:

1. At all times relevant herein, Plaintiff, Lawra Kassee Bulen was an individual residing in Clark County, Nevada.

2. At all relevant times herein Defendant Rob Lauer was an individual residing in Clark County, Nevada.

3. At all relevant times herein Defendant Steve Sanson was an individual residing in Clark County, Nevada.

MCDONALD LAW GROUP, LLC
203 S. Water Street, Suite 300
Henderson, NV 89015
Phone (702)448-4962 Fax (702)448-5011

1 4. The true names and capacities of Defendants named herein as DOES I through
2 X, inclusive, and ROE CORPORATIONS I through X inclusive, whether individual, corporate,
3 associate or otherwise, are presently unknown to Plaintiff, who therefore sues said Defendants
4 by such fictitious names; and when the true names and capacities of DOES I through X,
5 inclusive and ROE CORPORATIONS I through X, inclusive are discovered, , Plaintiff will ask
6 leave to amend this Complaint to substitute the true names of said Defendants. Plaintiff is
7 informed believes and therefore alleges that Defendants so designated herein are responsible in
8 some manner for the events and occurrences contained in this action.
9

10 5. Plaintiff is a campaign manager for Republican candidates and a real estate
11 agent. Plaintiff's career is dependent upon her reputation in the community and with the
12 Republican party.

13 6. Defendant Lauer is a political writer.

14 7. Defendant Sanson is the President of Veterans in Politics International, Inc. and
15 the author of multiple defamatory articles written about Plaintiff and posted on the website for
16 Veterans in Politics.
17

18 8. Plaintiff has never met Defendant Sanson.

19 9. Plaintiff met Defendant Lauer on or about March 20, 2018 at the Clark County
20 Republican Party ("CCRP") meeting at Elks Lodge. Defendant was not a member of the CCRP.
21 At the event the Defendant asked the Plaintiff to participate in and screen test for a show. On or
22 about March 22, 2018 Defendant requested that Plaintiff meet to discuss the show. Plaintiff met
23 with the Defendant but declined to participate in the show. During the parties' meeting the
24 Defendant made sexual passes at the Plaintiff and Plaintiff explained to Defendant that she did
25 not want to be in a relationship.
26

27 10. On or about April 9, 2018 Defendant Lauer called Plaintiff four or five times
28 during the course of the day. On that same day, Defendant then showed up at the Clark County

1 Platform meeting-knowing that Plaintiff would be in attendance. Plaintiff and Defendant spoke
2 that night and during their conversation Defendant asked Plaintiff out to dinner several times.
3 Plaintiff declined each of the Defendant's requests.

4 11. Defendant Lauer published a derogatory article online about Plaintiff's
5 committee. Upon discovering the article, Plaintiff immediately contacted the Defendant and
6 expressed her disapproval of the article and its posting. Defendant then removed the article but
7 shortly thereafter published an article with false and defamatory information personally
8 attacking the Plaintiff.
9

10 12. Plaintiff attempted to maintain a friendship with Defendant Lauer; however, his
11 behavior became erratic and made the Plaintiff feel threatened which resulted in Plaintiff
12 applying for a protective order.

13 13. On or about July 10, 2018 Plaintiff and Defendant Lauer appeared at the hearing
14 for the temporary protective order and through their respective counsels agreed to attempt to
15 resolve their issues without having a protective order issued.
16

17 14. On or about August 8th, 2018 Defendant Lauer instructed his friend and client
18 Steve Sanson to publish a defamatory article Defendant had written about the Plaintiff, titled,
19 *Kassee Bulen, Political Gypsy?*. This article (hereafter "Political Gypsy Article") was
20 originally written by Steve Sanson and posted as an article on Veterans in Politics website
21 <https://veteransinpolitics.org/2018/08/kassee-bulen-political-gypsy/>. Mr. Sanson and Mr. Lauer
22 then shared the article with the public, on several social media websites, 26 Facebook
23 Republican and military groups and many of Plaintiff's friends on Facebook.
24

25 15. The Political Gypsy Article was an attack on Plaintiff's suitability to act a
26 member of the CCRP and act as a campaign manager for candidates. This Article clearly was
27 drafted in an attempt to defame Ms. Bulen and make it appear as though she is unsuitable to
28 represent political candidates.

1 16. The Political Gypsy Article contained several false facts, including but not
2 limited to: Bulen Strategies is not a licensed lawful business in the State of Nevada. Attached
3 as Exhibit 1 please find the Nevada State Business License for Lawra Kassee Bulen along with
4 the Fictitious Firm Name Certificate of Business; Plaintiff was convicted of assault- the charges
5 referenced in the Article were dismissed against Plaintiff and her record was sealed and the
6 Order sealing this record was deemed confidential by the Court as was Plaintiff's record;
7 Plaintiff was chased out of Republican Party groups in Arizona and St. George and that several
8 married men accused Ms. Bulen of trying to extort money out of them-Plaintiff has never been
9 charged with extortion.
10

11 17. On or about August 13th, 2018 Defendant instructed his friend and client Steve
12 Sanson to publish a second defamatory article titled, *KASSEE BULEN UNDER*
13 *INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT*
14 *FILED WITH GLVAR*. This Article (hereafter "Ethics Article") was originally written by Steve
15 Sanson and posted as an article on Veterans in Politics website
16 [https://veteransinpolitics.org/2018/08/kassee-bulen-under-investigation-after-being-charged-](https://veteransinpolitics.org/2018/08/kassee-bulen-under-investigation-after-being-charged-with-ethics-violations-in-complaint-filed-with-glvar/)
17 [with-ethics-violations-in-complaint-filed-with-glvar/](https://veteransinpolitics.org/2018/08/kassee-bulen-under-investigation-after-being-charged-with-ethics-violations-in-complaint-filed-with-glvar/). Mr. Sanson and Mr. Lauer then shared the
18 article with the public, on several social media websites, 24 Facebook Republican and military
19 groups and many of Plaintiff's friends on Facebook. The Ethics Article was also posted in
20 Defendant Lauer's Facebook group Vegas Real Estate Magazine.
21

22 18. The Ethics Article article was an attack on Plaintiff's real estate career and called
23 into question her suitability for her position as a real estate agent- the name of the Ethics Article
24 itself contains false and defamatory information about Plaintiff.
25

26 19. Again, the Ethics Article contains several defamatory and false facts, including
27 but not limited to: "An ethics complaint was filed this week with the Great Las Vegas
28 Association of Realtors against Lawra Kassee Bulen." (Ms. Bulen has never been investigated

1 by the GLVAR or the State of Nevada Real Estate Division). Attached as Exhibit 2 please find
2 a record search conducted by the Administration Section Manager of NVRED evidencing that
3 no complaints have been filed against Plaintiff's license. Further, attached as Exhibit 3 you will
4 find an email from GLVAR's general counsel evidencing that not only have no complaints been
5 received against Plaintiff but that GLVAR is also investigating the Article. Defendants went so
6 far as to post a copy of a fake complaint in the Article; the Article moves on to state that
7 "according to the Nevada Secretary of State's official website and Clark County business
8 records Kasee Bulen's company, Bulen Strategies, is not a licensed lawful business in the state
9 of Nevada." Again please see Exhibit 1; Defendants claim Plaintiff represented herself as an
10 expert in the article by NBC titled *HOME SWEET HOME: Top 5 hottest zip codes for buying &*
11 *selling in Las Vegas* located at <https://news3lv.com/news/local/home-sweet-home-top-5-hottest->
12 [zip-codes-for-buying-and-selling-in-las-vegas.](https://news3lv.com/news/local/home-sweet-home-top-5-hottest-) At no time in the video does Plaintiff state or
13 represent that she is an expert.
14

15
16 20. On or about August 20, 2018 Defendant Lauer posted in his Facebook group,
17 Trump Victory Team, a video he made from the audition screen test footage. The video was
18 titled *KASSEE BULEN ATTACKS PRESIDENT TRUMP* (hereafter "Video"). In the Video
19 Defendant Lauer attempted to have Plaintiff speak about the Stormy Daniels affair. Mr. Lauer
20 heavily edited the video to make it sound like Plaintiff made derogatory statements about
21 President Trump.
22

23 21. The Video was not only posted by Mr. Lauer's Trump Victory Team page but
24 was also shared with several other individuals and Facebook groups. The sharing of the Video
25 caused several people to share the Video with others and with defamatory statements such as
26 "Republican Never-Trumper attacks President Trump over Stormy Daniels alleged affair" It is
27 clear that Defendant Lauer chose to author, edit and share this Video in an attempt to make it
28 appear as though Plaintiff is unfit to run political campaigns, lower Plaintiff's reputation in the

1 community and call others to make defamatory statements against her in an attempt to prevent
2 Plaintiff from working in the Republican Party.

3 22. Defendant Lauer has continued to send Plaintiff harassing text messages from
4 different numbers pretending to be different people. On or about August 22, 2018 through
5 August 24, 2018 Plaintiff received harassing text messages from a person who she believes to be
6 Defendant Lauer bating her for information that could be used to defame her and stating, among
7 other things, that Plaintiff would be politically destroyed, Plaintiff would never work for any
8 political candidate ever again, stating that if she cared about the party she would play nice with
9 Defendant Lauer. Please see the text messages attached hereto as Exhibit 4.

10 23. The day after sending these threatening text messages, Defendant Lauer wrote and
11 posted an article for 360 News Las Vegas (hereafter "360 Article") wherein Defendant invented
12 a fictitious "campaign source" so that he could yet again the Plaintiff's character; essentially
13 calling Plaintiff a liar and questioning her credibility. This was obviously done so that others
14 reading the 360 Article would believe Plaintiff to be a liar.

15 24. On or about August 27, 2018 Defendant Lauer called Plaintiff from a blocked
16 number making vague threats about "kicking someone's ass" Plaintiff hung up on Defendant
17 Lauer and he attempted to call her back.

18 25. On or about October 2, 2018 Plaintiff's counsel sent correspondence to the
19 Defendants demanding that they remove the Political Gypsy Article, Ethics Article, 360 Article
20 and Video and providing evidence to the Defendants that their statements were false; however,
21 Defendants have yet to remove the articles and video from their websites and social media
22 pages. Please see the demand letters attached hereto as Exhibit 5. Also attached as Exhibit 6
23 please see evidence that the articles and video have not been removed.

24 ///

25 ///

1 26. Despite repeated requests to leave Plaintiff alone Defendant Lauer continues to
2 threaten and harass the Plaintiff. Attached as Exhibit 7 is a text exchange between Defendant
3 Lauer and Cheryl Prater wherein Defendant Lauer implies he will continue to harass Plaintiff.

4 **FIRST CAUSE OF ACTION**

5 **(Defamation as to all Defendants)**

6 27. Plaintiff re-alleges and incorporates by this reference each and every allegation
7 contained in paragraphs 1 through 26 of this Complaint as though fully set forth herein.

8 28. Defendants made several false and defamatory statements concerning Plaintiff by
9 authoring, posting and sharing the Political Gypsy Article, Ethics Article and Video.

10 29. The Political Gypsy Article contained several false facts, including but not limited
11 to: Bulen Strategies is not a licensed lawful business in the State of Nevada, attached as Exhibit 1
12 please find the Nevada State Business License for Lawra Kasee Bulen along with the Fictitious
13 Firm Name Certificate of Business; Plaintiff was convicted of assault- the charges referenced in
14 the Article were dismissed against Plaintiff and her record was sealed and the Order sealing this
15 record was deemed confidential by Court as was Plaintiff's record; Plaintiff was chased out of
16 Republican Party groups in Arizona and St. George and that several married men accused Ms.
17 Bulen of trying to extort money out of them-Plaintiff has never been charged with extortion.

18 30. The Ethics Article contains several defamatory and false facts, including but not
19 limited to: "An ethics complaint was filed this week with the Great Las Vegas Association of
20 Realtors against Lawra Kasee Bulen." (Ms. Bulen has never been investigated by the GLVAR
21 or the State of Nevada Real Estate Division). Attached as Exhibit 2 please find a record search
22 conducted by the Administration Section Manager of NVRED evidencing that no complaints
23 have been filed against Plaintiff's license. Further, attached as Exhibit 3 you will find an email
24 from GLVAR's general counsel evidencing that not only have no complaints been received
25 against Plaintiff but that GLVAR is also investigating the Article. Defendants went so far as to
26
27
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1 post a copy of a fake complaint in the Article; the Article moves on to state that "according to the
2 Nevada Secretary of State's official website and Clark County business records Kasee Bulen's
3 company, Bulen Strategies, is not a licensed lawful business in the state of Nevada." Again
4 please see Exhibit 1; Defendants claim Plaintiff represented herself as an expert in the article by
5 NBC titled HOME SWEET HOME: Top 5 hottest zip codes for buying & selling in Las Vegas
6 located at [https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-](https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-and-selling-in-las-vegas)
7 [and-selling-in-las-vegas](https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-and-selling-in-las-vegas). At no time in the video does Plaintiff state or represent that she is an
8 expert.
9

10 31. In the Video Defendant Lauer attempted to have Plaintiff speak about the Stormy
11 Daniels affair. Mr. Lauer heavily edited the video to make it sound like Plaintiff was make
12 derogatory statements about President Trump. Defendant Lauer then posted the Video to
13 Defendant Lauer's Trump Victory Team page but was also shared with several other individuals
14 and Facebook groups. The sharing of the Video caused several people to share the Video with
15 others and with defamatory statements such as "Republican Never-Trumper attacks President
16 Trump over Stormy Daniels alleged affair" It is clear that Defendant Lauer chose to author, edit
17 and share this Video in an attempt to make it appear as though Plaintiff is unfit to run political
18 campaigns, lower Plaintiff's reputation in the community and call others to make defamatory
19 statements against her in an attempt to prevent Plaintiff from working in the Republican Party.
20

21 32. Defendant Lauer has continued to send Plaintiff harassing text messages from
22 different numbers pretending to be different people. On or about August 22, 2018 through
23 August 24, 2018 Plaintiff received harassing text messages from a person who she believes to
24 be Defendant Lauer bating her for information that could be used to defame her and stating,
25 among other things, that Plaintiff would be politically destroyed, Plaintiff would never work for
26 any political candidate ever again, stating that if she cared about the party she would play nice
27 with Defendant Lauer. Please see the text messages attached hereto as Exhibit 4.
28

1 33. Defendant Lauer wrote the 360 Article citing a fictitious "campaign source" so
2 that he could yet again diminish the Plaintiff's character; essentially calling Plaintiff a liar and
3 questioning her credibility. This was obviously done so that others reading the 360 Article
4 would believe Plaintiff to be a liar.

