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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
JM

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Zillow Group, Inc. et al.

Plaintiff,

v.

Midwest Real Estate Data LLC et al.

Defendant.

Case No.: 1:26-cv-05451

**GEODOMA’S STATEMENT IN
SUPPORT OF NEITHER PARTY**

Judge: Hon. John J. Tharp Jr.

STATEMENT

Your Honor, fully aware of the value of your time, I am compelled to add one more piece of information to STATEMENTS IN SUPPORT OF NEITHER PARTY (ECF 17 and ECF 59). Neither Compass brokerage nor the Zillow platform will share this information with you, but it exists, and this Court could require Parties to confirm it (under oath) at the upcoming presentation of evidence during the preliminary injunction hearing. In more ways than one, this information is the only thing that matters. During the Compass, Inc. v. Zillow, Inc. et al 1:25-cv-05201 (S.D.N.Y.) lawsuit, on November 26, 2025, Robert Reffkin posted the following message:

“Zillow offered Compass an annual \$1.3–\$1.6B “revenue uplift” plus an offer to Double-End all Compass pre-marketed listings through Zillow (where Zillow would send every buyer lead to a Compass buyer agent that wasn’t the Compass listing agent to ensure Compass was always on both sides of the transaction). Compass said no. No payout is worth compromising what we stand for. And we won’t accept deals that force home sellers to market their home on someone else’s terms. This is about choice versus control, and at Compass, we believe agents and their sellers deserve the freedom to decide how to market their home.” (Source: <https://www.instagram.com/p/DRhM2p4DVHr/>)

Zillow CFO testimony reveals Compass rejected Zillow's "\$1.6 Billion annual "revenue uplift" deal to restrict homeowner choice and prevent agents from marketing off Zillow. Testimony from Zillow's CFO also reveals Compass rejected the Zillow double-ending deal.

2 Q. You personally participated in negotiations with Compass
3 regarding Zillow's standards, right?
4 A. Yes.
5 Q. You understood that any partnership with Compass would
6 require Compass to adhere to Zillow's standards, right?
7 A. Yes.

11 Q. You offered Compass a potential revenue uplift of \$1.3 to
12 \$1.6 billion annually if Compass would adhere to Zillow's
13 standards, correct?

14 A. We offered, at a high level, what we thought were a pretty
15 interesting set of ways to work together and grow our
16 businesses together. When we went into those discussions we
17 knew that they weren't necessarily going to be successful
18 and --

19 Q. That wasn't my question. My question is just, sir: You
20 offered Compass a potential revenue uplift of \$1.3 to
21 \$1.6 billion annually if Compass would adhere to Zillow's
22 standards?

23 A. Yeah, unfortunately not that simple, in that we had one
24 meeting about it. They weren't particularly interested, and we
25 never really like honed in on what the numbers could be.

1 Q. My question is just what you offered, sir.
2 A. The force foray into a potential how do we work together
3 was those numbers. They just weren't particularly well thought
4 through across both companies.

16 Q. I'll rephrase my question then, sir. As part of its
17 negotiations with Compass, Zillow actually offered Compass the
18 opportunity to double-end more transactions at the brokerage
19 level. Isn't that right?

20 A. At the brokerage level, that was one of the ideas we
21 contemplated. We didn't move very far on anything because
22 after one meeting, it wasn't interesting enough for them.

23 Q. My question is just what you offered, and so the answer is
24 yes?

25 A. Again, for the first meeting, yes.

This exposé about an annual \$1.3–\$1.6B “revenue uplift” offer is missing something very important – the price. Specifically, the monetary “thing of value” Zillow platform would have collected for referrals of \$1.3–\$1.6B in RESPA-covered real estate brokerage commissions (assuming most, if not all, these referrals would have involved federally related mortgage loans). I do not know the exact cut Zillow platform offered to take, but it likely resembled the Preferred (Flex) ~40% “success fees” (Source: <https://www.zillow.com/preferred/pricing/>) where this \$1.3–\$1.6B “revenue uplift” offer would have been made subject to ***an estimated \$520,000,000 to \$640,000,000 in RESPA-banned kickbacks*** paid by a real estate brokerage into a referral platform. This is the true reason WHY this offer was rejected.

This kickback says everything about this entire lawsuit. The illegality of this kickback affects both the Zillow platform and Compass (recently merged with Anywhere Real Estate and serving as the broker of record for thousands of Preferred (Flex) “partner agents” nationwide).

To bring out the full truth, I invite this Court to ask both Parties about the exact terms of the kickbacks that were attached to the \$1.3–\$1.6B “revenue uplift” offer. This information will remove all doubt about Parties’ intent, about how our broken real estate market functions, about the lack of integrity at the highest level, about illegal steering under RESPA, about the fraudulent RICO kickback-driven enterprise Zillow platform had devised since 2018, and about why neither Party deserves a single thing to be restituted to them by this Court.

As part of this Statement in Support of Neither Party, I am also attaching my personal editorials for both Compass and the Zillow platform (Please see Exhibit A, Exhibit B, Exhibit C). Further, on May 21, 2026, Compass CEO Robert Reffkin openly admitted in their social media post that criticizes Zillow Preferred (Flex) that they KNOW about the illegality of their conduct as follows:

“Under Illinois law, brokerages are responsible for supervising how listings are marketed to consumers, and directly submitting listings to Zillow creates legal and regulatory risk for both the brokerage and agents. Specifically, Illinois law prohibits advertising, “whether in print, via the Internet, or through social media, digital forums, or any other media” that is “fraudulent, deceptive, inherently misleading, or proven to be misleading in practice.”

