



Streambend Properties II, LLC and Streambend Properties VIII, LLC appeal the district court's order dismissing their civil action for failure to state a claim. The court concluded that plaintiffs failed to sufficiently plead the interstate-commerce element of the claims brought under the Interstate Land Sales Full Disclosure Act, 15 U.S.C. § 1701 *et seq.* After careful de novo review, *see Owen v. Gen. Motors Corp.*, 533 F.3d 913, 918 (8th Cir. 2008), we find that paragraphs 46 and 47 of the complaint sufficiently pleaded this element. *See* Fed. R. Civ. P. 8(a); *Ashcroft v. Iqbal*, 129 S. Ct. 1937, 1949-50 (2009); *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555-57 (2007). The complaint alleges that the defendants “made use . . . of the mails” and made false representations “by . . . letters.” Given that Rule 8(a)(2) requires only “a short and plain statement of the claim,” and that “[s]pecific facts are not necessary,” *Erickson v. Pardus*, 551 U.S. 89, 93 (2007) (per curiam), these statements were sufficient to allege “use . . . of the mails” as required by 15 U.S.C. § 1703(a). Accordingly, we reverse the dismissal of the Interstate Land Sales Full Disclosure Act claims in Counts 1 and 2 of the complaint, and we remand to the district court for further proceedings.

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