5 34. Defendant Lauer through text messages to a third party states that he will continue
6 to harass the Plaintiff.

7 35. These Articles and Video were unprivileged publications and were made to
8 several third parties.

9 36. Defendants were at least negligent in making these statements.

10 37. Plaintiff has incurred damages as a result of the Defendants actions.

11 38. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of
12 Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence
13 at the time of trial.

14 39. Plaintiff has been required to retain the services of an attorney to defend this
15 action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and
16 costs.

17 SECOND CAUSE OF ACTION

18 (Defamation Per Se-As to all Defendants)

19 40. Plaintiff re-alleges and incorporates by this reference each and every allegation
20 contained in paragraphs 1 through 39 of this Complaint as though fully set forth herein.

21 41. Defendants made several false and defamatory statements concerning Plaintiff by
22 authoring, posting and sharing the Political Gypsy Article, Ethics Article and Video.

23 42. The Political Gypsy Article contained several false facts, including but not limited
24 to: Bulen Strategies is not a licensed lawful business in the State of Nevada, attached as Exhibit 1
25 please find the Nevada State Business License for Lawra Kasee Bulen along with the Fictitious
26
27
28

1 Firm Name Certificate of Business; Plaintiff was convicted of assault- the charges referenced in
2 the Article were dismissed against Plaintiff and her record was sealed and the Order sealing this
3 record was deemed confidential by Court as was Plaintiff's record; Plaintiff was chased out of
4 Republican Party groups in Arizona and St. George and that several married men accused Ms.
5 Bulen of trying to extort money out of them-Plaintiff has never been charged with extortion.

6 43. The Ethics Article contains several defamatory and false facts, including but not
7 limited to: "An ethics complaint was filed this week with the Great Las Vegas Association of
8 Realtors against Lawra Kasse Bulen." (Ms. Bulen has never been investigated by the GLVAR
9 or the State of Nevada Real Estate Division). Attached as Exhibit 2 please find a record search
10 conducted by the Administration Section Manager of NVRED evidencing that no complaints
11 have been filed against Plaintiff's license. Further, attached as Exhibit 3 you will find an email
12 from GLVAR's general counsel evidencing that not only have no complaints been received
13 against Plaintiff but that GLVAR is also investigating the Article. Defendants went so far as to
14 post a copy of a fake complaint in the Article; the Article moves on to state that "according to the
15 Nevada Secretary of State's official website and Clark County business records Kasse Bulen's
16 company, Bulen Strategies, is not a licensed lawful business in the state of Nevada." Again
17 please see Exhibit 1; Defendants claim Plaintiff represented herself as an expert in the article by
18 NBC titled HOME SWEET HOME: Top 5 hottest zip codes for buying & selling in Las Vegas
19 located at [https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-](https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-and-selling-in-las-vegas)
20 [and-selling-in-las-vegas.](https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-and-selling-in-las-vegas) At no time in the video does Plaintiff state or represent that she is an
21 expert.
22

23 44. In the Video Defendant Lauer attempted to have Plaintiff speak about the Stormy
24 Daniels affair. Mr. Lauer heavily edited the video to make it sound like Plaintiff made
25 derogatory statements about President Trump. Defendant Lauer then posted the Video to
26 Defendant Lauer's Trump Victory Team page but was also shared with several other individuals
27
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1 and Facebook groups. The sharing of the Video caused several people to share the Video with
2 others and with defamatory statements such as "Republican Never-Trumper attacks President
3 Trump over Stormy Daniels alleged affair" It is clear that Defendant Lauer chose to author, edit
4 and share this Video in an attempt to make it appear as though Plaintiff is unfit to run political
5 campaigns, lower Plaintiff's reputation in the community and call others to make defamatory
6 statements against her in an attempt to prevent Plaintiff from working in the Republican Party.

7
8 45. Defendant Lauer has continued to send Plaintiff harassing text messages from
9 different numbers pretending to be different people. On or about August 22, 2018 through
10 August 24, 2018 Plaintiff received harassing text messages from a person who she believes to
11 be Defendant Lauer bating her for information that could be used to defame her and stating,
12 among other things, that Plaintiff would be politically destroyed, Plaintiff would never work for
13 any political candidate ever again, stating that if she cared about the party she would play nice
14 with Defendant Lauer. Please see the text messages attached hereto as Exhibit 4.

15
16 46. On or about August 27, 2018 Defendant Lauer called Plaintiff from a blocked
17 number making vague threats about "kicking someone's ass" Plaintiff hung up on Defendant
18 Lauer and he attempted to call her back.

19 47. Defendant Lauer wrote the 360 Article citing a fictitious "campaign source" so
20 that he could yet again diminish the Plaintiff's character; essentially calling Plaintiff a liar and
21 questioning her credibility. This was obviously done so that others reading the 360 Article
22 would believe Plaintiff to be a liar.

23
24 48. Defendant Lauer through text messages to a third party states that he will continue
25 to harass the Plaintiff.

26 49. These Articles and Video were unprivileged publications and were made to
27 several third parties.

28 50. Defendants were negligent in making these statements.

1 51. Plaintiff trade, business and professions have been damaged as a result of the
2 Defendants actions and their habitual defamation of the Plaintiff.

3 52. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of
4 Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence
5 at the time of trial.

6 53. Plaintiff has been required to retain the services of an attorney to defend this
7 action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and
8 costs.
9

10 **THIRD CAUSE OF ACTION**

11 **(Invasion of Privacy: False Light-as to all Defendants)**

12 54. Plaintiff re-alleges and incorporates by this reference each and every allegation
13 contained in paragraphs 1 through 53 of this Complaint as though fully set forth herein.

14 55. Defendants made several false statements concerning Plaintiff by authoring,
15 posting and sharing the Political Gypsy Article, Ethics Article and Video.
16

17 56. The statements published by the Defendants placed Plaintiff before the public in a
18 false light as the Defendants made several false statements that made it appear to the public that
19 the Plaintiff is corrupt, deceptive, a criminal, unfit to be a campaign manager, unethical and a
20 liar.
21

22 57. The false light under which Plaintiff was placed would be highly offensive to a
23 reasonable person.

24 58. Defendants had knowledge that their statements were false and acted in reckless
25 disregard as to the falsity of the publicized statements and the false light in which Plaintiff was
26 placed.

27 59. Plaintiff has been injured and received mental distress from having been exposed
28 to public view.

60. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence at the time of trial.

61. Plaintiff has been required to retain the services of an attorney to defend this action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and costs.

FOURTH CAUSE OF ACTION

(Invasion of Privacy: Unreasonable Publicity Given to Private Facts-as to all

Defendants)

62. Plaintiff re-alleges and incorporates by this reference each and every allegation contained in paragraphs 1 through 61 of this Complaint as though fully set forth herein.

63. Defendant Sanson authored and shared the Political Gypsy Article wherein he states that Plaintiff "was charged and sentenced for Assault Causing Bodily Injury in Dallas Texas." The assault charges referenced in the Political Gypsy Article were dismissed against Plaintiff and her record was sealed. The Order sealing this record was deemed confidential by Court as was Plaintiff's record. Defendant Lauer also shared the Political Gypsy Article with several people and Facebook groups.

64. Disclosure of these sealed records would be offensive and objectionable to a reasonable person of ordinary sensibilities.

65. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence at the time of trial.

66. Plaintiff has been required to retain the services of an attorney to defend this action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and costs.

FIFTH CAUSE OF ACTION

(Intentional Interference with Prospective Economic Advantage-as to all Defendants)

67. Plaintiff re-alleges and incorporates by this reference each and every allegation contained in paragraphs 1 through 66 of this Complaint as though fully set forth herein.

68. There are several prospective relationships that exist between Plaintiff and third parties, both as a campaign manager and a real estate agent.

69. Defendants were aware of Plaintiff's prospective contractual relationships with political candidates and real estate clients.

70. Defendants specifically authored published and shared the Articles and Video attacking Plaintiff's credibility and suitability to act as a campaign manager and real estate agent. Defendant accused Plaintiff of ethical violations under real estate license, called Plaintiff a criminal, called Plaintiff a liar, falsely stated that Plaintiff does not have a business license, and among several other accusations accused Plaintiff of extortion.

71. Defendants knew their statements were false and after being shown proof of the falsity of the statements refused to remove them from the public's view.

72. Defendants had no purpose to authoring, posting and sharing these Articles and Video other than to harm Plaintiff by preventing her relationships with third parties.

73. Defendants had no privilege or justification to publish these false statements.

74. As a result of Defendant's actions Plaintiffs has been harmed.

75. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence at the time of trial.

76. Plaintiff has been required to retain the services of an attorney to defend this action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and costs.

SIXTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress-as to all Defendants)

77. Plaintiff re-alleges and incorporates by this reference each and every allegation contained in paragraphs 1 through 78 of this Complaint as though fully set forth herein.

78. Defendants' conduct was extreme and outrageous with the intention of and reckless disregard for causing emotional distress to Plaintiff.

79. Defendants actions were conducted with malice.

80. Plaintiff suffered severe and extreme emotional distress as the actual or proximate result of Defendants' conduct.

81. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence at the time of trial.

82. Plaintiff has been required to retain the services of an attorney to defend this action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and costs.

SEVENTH CAUSE OF ACTION

(Negligence Per Se-as to all Defendants Violations of NRS 200.510 & NRS 200.530 & NRS

200.550)

83. Plaintiff re-alleges and incorporates by this reference each and every allegation contained in paragraphs 1 through 82 of this Complaint as though fully set forth herein.

84. Defendants violated NRS 200.510, NRS 200.530 & NRS 200.550

85. Defendants violations of the statutes caused Plaintiff injuries.

86. Plaintiff belongs to a class of persons that the statutes were intended to protect.

87. Plaintiff's injuries were the type against which the statutes were intended to protect.

1 88. As a result of the Defendants breaches of the statutes, Plaintiff has been damaged
2 in a sum excess of Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof
3 introduced into evidence at the time of trial.

4 89. Plaintiff has been required to retain the services of an attorney to defend this
5 action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and
6 costs.

7 **EIGHTH CAUSE OF ACTION**

8 **(Concert of Action-as to all Defendants)**

9
10 90. Plaintiff re-alleges and incorporates by this reference each and every allegation
11 contained in paragraphs 1 through 89 of this Complaint as though fully set forth herein.

12 91. Defendants acted together, in concert, to commit each and every one of the
13 causes of action contained herein this Complaint.

14 92. As a result of the Defendants actions, Plaintiff has been damaged in a sum excess
15 of Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into
16 evidence at the time of trial.

17 93. Plaintiff has been required to retain the services of an attorney to defend this
18 action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and
19 costs.
20

21 **NINTH CAUSE OF ACTION**

22 **(NRS 42.005 Request for Exemplary and Punitive Damages)**

23
24 94. Plaintiff re-alleges and incorporates by this reference each and every allegation
25 contained in paragraphs 1 through 93 of this Complaint as though fully set forth herein.

26 95. It is proven by clear and convincing evidence that the Defendants are guilty of
27 oppression, fraud or malice.
28

96. The Plaintiff, in addition to the compensatory damages, are entitled to recover damages for the sake of example and by way of punishing the Defendants for three times the amount of compensatory damages awarded to the Plaintiff if the amount of compensatory damages is \$100,000 or more; or three hundred thousand dollars if the amount of compensatory damages awarded to the plaintiff is less than \$100,000.00.

WHEREFORE, the Plaintiff prays for each and every aforementioned cause of action, the following relief against the Defendants:

1. For General Damages in excess of Fifteen Thousand Dollars (\$10,000.00),
2. For Punitive Damages in excess of Fifteen Thousand Dollars (\$10,000.00),
3. For an award of attorney's fees and costs,
4. Such other and further relief as the Court may deem just and proper.

DATED this 12 day of November, 2018.

MCDONALD LAW GROUP, LLC

By

Rena McDonald, Esq.
Nevada Bar No. 8852
203 S. Water Street, Suite 300
Henderson, NV 89015
(702)448-4962
Fax (702)448-5011
Attorney for Plaintiff

VERIFICATION

STATE OF NEVADA)

) ss.

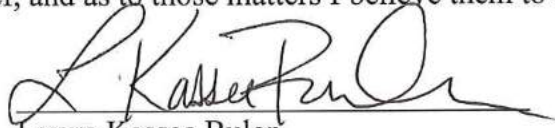
COUNTY OF CLARK)

Lawra Kasse Bulen, being first duly sworn, deposes and says:

1. That I am the Plaintiff in the above entitled action.

2. That I have read the foregoing Complaint and know the contents hereof.

3. That the same is true of my own knowledge, except for those matters therein
contained stated upon information and belief, and as to those matters I believe them to be true.


Lawra Kasse Bulen

Subscribed and sworn to before me

this 14th day of October, 2018.

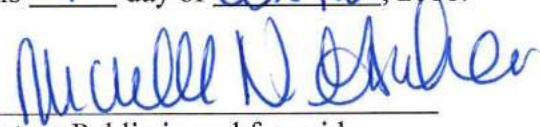

Notary Public in and for said
County and State



EXHIBIT 1

SECRETARY OF STATE



NEVADA STATE BUSINESS LICENSE

Sole Proprietor
Lawra Kassee Bulen

Nevada Business Identification # NV20171644458

Expiration Date: 10/31/2018

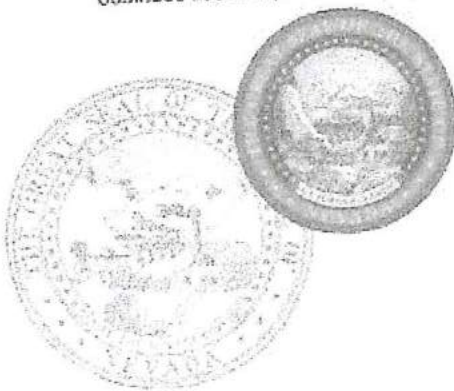
In accordance with Title 7 of Nevada Revised Statutes, pursuant to proper application duly filed and payment of appropriate prescribed fees, the above named is hereby granted a Nevada State Business License for business activities conducted within the State of Nevada.

