

IN THE SUPREME COURT OF THE STATE OF NEVADA

STEVE SANSON, AN INDIVIDUAL;
AND ROB LAUER,
AN INDIVIDUAL,

Appellants,

v.

LAWRA KASSEE BULEN,

Respondent.

Electronically Filed
May 28 2021 12:54 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

SUPREME COURT CASE NO. 82393

Dist. Court Case No. A-18-784807-C

**APPENDIX TO APPEAL FROM THE
EIGHTH JUDICIAL DISTRICT COURT**

VOLUME I

ADAM J. BREEDEN, ESQ.

Nevada Bar No. 008768

BREEDEN & ASSOCIATES, PLLC

376 E. Warm Springs Road, Suite 120

Las Vegas, Nevada 89119

Telephone: (702) 819-7770; Facsimile: (702) 819-7771

Adam@breedenandassociates.com

Attorney for Appellants

DESCRIPTION OF DOCUMENT	DATE	VOL.	PAGE(S)
Complaint	11/20/2018	I	ROA000001 – ROA000077
Affidavit of Service on Rob Lauer	02/26/2019	II	ROA000078
Affidavit of Service on Rob Lauer (duplicate filed)	02/26/2019	II	ROA000079
Affidavit of Service on Steve Sanson	02/26/2019	II	ROA000080
Affidavit of Service on Steve Sanson (duplicate filed)	02/26/2019	II	ROA000081
Order to Show Cause re: Dismissal	02/13/2020	II	ROA000082 – ROA000083
Defendants' Notice of Motion and Motion to Dismiss Plaintiff's Complaint; Memorandum of Points and Authorities in Support, Exhibits, Affidavit of Robert Lauer in Support	04/03/2020	II	ROA000084 – ROA000091
Plaintiff's Opposition to Defendants' Untimely Motion to Dismiss Complaint and Countermotion for Attorneys' Fees and Costs	04/20/2020	III	ROA000092 – ROA000178
Recorder's Transcript of Hearing: All Pending Motions	05/12/2020	IV	ROA000179 – ROA000186
Recorder's Transcript of Video Conference Hearing: All Pending Motions	06/23/2020	IV	ROA000187 – ROA000198
Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660	07/02/2020	IV	ROA000199 - ROA000242
Notice of Entry of Order Granting Defendants' Motion to Set Aside Defaults and Denying Plaintiff's Countermotion for Application for Default Judgment	07/09/2020	IV	ROA000243 – ROA000249
Notice of Non-Opposition to Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660	07/21/2020	IV	ROA000250 – ROA000251
Plaintiff Bulen's Opposition to Defendants' Anti-SLAPP Special Motion to Dismiss Under NRS 41.660	07/21/2020	IV	ROA000252 – ROA000345

DESCRIPTION OF DOCUMENT	DATE	VOL.	PAGE(S)
Defendants' Reply in Support of Special Motion to Dismiss Complaint Pursuant to NRS 41.660	07/28/2020	V	ROA000346 – ROA000349
Recorder's Transcript of Video Conference Hearing: Defendants' Special Motion to Dismiss Pursuant to NRS 41.660	08/04/2020	V	ROA000350 – ROA000368
Order Granting Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660	08/21/2020	V	ROA000369 – ROA000377
Notice of Entry of Order	08/25/2020	V	ROA000378 – ROA000388
Defendants' Motion for Attorney's Fees, Costs, and Additional Relief Pursuant to NRS 41.660 and NRS 41.670	09/01/2020	V	ROA000389 – ROA000410
Plaintiff Bulen's Opposition to Defendants' Motion for Attorney's Fees, Costs, and Additional Relief Pursuant to NRS 41.660 and NRS 41.670	09/15/2020	V	ROA000411 – ROA000420
Notice of Appeal	09/24/2020	V	ROA000421 – ROA000434
Recorder's Transcript of Video Conference Hearing: Defendants' Motion for Attorneys Fees and Costs and Additional Relief Pursuant to NRS 41.660 and NRS 41.670	10/06/2020	V	ROA000435 – ROA000446
Order on Defendants' Motion for Attorneys' Fees	12/18/2020	V	ROA000447 – ROA000452
Notice of Entry of Order	12/21/2020	V	ROA000453 – ROA000461
Case Appeal Statement	01/20/2021	V	ROA000462 – ROA000465
Notice of Appeal	01/20/2021	V	ROA000466 – ROA000467

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Breeden & Associates, PLLC, and on the 28th day of May, 2021, a true and correct copy of the foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system.