Zillow is facing a federal class-action lawsuit accusing it of deceptive marketing and illegal business practices. The lawsuit, on behalf of a class of homebuyers, alleges that Zillow “tricks” users clicking “contact agent” buttons into using Zillow-affiliated agents rather than the home’s actual listing agent, while hiding a steep 40% commission referral fee that inflates home prices.” (Source: <https://www.instagram.com/p/DYmVInAO63H/>)

Robert Reffkin admits that they KNOW that Zillow Preferred (Flex) 40% kickbacks are illegal under RESPA and that these fees inflate home prices. Yet, Compass itself shells out illegal kickbacks into the Zillow platform. The Zillow Preferred (Flex) program does not act in a brokerage capacity (and is unable to meet 12 U.S.C. 2607(c)(3) and 12 C.F.R. 1024.14(g)(1)(v) exemption for broker-to-broker referrals). In the United States, anyone violating RESPA’s referral fee ban commits a crime 12 U.S.C. 2607(d)(1). By working together as part of an enterprise and using interstate wire communications in furtherance of their fraudulent scheme, Zillow Preferred (Flex) conspires with unaffiliated real estate brokerages, including Compass.

Thank you for your time,

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

Dated: June 25, 2026

/s/ Dmitry Shkipin

Dmitry Shkipin, pro se

Exhibit A

GEODOMA'S STATEMENT IN SUPPORT OF NEITHER PARTY

Case No.: 1:26-cv-05451

Zillow Group, Inc. et al. v. Midwest Real Estate Data LLC et al.

Litesand

Antitrust, real estate, e-commerce, fintech, proptech, bigtech

Compass Review (RESPA Fraud, Read Warning!)



WARNING: RESPA-banned Kickbacks, Broker-to-Broker Collusion, False Marketing, Wire Fraud, Price Fixing, Fiduciary Duty Fraud.

[Compass](#) (through the combined reach of Compass International Holdings' real estate professionals, including @properties, Better Homes and Gardens Real Estate, CENTURY 21, Christie's International Real Estate, Coldwell Banker, Compass, Corcoran, ERA and Sotheby's International Realty) unlawfully agrees to pay massive kickbacks to receive your information from various "referral fee networks" and engages fiduciary duty fraud, market allocation, consumer allocation, false advertising, unlawful kickbacks, wire fraud,

and price-fixing practices in violation of, inter alia, 18 U.S.C. § 1346, 18 U.S.C. § 1343, 15 U.S.C. § 1, 15 U.S.C. § 45, 12 U.S.C. § 2607, 12 C.F.R. § 1024.14. As a consumer, you will always significantly overpay for Realtor commissions, subject to hidden kickbacks and pay-to-play steering toward Compass-affiliated agents. Compass further engaged in unlawful kickbacks as part of an opportunity to participate in a money-making program with Rocket Mortgage.

United States federal antitrust laws prohibit consumer allocation and blanket referral agreements between real estate companies.

Be smart; do not allow your information to be “sold as a lead” to a double-dealing Compass Agent in exchange for massive commission kickbacks paid from your future home sale or your future home purchase.

Compass and Rocket Form Historic
Alliance to Dramatically Increase Home
Listing Inventory on Redfin



COMPASS
INTERNATIONAL HOLDINGS

As a consumer, you will always significantly overpay for Realtor commissions, subject to hidden kickbacks and pay-to-play steering toward Compass-affiliated agents. Compass is further engaged in unlawful kickbacks as part of an opportunity to participate in a money-making program with Rocket Mortgage.

s RESPA-banned kickbacks schemes with a multitude of no upfront costs post-pay referral fee, “agent-matching services,” or “referral platforms” that collect as much as 40% from Compass’ RESPA-covered real estate brokerage commissions. The kickbacks that Compass shells out into all such “referral networks” MUST meet

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certain exemption to be lawful, and they do not meet any of them. Under RESPA's referral fee ban, "... No person shall give, and no person shall accept any fee, kickback, or thing of value..." 12 U.S.C. 2607(a).

All these criminals use shell brokerages (such as loanDepot [mellohome](#), Rocket [Rocket Homes](#), Tomo Mortgage [Tomo Brokerage](#), Lower-dot-com [OJO](#), [Opendoor Key Agent](#) Opendoor Home Loans, [HomeStory](#), [Blend Realty](#), [Better-dot-com Real Estate](#), Veterans United Home Loans/[Veterans United Realty](#), and New American Funding [NAF Homes](#)) use shell brokerage licenses to collect RESPA-banned kickbacks. Certain agent-matching platforms (such as [HomeLight](#), [Clever Real Estate](#), [IDEAL AGENT](#), [EffectiveAgents](#), [FastExpert](#), [TopAgentsRanked](#), [SOLD-dot-com](#), and [homegenius](#)), and certain listings platforms (such as [Zillow Flex](#) and [Realtor-dot-com-Opcity-Upnest](#)) do the same. Even some TV media influencers (like Dave Ramsey [RamseyTrusted Agent](#) and "Real Estate Agents Glenn Beck Trusts" are involved) in a flawed attempt to bypass 12 U.S.C. 2607(a) kickbacks ban by falsely claiming to meet exemption under 12 U.S.C. 2607(c)(3). Compass is directly involved with all of them (same as a bribe to a politician: RESPA-banned kickbacks are both illegal to give and illegal to accept).