Valid until the expiration date listed unless suspended, revoked or cancelled in accordance with the provisions in Nevada Revised Statutes. License is not transferable and is not in lieu of any local business license, permit or registration.

IN WITNESS WHEREOF, I have hereunto
set my hand and affixed the Great Seal of
State, at my office on 10/05/2017

A handwritten signature in cursive script that reads "Barbara K. Cegavske".

BARBARA K. CEGAVSKE
Secretary of State



You may verify this license at www.nvsos.gov under the Nevada Business Search.
State Business License may be renewed 90 days prior to the expiration date.

License must be cancelled on or before its expiration date if business activity ceases.
Failure to do so will result in late fees or penalties which by law cannot be waived.
There is no fee for cancellation.



Office of the Clark County Clerk
Lynn Marie Goya

Please Select One:

- ☒ New Application
☐ Renewal of existing Fictitious Firm Name

Certificate of Business: Fictitious Firm Name
Sole Proprietor or Individual

Please Print or Type

The expiration date for such certificates shall expire after five years from the date of filing.

The undersigned does hereby certify that

Lawra Kassee Bulen

(Sole Proprietor or Individual)

with a mailing address of 3545 Cactus Shadow Street, #203

(Mailing Address for notification of renewal) (Street)

Las Vegas, NV 89129

(City, State, Zip)

is conducting business in Clark County, Nevada, under the fictitious name of

Bulen Strategies

(Fictitious Firm Name or Doing Business As)

and that said firm is composed of the following person whose name and address is as follows:

By signing below I declare (or affirm), under penalty of perjury, that all statements made in this document are true, and that I have authority to sign on behalf of and to bind the above named business to a contract.

(1) Lawra Kassee Bulen

(Full Name and title (Type or Print))

3545 Cactus Shadow St, #203

(Street Address of Business or Residence)

L. Kassee Bulen 7/11/18

(Signature)

Las Vegas, NV 89129

(City, State, Zip)

STATE OF Nevada } ss:
COUNTY OF Clark

This instrument was acknowledged before me on

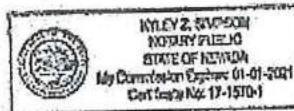
July 11, 2018
(Date)

by

Lawra Kassee Bulen

(Name of individual whose signature is being extracted)

[Signature]
(Signature of Notary Public or Deputy Clerk)



RECEIVED
JUL 16 2018
COUNTY CLERK

Notarize: Lynn Marie Goya, County Clerk, Attn: FFN, Box 551604, Las Vegas NV 89155 1604
Filing Fee of \$20.00 payable to County Clerk, associated certificate and a self and renewal sponsored coverings

9/29/2016

EXHIBIT 2

BRIAN SANDOVAL
Governor

STATE OF NEVADA



C.J. MANTHE
Director
SHARATH CHANDRA
Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION
www.red.nv.gov

August 30, 2018

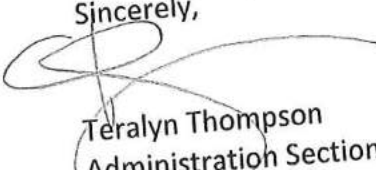
Lawra Kassee Bulen
3545 Cactus Shadow Street #203
Las Vegas, Nevada 89129

Re: Request for Records of Complaints.

Enclosed you will find the record of complaints for LAWRA KASSEE BULEN License No(s). S.0182795.

The information contained in this document reflects all complaints filed with the Division against the requested licensee named herein along with the disposition of each complaint.

Sincerely,


Teralyn Thompson
Administration Section Manager
State of Nevada Department of Business and Industry
Real Estate Division

cc: File

BRIAN SANDOVAL
Governor

STATE OF NEVADA



C.J. MANTHE
Director

SHARATH CHANDRA
Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION
www.red.nv.gov

RECORD OF COMPLAINTS

DATE: August 30, 2018

LICENSEE NAME: LAWRA KASSEE BULEN

LICENSE NUMBER(S): S.0182795

STATUS: ACTIVE

NUMBER OF COMPLAINTS	YEAR	DISPOSITION OF COMPLAINT
0		

EXHIBIT 3

9/18/2018

Gmail - Alleged Ethics Complaint at GLVAR

Kassee Bulen <kasseeB@gmail.com>



Alleged Ethics Complaint at GLVAR

Mon, Aug 13, 2018 at 1:50 PM

David Sanders <dsanders@glvar.org>
To: "KasseeB@gmail.com" <KasseeB@gmail.com>
Cc: Wendy DiVecchio <Wendy@glvar.org>

Ms. Bulen:

GLVAR has recently become aware of the publication of an alleged ethics case against you being used as a part of a political campaign, the article in question can be found at <https://veteransinpolitics.org/2018/08/kassee-bulen-under-investigation-after-being-charged-with-ethics-violations-in-complaint-filed-with-glvar/>

As of the date of this email, GLVAR has not received such a complaint. If such a complaint is received, it will be reviewed by the Grievance Committee pursuant to the *National Association of REALTORS Code of Ethics and Arbitration Manual*. If the case proceeds to an Ethics Hearing, you be notified at that time.

The ethics proceeding process is confidential and GLVAR had no part in the publication of this alleged complaint. GLVAR is looking into this matter and will act accordingly.

GLVAR recommends that you discuss your legal options related to the publication of this alleged complaint with a Nevada licensed attorney.

Sincerely,

David B. Sanders, Esq.
General Counsel
Greater Las Vegas Association of REALTORS®
6360 South Rainbow Boulevard
Las Vegas, NV 89118
(702) 784-5054 (702) 784-5060 FAX
dsanders@GLVAR.org
www.LasVegasRealtor.com

CONFIDENTIALITY NOTICE: This message, as well as any attached document, contains information from the Greater Las Vegas Association of REALTORS® that is confidential and privileged, or may contain attorney work product. The information is intended only for the use of the addressee named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, or distribution of this email or attached documents, or taking any action in reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. If you have received this message in error, please (1) immediately notify me by reply email, (2) do not review, copy, save, forward, or print this email or any of its attachments, and (3) immediately delete and destroy this email, its attachments and all copies thereof. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege.

9/18/2018

Gmail - Alleged Ethics Complaint at GLVAR

Kassee Bulen <kasseeb@gmail.com>



Alleged Ethics Complaint at GLVAR

Tue, Sep 4, 2018 at 8:23 AM

David Sanders <dsanders@glvar.org>
To: Kassee Bulen <kasseeb@gmail.com>
Cc: Wendy DiVecchio <Wendy@glvar.org>

GLVAR has not received an ethics complaint as alleged in the article.

D

David B. Sanders, Esq.
General Counsel
Greater Las Vegas Association of REALTORS®
6360 South Rainbow Boulevard
Las Vegas, NV 89118
(702) 784-5054 (702) 784-5060 FAX
dsanders@GLVAR.org
www.LasVegasRealtor.com

CONFIDENTIALITY NOTICE: This message, as well as any attached document, contains information from the Greater Las Vegas Association of REALTORS® that is confidential and privileged, or may contain attorney work product. The information is intended only for the use of the addressee named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, or distribution of this email or attached documents, or taking any action in reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. If you have received this message in error, please (1) immediately notify me by reply email, (2) do not review, copy, save, forward, or print this email or any of its attachments, and (3) immediately delete and destroy this email, its attachments and all copies thereof. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege.

From: Kassee Bulen <kasseeb@gmail.com>
Sent: Monday, September 3, 2018 9:16 AM
To: David Sanders <dsanders@glvar.org>
Cc: Wendy DiVecchio <Wendy@glvar.org>
Subject: Re: Alleged Ethics Complaint at GLVAR

[Quoted text hidden]

EXHIBIT 4



(702) 755-9019



Text Message
Wed, Aug 22, 7:08 PM

Kassee You are about to be destroyed politically n NV. Why are so many people mad at you?

I'm sorry who is this ?

Sorry but I can't say right now. Someone close to Jimmy

Ok well not sure what you're talking about. I just helped on two races.

Jimmy Vega wants you



Text Message





(702) 755-9019



If you are named as a witness for Ellison you're done.

I am a threat to no one and just want to be left alone.

I have never met the dude

But you know if Jimmy actually lived at the address listed or at Merry's

How would I know.

I volunteered on a political race



Text Message





(702) 755-9019



Lisa Mayo put you on a witness list

I don't know who that is

What In fighting? All the shit hitting you online

I haven't fought back once

So it's just being attacked

For volunteering on races

Makes no sense

Lisa is Ellison's



Text Message





(702) 755-9019



Lisa is Ellison's
campaign manager

Ah never met her

I know rob knows her

Listen just want to be
left alone is all

I just want to see all this
fighting end. Are you
willing to make peace
with Jimmy and Rob?

I haven't done anything

Are you open to talking
to them and trying to
put it behind?



Text Message





(702) 755-9019



You are entitled to your feelings. I'm sorry you feel so scared.

Ironically Rob is scared of you from what I gather. So is Jimmy

Ya I'm sure.

So menacing

Rob and Jimmy seem more focused on hurting you politically not physically. But this threatens the party. That's my concern.

Thu, Aug 23, 8:16 PM



Text Message





(702) 755-9019



I spoke with Rob today.
You and Rob's Bull shit
is about to hurt all of us.
Rob called the secret
service and filed a
complaint against you.
This fucking crap ends
now.

I don't know who this is
and I have done nothing
to Rob. Nothing.

You filed some Bull shit
that got him thrown out
of the Trump speech
and filed a fake
restraining order against
him. He's agreed to
leave u alone.



Text Message





(702) 755-9019



Nope not true

He has not

Rob is busy dating
some new woman
according to Jimmy.
Daleine

I don't care.

I will make sure he stops
posting bull shit about
you and you cut your
shit out against him.
Agreed?

Listen I don't know who
this. You have no clue
what you are talking



Text Message





(702) 755-9019



what you are talking
about

Is

If you don't stop this
stupid fighting you will
never work for any
republican candidate in
NV again. Like Richard.

I'm not doing anything

Please stop

You have great future
ahead of you

Not restraining order
filed



Text Message





(702) 755-9019



been terrorised?

Leave me alone please

If you care about the party and your role in it make nice with Jimmy and Rob. Trump's people are watching.

Fri, Aug 24, 8:27 PM

I know you want to be rich, politically powerful, but most importantly you want to make your dad proud. What are you willing to do to make that happen? Are you a team player?



Text Message



EXHIBIT 5

McDonald Law Group, LLC

October 2, 2018

Veterans in Politics
Info@veteransinpolitics.org

Steve Sanson
devildog1285@cs.com

Rob Lauer
3888 Quadrel St.
Las Vegas, NV 89129

Nevada Women For President Donald J. Trump

Nevada Liberty & Reno Tea Party Coalition Nevada GOP Issues & Discussions

Clark County Politics II Las Vegas: Politics on the Rocks Rob Telles

Re: NOTICE TO CEASE AND DESIST PUBLICATION OF FALSE INFORMATION

Dear Proprietors:

Please be advised that our office has been retained by Lawra Kassee Bulen with regards to the drafting, posting and sharing of the article titled *Kassee Bulen, Political Gypsy?* This Article was originally written by Steve Sanson and posted as an article on Veterans in Politics website <https://veteransinpolitics.org/2018/08/kassee-bulen-political-gypsy/> on August 8, 2018 (hereafter "Article").

You are receiving this Cease and Desist Notice as you have authored, posted and/or shared this Article on your Facebook, Twitter or other social media site. This article contains several false and defamatory statements and therefore must immediately be removed. It is unfortunate that you have chosen to author/share/post such a defamatory article without doing the necessary research to write or share these claims as you have now opened yourselves up to litigation and criminal prosecution.

First, the Article states that "Bulen Strategies, is not a licensed lawful business in the state of Nevada." This is incorrect. A simple search of Clark County Nevada's records would have shown you that Bulen Strategies is in fact a fictitious firm name of the Sole Proprietorship owned and licensed in the State of Nevada by Lawra Kassee Bulen. Attached as Exhibit 1 please find the Nevada State Business License for Lawra Kassee Bulen along with the Fictitious Firm Name Certificate of Business. This is clearly defamatory as this false statement of fact was something that is easily researched-especially if you are implying that you conducted research to support your false facts. Your imputation that Ms. Bulen's lack of fitness for her profession is defamatory per se. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

The assault charges referenced in the Article were dismissed against Ms. Bulen and her record was sealed. The Order sealing this record was deemed confidential by Court as was Ms. Bulen's record. As such, your authoring and sharing of this information is in violation of said Court Order. This is not public information and giving publicity to private facts is an invasion of privacy. *State v. Eighth Judicial Dist. Court*, 118 Nev. 140, 42 P.3d 233; *Montesano v. Donrey Media Group*,

203 S. Water Street, Suite 300
Henderson, NV 89015

Telephone: (702) 448-4962 · Facsimile: (702) 448-5011 · E-mail: rena@mcdonaldlawgroup.com

99 Nev. 644, 668 P.2d 1081 (1983). The imputation of a crime is defamatory per se. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

The Article states further that Ms. Bulen was "chased" out of Republican Party groups in Arizona and St. George and that several married men accused Ms. Bulen of trying to extort money out of them. There are no charges that have been brought against our client for extortion. These claims again are false and the Article fails to cite any sources that could provide any factual basis for these claims.

Your impeachment of our client's name and reputation and exposure of our client to public ridicule will not be tolerated. It is clear that your intentions are to harass and tarnish our client's name and prevent her from doing business in the State of Nevada. You knowingly published statements with reckless disregard for the truth acting with actual malice *Miller v. Jones*, 114 Nev. 1291, 970 P.2d 571 (1998); *Posadas v. City of Reno*, 109 Nev. 448, 851 P.2d 438 (1993).

As such we are demanding that the libelous, defamatory information in the Article be immediately redacted and the posting and sharing of the Article be removed from each and every one of your sites. In lieu of immediately proceeding forward against you, Ms. Bulen is giving you the opportunity to redact and remove the Article.

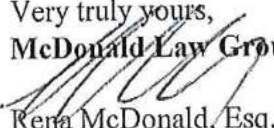
Be advised that should you fail to provide confirmation that this information has been removed and the posts have been deleted by October 5, 2018 our client will be seeking legal action against you.