Additionally, a hard copy of the Appendix with all documents on CD-ROM was served on Respondent by placing a copy in the US Mail, postage pre-paid, on the same date to:

Brandon L. Phillips, Esq.
BRANDON L. PHILLIPS ATTORNEY AT LAW PLLC
1455 E. Tropicana Avenue, Suite 750
Las Vegas, Nevada 89119
Attorneys for Respondent

/s/ Kristy L. Johnson
Attorney or Employee of
Breeden & Associates, PLLC

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

Electronically Filed
11/20/2018 11:23 AM
Steven D. Grierson
CLERK OF THE COURT



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,)	CASE NO.	:	
)	DEPT. NO.	:	Department 18
Plaintiff,)			
vs.)			
)			
ROB LAUER, an individual, STEVE SANSON, and)			
individual, and DOES, I through X; and ROE)			
CORPORATIONS I through X, inclusive.)			
Defendant.)			

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.

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

14 6. Defendant Lauer is a political writer.
15

16 7. Defendant Sanson is the President of Veterans in Politics International, Inc. and
17 the author of multiple defamatory articles written about Plaintiff and posted on the website for
18 Veterans in Politics.
19

20 8. Plaintiff has never met Defendant Sanson.
21

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

 10. On or about April 9, 2018 Defendant Lauer called Plaintiff four or five times
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/kassec-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.

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.

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

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 Kassee 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.

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

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

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

27 ///

28 ///

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
28

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 Kassee 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

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

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

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

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

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

38. 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.

39. 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.

SECOND CAUSE OF ACTION

(Defamation Per Se-As to all Defendants)

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

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

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

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
7 43. The Ethics Article contains several defamatory and false facts, including but not
8 limited to: "An ethics complaint was filed this week with the Great Las Vegas Association of
9 Realtors against Lawra Kasse Bulen." (Ms. Bulen has never been investigated by the GLVAR
10 or the State of Nevada Real Estate Division). Attached as Exhibit 2 please find a record search
11 conducted by the Administration Section Manager of NVRED evidencing that no complaints
12 have been filed against Plaintiff's license. Further, attached as Exhibit 3 you will find an email
13 from GLVAR's general counsel evidencing that not only have no complaints been received
14 against Plaintiff but that GLVAR is also investigating the Article. Defendants went so far as to
15 post a copy of a fake complaint in the Article; the Article moves on to state that "according to the
16 Nevada Secretary of State's official website and Clark County business records Kasse Bulen's
17 company, Bulen Strategies, is not a licensed lawful business in the state of Nevada." Again
18 please see Exhibit 1; Defendants claim Plaintiff represented herself as an expert in the article by
19 NBC titled HOME SWEET HOME: Top 5 hottest zip codes for buying & selling in Las Vegas
20 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)
21 [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
22 expert.
23

24
25 44. In the Video Defendant Lauer attempted to have Plaintiff speak about the Stormy
26 Daniels affair. Mr. Lauer heavily edited the video to make it sound like Plaintiff made
27 derogatory statements about President Trump. Defendant Lauer then posted the Video to
28 Defendant Lauer's Trump Victory Team page but was also shared with several other individuals

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.

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

4 61. 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
8 **FOURTH CAUSE OF ACTION**

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

10 **Defendants)**

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

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

19
20 64. Disclosure of these sealed records would be offensive and objectionable to a
21 reasonable person of ordinary sensibilities.

22
23 65. By reason of the forgoing facts, Plaintiff has been damaged in a sum excess of
24 Fifteen Thousand Dollars (\$15,000.00) as will be determined by proof introduced into evidence
25 at the time of trial.