Compass CEO, Robert Reffkin KNOWS that the kickbacks shelled out into "agent-matching platforms" are illegal.

On May 21, 2026, Compass CEO Robert Reffkin openly admitted in thier LinkedIn post that criticizes Zillow Preferred (Flex) that they KNOW about the illegality of thier conduct as the following:

Under Illinois law, brokerages are responsible for supervising how listings are marketed to consumers, and directly submitting listings to Zillow creates legal and regulatory risk for both the brokerage and agents. Specifically, Illinois law prohibits advertising, "whether in print, via the Internet, or through social media, digital forums, or any other media" that is "fraudulent, deceptive, inherently misleading, or proven to be misleading in practice." Zillow is facing a federal class-action lawsuit accusing it of deceptive marketing and illegal business practices. The lawsuit, on behalf of a class of homebuyers, alleges that

Zillow “tricks” users clicking “contact agent” buttons into using Zillow-affiliated agents rather than the home’s actual listing agent, while hiding a steep 40% commission referral fee that inflates home prices.

12:15



Sign in

Join now



Robert Reffkin

7h



Why Compass International Holdings will not provide [Zillow.com](#) with a listing feed outside of the MLS?

The only way we can protect our clients' data is if it's entered securely into the MLS or directly into our platform.

Under Illinois law, brokerages are responsible for supervising how listings are marketed to consumers, and directly submitting listings to Zillow creates legal and regulatory risk for both the brokerage and agents. Specifically, Illinois law prohibits advertising, "whether in print, via the Internet, or through social media, digital forums, or any other media" that is "fraudulent, deceptive, inherently misleading, or proven to be misleading in practice."

Zillow is facing a federal class-action lawsuit accusing it of deceptive marketing and illegal business practices. The lawsuit, on behalf of a class of homebuyers, alleges that Zillow “tricks” users clicking “contact agent” buttons into using Zillow-affiliated agents rather than the home's actual listing agent, while hiding a steep 40% commission referral fee that inflates home prices.

linkedin.com

Robert Reffkin admits that they KNOW that Zillow Preferred (Flex) 40% kickbacks are illegal under RESPA. Yet, Compass itself shells out illegal kickbacks into Zillow Preferred (Flex), same as every major brokerage in America.

The 12 U.S.C. 2607(c)(3) safe harbor does NOT apply to kickbacks that Compass shells out into “agent-matching platforms.”

In recent years, so-called “referral networks” or “agent-matching platforms” have turned the U.S. residential real estate services market into large RESPA-banned kickback schemes. Most of these networks get a shell real estate license, but they do not provide actual brokerage services. Instead, they refer home sellers and buyers to so-called “partner agents” for 25% to 40% of the agents’ commissions.

A “referral platform” may, of course, easily sell customer leads to real estate brokers. However, under law such sales must never be tied to the outcome of the successful transaction or based on a percentage of brokerages’ commissions. The [US-CFPB Advisory Opinion issued on February 7, 2023](#), further confirms that any operator of a “settlement services” digital comparison-shopping platform receives

a prohibited referral fee in violation of RESPA Section 8 when the operator receives a “thing of value” for referral activity.

For instance, in my civil lawsuit with [HomeLight](#), the United States District Court for the Northern District of California had recently reasoned that [HomeLight](#) acts in a vertical servicer-customer relationship on a different level of the supply chain with +/-28,000 partner agents.

The federal court had reasoned that [HomeLight](#) is an “upstream” supplier of paid referrals to “downstream” real estate brokers, as opposed to a real estate broker acting on the same level of distribution, where

“... [E]ven though HomeLight is a licensed brokerage, in the context of this [referral] agreement HomeLight and agents are not acting as horizontal competitors ...” where “... real estate agents [are] referral platform’s “intermediate” consumers ...”

This designation precludes 12 U.S.C. 2607(c)(3) safe harbor applicability for any of their referrals. Some of these “referral platforms” also engage in price-fixing of real estate commissions, which is a felony.

If you have been referred to Compass Agent by some “referral platform” – you got scammed – they will give you 60% full service laced with 40% kickbacks shelled out into whichever “referral platform” made the referral – Compass just sold you out for illegal kickbacks. This fact should tell you everything about Compass and thier integrity, or lack thereof.

Why work with criminals to help anyone buy and sell a home anywhere? I can’t think of a single reason. Granted, not every Compass-affiliated Agent shells out illegal kickbacks into these “referral platforms.” However, Compass as the broker of record is fully-complicit in this RESPA fraud (because ALL Compass-affiliated Agents work for and a legal extension of Compass brokerage).

Robert Reffkin bashes Zillow Preferred (Flex) for the illegal “40% commission referral fee that inflates home prices” that they themselves shell out into Zillow Preferred (Flex). In RICO collusion with Zillow, Robert Reffkin and Compass are engaged in a felony and a conspiracy to defraud their own clients with conduct that does, indeed, inflate home prices.

