

**FILED**

DEC 29 2014

REAL ESTATE COMMISSION  
BY *Richard H. L.*

1 CASSELL VON BAEYER, ESQ. (Bar No. 7161)  
2 ANDREW N. WOLF, ESQ. (Bar No. 4424)  
3 JEREMY L. KRENEK, ESQ. (Bar No. 13361)  
4 Incline Law Group, LLP  
5 264 Village Blvd., Suite 104  
6 Incline Village, Nevada 89451  
7 Phone: (775) 831-3666; Fax: (775) 831-4044  
8 cvonbaeyer@inclinelaw.com; jkrenek@inclinelaw.com  
9 Attorneys for Respondent

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7 **BEFORE THE REAL ESTATE COMMISSION**  
8 **STATE OF NEVADA**

9 JOSEPH R. DECKER, Administrator, REAL  
10 ESTATE DIVISION, DEPARTMENT OF  
11 BUSINESS & INDUSTRY, STATE OF NEVADA,

Case No.: REN 14-04-11-040

12 Petitioner,

13 vs.

14 SUSAN KAY LOWE,

15 Respondent.

16 **APPLICATION FOR MORE DEFINITE AND DETAILED STATEMENT**

17 **NRS 233B.121**

18 COMES NOW, Respondent SUSAN KAY LOWE, by and through her undersigned counsel  
19 Cassell von Baeyer, Esq. of Incline Law Group, LLP, pursuant to the provisions of NRS 233B.121, makes  
20 application of the Commission that the Department provide a more definite statement of the factual basis  
21 of the alleged violations in the Complaint.

22 The allegations of the Complaint merely set forth the bare facts relating to the sale of several  
23 parcels of real property including: 1725 Gold Belt Drive, Reno, Nevada; 2219 Big Trail Circle, Reno  
24 Nevada; 7075 Jermann Drive, Sparks, Nevada; 12240 Jean Way, Reno, Nevada; 1765 Wyoming Avenue,  
25 Reno, Nevada; 17090 Amethyst Drive, Reno, Nevada; 1795 Trabert Circle, Sparks, Nevada; 11785  
26 Heartpine Street, Reno, Nevada; 6475 Marissa Anne Court, Sparks, Nevada; and 2835 Santa Ana Drive,  
27 Sparks, Nevada.  
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1 The Complaint alleges that Respondent "violated NAC 645.600(1) on ten occasions by failing to  
2 maintain adequate supervision of Plevel" (Complaint at ¶76). However, at no point does this complaint  
3 even allege that Ms. Plevel violated any law or regulation. As a result, no facts are alleged to support or  
4 give the Respondent reasonable notice of how she violated any provisions of Chapter 645 of the Nevada  
5 Revised Statutes.

6 Based upon the foregoing, it is respectfully requested that Petitioner be required to provide a more  
7 definite statement of the facts upon which the Complaint is based, pursuant to NRS 233B.121, or in the  
8 alternative, that the Complaint be dismissed.

9 **Affirmation Pursuant to NRS 239B.030**

10 The undersigned does hereby affirm that the preceding document does not contain the social  
11 security number of any person.

12 DATED this 20<sup>th</sup> day of December, 2014.

13 **INCLINE LAW GROUP, LLP**

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16 CASSELL VON BAEYER, ESQ.  
17 Attorneys for Respondent Susan Kay Lowe  
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**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am an employee of INCLINE LAW GROUP, LLP that I am over the age of eighteen (18) years, and that I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing document on all parties to this action by placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Incline Village, Nevada postage paid, following the ordinary course of business practices; addressed as follows:

Real Estate Division, State of NV  
Attn: Legal Administrative Officer  
2501 East Sahara Avenue  
Las Vegas, Nevada 89104-4137

Keith E. Kizer  
Deputy Attorney General  
555 East Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101  
Attorneys for Real Estate Division

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22 day of December, 2014.

  
\_\_\_\_\_  
Willow Cornelius, an employee of  
Incline Law Group, LLP