You have stated false facts that our client is not licensed, that our client has a criminal record, that our client was chased out of the Republican Party and has committed extortion. If our client is forced to pursue legal action against you she will not only be seeking to collect actual damages for each one of these statements. She will further be seeking treble damages and recovery for lost time, hardship, intentional infliction of emotional distress and attorney's fees and costs. No proof of any actual harm to reputation or any other damage is required for the recovery of damages as to the imputation of a crime or imputing Ms. Bulen's lack of fitness for her profession. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

Be further advised that Libel is a crime pursuant to NRS 200.510 and your harassment of our client is also a crim pursuant to NRS 200.571. As such, in addition to the civil claims brought against you our client will also be seeking prosecution of each and every one of you for your criminal violations. Again, you have until close of business on October 5, 2018 to remove the false information otherwise our client will begin the process of pursuing civil litigation and/or criminal prosecution against you.

Guide yourselves accordingly.

Very truly yours,
McDonald Law Group


Rena McDonald, Esq.
RM/mg

203 S. Water Street, Suite 300
Henderson, NV 89015

Telephone: (702) 448-4962 · Facsimile: (702) 448-5011 · E-mail: rena@mcdonaldlawgroup.com

EXHIBIT 1



Office of the Clark County Clerk
Lynn Marie Goya

Please Select One:

- ☒ New Application
☐ Renewal of existing Fictitious Firm Name

Certificate of Business: Fictitious Firm Name
Sole Proprietor or Individual

Please Print or Type

The expiration date for such certificates shall expire after five years from the date of filing.

The undersigned does hereby certify that

Lawra Kassee Bulen

(Sole Proprietor or Individual)

with a mailing address of 3545 Cactus Shadow Street, #203

(Mailing Address for notification of renewal) (Street)

Las Vegas, NV 89129

(City, State, Zip)

is conducting business in Clark County, Nevada, under the fictitious name of
Bulen Strategies

(Fictitious Firm Name or Doing Business As)

and that said firm is composed of the following person whose name and address is as follows:

By signing below I declare (or affirm), under penalty of perjury, that all statements made in this document are true, and that I have authority to sign on behalf of and to bind the above named business to a contract.

(1) Lawra Kassee Bulen

(Full Name and title (Type or Print))

3545 Cactus Shadow St, #203

(Street Address of Business or Residence)

Signature

Lawra Kassee Bulen 7/11/18

Date

Las Vegas, NV 89129

(City, State, Zip)

STATE OF Nevada

COUNTY OF Clark

} ss:

This instrument was acknowledged before my on

July 11, 2018

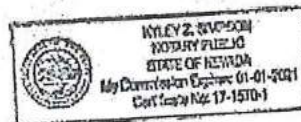
(Date)

by

Lawra Kassee Bulen

(Name of individual whose signature is being extracted)

Signature of Notary Public or County Clerk



RECEIVED
JUL 16 2018
COUNTY CLERK

Mailing: Lynn Marie Goya, County Clerk, Attn: FFN, Box 551604, Las Vegas NV 89155-1604
Filing Fee of \$20.00 payable to County Clerk, submitted certificate and a self-addressed stamped envelope

9/29/2016

SECRETARY OF STATE



NEVADA STATE BUSINESS LICENSE

Sole Proprietor
Lawra Kassee Bulen

Nevada Business Identification # NV20171644458

Expiration Date: 10/31/2018

In accordance with Title 7 of Nevada Revised Statutes, pursuant to proper application duly filed and payment of appropriate prescribed fees, the above named is hereby granted a Nevada State Business License for business activities conducted within the State of Nevada.

Valid until the expiration date listed unless suspended, revoked or cancelled in accordance with the provisions in Nevada Revised Statutes. License is not transferable and is not in lieu of any local business license, permit or registration.

IN WITNESS WHEREOF, I have hereunto
set my hand and affixed the Great Seal of
State, at my office on 10/05/2017



Barbara K. Cegavske

BARBARA K. CEGAVSKE
Secretary of State

You may verify this license at www.nvsos.gov under the Nevada Business Search.
State Business License may be renewed 90 days prior to the expiration date.

License must be cancelled on or before its expiration date if business activity ceases.
Failure to do so will result in late fees or penalties which by law cannot be waived.
There is no fee for cancellation.

McDonald Law Group, LLC

October 2, 2018

Veterans in Politics
Info@veteransinpolitics.org

Steve Sanson
devildog1285@cs.com

Rob Lauer
3888 Quadrel Street
Las Vegas, NV 89129

Veterans in Politics International

Nevadans Military Veterans Court Active or Inactive

Northern Nevada Republican Women

Nevada Republican Assembly (NVRA)

Las Vegas Politically Conservative Jews

Eye On Nevada Politics

No Property Tax Hike - GOP in 2019 Nevada Legislature

Republican Women of Reno

Republicans giving time, sweat & treasure to elect Republicans!

Prosecute the Police Officer who Killed Army Veteran Stanley Gibson

Re: NOTICE TO CEASE AND DESIST PUBLICATION OF FALSE INFORMATION

Dear Proprietors:

Please be advised that our office has been retained by Lawra Kassee Bulen with regards to the drafting, posting and sharing of the article titled *KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR*. This Article was originally written by Steve Sanson and posted as an article on Veterans in Politics website <https://veteransinpolitics.org/2018/08/kassee-bulen-under-investigation-after-being-charged-with-ethics-violations-in-complaint-filed-with-glvar/> on August 13, 2018 (hereafter "Article").

You are receiving this Cease and Desist Notice as you have authored, posted and/or shared this Article on your Facebook, Twitter or other social media site. This article contains several false and defamatory statements and therefore must immediately be removed. It is unfortunate that you have chosen to author/share/post such a defamatory article without doing the necessary research to write or share these claims as you have now opened yourselves up to litigation and criminal prosecution.

First, the title of the Article in and of itself is defamatory and a false fact. Secondly, the Article states that "An ethics complaint was filed this week with the Great Las Vegas Association of Realtors against Lawra Kassee Bulen." This is a false fact. First of all the entity is the Greater Las Vegas Association of Realtors®. Secondly, as with other false facts written in articles by Mr. Sanson-a simple search would have shown that Ms. Bulen has never been investigated by the GLVAR or the State of Nevada Real Estate Division. Attached as Exhibit 1 please find a record

203 S. Water Street, Suite 300
Henderson, NV 89015

Telephone: (702) 448-4962 · Facsimile: (702) 448-5011 · E-mail: rena@mcdonaldlawgroup.com

search conducted by the Administration Section Manager of NVRED evidencing that no complaints have been filed against Ms. Bulen's license. Further, attached as Exhibit 2 you will find an email from GLVAR's general counsel evidencing that not only have no complaints been received against Ms. Bulen but that GLVAR is also investigating the Article. In an effort to assist GLVAR with its investigation into the matter we will be forwarding a copy of this correspondence to GLVAR's counsel. Of course included in the correspondence will be each of your names for investigation. Your imputation that Ms. Bulen's lack of fitness for her profession is defamatory per se. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

The "Complaint" shown as a picture in the Article is illegible and does not show the name of any complainant. Clearly this was done in an effort to give some validity to the libelous claims contained in the Article and to convey the idea that Ms. Bulen is unethical and incapable of performing in her business. The author goes as far as citing Standards of Practice in a further attempt to deceive his audience and defame Ms. Bulen. It appears that Mr. Sanson has written and shared this Article in an attempt to lower Ms. Bulen's reputation in the community and call others to make defamatory statements against her further defaming our client. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993). *Lubin v. Kunin*, 117 Nev. 107, 17 P.3d 4222 (2001).

Moreover, as stated in previous articles authored by Mr. Sanson, the Article moves on to state that "according to the Nevada Secretary of State's official website and Clark County business records Kasee Bulen's company, Bulen Strategies, is not a licensed lawful business in the state of Nevada." As Mr. Sanson has previously been advised this is incorrect. A simple search of Clark County Nevada's records would have shown you that Bulen Strategies is in fact a fictitious firm name of the Sole Proprietorship owned and licensed in the State of Nevada by Lawra Kasee Bulen. Attached as Exhibit 3 please find the Nevada State Business License for Lawra Kasee Bulen along with the Fictitious Firm Name Certificate of Business. This is clearly defamatory as this false statement of fact was something that is easily researched-especially if you are implying that you conducted research to support your false facts. The imputation that Ms. Bulen's lack of fitness for her profession is defamatory per se. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

Had Mr. Sanson or any of you for that matter conducted any form of due diligence prior to posting this defamatory Article you would have known this entire Article is false. Again, another simple search of the internet will bring you to <https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-and-selling-in-las-vegas> wherein you will find the article by NBC titled *HOME SWEET HOME: Top 5 hottest zip codes for buying & selling in Las Vegas* and the video wherein Ms. Bulen is featured. At no time in the video does Ms. Bulen purport herself to be an "expert" and nowhere in the article does it state that Ms. Bulen is an expert.

Your impeachment of our client's name and reputation and exposure of our client to public ridicule will not be tolerated. It is clear that your intentions are to harass and tarnish our client's name and prevent her from doing business in the State of Nevada. You knowingly published statements with reckless disregard for the truth acting with actual malice *Miller v. Jones*, 114 Nev. 1291, 970 P.2d 571 (1998); *Posadas v. City of Reno*, 109 Nev. 448, 851 P.2d 438 (1993).

As the entire Article, even the title, is libelous and defamatory we are demanding that the posting and sharing of the Article be removed from each and every one of your sites. In lieu of immediately proceeding forward against you, Ms. Bulen is giving you the opportunity to remove the Article.

Be advised that should you fail to provide confirmation that this information has been removed and the posts have been deleted by October 5, 2018 our client will be seeking legal action against you.

You have stated false facts that our client has received complaints and is being investigated by GLVAR and that our client is unlicensed. If our client is forced to pursue legal action against you she will not only be seeking to collect actual damages for each one of these statements. She will further be seeking treble damages and recovery for lost time, hardship, intentional infliction of emotional distress and attorney's fees and costs. No proof of any actual harm to reputation or any other damage is required for the recovery of damages as to the imputation of a crime or imputing Ms. Bulen's lack of fitness for her profession. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

Be further advised that Libel is a crime pursuant to NRS 200.510 and your harassment of our client is also a crime pursuant to NRS 200.571. As such, in addition to the civil claims brought against you our client will also be seeking prosecution of each and every one of you for your criminal violations. Again, you have until close of business on October 5, 2018 to remove the false information otherwise our client will begin the process of pursuing civil litigation and/or criminal prosecution against you.

Guide yourselves accordingly.

Very truly yours,
McDonald Law Group

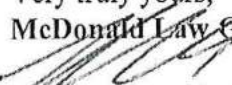

Rena McDonald, Esq.
RM/mg

EXHIBIT 1

BRIAN SANDOVAL
Governor

STATE OF NEVADA



C.J. MANTHE
Director

SHARATH CHANDRA
Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION
www.red.nv.gov

August 30, 2018

Lawra Kassee Bulen
3545 Cactus Shadow Street #203
Las Vegas, Nevada 89129

Re: Request for Records of Complaints.

Enclosed you will find the record of complaints for LAWRA KASSEE BULEN License No(s). S.0182795.

The information contained in this document reflects all complaints filed with the Division against the requested licensee named herein along with the disposition of each complaint.

Sincerely,

A handwritten signature in black ink, appearing to read "Teralyn Thompson", written over a circular stamp.

Teralyn Thompson
Administration Section Manager
State of Nevada Department of Business and Industry
Real Estate Division

cc: File

BRIAN SANDOVAL
Governor

STATE OF NEVADA



C.J. MANTHE
Director

SHARATH CHANDRA
Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION

www.red.nv.gov

RECORD OF COMPLAINTS

DATE: August 30, 2018

LICENSEE NAME: LAWRA KASSEE BULEN

LICENSE NUMBER(S): S.0182795

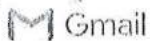
STATUS: ACTIVE

NUMBER OF COMPLAINTS	YEAR	DISPOSITION OF COMPLAINT
0		

EXHIBIT 2

9/18/2018

Gmail - Alleged Ethics Complaint at GLVAR



Kassee Bulen <kasseeb@gmail.com>

Alleged Ethics Complaint at GLVAR

David Sanders <dsanders@glvar.org>
To: "KasseeB@gmail.com" <KasseeB@gmail.com>
Cc: Wendy DiVecchio <Wendy@glvar.org>

Mon, Aug 13, 2018 at 1:50 PM

Ms. Bulen:

GLVAR has recently become aware of the publication of an alleged ethics case against you being used as a part of a political campaign, the article in question can be found at <https://veteransinpolitics.org/2018/08/kassee-bulen-under-investigation-after-being-charged-with-ethics-violations-in-complaint-filed-with-glvar/>

As of the date of this email, GLVAR has not received such a complaint. If such a complaint is received, it will be reviewed by the Grievance Committee pursuant to the *National Association of REALTORS Code of Ethics and Arbitration Manual*. If the case proceeds to an Ethics Hearing, you be notified at that time.

The ethics proceeding process is confidential and GLVAR had no part in the publication of this alleged complaint. GLVAR is looking into this matter and will act accordingly.

GLVAR recommends that you discuss your legal options related to the publication of this alleged complaint with a Nevada licensed attorney.

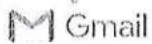
Sincerely,

David B. Sanders, Esq.
General Counsel
Greater Las Vegas Association of REALTORS®
6350 South Rainbow Boulevard
Las Vegas, NV 89118
(702) 784-5054 (702) 784-5060 FAX
dsanders@GLVAR.org
www.LasVegasRealtor.com

CONFIDENTIALITY NOTICE: This message, as well as any attached document, contains information from the Greater Las Vegas Association of REALTORS® that is confidential and privileged, or may contain attorney work product. The information is intended only for the use of the addressee named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, or distribution of this email or attached documents, or taking any action in reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. If you have received this message in error, please (1) immediately notify me by reply email, (2) do not review, copy, save, forward, or print this email or any of its attachments, and (3) immediately delete and destroy this email, its attachments and all copies thereof. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege.