By protecting their brokerage commissions from unlawful kickbacks, honest real estate professionals always act to serve their clients with full-service value and protect their reputations. RESPA compliance is not merely the best practice for any honest professional; it is the fundamental federal law that governs the most valuable transactions in most American consumers’ lives. Robert Reffkin and Compass cardinaly fail to meet this very simple standard.

The 12 U.S.C. 2607(c)(4) AfBA safe harbor does NOT apply to Rocket/Compass so-called “historic alliance.”

Compass is also involved in a highly specific RESPA fraud with Rocket Mortgage as following:

High-Intent Lead Pipeline: Over the term of the partnership, Compass International Holdings real estate professionals will gain access to more than 1 million buyer inquiries generated through Redfin, giving them more opportunities to build relationships and support buyers as they move toward a purchase. Redfin agents will benefit from increased consumer traffic driven by a broader selection of homes — creating more opportunities to engage buyers earlier in their journey. (Source:

<https://www.compass.com/newsroom/press-releases/1bEUKQf15AEPWfjbXEQSqc/>)

There are a number of legal reasons why this arrangement is illegal, starting with lack of AfBA disclosure statement that must be given to meet the AfBA safe harbor (See <https://www.consumerfinance.gov/rules-policy/regulations/1024/15/>) and ending with the fact that the thing of value is exchanged between Rocket Mortgage

and Compass for referrals as part of an opportunity to participate in a money-making program with Rocket Mortgage.

Incidentally, Compass has a 100% lawful joint venture (JV) called OriginPoint, formed in 2021 with a lender Guaranteed Rate (now known as Rate) (See <https://investors.compass.com/news/news-details/2021/Compass-and-Guaranteed-Rate-Join-Forces-to-Announce-the-Launch-of-OriginPoint/>), so they KNOW how to form lawful AfBAs – they just chose not to do that with Rocket Mortgage. I guess, its easier to break the cardinal law in real estate and defraud their clients with Rocket Mortgage steering, for whatever reason. This scam is off the rails – each RESPA violation carries a year in federal prison and a \$10,000 fine. None of these people would EVER get out of prison, if the law is to become enforced against them by our government.

Compass admits in their 2025 Annual Report Form 10-K that they are fully-aware of the Zillow Preferred (Flex) litigation.

Compass, Inc. in their Form 10-K for the fiscal year ended December 31, 2025 states:

“RESPA also has been invoked by plaintiffs in private litigation for various purposes and some state authorities have also asserted enforcement rights. Ongoing private litigation in our industry reflects increasingly expansive interpretations of RESPA as applied to referral fee programs, lead distribution, and affiliated-service arrangements.” (Source: <https://www.sec.gov/Archives/edgar/data/1563190/000156319026000057/comp-20251231.htm>)

This seemingly blanket legal disclosure (and a vague reference to the [Alucard Taylor, et al. v. Zillow Group, Inc., et al. Case No.: 2:25-cv-01818](#) class action lawsuit) attempts to hide the full-blown RESPA liability for Compass (Compass employs very well-paid lawyers: they KNOW that this is a major legal fallout – the entire brokerage is built on illegal kickbacks – this is a felony).

In fact, in 2025, Zillow offered Compass a \$1.3 billion to \$1.6 billion annual “revenue uplift” – in exchange for ~40% kickbacks shelled out from Compass into Zillow. This, alone, is ~\$640,000,000 in illegal kickbacks being discussed. Even though Compass declined this deal, it exposes the overall problem – there are thousands of Compass agents who shell out illegal kickbacks into Zillow Preferred (Flex) as well as (50)+ other referral fee programs.

There is no such thing as a “referral fee program” under RESPA – referral fees are illegal in U.S. residential real estate markets. The so-called “expansive interpretations” is nothing more than Compass brokers (kickback-paying criminals, starting with Reffkin) getting caught (in RESPA/RICO collusion with Zillow Preferred (Flex), Rocket Homes, Veterans United Realty, etc.) violating the law hundreds of thousands (if not millions) of times – that carries a year in federal prison, for each violation.

Compass, to “double-end” their commissions with a 3-Phase Marketing (3PM) strategy, steers their own buyer clients toward pre-marketed listings that Compass KNOWS are overpriced by 2.9%.

Compass’s 3PM listings strategy delays the submission to MLSs in an effort to “game” the MLS participation. In fact, ~94% of all Compass 3PM listings continue to MLS, and only ~6% of homes are sold in the “pre-marketing” phase. If the home seller could not utilize the final MLS phase, they would never agree to the 3PM listings strategy. Compass’s 3PM listings strategy is not off-MLS listings, but delayed-MLS listings strategy that fails (and is designed to fail) ~94% of the time.

