

**Instructions: FILL IN THE NAMES OF THE PARTIES AND THE INDEX NUMBER. COMPLETE THE BLANK SPACES NEXT TO THE INSTRUCTIONS PRINTED IN BOLD TYPE. PRINT AND USE BLACK INK ONLY. SIGN YOUR NAME IN THE PRESENCE OF A NOTARY PUBLIC.**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X

Index No. 504399 / 2022

Access Institute d/b/a  
Access Group

Plaintiff,

ANSWER

- against -

Robert Broadhurst

Defendant.

-----X

As and for his/her answer to the complaint herein, the defendant Robert  
Broadhurst respectfully shows and alleges as follows:

X. Admits the truth of the allegations of Paragraph(s) 2, 5, 7, 10

\_\_\_\_\_ of the complaint.

X Denies knowledge or information sufficient to form a belief as to the truth  
of the allegations of Paragraph(s) 1, 3, 4, 8  
\_\_\_\_\_ of the complaint.

X. Denies the allegations of Paragraph(s) 9, 11

\_\_\_\_\_ of the complaint.

X. Defendant admits that he executed an Application and Loan Agreement  
but denies the allegation to the extent that any amount is owed to the Plaintiff.

\_\_\_\_\_

[illegible]

## AFFIRMATIVE DEFENSES

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## This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page.

Dated: 4/6/22

Robert Broadhurst  
Print Name

357 Court St., Apt 3

Brooklyn, NY 11231

**917-696-5426**


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**Defendant's Address and  
Telephone Number**

VERIFICATION

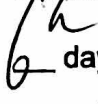
\_\_\_\_\_, being duly sworn, deposes and says:

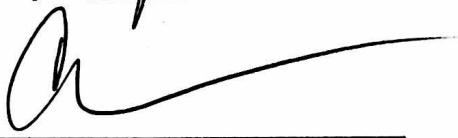
I am the defendant. I have read the foregoing answer and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true. To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in subsection (c) of section 130-1.1 of the Rules of the Chief Administrator (22 NYCRR).

  
\_\_\_\_\_  
Sign Name

ROBERT BROADHURST  
\_\_\_\_\_  
Print Name

Sworn to before me this

 day of April, 2022.

  
\_\_\_\_\_  
Notary Public