9/18/2018

Gmail - Alleged Ethics Complaint at GLVAR



Kassee Bulen <kasseeb@gmail.com>

Alleged Ethics Complaint at GLVAR

David Sanders <dsanders@glvar.org>
To: Kassee Bulen <kasseeb@gmail.com>
Cc: Wendy DiVecchio <Wendy@glvar.org>

Tue, Sep 4, 2018 at 8:23 AM

GLVAR has not received an ethics complaint as alleged in the article.

D

David B. Sanders, Esq.
General Counsel
Greater Las Vegas Association of REALTORS®
6360 South Rainbow Boulevard
Las Vegas, NV 89118
(702) 784-5054 (702) 784-5060 FAX
dsanders@GLVAR.org
www.LasVegasRealtor.com

CONFIDENTIALITY NOTICE: This message, as well as any attached document, contains information from the Greater Las Vegas Association of REALTORS® that is confidential and privileged, or may contain attorney work product. The information is intended only for the use of the addressee named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, or distribution of this email or attached documents, or taking any action in reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. If you have received this message in error, please (1) immediately notify me by reply email, (2) do not review, copy, save, forward, or print this email or any of its attachments, and (3) immediately delete and destroy this email, its attachments and all copies thereof. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege.

From: Kassee Bulen <kasseeb@gmail.com>
Sent: Monday, September 3, 2018 9:16 AM
To: David Sanders <dsanders@glvar.org>
Cc: Wendy DiVecchio <Wendy@glvar.org>
Subject: Re: Alleged Ethics Complaint at GLVAR

[Quoted text hidden]

EXHIBIT 3



Office of the Clark County Clerk
Lynn Marie Goya

Please Select One:

- ☒ New Application
☐ Renewal of existing Fictitious Firm Name

Certificate of Business: Fictitious Firm Name
Sole Proprietor or Individual

Please Print or Type

The expiration date for such certificates shall expire after five years from the date of filing.

The undersigned does hereby certify that

Lawra Kasseo Bulen

(Sole Proprietor or Individual)

with a mailing address of 3545 Cactus Shadow Street, #203

Las Vegas, NV 89129

(Mailing Address for notification of renewal) (Street)

(City, State, Zip)

is conducting business in Clark County, Nevada, under the fictitious name of

Bulen Strategies

(Fictitious Firm Name or Doing Business As)

and that said firm is composed of the following person whose name and address is as follows:

By signing below I declare (or affirm), under penalty of perjury, that all statements made in this document are true, and that I have authority to sign on behalf of and to bind the above named business to a contract.

(1) Lawra Kasseo Bulen

Full Name and Title (Type or Print)

3545 Cactus Shadow St, #203

Street Address of Business or Residence

Signature

Las Vegas, NV 89129

City, State, Zip

STATE OF Nevada

COUNTY OF Clark

ss:

This instrument was acknowledged before me on

July 11, 2018

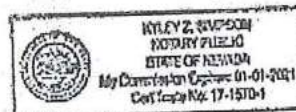
(Date)

by

Lawra Kasseo Bulen

(Name of individual whose signature is being collected)

Signature of County Probationary Clerk



RECEIVED
JUL 18 2018
COUNTY CLERK

Mailed to: Lynn Marie Goya, County Clerk, Attn: FFN, Box 551604, Las Vegas NV 89158-1604
Filing Fee of \$20.00 payable to County Clerk, accompanied certificate and a self-addressed stamped envelope

9/29/2016

SECRETARY OF STATE



NEVADA STATE BUSINESS LICENSE

Sole Proprietor
Lawra Kassee Bulen

Nevada Business Identification #NV20171644458

Expiration Date: 10/31/2018

In accordance with Title 7 of Nevada Revised Statutes, pursuant to proper application duly filed and payment of appropriate proscribed fees, the above named is hereby granted a Nevada State Business License for business activities conducted within the State of Nevada.

Valid until the expiration date listed unless suspended, revoked or cancelled in accordance with the provisions in Nevada Revised Statutes. License is not transferable and is not in lieu of any local business license, permit or registration.

IN WITNESS WHEREOF, I have hereunto
set my hand and affixed the Great Seal of
State, at my office on 10/05/2017

Barbara K. Cegavske

BARBARA K. CEGAVSKE
Secretary of State

You may verify this license at www.nvsos.gov under the Nevada Business Search.
State Business License may be renewed 90 days prior to the expiration date.

Licensee must be cancelled on or before its expiration date if business activity ceases.
Failure to do so will result in late fees or penalties which by law cannot be waived.
There is no fee for cancellation.

McDonald Law Group, LLC

October 2, 2018

Trump Victory Team
2585 South Jones
Las Vegas, Nevada

Rob Lauer
3888 Quadrel Street
Las Vegas, NV 89129

Steve Sanson
devildog1285@cs.com

Kimberly Fergus
kfergus@kimersellshomes.com

Megan Barth

Jim Marchant

Edith Behm

Re: NOTICE TO CEASE AND DESIST PUBLICATION OF FALSE INFORMATION

Dear Interested Parties:

Please be advised that our office has been retained by Lawra Kassee Bulen with regards to the drafting, posting and sharing of the video titled *KASSEE BULEN ATTACKS PRESIDENT TRUMP* (hereafter "Video"). This video was shot and edited by Rob Lauer.

You are receiving this Cease and Desist Notice as you have posted and/or shared this Video on your Facebook, Twitter or other social media site. This Video was heavily edited by Mr. Lauer so that it would appear that Ms. Bulen was making derogatory remarks about President Trump. It is unfortunate that you have chosen to post or share such a defamatory Video without doing the necessary research to write or share these claims as you have now opened yourselves up to litigation and criminal prosecution. There can be no doubt that this Video was heavily edited-it is clear that Ms. Bulen's words were cut to fit Mr. Lauer's narrative. As the editing is so obvious your ignorance of the editing of the video will not stand as an excuse or defense.

In addition to sharing the Video you have also drafted or shared false, defamatory, libelous remarks about Ms. Bulen, including but not limited to, "Republican" "Never-Trumper" "attacks President Trump over Stormy Daniels alleged affair" It is clear that you have chosen to author or share these defamatory remarks in an attempt to bring attention to the Video in an attempt to further defame our client. We are sure that you understand that your sharing of this Video makes it appear as though Ms. Bulen is not a Republican and/or does not support the President; thus making her unfit to run political campaigns. You are obviously attempting to lower Ms. Bulen's reputation in the community and call others to make defamatory statements against her in an attempt to prevent Ms. Bulen from working in the Republican Party. There can be question that your actions constitute defamation. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993). *Lubin v. Kunin*, 117 Nev. 107, 17 P.3d 4222 (2001).

Your impeachment of our client's name and reputation and exposure of our client to public ridicule will not be tolerated. It is clear that your intentions are to harass and tarnish our client's name and prevent her from doing business in the State of Nevada. You knowingly published this Video and defamatory statements with reckless disregard for the truth acting with actual malice

203 S. Water Street, Suite 300
Henderson, NV 89015

Telephone: (702) 448-4962 · Facsimile: (702) 448-5011 · E-mail: rena@mcdonaldlawgroup.com

Miller v. Jones, 114 Nev. 1291, 970 P.2d 571 (1998); *Posadas v. City of Reno*, 109 Nev. 448, 851 P.2d 438 (1993).

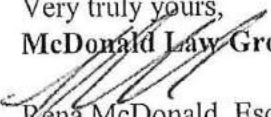
As the entire Video, and the phrases you have chosen to share with it are libelous and defamatory we are demanding that the posting and sharing of the Video be removed from each and every one of your sites. In lieu of immediately proceeding forward against you, Ms. Bulen is giving you the opportunity to remove the Video. Be advised that should you fail to provide confirmation that this information has been removed and the posts have been deleted by October 5, 2018 our client will be seeking legal action against you.

You have shared and/or posted a defamatory Video and if you refuse to remove the Video after your receipt of this demand there can be no question as to your intent to harass and defame Ms. Bulen. If our client is forced to pursue legal action against you she will not only be seeking to collect actual damages against each of you. She will further be seeking treble damages and recovery for lost time, hardship, intentional infliction of emotional distress and attorney's fees and costs. No proof of any actual harm to reputation or any other damage is required for the recovery of damages as to the imputation of Ms. Bulen's lack of fitness for her profession. *K-Mart Corp. v. Washington*, 109 Nev. 1180, 866 P.2d 274 (1993).

Be further advised that Libel is a crime pursuant to NRS 200.510 and your harassment of our client is also a crime pursuant to NRS 200.571. As such, in addition to the civil claims brought against you our client will also be seeking prosecution of each and every one of you for your criminal violations. Again, you have until close of business on October 5, 2018 to remove the false information otherwise our client will begin the process of pursuing civil litigation and/or criminal prosecution against you.

Guide yourselves accordingly.

Very truly yours,
McDonald Law Group


Rena McDonald, Esq.
RM/mg

203 S. Water Street, Suite 300
Henderson, NV 89015

Telephone: (702) 448-4962 · Facsimile: (702) 448-5011 · E-mail: rena@mcdonaldlawgroup.com

McDonald Law Group, LLC

October 4, 2018

Rob Lauer
3888 Quadrel Street
Las Vegas, NV 89129

**Re: NOTICE TO CEASE AND DESIST HARASSMENT, STALKING AND
DEFAMATION**

Dear Mr. Lauer:

As we are sure you are already aware our office represents Lawra Kasee Bulen with regards to your continued harassment and stalking. Despite the fact that our client has given you notice on several occasions that she wishes to have not contact with you-you continue to call, text and email her. Further, you have colluded with other people and organizations to spread defamatory articles and videos about our client.

You have received the cease and desist demands regarding the dissemination of fallacious information. There is no point in regurgitating the facts in those demands; however, we will go on to say that we are aware that you are the person providing Mr. Sanson with the false and defamatory "facts" and heavily edited video for the articles. As such, should any one person or organization fail to remove the articles and/or video from their social media or website we will be holding you personally responsible.

Further, we are aware of the article that you wrote for 360 News Las Vegas wherein you invented a fictitious "campaign source" so that you could yet again diminish our client's character; essentially calling Ms. Bulen a liar and questioning her credibility. This is obviously done so that others reading your article will believe Ms. Bulen to be a liar and is therefore actionable in a court of law.

While we are unclear as to the level of your deficiencies, your continued malfeasance will not be tolerated. So as to avoid any future confusion, let us be clear that Ms. Bulen has no affection or kind feelings for you. You have never been and will never be in a romantic relationship with Ms. Bulen. She has no want or need for you to be present in her life in any way.

203 S. Water Street, Suite 300
Henderson, NV 89015

Telephone: (702) 448-4962 · Facsimile: (702) 448-5011 · E-mail: rena@mcdonaldlawgroup.com

In the future there can be no doubt that you have been provided notice that our client wishes to have no further contact with you. Be advised that this does not mean that you have the right to lash out and continue making and/or writing defamatory statements about our client. Again, let us be clear that your behavior will no longer be tolerated.

We are demanding that you immediately remove any reference to our client in any article and specifically in the article titled "*Ethics Complaint Filed in N.L.V Constable Race, Key Witness Credibility in Doubt*" posted on August 25, 2018. Should you fail to remove the article on or before October 5, 2018, decide to reach out to our client in any way and/or continue to conspire with other parties to spread defamatory statements about Ms. Bulen she will not only move forward with her previous request for a restraining order against you but she will also be filing civil litigation against you for your continued stalking, harassment, defamation, libel, collusion, conspiracy, fraud, intentional interference with prospective contractual relations, intentional interference with prospective economic advantage, invasion of privacy, aiding and abetting and intention infliction of emotional distress. wherein she will seek out both civil and criminal injuries, including but not limited to attorney's fees and costs. If you contact our client or ask someone else to contact our client she will immediately contact the police.

You will receive no further warnings or communications prior to Ms. Bulen filing litigation against you or contacting the police.

Guide yourself accordingly.

Very truly yours,

McDonald Law Group



Rena McDonald, Esq.

RM/mg



Steve Sanson Timeline 2018 August

Add Friend Follow



Friends 106 Mutual Friends



Tiffany Roth
1 new post



Robin Yates
0 new posts



Christof Wehman



Mark Weinberger
3 new posts



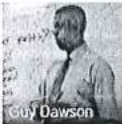
Paul Kuhn
2 new posts



Robert Kuhn
2 new posts



Mike Tombaro
2 new posts



Guy Dawson



Jennifer Heston

English (US) Español Português (Brasil)
Français (France) Deutsch

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Facebook © 2018

Steve Sanson was tagged in a video



Trump Victory Team is with Steve Sanson and 4 others.

August 20 · 🌐

Like Page

Self Described "Republican" Never-Trumper attacks President Trump over Stormy Daniels alleged affair



2

2 Comments 3 Shares 289 Views

Like

Comment

Share



https://www.facebook.com/christof.wehman/?_ft_n=1&id=1000010101010101&fbid=1000010101010101&fbid=1000010101010101

Chat (67)



https://www.facebook.com/steve.sanson/?_in_...&_ft_n=12Cd-h-R&id=ARCIP_2c...&_ft_n=12Cd-h-R&id=ARCIP_2c...&_ft_n=12Cd-h-R&id=ARCIP_2c...

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Bing Suggested Sites MyCase Login MyCase Clio - Dashboard JC filing Nevada Secretary of State iSolved HCM Silverflume Nevada's Busi... Assessor Home Page

Find: representative Previous Next Options

Steve Sanson

Rena Home Create 2 37

Steve Sanson Timeline 2018 August Add Friend Follow

Like Comment Share

Write a comment...

Steve Sanson August 13 · 4

KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR

VETERANSINPOLITICS.ORG

KASSEY BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR - Veterans In Politics International

August 13, 2018 Clark County Nevada An ethics...

19 Shares

Like Comment Share

Write a comment...

2 friends posted on Steve's timeline

Chat (58)

11:49 AM 11/1/2018

https://www.facebook.com/pg/Trump-Victory-Team-245242095750719/posts/?eta=page... Calend... Odys... Billing... NRS: C... News... (38)... X (38) XL...