The Compass research assessed Compass sell-side residential transactions from January 1, 2024, through December 31, 2024, finding that:

“Homes pre-marketed as Compass Private Exclusives and/or Compass Coming Soon before going active on the MLS were associated with an average 2.9% higher close price compared to those that were not pre-marketed.” (See

<https://www.compass.com/newsroom/press-releases/3UJruvyWpqhodbxQ4yShtLp/>)

In these ~6% of Compass 3PM home sales that actually do sell in pre-marketing phase, Compass favors the home seller by initially overpricing 3PM listings by 2.9%. Pre-marketed listings do not have to be priced lower because there are no “Days on Market” and “Price History” associated with pre-marketing. Pre-marketed listings allow home sellers to list their home for 2.9% more without the downside of the MLS-tracked metrics. Alas, this also means that Compass (when it represents both the home seller and the homebuyer) must steer BUYER clients toward homes that they KNOW are overpriced by 2.9% to double-end the deal. This conduct violates the fiduciary duty to BUYER clients, by self-admission on the Compass website.

The math is such that with these ~6% of Compass 3PM home sales, Compass BUYER clients, statistically, overpay for homes by about \$200 million a year – even though Compass holds a fiduciary duty to treat both their buyer and seller clients fairly.

About Compass Review

This is a genuine, independent, and unpaid editorial review for Compass Brokerage. There are no commercial agreements (paid or otherwise) between the author and the reviewed business.

Consumers may post helpful, independent comments about this business with any sentiment. Compass Brokerage can never ask to remove legitimate consumer comments. All user comments are protected by the Consumer Review Fairness Act (CRFA), which safeguards people’s ability to share their honest opinions about a business.

[Compass Brokerage was explicitly notified about this editorial review.](#) Although Compass Brokerage is not required to respond, the author did not receive any formal correction notices or objections. This, in effect, means that Compass Brokerage is unable to formally address its illegal conduct.

About the Author

Dmitry Shkipin operates [Geodoma](#) and is a well-known critic of illegal referral fees charged by so-called “paper brokerages” that organize real estate agents into “referral fee networks” and don’t actually buy and sell property.

The information presented in this review is 100% accurate and an objective analysis of massive and ongoing RESPA fraud in the U.S. residential real estate industry.

The so-called “no upfront costs referral networks,” “agent-matching services,” “pay-at-close companies,” and “referral fee programs” are not genuine brokerages acting in a brokerage capacity. (Source:

<https://www.housingwire.com/articles/opinion-broker-to-broker-referral-exemption-does-not-apply-to-agent-matching-platforms/>)

Every year, illegal RESPA-banned referral fees from so-called “paper brokerages” inflate real estate commissions by \$15B. (Source:

<https://www.inman.com/2022/10/07/referral-fees-from-so-called-paper-brokerages-including-zillow-inflate-commissions-by-15b-a-year-ceo/>)

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Exhibit B

GEODOMA'S STATEMENT IN SUPPORT OF NEITHER PARTY

Case No.: 1:26-cv-05451

Zillow Group, Inc. et al. v. Midwest Real Estate Data LLC et al.

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Antitrust, real estate, e-commerce, fintech, proptech, bigtech

Zillow.com Preferred (Flex) Review (RESPA Fraud, Read Warning!)



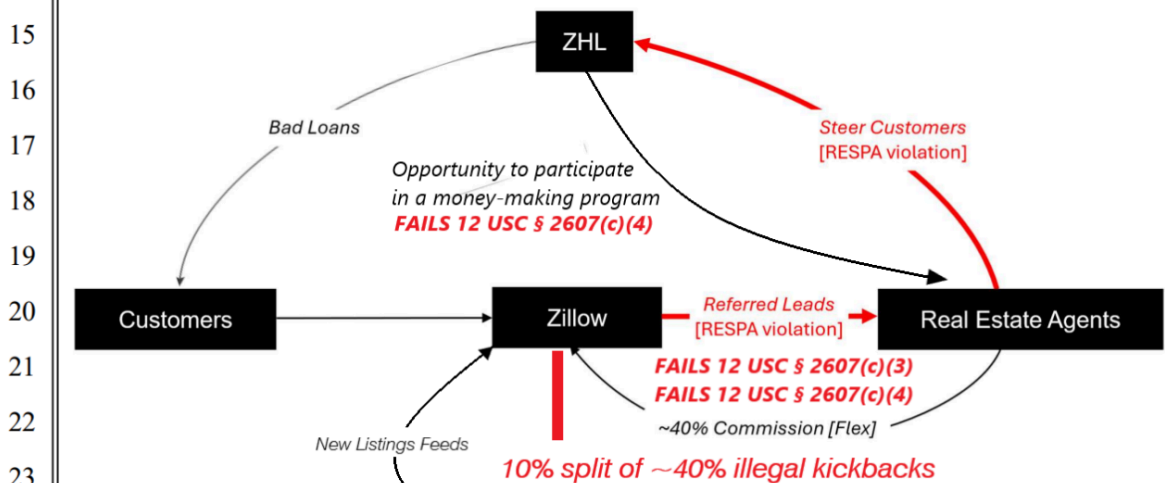
WARNING: RESPA-banned Kickbacks, False Marketing, Wire Fraud.

[Zillow Preferred](#) (also see [Zillow Flex](#), [Zillow Preview](#), [Zillow Home Loans](#), [Zillow 360](#)) is a RESPA-banned kickbacks scheme, where “partner agents” unlawfully agree to pay massive kickbacks to receive your information and engage in false advertising, unlawful kickbacks, and wire fraud in violation of, inter alia, 18 U.S.C. § 1346, 18 U.S.C. § 1343, 15 U.S.C. § 45, 12 U.S.C. § 2607, 12 C.F.R. § 1024.14. As a consumer, you will always significantly overpay for Realtor commissions, subject to hidden kickbacks and pay-to-play steering promoted in this scheme.