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

1 **FIFTH CAUSE OF ACTION**

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

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

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

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

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

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

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

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

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

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

23 76. Plaintiff has been required to retain the services of an attorney to defend this
24 action on her behalf and, as such, is entitled to an award of a reasonable attorney's fees and
25 costs.
26
27
28

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
8 **EIGHTH CAUSE OF ACTION**

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

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

21
22 **NINTH CAUSE OF ACTION**

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

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 18 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

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

VERIFICATION

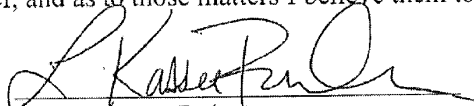
STATE OF NEVADA)

) ss.

COUNTY OF CLARK)

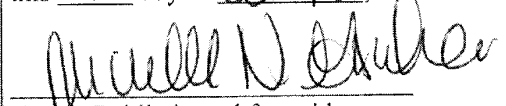
Lawra Kasee Bulen, being first duly sworn, deposes and says:

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 Kasee Bulen

Subscribed and sworn to before me

this 14 day of November, 2018.


Notary Public in and for said
County and State

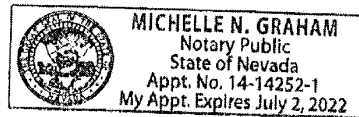
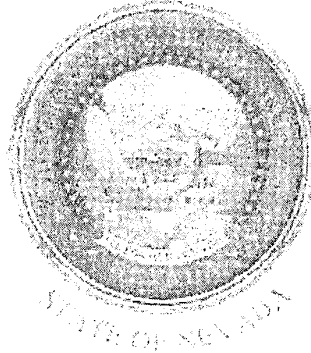


EXHIBIT 1

ROA000019

SECRETARY OF STATE



NEVADA STATE BUSINESS LICENSE

Sole Proprietor

Lawra Kasse 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.

ROA000020



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 Las Vegas, NV 89129

(Mailing Address for notification purposes) (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 Kassee 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

Date

7/11/18

STATE OF Nevada

COUNTY OF Clark

SS:

This instrument was acknowledged before me on

July 11, 2018

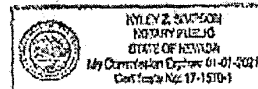
(Date)

by

Lawra Kassee Bulen

(Name of individual whose signature is being acknowledged)

[Signature]
Signature of Notary Public or Deputy Clerk



RECEIVED

JUL 16 2018

COUNTY CLERK

Mail to: Lynn Marie Goya, County Clerk, Attn: FFN, Box 551604, Las Vegas NV 89155-0604
Fees: Filing fee of \$20.00 payable to County Clerk, recorded certificate and self-addressed stamped envelope

07/20/2018

ROA000021

EXHIBIT 2

ROA000022

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

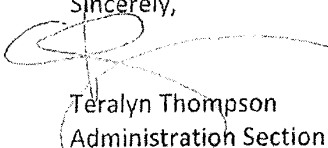
Lawra Kassee Bulen
3545 Cactus Shadow Street #203
Las Vegas, Nevada 89129

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,


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

cc: File

ROA000023

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

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

Mon, Aug 13, 2018 at 1:59 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,

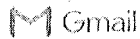
David B. Sanders, Esq.
General Counsel
Greater Las Vegas Association of REALTORS®
6360 South Rainbow Boulevard
Las Vegas, NV 89118
(702) 784-5054 (702) 784-5080 FAX
dsanders@GLVAR.org
www.LasVegasRealtor.com

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.

ROA000026

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®
6300 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)

ROA000027

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





(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



< (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



(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?

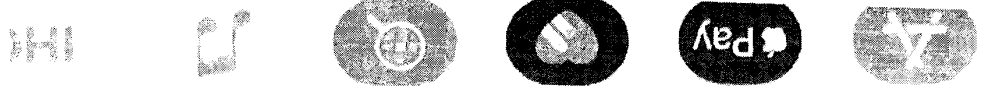
I haven't done anything

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



Text Message





Thu, Aug 23, 8:16 PM

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

So menacing

Ya I'm sure

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

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





(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.





(702) 755-9019



Nope not true

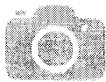
He has not

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





(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 released:

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?

