

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

UNITED STATES OF AMERICA Plaintiff, v. ROCKET MORTGAGE, LLC, SOLIDIFI U.S., INC., MAKSYM MYKHAILYNA, and MAVERICK APPRAISAL GROUP, INC., Defendants.	Civil Action No. 1:24-cv-02915-GPG- TPO
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**ANSWER
BY DEFENDANTS MAKSYM MYKHAILYNA AND
MAVERICK APPRAISAL GROUP, INC.**

Defendants Maxym Mykhailyna and Maverick Appraisal Group, Inc. (collectively, the “Maverick Defendants”), by and through their attorneys Temkin & Associates, LLC, hereby file an Answer Plaintiff United States of America (the “USA”)’s Complaint.

AS TO INTRODUCTION

1. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the averment of this paragraph and strict proof thereof, if relevant, is demanded.

2. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

3. The Maverick Defendants admit that they were contracted and agreed to perform appraisal of the Subject Property and the completed the appraisal and submitted

it to Solidifi U.S., Inc (“Solidifi”). The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth as to the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

4. The Maverick Defendants deny the allegations in this paragraph.

5. The Maverick Defendants admit that the appraisal valued the property at \$640,000. The appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with this document. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the averment of this paragraph and strict proof thereof, if relevant, is demanded.

6. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

7. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

8. The Maverick Defendants admit that Ms. Cheroutes filed a complaint with the U.S. Department of Housing and Urban Development (“HUD”). The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the averment of this paragraph and strict proof thereof, if relevant, is demanded.

AS TO JURISDICTION AND VENUE

9. The Maverick Defendants admit that the jurisdiction is proper in this case. The remaining allegations constitute legal conclusions and/or characterizations of law, and as such no response is required.

10. The Maverick Defendants admit that the venue is proper in this case. The remaining allegations constitute legal conclusions and/or characterizations of law, and as such no response is required.

AS TO PARTIES AND SUBJECT PROPERTY

11. Admitted.

12. The Maverick Defendants admit that Maverick is an appraisal company incorporate in Colorado with its principal place of business in Denver, Colorado. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the averment of this paragraph and strict proof thereof, if relevant, is demanded.

13. The Maverick Defendants admit that Defendant Maksym Mykhailyna is the owner and CEO of Maverick and was a licensed appraiser at all times relevant to this Complaint. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

14. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

15. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

16. The Maverick Defendants admit that the Subject Property is a duplex located at 749-751 Ash Street, Denver. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the averment of this paragraph and strict proof thereof, if relevant, is demanded.

17. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

**AS TO ALLEGATIONS REGARDING DEFENDANTS' DISCRIMINATION AGAINST
MS. CHEROUTES**

18. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

19. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

20. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

21. The Maverick Defendants admit that the real estate appraisal is usually required to purchase a property or refinance a mortgage. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth as to the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

22. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

23. The Maverick Defendants admit that Ms. Cheroutes is Black. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth as to the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

24. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

25. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

26. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

27. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

28. The Maverick Defendants admit that the Subject Property is located in the Hale neighborhood of Denver, three miles from downtown Denver and one mile from Congress Park. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth as to the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

29. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

30. The map that is part of this paragraph is a document that speaks for itself. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

31. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

32. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

33. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

34. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

35. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

36. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

37. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

38. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

39. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

40. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

41. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

42. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

43. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

44. The Maverick Defendants admit that on or about January 14, 2021, Solidifi entered into agreement with Maverick to carry out the appraisal. The agreement is a document that speaks for itself.

45. The Maverick Defendants admit that Solidifi had contracted the Maverick Defendants to perform appraisals on a number of occasions. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth as to the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

46. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

47. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

48. The Maverick Defendants admit that Solidifi provided the Maverick Defendants with the letter of engagement in connection with appraisal of the Subject Property. In regard to Solidifi's process with other appraisers, the Maverick Defendants

lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

49. The Maverick Defendants admit that Solidifi provided the Maverick Defendants with the letter of engagement in connection with appraisal of the Subject Property which the Maverick Defendants accepted. The agreement is a document that speaks for itself. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the averment of this paragraph and strict proof thereof, if relevant, is demanded.

50. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

51. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

52. The Maverick Defendants admit that they used Solidifi's computer system to communicate and submit the appraisals, including that of the Subject Property. The Maverick Defendants lack knowledge or information sufficient to form a belief about the

truth of the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

53. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

54. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

55. The Solidifi Standards is a document that speaks for itself. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

56. The Solidifi Standards is a document that speaks for itself. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

57. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

58. The “policies” described in paragraphs 46 through 57 are part of a document that speaks for itself. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

59. The Maverick Defendants admit that Mr. Mikhaylina along with a trainee came to the Subject Property on January 20, 2021 to conduct the appraisal. The Maverick Defendants admit that both individuals are White. The Maverick Defendants deny any inference that the visit to the Subject Property was in any way biased or improper because Mr. Mikhaylina is White.

60. Denied as stated. Mr. Mikhaylina started taking outside pictures upon arriving at the Subject Property and then proceeded to the front porch of 749 Ash Street as it seemed the entrance to the Subject Property. After talking to the tenant and inspecting the unit, Mr. Mikhaylina and his trainee entered the backyard where they were met by Ms. Cheroutes.

61. The Maverick Defendants deny the allegations in this paragraph. Ms. Cheroutes met Mr. Mikhaylina and his trainee in the backyard.

62. The Maverick Defendants deny the allegations in this paragraph.

63. The Maverick Defendants deny the allegations in this paragraph. Both Mr. Mikhaylina and trainee talked to Ms. Cheroutes and explained to her the inspection process as well as asked questions about the house.

64. The Maverick Defendants admit that Mr. Mikhaylina and trainee continued the inspection of the house and there was a young lady in the house. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded. The Maverick Defendants deny any inference that the visit to the Subject Property was in any way biased or improper.

65. The Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

66. The Maverick Defendants deny the allegations in this paragraph.

67. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

68. The Maverick Defendants admit that the Subject Appraisal was dated January 21, 2021. The Appraisal is a document that speaks for itself.

69. The Appraisal is a document that speaks for itself. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

70. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

71. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

72. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

73. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

74. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

75. The Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

76. The Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

77. The Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny

any inference and allegation of wrongdoing. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

78. The map is a document that speaks for itself. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph regarding the percentage of Black residents. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

79. The map is a document that speaks for itself. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph regarding the percentage of Black residents in other neighborhoods. The Maverick Defendants deny that the referral to the six properties was in any way improper or inconsistent with the applicable professional appraisal standard and specifically deny any inference and allegation of wrongdoing.

80. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded. The Maverick Defendants further deny that homes in Hale and adjacent neighborhoods generally had higher prices than homes in other neighborhoods as the prices depend, inter alia, on the specific characteristics of the homes. The Maverick Defendants further deny that the Appraisal was in any way improper or inconsistent with the applicable professional appraisal standard and specifically deny any inference and allegation of wrongdoing.

81. The Solidifi Standards is a document that speaks for itself. The Maverick Defendants deny the remaining allegations in this paragraph.

82. The map is a document that speaks for itself. The Maverick Defendants deny the remaining allegations in this paragraph. The Maverick Defendants specifically deny that choice of the properties as comps for the Appraisal was in any way improper or inconsistent with the applicable professional appraisal standard and specifically deny any inference and allegation of wrongdoing. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

83. The map is a document that speaks for itself. The Maverick Defendants deny the remaining allegations in this paragraph. The Maverick Defendants specifically deny that choice of the properties as comps for the Appraisal was in any way improper or inconsistent with the applicable professional appraisal standard and specifically deny any inference and allegation of wrongdoing. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

84. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

85. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

86. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

87. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

88. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

89. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

90. The Maverick Defendants admit that they conducted another appraisal of a different property with different characteristics approximately one month prior to the Appraisal of the Subject Property. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

91. The Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny

any inference and allegation of wrongdoing. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

92. The Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

93. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

94. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

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98. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

99. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

100. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

101. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

102. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual

allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

103. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

104. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

105. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

106. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

107. The Maverick Defendants admit that the Subject Appraisal was dated and submitted to Solidifi on January 21, 2021. The Appraisal is a document that speaks for itself.

108. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

109. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph. Further, the Appraisal is a document that speaks for itself and the Maverick Defendants deny all allegations inconsistent with that document. The Maverick Defendants specifically deny any inference and allegation of wrongdoing.

110. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. To the extent factual allegations are asserted, the Maverick Defendants deny the allegations in this paragraph.

111. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

112. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

113. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

114. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

115. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

116. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

117. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

118. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

119. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

120. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

121. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

122. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

123. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

124. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

125. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

126. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

127. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

128. The Maverick Defendants admit that Rocket's legal team did not ever contact Mr. Mykhailyna. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

129. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

130. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

131. The Maverick Defendants admit that Rocket on an occasion has requested Mr. Mykhailyna to correct an unrelated appraisal, which he did. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

132. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

133. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

134. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

135. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

AS TO HUD ADMINISTRATIVE PROCESS

136. The Maverick Defendants admit that Ms. Cheroutes filed her complaint CCRD. The remaining allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

137. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

138. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded.

139. The Maverick Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. These allegations are, therefore, denied, and strict proof thereof, if relevant, is demanded. The remaining

allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

140. Admitted.

141. Admitted,

142. Admitted,

143. Admitted.

AS TO CAUSE OF ACTION: VIOLATED OF THE FAIR HOUSING ACT

144. The Maverick Defendants hereby incorporate by reference their answers to the paragraphs above as though more fully set forth at length herein.

145. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

146. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

147. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. However, to the extent the averment of this paragraph is factual, the Maverick Defendants deny such averment and strict proof thereof, if relevant, is demanded.

148. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. However, to the extent the averment of this paragraph is factual, the Maverick Defendants deny such averment and strict proof thereof, if relevant, is demanded.

149. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required.

However, to the extent the averment of this paragraph is factual, the Maverick Defendants deny such averment and strict proof thereof, if relevant, is demanded.

150. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. However, to the extent the averment of this paragraph is factual, the Maverick Defendants deny such averment and strict proof thereof, if relevant, is demanded.

151. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. However, to the extent the averment of this paragraph is factual, the Maverick Defendants deny such averment and strict proof thereof, if relevant, is demanded.

152. Denied. The allegations set forth in this paragraph constitute legal conclusions and/or characterizations of law, and as such no response is required. However, to the extent the averment of this paragraph is factual, the Maverick Defendants deny such averment and strict proof thereof, if relevant, is demanded.

WHEREFORE, the Maverick Defendants reserve their right to amend this Answer as new information becomes available during the course of discovery. Any allegation not specifically admitted herein is hereby denied. The Maverick Defendants deny every allegation of wrongdoing, negligence, and liability and respectfully request that judgment be entered in their favor and against Plaintiff, that Plaintiff's Complaint as against the Maverick Defendants be dismissed with prejudice and that the Maverick Defendants be awarded such other relief which this Court deems appropriate.

AFFIRMATIVE DEFENSES

1. The Maverick Defendants hereby incorporate by reference their answers to the paragraphs above as though more fully set forth at length herein.
2. Plaintiff's claims are barred by the doctrine of assumption of risk.
3. Plaintiff's claims are barred by the doctrine of estoppel.
4. Plaintiff's claims are barred by failure to mitigate damages.
5. Plaintiff's claims are barred by the doctrine of waiver.
6. Plaintiff's claims are barred by failure to exhaust administrative and/or statutory remedies.
7. Plaintiff's claims are barred because the alleged damages were caused by an intervening and/or superseding cause.
8. Plaintiff's alleged damages were caused by the acts and/or omissions of persons or entities over whom the Maverick Defendants had no control and for whom the Maverick Defendants have no liability.
9. Plaintiff's alleged damages were not proximately caused by any act or omission on the part of the Maverick Defendants.
10. Plaintiffs' Complaint fails to state a claim against the Maverick Defendants upon which relief may be granted.
11. Plaintiff's claims are barred by Plaintiff's fraud.
12. Plaintiffs' claims are barred by the doctrine of unclean hands.
13. The Maverick Defendants also reserve the right to amend and/or supplement the within Affirmative Defenses at any time prior to trial.

WHEREFORE, the Maverick Defendants respectfully request that judgment be entered in their favor and against Plaintiff, that Plaintiff's Complaint as against the Maverick Defendants be dismissed with prejudice and that the Maverick Defendants be awarded such other relief which this Court deems appropriate.

Dated: February 5, 2025

Respectfully submitted,

TEMKIN & ASSOCIATES, LLC

/s/Maria Temkin

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*Attorneys for Defendants Maxym Mykhailyna
and Maverick Appraisal Group, Inc.*

CERTIFICATE OF SERVICE

I certify that on this 5th day of February 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of filing on all counsel of record.

Dated: February 5, 2025

/s/Maria Temkin
Maria Temkin, Esq.
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