Be smart; do not allow your information to be “sold as a lead” to a double-dealing Realtor in exchange for massive commission kickbacks paid from your future home sale or your future home purchase.

Zillow Preferred (Flex) Review

12 of clients to ZHL. This is a clear RESPA violation. *See* 12 U.S.C. § 2607(a). In graphic form, it
13 looks like this:



12. **Second**, by requiring Flex agents to pay these hidden fees, Zillow is further violating

Zillow Preview Listing Agents



Zillow Flex referrals are unable to meet 12 U.S.C. § 2607(c)(3) and 12 U.S.C. § 2607(c)(4) RESPA exemptions.

All of this RESPA fraud may seem complex. Here is the easy way to understand this –

RESPA Section 8 and CFPB Regulation X maintain firm prohibitions against kickbacks and unearned fees, with particular statutory exemptions, for all residential real estate settlement services involving federally related mortgage loans. *“No person shall give, and no person shall accept any fee, kickback, or thing of value pursuant to any agreement or understanding, oral or otherwise, that business incident to or a part of a real estate settlement service involving a federally related mortgage loan shall be referred to any person.”* 12 U.S.C. 2607(a).

Zillow Preferred (Flex) is a shell brokerage entity; it does not act as a true settlement services provider. The exemption from RESPA’s kickbacks ban that Zillow Preferred (Flex) *attempts* to utilize to collect 40% kickbacks from real estate brokerage commissions *only allows* “real estate agents or real estate brokers” where all parties deliver “services provided in connection with a prospective or actual settlement” ... “for which a settlement service provider requires a borrower or seller to pay” to share cooperative broker commissions between one another. 12 C.F.R. 1024.2(b)(29) (14)

Zillow Group 2018 Form 10-K, plainly admits that the 40% Flex kickback is an advertising fee charged by an advertising platform for advertising services:

“In October 2018, we began testing a new Flex Pricing model for Premier Broker and Premier Agent advertising services in limited markets. With the Flex Pricing model, Premier Brokers and Premier Agents are provided with validated leads at no upfront cost, and they pay a performance advertising fee only when a real estate transaction is closed with one of their leads.”

where Zillow Group further admits that:

“to compete successfully for advertisers against future and existing competitors, [Zillow] must continue to invest resources in developing our advertising platform and proving the effectiveness and relevance of our advertising products and services.”

(See <https://www.sec.gov/Archives/edgar/data/1617640/000161764019000005/q42018form10-kdoc.htm>)

Nothing further is required to show that Zillow Preferred (Flex) scams consumers with **illegal** kickbacks under Section 8 of RESPA. This may seem like a **gotcha!** argument, but it is actually a product of Zillow's calculated deception to steal over \$5 billion in fees (a felony) – referral fees are cardinally banned in real estate industry (that same way the Stark Law, aka Physician Self-Referral Law, prohibits physicians from referring Medicare/Medicaid patients to entities for “designated health services” if the physician has a financial relationship, such as compensation for referrals, with that entity. 42 U.S.C. 1395nn; 42 C.F.R. 411.353 et seq.)

Zillow's flawed attempt to meet an exemption from this referral fee ban is a federal crime. Nobody forced Zillow to start collecting these illegal kickbacks in 2018 – this criminal Corporation chose to let go of perfectly lawful ads revenues (upfront payments for ads and upfront payments for leads are 100% OK under RESPA – this federal law only bans kickbacks) to partake in much higher (32x) fees conditioned on a completed sale – an agent who pays 40% from commissions shells out 32x more money to Zillow because there are no upfront costs.

Why Zillow violates RESPA? Three reasons.

First, kickbacks from commissions yield about 32x more money than lawful ads. These fees are paid from the greater sum of the federally related mortgage loan. Flex agents do not actually pay anything from their checking account – they just cut Zillow into 40% from commissions. In effect, these fees are offset to a consumer with higher commissions and give colluding agent free business.

Second, brokers do not mind handing out 40% of real estate commissions because they can simply inflate the price to the buyer or seller. The broker who only charges 60% of typical commissions on the open market, will quote the referred client full 100% commission and simply hand 40% to Zillow as free money – aka a kickback.

Third, most people have no clue what RESPA is (nor should anyone have to know what this law is) and have no reason to suspect that a massive Corporation like Zillow will scam anyone. Most people, simply assume that any fees paid in this arrangement are legal. In reality, our entire real estate industry is now neck-deep in this RESPA fraud (see “Referral fees from so-called ‘paper brokerages’ including

Zillow inflate commissions by \$15B: HomeOpenly”

<https://www.inman.com/2022/10/07/referral-fees-from-so-called-paper-brokerages-including-zillow-inflate-commissions-by-15b-a-year-ceo/>)

Details of the Zillow Preferred (Flex) RESPA fraud

There are multiple issues with Zillow Preferred (Flex) fraud. The scheme is so broken that it violates RESPA and multiple other federal and state laws concurrently. On September 19, 2025, Hagens Berman Sobol Shapiro and Cohen Milstein Sellers & Toll, on behalf of Consumers as a class, filed a Complaint (*Taylor et al. v. Zillow Group, Inc. et al. 2:25-cv-01818 W.D. Wash.*) accusing Zillow Flex, of major RESPA fraud.