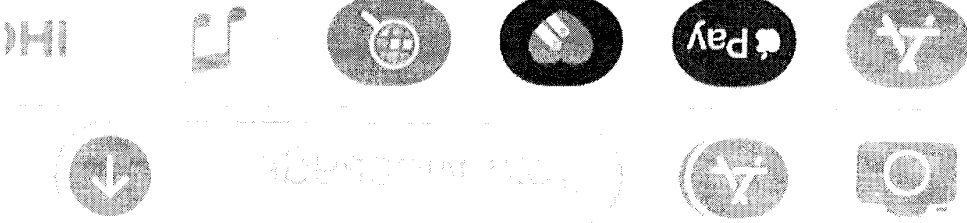


EXHIBIT 5

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 Kasee Bulen with regards to the drafting, posting and sharing of the article titled *Kasee 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/kasee-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 Kasee Bulen. Attached as Exhibit 1 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. 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

ROA000039

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).

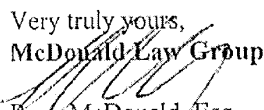
As such we are demanding that the libelous, defamatory information in the Article be immediately redacted and the posting and sharing of the Article be removed from each and every one of your sites. In lieu of immediately proceeding forward against you, Ms. Bulen is giving you the opportunity to redact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

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

ROA000040

EXHIBIT 1

FFN - #: 201807171156150 - Fees: \$20.00 - 07/17/2018 09:56:02 AM - Receipt #: 639385 - Filed By: MCL318HS - Pgs: 1 - LYNN MARIE GOYA, CLARK COUNTY CLERK



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 under-signed does hereby certify that

Lawra Kassoe 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 Kassoe Bulen

(Full Name and title (Sole or Joint))

3545 Cactus Shadow St, #203

(Street Address of location of residence)

Signature

Lawra Kassoe Bulen 7/11/18

Date

(City, State, Zip)

STATE OF Nevada

COUNTY OF Clark

ss:

This instrument was acknowledged before me on

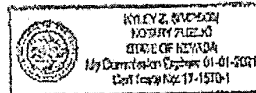
July 11, 2018
(Date)

by

Lawra Kassoe Bulen

(Name of individual whose signature is being certified)

Signature of County Trust or Deputy Clerk



RECEIVED
JUL 18 2018
COUNTY CLERK

Mail to: Lynn Marie Goya, County Clerk, Attn: FFN, Box 551604, Las Vegas NV 89155-1604
or by: Either Fax at 725-0600 or provide to County Clerk, completed certificate and a self-addressed stamped envelope.

07/20/2018

ROA000042

SECRETARY OF STATE



NEVADA STATE BUSINESS LICENSE

**Sole Proprietor
Lawra Kasse 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.

ROA000043

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

ROA000044

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 Kassee 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 Kassee Bulen. Attached as Exhibit 3 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. 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).

203 S. Water Street, Suite 300

Henderson, NV 89015

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

ROA000045

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

ROA000047

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 "Terilyn Thompson", written over a circular stamp.

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

cc: File

ROA000048

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

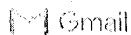
NUMBER OF COMPLAINTS	YEAR	DISPOSITION OF COMPLAINT
0		

EXHIBIT 2

ROA000050

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 Divocchio <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) 784-5064 (702) 784-5060 FAX

dsanders@GLVAR.org

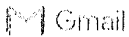
www.LasVegasRealtor.com

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.

ROA000051

9/18/2018

Gmail - Alleged Ethics Complaint at GLVAR



Kassee Bulen <kasseeob@gmail.com>

Alleged Ethics Complaint at GLVAR

David Sanders <dsanders@glvar.org>
To: Kassee Bulen <kasseeob@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) 784-5080 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. Unintentional transmission does not constitute waiver of the attorney-client privilege or any other privilege.