File Edit View Favorites Tools Help

X RoboForm X Logins X Safenotes X Facebook - 1 (+1) X Rena McDonald X Save X Generate X Sync X Home

X Bing X Suggested Sites X MyCase Login MyCase X Clio - Dashboard X JC filing X Nevada Secretary of State... X iSolved HCM X SilverFlume Nevada's Busk... X Assessor Home Page

X Find: representative Previous Next Options

f Trump Victory Team

Like Comment Share

Trump Victory Team is with Steve Sanson and 4 others. August 20

Self Described "Republican" Never-Trumper attacks President Trump over Stormy Daniels alleged affair



2 Comments 3 Shares 201 Views

Like Comment Share


Oldest

View 1 more comment

Chat (53)

11:57 AM 11/7/2015

EXHIBIT 6



Steve Sanson

Timeline


2018

August

Add Friend


Follow

Friends · 106 Mutual Friends




Brittany Rohr

4 new posts




Robin Yates

3 new posts




Christoff Weihman

2 new posts




Mark Weinberger

3 new posts




Paul Kuhn

2 new posts




Robert Young

2 new posts




Vicky Fronticere

2 new posts



Guy Dawson

2 new posts



Gerry Holinski


2 new posts

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

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Facebook © 2018


Steve Sanson was tagged in a video.



Trump Victory Team is with Steve Sanson and 4 others.

August 20 · 🌐

Self Described "Republican" Never-Trumper attacks President Trump over Stormy Daniels alleged affair



DID SHE JUST CALL PRESIDENT TRUMP
RUN A MYSOGINIST?

KASSEL BULLEN ATTACKS PRESIDENT TRUMP

2

2 Comments · 3 Shares · 289 Views

Like

Comment

Share

https://www.facebook.com/christoff.weihman?_tn_=%2Cd-%5D-h-R&eid=ARD_AGAy6Vq5Gy9RZb25R2gyZ-Hi8S...

Chat (67)

11:38 AM 11/1/2018

https://www.facebook.com/steve.sanson.37/?in=%2Cdc-R-R&eid=ARCPjPctnnGfBu... Calend... Odys... Billing... NRS: C... News... (37)... (37) K...

File Edit View Favorites Tools Help

X RoboForm Search Logins Safenotes Facebook - 1 (+5) Rena McDonald Save Generate Sync Home

Bing Suggested Sites MyCase Login MyCase Clio - Dashboard JC filing Nevada Secretary of State ... Isolved HCM SilverFlume Nevada's Busi... Assessor Home Page

X Find: representative Previous Next Options

f Steve Sanson

Steve Sanson Timeline 2018 August

Add Friend Follow

Like Comment Share

Write a comment...

Steve Sanson August 13 · 🌐

KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR

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KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR - Veterans In Politics International
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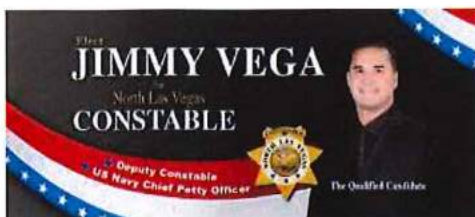
ETHICS COMPLAINT FILED IN N.LV CONSTABLE RACE, KEY WITNESS CREDIBILITY IN DOUBT



August 25, 2018

Rob Lauer Political Reporter

The campaign for North Las Vegas Constable just turned really ugly this week. The current Constable, Robert Eliason, is running for re-election against Deputy Constable Jimmy Vega. According to campaign sources, Eliason's campaign filed an ethics complaint against Jimmy Vega with the Nevada Secretary of State and the Nevada Attorney General's office on August 21, 2018.



Eliason is accusing Vega of violating election laws by not living in the city of North Las Vegas 30 days prior to filing for office. Former Clark County Commissioner Tom Collins filed the complaint.



According to Vega's official campaign filing, Vega lives at 1368 Journey Way North Las Vegas, NV. Vega told 360 that he has lived at the subject property as required by law and has a lease to back it up.



This week, 360 reached out to Vega's primary election campaign manager, Kasee Bulen, who Eliason's campaign said could be a key witness for them. When Bulen was pressed by 360 about Vega's living situation, Bulen claimed she knows nothing and was only a volunteer. Eliason's campaign source responded to Bulen's statements saying "Bulen's willingness to 'allegedly' lie on the record about her position on the Vega campaign calls her credibility in question and makes us ask, is she covering for Vega."



But according to Eliason's campaign, besides Bulen, they don't have any other witnesses to confirm or deny whether Vega lived at the Journey address. But they are looking for additional witnesses.

Vega responded saying "this is just a desperate attempt to shift the public's attention away from the fact that Eliason failed out of the police academy on day one and is not qualified to hold office under Nevada state law."

[illegible]

FORM NO. 104-100 (Rev. 1-1-79)
 COMPLAINT FOR INDEMNITY COMPLAINT IN A SUICIDE
 (For use by the insured)
 Date of accident: 10/1/79
 Date of filing: 11/1/79
 Policy Number: 104-100
 Insured's Name: JIMMY VEGA
 Insured's Address: 104-100
 Insured's Phone: 104-100
 Insured's Email: jimmy.vega@ccm
 Insured's Website: www.jimmyvega4constable.com
 Please detail the nature of your complaint against the individual, business, or service listed in
 the table below, when, where, and why of your complaint, a full explanation of the business transac-
 tion of the event. Please include any witnesses or others, identifying information, and
 any other information. (Include phone, business, or website, etc.) You may use different dates
 if necessary.
 Complaint in:
 did not meet the test for permanent residency
 in town ship - see attached Page 1 of 2
 re, see attached information from Registrar
 TO OPEN MEETING LAW VIOLATION IS AGAINST
 the Board:
 board, commission, agency, or person(s) etc.)
 where alleged violation occurred (address)
 specific violations against the board, commission,

1. The candidate's school shall require the voter to address every portion of the petition that is required to constitute a valid petition. If the respondent denies, directly or indirectly, the truth of any item of North Las Vegas, County of Clark, State of Nevada, that is verifiably established as constituting evidence in the filing, directly, indirectly, derivatively, or in other manner, as presented by the voter the other portions remain in effect as long as they do not constitute perjurying the State of the filing of distribution of candidacy for this office.

2. The only proof of residency offered by James Elliot Jorgin on March 22, 2018 at 4:44:25 p.m. was a voter's affidavit that that the address: 4615 Independence Court, Las Vegas, Nevada, 89146, is the address used.)

3. Regarding that same date, March 23, 2018, Vex requested a letter of address of Address and presented that Vex was on 1550 Jorgin Way on an address. This is a clear indication. He did not have a voter's license at 87 North Las Vegas, at residence, 30 days prior to March 13, 2018 or he would have to have lived in a permanent HSV domicile on or before February 13, 2018 to legally file for office on March 15.

4. The last he actual resident requires more human analysis. A permanent resident includes the following: For Nevada Superior Court (Williams v. Clark County District Attorney 118 Nev. 473-50 7/30/2001).

- a. Where other residents of the candidate's household reside;
- b. Where their pets reside;
- c. Address on their power bill, phone bill, water bill;
- d. Voter registration; and;
- e. That their employer considers the permanent address.



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Self Described "Republican" Never-Trumper attacks President Trump over
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2

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Terry Raymond INSANE dumb ass!!

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Steve Sanson

August 20 ·

If you are a paralyzed military veteran or know a paralyzed military veteran,
that uses a wheelchair. We would like to gift you a \$50,000 custom made
wheelchair. Please contact [Steve Sanson](#) at 702 283 8088 or
Vipipresident@cs.com for more information.

7

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KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR

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August 13, 2018

[Clark County Nevada](#)

An ethics complaint was filed this week with the Great Las Vegas Association of Realtors against Lawra Kassee Bulen, who recently appeared on a local Las Vegas News on Channel 3 NBC representing herself as a Real Estate "Expert" when in fact she never sold a single house in Nevada since obtaining her Real Estate License less than a year ago.



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- > [Minddie Lloyd & Miriam Gibson & Debbie Conway to appear on the Veterans In Politics video Talk-show](#)
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> August 2018

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		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		
» Jul					Sep »	

Kassee Bulen is charged in the ethics complaint with violating:

Article 12

"REALTORS® shall be honest and truthful in their real estate communications and shall present a true picture in their advertising, marketing, and other representations."

Kassee Bulen was also cited for the following ethics violations:

Standard of Practice 12-5

REALTORS® shall not advertise nor permit any person employed by or affiliated with them to advertise real estate services or listed property in any medium (e.g., electronically, print, radio, television, etc.) without disclosing the name of that REALTOR®'s firm in a reasonable and readily apparent manner.

Standard of Practice 12-5

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REALTORS® shall not advertise nor permit any person employed by or affiliated with them to advertise real estate services or listed property in any medium (e.g., electronically, print, radio, television, etc.) without disclosing the name of that REALTOR®'s firm in a reasonable and readily apparent manner.

The basis of the Bulen ethics complaint:

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"Lawra Kassee Bulen appeared on Las Vegas News on Channel 3 NBC pretending to show a house to a prospective buyer which she neither was the listing agent for nor the buyer's agent for. Kassee Bulen put herself out as a real estate "expert" on TV. Kassee Bulen's action was meant to defraud and mislead the public including prospective real estate clients into believing she had actual experience in the residential real estate in Nevada when in fact Bulen never sold any such homes ever."

HOME SWEET HOME: Top 5 hottest zip codes for buying & selling in Las Vegas

<https://news3lv.com/news/local/home-sweet-home-top-5-hottest-zip-codes-for-buying-and-selling-in-las-vegas>

Republican Candidate for Clark County Public Administrator Thomas Fougere retained Bulen Strategies owned and operated by Kassee Bulen to manage his campaign. But according to the Nevada Secretary of State's official website and Clark County business records Kassee Bulen's company, Bulen Strategies, is not a licensed lawful business in the state of Nevada.

This calls for Fougere decision making into question.

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BY [STEVE SANSON](#) IN [HOME - FEATURED, NEWS, PRESS RELEASE](#) TAGS [AN ETHICS COMPLAINT WAS FILED THIS WEEK WITH THE GREAT LAS VEGAS ASSOCIATION OF REALTORS AGAINST LAWRA KASSEE BULEN](#)

August 13, 2018 0

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Kassee Bulen, Political Gypsy?

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Republican Candidate for Clark County Public Administrator Thomas Fougere defeated Aaron Manfredi in the re-vote on June 12, 2018, by more than 20%. Fougere savaged Manfredi throughout the bitterly fought campaign over his criminal conviction, which consisted of a gross misdemeanor.



Fougere now faces Robert Telles in the general election this fall.

The Public Administrator oversees the assets of people in Clark County if they pass away without a will. So after Manfredi's defeat over his criminal conviction attention turned to Fougere. Fougere retained Bulen Strategies owned and operated by Kassee Bulen to manage his campaign. But according to the Nevada Secretary of State's official website and Clark County business records Kassee Bulen's company, Bulen Strategies, is not a licensed lawful business in the state of Nevada.

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Furthermore, according to public databases, Kasee Bulen or "Lawra Kasee Bulen" was charged and sentenced for Assault Causing Bodily Injury in Dallas Texas. Bulen has lived in at least 6 states in the past 10 years filing bankruptcy and chased out of Republican Party groups in Arizona and St. George according to sources.

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Additionally, according to people we spoke with directly, several married men in other states have accused Kassee Bulen of trying to extort money out of them after she had an affair with them.

Kassee Bulen's issues are raising serious questions with voters regarding Fougere's failure to vet his staff and ultimately his judgment to run such an important public office.

We reached out to Mr. Fougere for comment. He never responded back. But according to a recent Review-Journal article, Kassee Bulen still works for Fougere's as his campaign manager.

Kassee Bulen's background also calls into question Las Vegas Metro's screening process. Ms. Bulen recently became a member of the LVMPD Use of Force Review Board.



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BY STEVE SANSON IN HOME - FEATURED, NEWS TAGS BITTERLY FOUGHT CAMPAIGN, CRIMINAL CONVICTION, KASSEE BULEN, POLITICAL GYPSY?, REPUBLICAN CANDIDATE FOR CLARK COUNTY PUBLIC ADMINISTRATOR THOMAS FOUGERE DEFEATED AARON MANFREDI, WHICH CONSISTED OF A GROSS MISDEMEANOR.

August 8, 2018 3



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4:57 PM

Rob can you just
walk Away from
Kassee. For me?
Don't engage at all.
We have always
gotten along and
you are better than
this.

if you want to
meet me for
coffee and talk I
would be open to
that But there is



4:57 PM

We have always
gotten along and
you are better than
this.

if you want to
meet me for
coffee and talk I
would be open to
that. But there is
a whole lot that
needs to be done
before I would I
consider that.

EXHIBIT B

EXHIBIT B

27
FILED

FEB 27 2019

Ch. 112
CLERK OF COURT

1 **DFLT**

2 Lawra Kassee Bulen
3 10040 W. Cheyenne Ave., #170-16
4 Las Vegas, Nevada 89129
5 *Plaintiff, In Proper Person*

6 Eighth Judicial District Court
7 Clark County, Nevada

8 LAWRA KASSEE BULEN, an
9 individual,

10 Plaintiff,

11 vs.

12 ROB LAUER, an individual, STEVE)
13 SANSON, an individual, and DOES I)
14 through X and ROE)
15 CORPORATIONS I through X,)
16 inclusive,)

17 Defendants.

Case No.: A-18-784807-C

Department: XVIII

A-18-784807-C
DFLT
Default
4819106



18 **DEFAULT**

19 It appearing from the files and records in the above titled action that
20 the Defendant, STEVE SANSON, having been served with the Complaint
21 on January 8, 2019; that a copy of the (1) Summons; and (2) Complaint
was personally served on Defendant at his last known address; that more
than twenty (20) days, exclusive of the days of service, having expired
since service upon the Defendant; That no answer or other appearance
having been filed and no further time having been granted, therefore, the

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FEB 27 2019

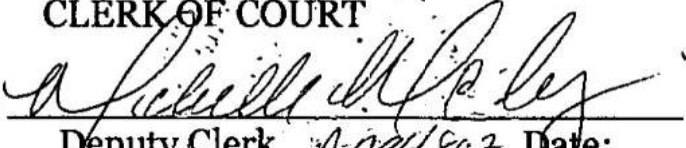
CLERK OF THE COURT

1 of the above named Defendant for failing to answer or otherwise plead to
2 Plaintiff's Complaint is hereby entered.