Since 2018, when Zillow Flex was first introduced (prior to 2018, Zillow utilized lawful upfront pay-per-click ads sales as its core business model), it can be fairly estimated that Zillow Flex stole over \$5 billion in RESPA-banned kickbacks, in collusion with over 100,000 so-called “Flex partner agents” nationwide. Our amicus curiae (“friend of the court”) brief is posted on this public docket.

A copy of this brief is also available here *Alucard Taylor, et al. v. Zillow Group, Inc., et al. Case No.: 2:25-cv-01818 GEODOMA’S AMICUS CURIAE BRIEF IN SUPPORT OF CONSUMERS* – [Click to access 2-25-cv-01818-geodoma-amicus-curiae-kickbacks-taylor-zillow-flex.pdf](#)

Zillow is not merely stealing RESPA-banned kickbacks from customers, every (4) seconds, they are engaged in wire fraud where illegal kickbacks are originated and transmitted with “use of interstate wire communication to further that scheme.”

The Zillow Flex Taylor class action lawsuit reads:

“Zillow ... conduct violates both the plain text of § 2607(a) and its implementing regulation.”

“The broker-to-broker referral exemption likewise does not apply, as Zillow does not act as a real-estate broker or perform brokerage functions in these transactions.

Its Premier program operates as a referral marketplace that sells and allocate consumer leads, collects contingent “success fees” tied to closed transactions, and performs no brokerage services in the purchase or sale of property. See 12 U.S.C. § 2607(c)(3).”

“The Zillow Fraudulent Business Enterprise’s common purpose of illegally profiting from the commissions paid by buyers for homes listed on Zillow’s website was facilitated by a pattern of mail and wire fraud. The Zillow Fraudulent Business Enterprise’s scheme constitutes racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) & 1962(c), by using mail and wire facilities, in violation of 18 U.S.C. §§ 1341 (mail fraud) & 1343 (wire fraud).”

Zillow Preview Distributes 10% of RESPA-banned Kickbacks to Listing Brokers

Since April of 2026, Zillow Preview has begun to accept listings directly from real estate brokers. To entice brokers into submitting their listings early into Preview, Zillow “creates an opportunity for listing agents to share in the revenue Zillow earns when a buyer who connects through a Zillow Preview listing ultimately transacts with a Zillow Preferred agent.” (Source: <https://www.zillow.com/news/introducing-zillow-preview/>).

According to Zillow:

“Zillow Preview also delivers something genuinely new for listing agents: the opportunity to earn share of the revenue Zillow receives. When a buyer who first connects through a Zillow Preview listing ultimately completes a transaction with a Zillow Preferred agent, the listing agent has the opportunity to earn a payment from Zillow equal to 10% of the buyer agent’s commission, with no additional cost to the buyer, seller, or agents. This is a new income stream for listing agents tied directly to the value they’re already creating.” (Source: <https://www.zillow.com/news/firstteam-zillow-preview-pre-market-listings/>)

Alas, there is a major “additional cost” to homebuyers – they are subjected to illegal ~40% kickbacks by an agent-matching platform. Zillow’s novel attempt to compete

for early access to listings with NAR-affiliated MLSs is a major extension of their RESPA-banned kickback fraud.

This, of course, also raises a secondary problem – Zillow Preview listing brokers (who receive 10% illegal kickbacks split from Zillow) receive proceeds from fees banned by RESPA for giving Zillow their listings data feeds. Zillow Preview listing brokers advertise these services as beneficial to their clients. We know who they are. Are we going to send all of them to federal prison? Because the law says that each violation of RESPA carries a year in prison – so what now? This, in a nutshell, is the problem with all of this kickbacks fraud – it is embedded into the industry by a series of cartels that involve 100,000 of co-conspirators and 1,000,000s of separate counts of RESPA violations. This is why this is not merely RESPA fraud – this is wire fraud.

Zillow Preferred (Flex) RESPA and RICO Co-conspirators

By working together as part of an enterprise, and using the interstate wire communications in furtherance of their fraudulent scheme, Zillow Preferred (Flex) (along with unaffiliated real estate brokerages co-conspirators, acting as brokers for Consumers) violates the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961, et seq. (RICO) (third-party real estate agents are potentially affiliated with various major as well as inconsequential real estate brokerages, such as anywhere.re elliman.com bhhs.com exprealty.com side.com atproperties.com bhgre.com century21.com christiesrealestate.com coldwellbanker.com compass.com corcoran.com era.com sothebysrealty.com windermere.com kw.com remax.com nexthome.com homesmart.com johnlscott.com realtyonegroup.com vyllahome.com weichert.com fathomrealty.com intero.com johnrwood.com worthclark.com unitedrealestate.com onerealestate.com howardhanna.com lpt.com thejasonmitchellgroup.com serhant.com theagencyre.com realtyexecutives.com evrealestate.com etc.)