From: Kassee Bulen <kasseeob@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

ROA000053

FFN - #: 201807171166150 - Fees: \$20.00 07/17/2018 09:56:02 AM - Receipt #: 639385 - Filed By: MCLISHS - Pgs: 1 - LYNN MARIE GOYA, CLARK COUNTY CLERK



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 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 Kassee Bulen

(Full Name and Title (Signer or Print))

3545 Cactus Shadow St, #203

(Street Address of business or Residence)

Signature

Las Vegas, NV 89129

(City, State, Zip)

L. Kassee Bulen 7/11/18
Date

STATE OF Nevada } ss:
COUNTY OF Clark

This instrument was acknowledged before me on

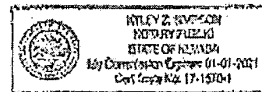
July 11, 2018
(Date)

by

Lawra Kassee Bulen

(Name of Individual whose signature is being verified)

Signature of County Clerk



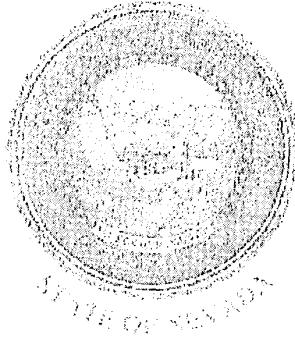
RECEIVED
JUL 16 2018
COUNTY CLERK

Notar for Lynn Marie Goya, County Clerk, Attn: FFN, Box 551601, Las Vegas NV 89158-1609
Notar Fee of \$20.00 payable to County Clerk, associated with filing and record charges

9/29/2016

ROA000054

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.

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.

ROA000055

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 Kasse 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

ROA000056

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

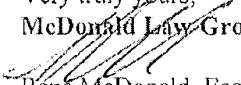
As the entire Video, and the phrases you have chosen to share with it are libelous and defamatory we are demanding that the posting and sharing of the Video be removed from each and every one of your sites. In lieu of immediately proceeding forward against you, Ms. Bulen is giving you the opportunity 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

ROA000057

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

ROA000058

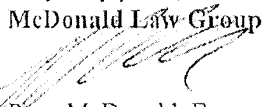
In the future there can be no doubt that you have been provided notice that our client wishes to have no further contact with you. Be advised that this does not mean that you have the right to lash out and continue making and/or writing defamatory statements about our client. Again, let us be clear that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

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

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

ROA000059

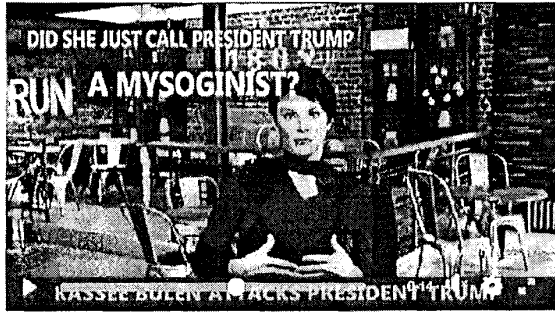
Friends

Steve Sanson was tagged in a video



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

Self Described "Republican" Naver-Trumper attacks President Trump over Stormy Daniels alleged affair



English (United States) Español Português (Brazil) Français (France) Deutsch
Persian (Iran) Hindi Urdu Afrikaans
Facebook © 2018

2 Comments 3 shares 200 Views

Like Comment Share

Chat (67)



https://www.facebook.com/stevesanson/...
Rena McDonald | Save | Generate | Sync | Home
Find representative Previous Item Options
Steve Sanson
Steve Sanson Timeline 2018 August
Add Friend Follow
Like Comment Share
Wanda is comment
Steve Sanson August 13
KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR
VETERANSINPOLITICS.ORG
KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR - Veterans in Politics International
August 13, 2016 Clark County Nevada An ethics...
19 Shares
Like Comment Share
Wanda is comment
2 friends posted on Steve's timeline
http://www.facebook.com/stevesanson/...
Chat (58)

https://www.facebook.com/...
PebCo.com | Log out | Safenotes | Facebook - 1 (x1) | Pens McDonald | Save | Generate | Sync | Home
Bing | Suggested Sites | MyCase Login MyCase | Clo - Dashboard | K filing | Nevada Secretary of State | Solved HCM | Silver Lume Nevada's Busi... | Assessor Monte Page
Find | representative | Previous | Next | Options
Trump Victory Team
Like | Comment | Share
Trump Victory Team is with Steve Sanson and 4 others. August 23
Self Described "Republican" Never-Trumper attacks President Trump over Stormy Daniels' alleged affair

2 | 2 Comments | 3 Shares | 261 Views
Like | Comment | Share
Oldest
View 1 more comment
Chat (53)

EXHIBIT 6

ROA000064

Internet Explorer browser window showing a Facebook profile page for Steve Sanson. The address bar displays a URL starting with 'https://www.facebook.com/steve.sanson31...'. The page header includes navigation links like 'Home', 'Create', and 'Add Friend'. The main content area shows a post by Steve Sanson dated August 13, 2016, titled 'KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR'. The post includes a link to 'VETERANSINPOLITICS.ORG' and a description of the investigation. The post has 4 likes and 19 shares. The bottom of the page shows a chat window with 68 messages.

