

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**BEFORE THE ADMINISTRATOR**

**In the Matter of:** )  
 )  
 **Detroit Renovations, LLC, and** ) **Docket No. TSCA-HQ-2018-5006**  
 **Nicole Curtis** )  
 )  
 **Respondents.** )

**ANSWER OF DEFENDANT**

Comes now, the Defendant, *Nicole Curtis and Detroit Renovations, LLC*, who answers the complaint of plaintiff, United States Environmental Protection Agency, would respectfully allege and state as follows:

1. Any allegation in Plaintiff Complaint not specifically admitted, modified, or otherwise denied is expressly denied.
2. Defendant, having extensive knowledge of the construction business and, coupled with the self-awareness of the Defendant's status as a public figure, has taken exhaustive and proper steps to ensure no wrong-doing *on-site* at any property owned by Defendant. This includes, but is not limited to:
  - a. Filing all lead-permits and passing all inspections.
  - b. Obtaining all lead release documents from the city stating that lead practices were followed properly and found to have no lead hazards (twice tested).
3. Defendant has no record of any EPA representative on-site at any time during any renovation on a property owned by Defendant.
4. Alleged wrongdoing filed by Plaintiff is strictly based on a television series that is produced for entertainment purposes only.

  
Detroit Renovations

\_\_\_\_\_  
Signature of Respondent

January 2, 2019

\_\_\_\_\_  
Date