STEVEN D. GRIERSON
CLERK OF THE COURT

3 CLERK OF COURT

4 By:


Deputy Clerk A-784/807 Date:

5 Michelle McLaerty

FEB 27 2019

6 Respectfully Submitted:

7 
8

Lawra Kasse Bulen

9 10040 W. Cheyenne Ave., #170-16

Las Vegas, Nevada 89129

10 Plaintiff, In Proper Person

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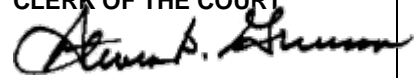
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EXHIBIT C

EXHIBIT C



1 **NEOJ**
2 BRANDON L. PHILLIPS, ESQ.
3 Nevada Bar No. 12264
4 Brandon L. Phillips, Attorney at Law, PLLC
5 1455 E. Tropicana Avenue Suite 750
6 Las Vegas, Nevada 89119
7 P: 702-795-0097 F: 702-795-0098
8 blp@abetterlegalpractice.com
9 Attorney for Plaintiff, Lawra Kassee Bulen

6 **EIGHTH JUDICIAL DISTRICT COURT**

7 **CLARK COUNTY, NEVADA**

8 LAWRA KASSEE BULEN,

9 Plaintiff,

10 vs.

11 STEVE SANSON, an Individual; ROB
12 LAUER, an Individual,

12 Defendant(s).

CASE NO.: A-18-784807-C

DEPT. NO.: VIII

13 **NOTICE OF ENTRY OF ORDER**

14 **TO: ALL PARTIES**

15 **YOU, AND EACH OF YOU** will please take notice that an Order was entered in this
16 matter on December 18, 2020. A copy of said ORDER is attached hereto and incorporated herewith
17 by reference.
18

19 **DATED** this 21st day of December, 2020.

20 Respectfully Submitted By:

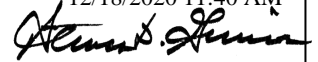
21 /s/ Brandon L. Phillips

22 BRANDON L. PHILLIPS, ESQ.
23 Nevada Bar No. 12264
24 Brandon L. Phillips, Attorney at Law, PLLC
25 1455 E. Tropicana Avenue Suite 750
26 Las Vegas, Nevada 89119
27 P: 702-795-0097 F: 702-795-0098
28 blp@abetterlegalpractice.com
Attorney for Plaintiff, Lawra Kassee Bulen

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EXHIBIT 1

EXHIBIT 1


CLERK OF THE COURT

ORD

BRANDON L. PHILLIPS, ESQ
Nevada Bar No. 12264
BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC
1455 E. Tropicana Ave., Suite 750
Las Vegas, NV 89119
Tel: (702) 795-0097
Fax: (702) 795-0098
blp@abetterlegalpractice.com
Attorney for Plaintiff, L. Bulen

**DISTRICT COURT
CLARK COUNTY, NEVADA**

LAWRA KASSEE BULEN,

Plaintiff,

vs.

STEVE SANSON, an Individual; ROB
LAUER, an Individual,

Defendant.

CASE NO. A-18-784807-C

DEPT. NO. 8

ORDER ON DEFENDANTS'

MOTION FOR ATTORNEYS' FEES

Hearing Date: October 6, 2020

THIS MATTER, having come before the Court with respect to *Defendants' Motion for Attorney's Fees, Costs, and Additional Relief pursuant to NRS 41.660 and NRS 41.670* ("Motion"), commencing on October 6, 2020 at the hour of 9:30 a.m.; Kory L. Kaplan, Esq. of the law firm of Kaplan Cottner, appearing on behalf of Defendants Rob Lauer and Steve Sanson (collectively, "Defendants"); and Brandon L. Phillips, Esq., appearing on behalf of Plaintiff Lawra Kassee Bulen ("Plaintiff"); the Court having read and considered Defendants' Motion, the Opposition and Reply on file, and the exhibits attached thereto; and the Court having heard and considered the arguments of counsel, and good cause appearing therefor, the Court finds the following:

I.
FINDINGS OF FACT

1. On November 20, 2018, Plaintiff filed her Complaint against Defendants for: (1) Defamation; (2) Defamation Per Se; (3) Invasion of Privacy: False Light; (4) Invasion of Privacy: Unreasonable Publicity Given to Private Facts; (5) Intentional Interference with Prospective Economic Advantage; (6) Intentional Infliction of Emotional Distress; (7) Negligence Per Se; (8) Concert of Action; and (9) NRS 42.005 Request for Exemplary and Punitive Damages.

2. On July 2, 2020, Defendants filed their Special Motion to Dismiss the Complaint pursuant to Nevada Revised Statutes (“NRS”) 41.660.

3. At the oral argument on August 4, 2020, the Court granted Defendants’ Special Motion to Dismiss in its entirety.

4. On August 25, 2020, Notice of Entry of Order was entered on the Court’s Order Granting Defendants’ Special Motion to Dismiss. The findings of fact and conclusions of law within the Court’s Order Granting Defendants’ Special Motion to Dismiss in its entirety is hereby incorporated by reference.

5. Defendants prevailed on obtaining dismissal of Plaintiff’s entire Complaint under Nevada’s anti-SLAPP statute, NRS § 41.660.

6. That Plaintiff’s claims were not brought in bad faith or for a frivolous purpose.

7. On September 1, 2020, Defendants filed the Motion.

8. On September 15, 2020, Plaintiff filed her Opposition to the Motion.

9. On September 29, 2020, Defendants filed their Reply in support of the Motion.

10. Defendants incurred \$16,415.00 in attorney’s fees and \$281.84 in costs related to this entire matter.

II.
CONCLUSIONS OF LAW

11. Nevada’s anti-SLAPP (“Strategic Lawsuit Against Public Participation”) statutes aim to protect First Amendment rights by providing defendants with a procedural mechanism to dismiss “meritless lawsuit[s] that a party initiates primarily to chill a defendant’s exercise of his

1 or her First Amendment free speech rights” before incurring the costs of litigation. *Stubbs v.*
2 *Strickland*, 129 Nev. 146, 150, 297 P.3d 326, 329 (2013). Nevada’s anti-SLAPP statute is
3 codified in NRS 41.635 thru NRS 41.670, inclusive.

4 12. A moving party seeking protection under NRS 41.660 need only demonstrate that
5 his or her conduct falls within one of four statutorily defined categories of speech, rather than
6 address difficult questions of First Amendment law. *See Delucchi v. Songer*, 133 Nev. 290, 299,
7 396 P.3d 826, 833 (2017). NRS 41.637(4) defines one such category as: “[c]ommunication made
8 in direct connection with an issue of public interest in a place open to the public or in a public
9 forum ... which is truthful or is made without knowledge of its falsehood.”

10 13. When an anti-SLAPP motion disposes of every cause of action, it is appropriate to
11 award all attorney’s fees incurred in connection with the case, even if not directly related to the
12 anti-SLAPP motion, because the successful movant “incurred the expenses Plaintiffs dispute in
13 responding to a lawsuit the district court found baseless.” *Graham-Suit v. Clainos*, 738 F.3d 1131,
14 1159 (9th Cir. 2013) (*affirmed in Graham-Suit v. Clainos*, 756 F.3d 724, 752 (9th Cir. 2014);
15 *Wanland v. Law Offices of Mastagni, Holstedt & Chiurazzi*, 141 Cal.App.4th 15, 45 Cal.Rptr.3d
16 633, 637 (2006) (“[T]o this end, the provision is broadly construed so as to effectuate the
17 legislative purpose of reimbursing the prevailing defendant for expenses incurred in extracting
18 herself from a baseless lawsuit.”).

19 14. Additionally, an award of anti-SLAPP costs and fees includes fees incurred after
20 the motion is granted. *See Wanland v. Law Offices of Mastagni, Holstedt & Chiurazzi*, 141 Cal.
21 App. 4th 15, 21 (2006) (finding that fees recoverable under anti-SLAPP statute include all post-
22 motion fees, such as fees on fees, fees in connection with defending an award of fees, and fees on
23 appeal of an order granting an Anti-SLAPP motion).

24 15. In Nevada, trial courts “have great discretion to award attorney fees, and this
25 discretion is tempered only by reason and fairness.” *Haley v. Dist. Ct.*, 128 Nev. Adv. Op. 16,273
26 P.3d 855, 860 (2012) (citing *Shuette v. Beazer Homes Holdings Corp.*, 121 Nev. 837, 864, 124
27 P.3d 530, 548-49 (2005)); *see also Bergmann v. Boyce*, 109 Nev. 670, 674, 856 P.2d 560, 563
28

1 (1993) (attorney's fees are "within the sound discretion of the trial court").)

2 16. In determining the reasonableness and amount of an attorney's fee award, a court
3 may begin its analysis with any method rationally designed to calculate a reasonable amount.
4 *Shuette v. Beazer Homes*, 121 Nev. 837, 864; 124 P.3d 530, 549 (2005). Whether the court seeks
5 to award the entire amount of attorney's fees or use an alternative approach, the court must
6 consider the requested amount in light of the factors enumerated in *Brunzell v. Golden Gate*
7 *National Bank*, 85 Nev. 345, 349; 455 P.2d 31 (1969), "namely, (1) the advocate's professional
8 qualities, (2) the nature of the litigation, (3) the work performed, and (4) the result." *Shuette*, 121
9 Nev. at 865; 124 P.3d at 549.

10 17. Upon review of the *Brunzell* factors, the Declaration of Kory L. Kaplan, Esq.
11 attached to the Motion, and the arguments made by the parties in the Motion, Plaintiff's
12 Opposition, and Defendants' Reply in support of the Motion, Defendants' attorney's fees were
13 reasonable and necessary.
14

15 18. As a matter of law, Defendants are entitled to their attorney's fees and costs. NRS
16 41.670(1)(a).

17 **III.**
ORDER AND FINAL JUDGMENT

18 Based on the foregoing findings of fact and conclusions of law,

19 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that Defendants' Motion
20 for Attorney's Fees, Costs, and Additional Relief pursuant to NRS 41.660 and NRS 41.670 is
21 **GRANTED** in part.
22

23 **IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED** that
24 Defendants are entitled to attorney's fees from Plaintiff in the amount of **\$16,415.00** and costs in
25 the amount of **\$281.84**, for a total judgment of **\$16,696.84**.
26

27 **IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED** that Plaintiff,
28 Lawra Kasee Bulen, shall pay the full amount of \$16,696.84 to Defendants no later than thirty

1 (30) days from the entry of this Order.

2 **IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED** that post-
3 judgment interest will accrue on the total judgment from entry of this judgment at the statutory
4 rate per annum, until the judgment is paid in full.

5 **IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED** that
6 Defendants' Motion for additional sanctions in the form of an award of \$10,000.00 per Defendant
7 is hereby **DENIED**.

8 **IT IS SO ORDERED** this ____ day of December, 2020.

Dated this 18th day of December, 2020

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HONORABLE TREVOR L. ATKIN
EIGHTH JUDICIAL DISTRICT COURT JUDGE

A0B 976 63C3 A433

Trevor Atkin
District Court Judge

Respectfully Submitted By:

Approved as to form and content:

Dated: December ____, 2020

Dated: December 17, 2020

KAPLAN COTTNER

BRANDON L. PHILLIPS, ATTORNEY
AT LAW, PLLC

By: submitted competing order
KORY L. KAPLAN
Nevada Bar No. 13164
850 E. Bonneville Ave.
Las Vegas, NV 89101
Attorneys for Defendants

By: /s/ Brandon L. Phillips
BRANDON L. PHILLIPS
Nevada Bar No. 12264
1455 E. Tropicana Ave., Suite 750
Las Vegas, NV 89119
Attorney for Plaintiff

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Lawra Bulen, Plaintiff(s)

CASE NO: A-18-784807-C

7 vs.

DEPT. NO. Department 8

8 Rob Lauer, Defendant(s)

9
10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 12/18/2020

15 Brandon Phillips

blp@abetterlegalpractice.com

16 Paul Padda

psp@paulpaddalaw.com

17 Steve Sanson

devildog1285@cs.com

18 Rob Lauer

news360daily@hotmail.com

19 Rob Lauer

centurywest1@hotmail.com

20 Robin Tucker

rtucker@abetterlegalpractice.com

21 Kory Kaplan

kory@kaplancottner.com

22 Sara Savage

sara@lzkclaw.com

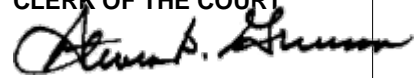
23 Sunny Southworth

24 sunny@kaplancottner.com

25
26
27
28

EXHIBIT D

EXHIBIT D



1 **NEOJ**
2 KAPLAN COTTNER
3 KORY L. KAPLAN
4 Nevada Bar No. 13164
5 Email: kory@kaplancottner.com
6 850 E. Bonneville Ave.
7 Las Vegas, Nevada 89101
8 Telephone: (702) 381-8888
9 Facsimile: (702) 832-5559
10 *Attorneys for Defendants*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LAWRA KASSEE BULEN an individual,
11 Plaintiff,

CASE NO. A-18-784807-C
DEPT. 8

12 vs.

NOTICE OF ENTRY OF ORDER

13 ROB LAUER, an individual, STEVE SANSON,
14 an individual, and DOES I through X; and ROE
15 CORPORATIONS I through X, Inclusive,
16 Defendants.

17 NOTICE IS HEREBY GIVEN that on the 21st day of August, 2020, an *Order Granting*
18 *Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660 ("Order")*, was entered
19 in the above-entitled matter, a copy of said Order is attached hereto.

20 Dated: August 25, 2020.

KAPLAN COTTNER

21
22 By: /s/ Kory L. Kaplan
23 KORY L. KAPLAN
24 Nevada Bar No. 13164
25 850 E. Bonneville Ave.
26 Las Vegas, Nevada 89101
27 *Attorney for Defendants*
28

KAPLAN COTTNER
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Tel: (702) 381-8888 Fax: (702) 832-5559

KAPLAN COTTNER
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Tel: (702) 381-8888 Fax: (702) 832-5559

CERTIFICATE OF SERVICE

I hereby certify that the *Notice of Entry of Order* submitted electronically for filing and/or service with the Eighth Judicial District Court on the 25th day of August, 2020. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows¹:

Attorneys for Plaintiff

Brandon Phillips

(blp@abetterlegalpractice.com)

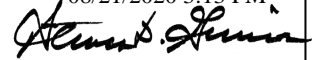
Robin Tucker

(rtucker@abetterlegalpractice.com)

/s/ Sunny Southworth

An employee of Kaplan Cottner

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).