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

VETERANSINPOLITICS.ORG
KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR - Veterans in Politics International
August 13, 2016 Clark County Nevada An ethics...

4 19 Shares

Like Comment Share

Write a comment

2 friends posted on Steve's timeline

Chat (68)

https://www.facebook.com/pg/Trump-Victory-Team/34551365979719/posts/?ref=page_... Calend... Odys... Billing... NRS... News... (58)... (58) KL...

File Edit View Favorites Tools Help

X RoboForm X Logins X Sitenotes 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 Solved HCM X SilverFlume Nevada's Busi... X Assessor Home Page


X Find: representative Previous Next Options

f Trump Victory Team Q Rena Home Create 2 38

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 2 Comments 3 Shares 291 Views

Like Comment Share

Oldest

View 1 more comment Chat (53)

Taskbar: Internet Explorer, Word, Excel, Outlook, etc.



BREAKING LAS VEGAS NEWS → REPUBLICAN ASSEMBLYMAN CANDIDATE JASON BURKE WINS LAWSUIT CLEARING THE WAY FOR HIM TO COMPETE IN THE GENES. [Entertainment](#)

[\(http://360newsลาสवेegas.com/category/entertainment/\)](http://360newsลาสवेegas.com/category/entertainment/)

[Politics \(http://360newsลาสवेegas.com/category/politics/\)](http://360newsลาสवेegas.com/category/politics/)

[Breaking News \(http://360newsลาสвеegas.com/category/breaking-news/\)](http://360newsลาสвеegas.com/category/breaking-news/)

[TV \(http://360newsลาสвеegas.com/category/tv/\)](http://360newsลาสвеegas.com/category/tv/)



360 NEWS LAS VEGAS

[\(http://360newsลาสвеegas.com/\)](http://360newsลาสвеegas.com/)

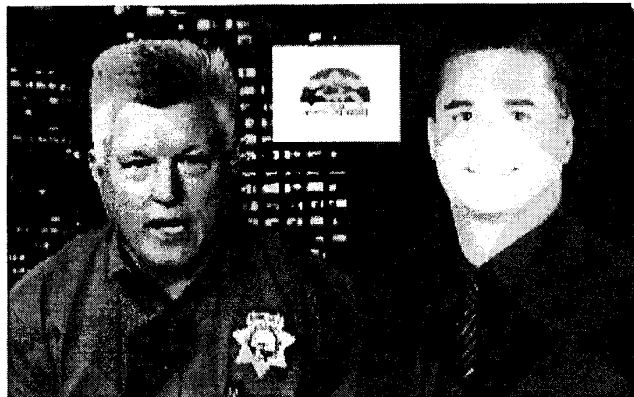


CHRISTIAN MORRIS
PERSONAL INJURY TRIAL ATTORNEY

THE
NETTLES LAW FIRM
NEVADA

[Politics \(http://360newsลาสвеegas.com/category/politics/\)](http://360newsลาสвеegas.com/category/politics/)

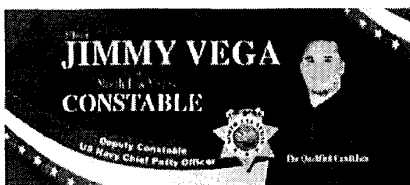
ETHICS COMPLAINT FILED IN N.LV CONSTABLE RACE, KEY WITNESS CREDIBILITY IN DOUBT



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.



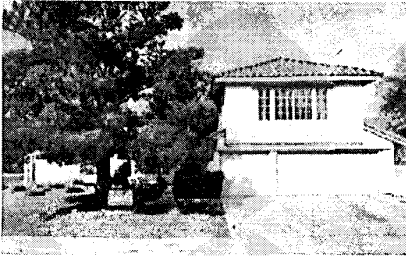
Eliason is accusing Vega of violating election laws by not living in the city of North Las Vegas 30 days prior to filing for office. Former Clark County Commissioner Tom Collins filed the complaint.

<http://360newsลาสвеegas.com/ethics-complaint-filed-in-n-lv-constable-race-key-witness-cre...> 11/1/2018

ROA000067



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][illegible][illegible]




Share

Steve Sanson was tagged in a video.


Friends · 106 Mutual Friends




Kimberly Fergus shared this video.
August 20 ·
Self Described "Republican" Never-Trumper attacks President Trump over Stormy Daniels alleged affair.




Mark Wainwright · 3 new likes




Paul Lutz · 2 new likes



Kimberly Fergus shared a video.
August 20 ·
Are you kidding? Kassee Buleen is a misogynist.



Kimberly Fergus shared a video.
August 20 ·
DID SHE JUST CALL PRESIDENT TRUMP A MYSOGINIST?



Kimberly Fergus shared a video.
August 20 ·
KASSEE BULEEN ATTACKS PRESIDENT TRUMP

Some posts may not be visible due to privacy settings.

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

Privacy · Terms · Advertising · Ad Choices · Cookies · More

Facebook © 2018

2 · 2 Comments · 3 Shares · 289 Views


Like

Comment


Share

Oldest


View 1 more comment



Terry Raymond INSANE dumb ass!!
Like · Reply · 10w



Write a comment...




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 · 59 Shares


Like

Comment


Share




Write a comment...



Steve Sanson shared a memory.
August 20 ·
5 Years Ago
See Your Memories



Steve Sanson is with Steve Sanson and 2 others.
August 20, 2013 ·


https://www.facebook.com/steve.sanson.1

11/1/2018

ROA000070

PO Box 28211 Las Vegas NV, NV 89126 (702) 383-8088 info@veteransinpolitics.org



**VETERANS
IN POLITICS**

[MEMBER'S LOGIN](#)

[Join Mailing List](#)

[Home](#)

[News](#)

[Goals & Values](#)

[Officers](#)

[Radio](#)

[Events](#)

[Photos](#)

[DONATE](#)

[Contact](#)

You are here: [Home](#) / [Home - Featured](#) / KASSEE BULEN UNDER INVESTIGATION AFTER BEING CHARGED WITH ETHICS VIOLATIONS IN COMPLAINT FILED WITH GLVAR

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

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.



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

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:

enter keywords

Recent Posts

- > [Mindie Lloyd & Miriam Gibson & Debbie Conway to appear on the Veterans In Politics video Talk-show](#)
- > [Kevin Child & Franklyn Verley to appear on the Veterans In Politics video Talk-show](#)
- > [Clark County Judges Defy and Deny the Authority of the Nevada State Supreme Court \(Court Facilitated "Kidnapping"\)](#)
- > [VIPI PROPOSED COURT-RELATED LEGISLATION](#)
- > [Phil Collins & Kenny Taylor to appear on the Veterans In Politics video Talk-show](#)

Upcoming Events

> August 2018

M	T	W	T	F	S	S
		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		
1 Jul					30 Jun	

Donate

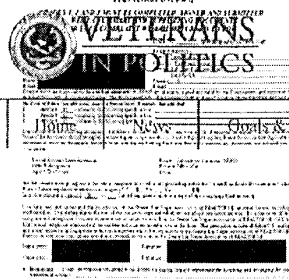
Veterans In Politics, International, Inc. is a 100% volunteer organization. We have no regular source of funding. All the costs for printing, banners,

© 2012-2016 Veterans In Politics | All Rights Reserved - Powered by OCCO

PO Box 28214, Las Vegas, NV, NV 89126
(702) 783-8088

info@veteransinpolitics.org

info@veteransinpolitics.org



MEMBERS LOGIN

Home News Goals & Values

Officers

Radio

Events

Photos

parades, political interviews, video editing, posting, website maintenance, and countless man-hours of research and hands-on relationship building are supplied by the VIPI volunteers. All the VIPI efforts are to keep the public educated and involved in our political process. Please help us help you by purchasing VIPI merchandise, or making a generous contribution.