CLERK OF THE COURT

ORDG
KAPLAN COTTNER
KORY L. KAPLAN
Nevada Bar No. 13164
Email: kory@kaplancottner.com
KYLE P. COTTNER
Nevada Bar No. 12722
Email: kyle@kaplancottner.com
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Telephone: (702) 381-8888
Facsimile: (702) 832-5559
Attorneys for Defendants

DISTRICT COURT
CLARK COUNTY, NEVADA

LAWRA KASSEE BULEN an individual,

Plaintiff,

vs.

ROB LAUER, an individual, STEVE SANSON,
an individual, and DOES I through X; and ROE
CORPORATIONS I through X, Inclusive,

Defendants.

CASE NO.: A-18-784807-C
DEPT. NO.: 8

ORDER GRANTING DEFENDANTS'
SPECIAL MOTION TO DISMISS
COMPLAINT PURSUANT TO NRS
41.660

Date of Hearing: August 4, 2020
Time of Hearing: 9:30 a.m.

THIS MATTER having come before the Court with respect to *Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660* ("Motion") commencing on August 4, 2020 at the hour of 9:30 a.m.; Kory L. Kaplan, Esq. of the law firm of Kaplan Cottner, appearing on behalf of Defendants Rob Lauer and Steve Sanson (collectively, "Defendants"); and Brandon L. Phillips, Esq., appearing on behalf of Plaintiff Lawra Kassee Bulen ("Plaintiff"); the Court having read and considered Defendants' Motion, the Opposition and Reply on file, and the exhibits attached thereto; and the Court having heard and considered the arguments of counsel, and good cause appearing therefor, the Court finds the following:

I.

FINDINGS OF FACT

1. On November 20, 2018, Plaintiff filed her Complaint against Defendants for: (1)

KAPLAN COTTNER
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Tel: (702) 381-8888 Fax: (702) 832-5559

1 Defamation; (2) Defamation Per Se; (3) Invasion of Privacy: False Light; (4) Invasion of Privacy:
2 Unreasonable Publicity Given to Private Facts; (5) Intentional Interference with Prospective
3 Economic Advantage; (6) Intentional Infliction of Emotional Distress; (7) Negligence Per Se; (8)
4 Concert of Action; and (9) NRS 42.005 Request for Exemplary and Punitive Damages.

5 2. On July 2, 2020, Defendants filed the Motion.

6 3. In their Motion, Defendants argue that each of Plaintiff's causes of action arise from
7 protected speech in the form of several published articles and a video.

8 4. Attached to the Motion are declarations from each of the Defendants, stating that
9 the articles and video are truthful, made without Defendants' knowledge of any falsehood, and/or
10 are the opinions of Defendants.

11 II.

12 CONCLUSIONS OF LAW

13 5. Nevada's anti-SLAPP ("Strategic Lawsuit Against Public Participation") statutes
14 aim to protect First Amendment rights by providing defendants with a procedural mechanism to
15 dismiss "meritless lawsuit[s] that a party initiates primarily to chill a defendant's exercise of his
16 or her First Amendment free speech rights" before incurring the costs of litigation. *Stubbs v.*
17 *Strickland*, 129 Nev. 146, 150, 297 P.3d 326, 329 (2013). Nevada's anti-SLAPP statute is codified
18 in NRS 41.635 thru NRS 41.670, inclusive.

19 6. Nevada's anti-SLAPP statutes "create a procedural mechanism to prevent wasteful
20 and abusive litigation by requiring the plaintiff to make an initial showing of merit." *John v.*
21 *Douglas Cnty. Sch. Dist.*, 125 Nev. 746, 757-58, 219 P.3d 1276, 1284 (2009); *U.S. ex rel. Newsham*
22 *v. Lockheed Missiles & Space Co.*, 190 F.3d 963, 970-71 (9th Cir. 1999) ("The hallmark of a
23 SLAPP suit is that it lacks merit, and is brought with the goals of obtaining an economic advantage
24 over a citizen party by increasing the cost of litigation to the point that the citizen party's case will
25 be weakened or abandoned, and of deterring future litigation."). The Nevada Legislature has
26 further "explained that SLAPP lawsuits abuse the judicial process by chilling, intimidating and
27 punishing individuals for their involvement in public affairs." *John*, 125 Nev. at 752, 29 P.3d
28 1281.

7. Under Nevada’s anti-SLAPP statutes, a moving party may file a special motion to dismiss if an action is filed in retaliation to the exercise of free speech. *Coker v. Sassone*, 135 Nev. 8, 11–12, 432 P.3d 746, 749–50 (2019). A district court considering a special motion to dismiss must undertake a two-prong analysis. First, it must “[d]etermine whether the moving party has established, by a preponderance of the evidence, that the claim is based upon a good faith communication in furtherance of ... the right to free speech in direct connection with an issue of public concern.” NRS 41.660(3)(a). If successful, the district court advances to the second prong, whereby “the burden shifts to the plaintiff to show ‘with prima facie evidence a probability of prevailing on the claim.’” *Shapiro v. Welt*, 133 Nev. 35, 38, 389 P.3d 262, 267 (2017) (quoting NRS 41.660(3)(b)). Otherwise, the inquiry ends at the first prong, and the case advances to discovery.

8. A moving party seeking protection under NRS 41.660 need only demonstrate that his or her conduct falls within one of four statutorily defined categories of speech, rather than address difficult questions of First Amendment law. *See Delucchi v. Songer*, 133 Nev. 290, 299, 396 P.3d 826, 833 (2017). NRS 41.637(4) defines one such category as: “[c]ommunication made in direct connection with an issue of public interest in a place open to the public or in a public forum ... which is truthful or is made without knowledge of its falsehood.”

9. The published articles and video were made in a public forum. *Damon v. Ocean Hills Journalism Club*, 85 Cal.App.4th 468, 475, 102 Cal.Rptr.2d 205) (2000).¹

10. The published articles and video concern an issue of public interest as Plaintiff states in her Complaint that she is a campaign manager for Republican candidates and a professional real estate agent.

11. All of Plaintiff’s causes of action in the Complaint are based upon protected speech by Defendants as the underlying conduct central to each of the causes of action are good-faith

¹ The Nevada Supreme Court considers California case law when determining whether Nevada's anti-SLAPP statute applies to a claim because California's anti-SLAPP statute is similar in purpose and language to Nevada's anti-SLAPP statute. *John v. Douglas Cnty. Sch. Dist.*, 125 Nev. 746, 756, 219 P.3d 1276, 1283 (2009); *see* NRS 41.660; Cal.Civ.Proc.Code § 425.16 (West 2004 & Supp. 2009).

1 communications. *Abrams v. Sanson*, 136 Nev. Adv. Op. 9, 458 P.3d 1062 (2020); *Veterans in*
2 *Politics Int'l, Inc. v. Willick*, 457 P.3d 970 (Nev. 2020) (unpublished).

3 12. Defendants have satisfied their burden under the first prong of the anti-SLAPP
4 analysis as they have demonstrated that their statements were either truthful or made without
5 knowledge of their falsity, the statements concern matters of public concern, and the statements
6 were made in a public forum.

7 13. As such, the burden shifts to Plaintiff to show “with prima facie evidence a
8 probability of prevailing on the claim.” *Shapiro*, 133 Nev. at 38, 389 P.3d at 267 (quoting NRS
9 41.660(3)(b)).

10 14. In reviewing Plaintiff’s probability of prevailing on each of her claims arising from
11 protected good-faith communications, Plaintiff has not shown minimal merit.

12 15. Plaintiff’s defamation claim and defamation per se claim lack minimal merit
13 because Defendants’ statements were truthful, made without knowledge of falsehood, and/or were
14 opinions that therefore could not be defamatory. *See Pegasus v. Reno Newspapers, Inc.*, 118 Nev.
15 706, 718, 57 P.3d 82, 90 (2002) (excluding statements of opinion from defamation).

16 16. Plaintiff has not shown minimal merit supporting her claims for invasion of privacy
17 because she failed to show that she was placed in a false light that was highly offensive or that
18 Defendants’ statements were made with knowledge or disregard to their falsity. *See Restatement*
19 *(Second) of Torts* § 652E (1977).

20 17. Plaintiff’s claim for intentional interference with prospective business advantage
21 lacks minimal merit as Plaintiff has not demonstrated that the statements were false or that there
22 was otherwise wrongful or unjustified conduct on the part of Defendants. *Klein v. Freedom*
23 *Strategic Partners, LLC*, 595 F. Supp. 2d 1152 (D. Nev. 2009).

24 18. Plaintiff has not shown that her intentional infliction of emotional distress (IIED)
25 claim had minimal merit because she did not show extreme and outrageous conduct beyond the
26 bounds of decency. *See Olivero v. Lowe*, 116 Nev. 395, 398, 995 P.2d 1023, 1025 (2000) (stating
27 IIED claim elements); *Maduike v. Agency Rent-A-Car*, 114 Nev. 1, 4, 953 P.2d 24, 26 (1998)
28 (considering “extreme and outrageous conduct” as that which is beyond the bounds of decency).

1 *See Candelore v. Clark Cty. Sanitation Dist.*, 975 F.2d 588, 591 (9th Cir. 1992) (considering claim
2 for IIED under Nevada law and observing that “[l]iability for emotional distress will not extend to
3 ‘mere insults, indignities, threats, annoyances, petty oppressions, or other trivialities’” (quoting
4 *Restatement (Second) of Torts* § 46 cmt. d (1965))).

5 19. Plaintiff did not show minimal merit supporting her claim for concert of action
6 because she did not show any tortious act or that Defendant agreed to conduct an inherently
7 dangerous activity or an activity that poses a substantial risk of harm to others. *See GES, Inc. v.*
8 *Corbitt*, 117 Nev. 265, 271, 21 P.3d. 11, 15 (2001).

9 20. Since there is no minimal merit supporting any of Plaintiff’s other causes of action,
10 Plaintiff’s claim for punitive damages must also be dismissed. NRS 24.005.

11 21. As a result, Plaintiff has failed to meet her burden under the second prong of the
12 anti-SLAPP analysis.

13 22. As a matter of law, Defendants are entitled to attorney’s fees and costs, and may
14 also be awarded, in addition to reasonable costs and attorney’s fees, an amount of up to \$10,000
15 per Defendant. NRS 41.670(1)(a)-(b).

16 23. Defendants shall file a separate motion for attorney’s fees, costs, and an award
17 pursuant to NRS 41.670(1)(a)-(b).

18 **III.**

19 **ORDER**

20 Based on the foregoing findings of fact and conclusions of law,

21 **IT IS HEREBY ORDERED** that Defendants’ Special Motion to Dismiss Complaint
22 Pursuant to NRS 41.660 is **GRANTED** in its entirety.

23 **IT IS HEREBY FURTHER ORDERED** that Defendants are entitled to attorney’s fees
24 and costs, and may also be awarded, in addition to reasonable costs and attorney’s fees, an amount
25 of up to \$10,000 per Defendant.

26 . . .

27 . . .

28 . . .

KAPLAN COTTNER
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Tel: (702) 381-8888 Fax: (702) 832-5559

IT IS SO ORDERED this ____ day of August, 2020.

Dated this 21st day of August, 2020



HONORABLE TREVOR L. ATKIN
EIGHTH JUDICIAL DISTRICT COURT JUDGE

62A 31E 23DA 200C
Trevor Atkin
District Court Judge

Respectfully Submitted By:

Approved as to form and content:

Dated: August 18, 2020

Dated: August 18, 2020

KAPLAN COTTNER

BRANDON L. PHILLIPS, ATTORNEY
AT LAW, PLLC

By: /s/ Kory L. Kaplan
KORY L. KAPLAN
Nevada Bar No. 13164
850 E. Bonneville Ave.
Las Vegas, NV 89101
Attorneys for Defendants

By: /s/ Brandon L. Phillips
BRANDON L. PHILLIPS
Nevada Bar No. 12264
1455 E. Tropicana Ave., Suite 750
Las Vegas, NV 89119
Attorney for Plaintiff

Sunny Southworth

From: Brandon Phillips <blp@abetterlegalpractice.com>
Sent: Tuesday, August 18, 2020 11:20 AM
To: Kory Kaplan
Cc: Kyle Cottner; Sunny Southworth
Subject: RE: Bulen-Lauer Order Granting Anti-Slapp Motion

Follow Up Flag: Follow up
Flag Status: Completed

Kory,

You can use my e-signature for the Order.

Thank you,

BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC

Brandon L. Phillips, Esq.
1455 E. Tropicana Ave., Suite 750
Las Vegas, Nevada 89119
Phone: 702-795-0097
Facsimile: 702-795-0098
Email: blp@abetterlegalpractice.com

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From: Kory Kaplan <kory@kaplancottner.com>
Sent: Monday, August 10, 2020 3:18 PM
To: Brandon Phillips <blp@abetterlegalpractice.com>
Cc: Kyle Cottner <kyle@kaplancottner.com>; Sunny Southworth <sunny@kaplancottner.com>
Subject: Bulen-Lauer Order Granting Anti-Slapp Motion

Brandon,

Please see the attached draft of the order granting Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660. Please let me know if you have any edits.

Thanks,
Kory



Kory L. Kaplan, Esq.
850 E. Bonneville Ave.
Las Vegas, NV 89101
Tel (702) 381-8888
Fax (702) 382-1169
www.kaplancottner.com

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Lawra Bulen, Plaintiff(s)

CASE NO: A-18-784807-C

7 vs.

DEPT. NO. Department 8

8 Rob Lauer, Defendant(s)

9
10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order Granting was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 8/21/2020

15 Brandon Phillips

blp@abetterlegalpractice.com

16 Paul Padda

psp@paulpaddalaw.com

17 Steve Sanson

devildog1285@cs.com

18 Rob Lauer

news360daily@hotmail.com

19 Rob Lauer

centurywest1@hotmail.com

20 Robin Tucker

rtucker@abetterlegalpractice.com

21 Kory Kaplan

kory@kaplancottner.com

22 Sara Savage

sara@lzkclaw.com

23 Sunny Southworth

sunny@kaplancottner.com

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25
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