Donate Today!

"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.

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 @

First Name :

Last Name :

Email* :

SUBSCRIBE

ENDORSEMENTS OF NEVADA ASSEMBLY DISTRICT'S 26 AND 39
◀ ENDORSEMENT OF KEVIN L. CHILD ▶

Share this post?

Tweet

+ G+

Save

Like



About author

Home | News | Goals & Values | Officers | Radio | Events | Photos | DONATE | Contact



Steve Sanson (Steve Sanson)

© 2012-2016 Veterans In Politics | All Rights Reserved - Powered by OCCO

More posts

PO Box 28211, Las Vegas NV, NV 89136 (702) 283-8086 Info@veteransinpolitics.org



VETERANS IN POLITICS

MEMBER'S LOGIN

Join Mailing List

Home	News	Goals & Values	Officers	Radio	Events	Photos	DONATE	Contact
----------------------	----------------------	------------------------------------	--------------------------	-----------------------	------------------------	------------------------	------------------------	-------------------------

You are here: [Home](#) / [Home » Featured](#) / Kasee Bulen, Political Gypsy?

Kassee Bulen, Political Gypsy?

enter keywords

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.

Recent Posts

- Mindie Lloyd & Miriam Gibson & Debbie Conway to appear on the Veterans In Politics video Talk-show
- Kevin Child & Franklyn Verley to appear on the Veterans In Politics video Talk-show
- Clark County Judges Defy and Deny the Authority of the Nevada State Supreme Court (Court Facilitated "Kidnapping")
- VIPI PROPOSED COURT-RELATED LEGISLATION
- Phil Collins & Kenny Taylor to appear on the Veterans In Politics video Talk-show

Upcoming Events

› August 2018

M	T	W	T	F	S	S
		<u>1</u>	2	3	4	5
<u>6</u>	7	<u>8</u>	<u>9</u>	10	11	<u>12</u>
<u>13</u>	14	<u>15</u>	16	17	18	19
<u>20</u>	21	22	23	24	25	<u>26</u>
27	28	29	<u>30</u>	<u>31</u>		

[illegible][s & Values](#) | [Officers](#) | [Radio](#) | [Events](#) | [Photos](#) | [DONATE](#) | [Contact](#)


Sep. 9

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.

© 2012-2016 Veterans In Politics | All Rights Reserved - Powered by OCCO

Donate

Veterans In Politics, International, Inc. is a 100% volunteer organization. We have no regular source of funding. All the costs for printing, banners, parades, political interviews,


**VETERANS
IN POLITICS**

[Home](#) | [News](#) | [Goals & Values](#) | [Officers](#) | [Radio](#) | [Events](#) | [Photos](#)

[MEMBER'S LOGIN](#)

video editing, posting, website maintenance, and countless man-hours of research and hands-on relationship building are supplied by the [VPI volunteers](#). All the VPI efforts are to keep the public educated and involved in our political process. Please help us help you by purchasing [MPT merchandise](#), or making a generous contribution

[Donate Today!](#)

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



Newsletter Subscription

If you want to subscribe to our monthly newsletter, please submit the form below.

First Name :

Last Name :

Email :

[SUBSCRIBE](#)

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



RODNEY SMITH & LYNN MARIE GOYA TO APPEAR ON THE VETERANS IN POLITICS VIDEO TALK-SHOW
HARRY VICKERS & WARREN MARKOWITZ TO APPEAR ON THE VETERANS IN POLITICS VIDEO TALK-SHOW

[DONATE](#) | [Contact](#)

Share this post?

Tweet



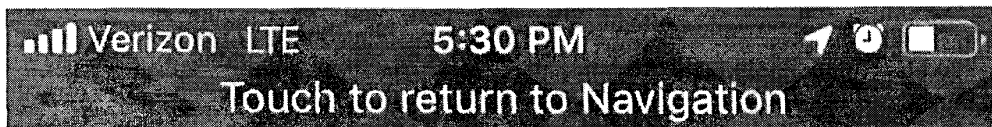
© 2012-2016 Veterans In Politics | All Rights Reserved - Powered by OCCO

Save

1

Like 65

EXHIBIT 7



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



Add to Library

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.