Zillow Preferred (Flex) Kickbacks and RICO Fraud are Administered by

Rich Barton: Co-founder and Co-Executive Chairman

Lloyd Frink: Co-founder and Co-Executive Chairman

Jeremy Wacksman: CEO and Board Member

Amy Bohutinsky: Former Zillow COO

Erik Blachford: Former CEO of Expedia

J. William (Bill) Gurley: General Partner at Benchmark

Jay Hoag: Founding General Partner at Technology Crossover Ventures

Gregory Maffei: President and CEO of Liberty Media Corporation

Gordon Stephenson: Co-founder of Zillow

Zillow, Inc.

1301 Second Avenue, Floor 36

Seattle, WA 98101

(877) 313-8601

legalrequests@zillowgroup.com

legal@zillowgroup.com

zcscompliance@zillowgroup.com

None of whom are acting in a licensed real estate brokerage capacity in any state.
Zillow, Inc. is not a bona fide real estate brokerage.

Zillow Preferred (Flex) Alternatives (hint: avoid all of them)

Compare Zillow.com Preferred (Flex) and [Opendoor.com Partner Program \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [mellohome.com \(loanDepot\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Tomo.com \(Moto Real Estate\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Better.com Real Estate \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [OwnUp.com \(dba Own Up, RateGravity\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [FastExpert.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Offerpad.com HomePro \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [AmeriSaveRealty.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [AtClosing.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Newzip.com \(dba Realeaux\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomeAdvantage.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomeStoryRewards.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [AgentFixup.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [SOLD.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [LemonBrew.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [ClosingLeads.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [55places.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Neighborhoods.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [NavyFederalRealtyPlus.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [KelleyBlueBookHomes.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [MyAgentFinder.com \(BoomTown\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomeAndMoney.com \(BoomTown\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [RealEstateAgentsITrust.com \(Glenn Beck\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [RamseySolutions.com \(RamseyTrusted Agent\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [TopAgentsRanked.com \(ReferralExchange\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [UpNest.com \(Realtor.com\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [PLACE.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomeGenius.com \(Radian\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [IdealAgent.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [RealEstateAgents.com \(ReferralExchange\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomeBuyerConnections.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [AgentPronto.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Estate.ly.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [ReferralExchange.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Landed.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HouseTea.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HouseWhisper.ai \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [GetRidley.com \(Ridley\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [TrueParity.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [ComeHome.com \(HouseCanary\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Lower.com \(Movoto OJO\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [NAFHomes.com \(New American Funding\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [ListWithClever.com \(Clever Real Estate\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [Realtor.com \(ReadyConnect OpCity UpNest\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [VeteransUnitedRealty.com \(Veterans United Home Loans\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [RocketHomes.com \(Redfin Partner Program\) \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomeLight.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [EffectiveAgents.com \(RESPA Fraud, Read Warning!\)](#)

Compare Zillow.com Preferred (Flex) and [HomesForHeroes.com \(RESPA Fraud, Read Warning!\)](#)

About Zillow Preferred (Flex) Review

This is a genuine, independent, and unpaid editorial review for Zillow Preferred (Flex). There are no commercial agreements (paid or otherwise) between the author

and the reviewed business.

Consumers may post helpful, independent comments about this business with any sentiment. Zillow Preferred (Flex) can never ask to remove legitimate consumer comments. All user comments are protected by the Consumer Review Fairness Act (CRFA), which safeguards people's ability to share their honest opinions about a business.

[Zillow, Inc. was explicitly notified about this editorial review.](#) Although Zillow, Inc. is not required to respond, the author did not receive any formal correction notices or objections. This, in effect, means that Zillow, Inc. is unable to formally address its illegal conduct.

About the Author

Dmitry Shkipin operates [Geodoma](#) and is a well-known critic of illegal referral fees charged by so-called "paper brokerages" that organize real estate agents into "referral fee networks" and don't actually buy and sell property, such as Zillow Preferred (Flex).

The information presented in this review is 100% accurate and an objective analysis of massive and ongoing RESPA fraud in the U.S. residential real estate industry.

The so-called "no upfront costs referral networks," "agent-matching services," "pay-at-close companies," and "referral fee programs" are not genuine brokerages acting in a brokerage capacity. (Source:

<https://www.housingwire.com/articles/opinion-broker-to-broker-referral-exemption-does-not-apply-to-agent-matching-platforms/>)

Every year, illegal RESPA-banned referral fees from so-called "paper brokerages" inflate real estate commissions by \$15B. (Source:

<https://www.inman.com/2022/10/07/referral-fees-from-so-called-paper-brokerages-including-zillow-inflate-commissions-by-15b-a-year-ceo/>)

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Exhibit C

GEODOMA'S STATEMENT IN SUPPORT OF NEITHER PARTY

Case No.: 1:26-cv-05451

Zillow Group, Inc. et al. v. Midwest Real Estate Data LLC et al.

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Antitrust, real estate, e-commerce, fintech, proptech, bigtech

Top 50 Most Harmful RESPA-banned Pay-at-Closing Referral Networks (RESPA Fraud, Read Warning!)



[Opendoor.com Partner Program Review \(RESPA Fraud, Read Warning!\)](#)

[mellohome.com \(loanDepot\) Review \(RESPA Fraud, Read Warning!\)](#)

[Tomo.com \(Moto Real Estate\) Review \(RESPA Fraud, Read Warning!\)](#)

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[NavyFederalRealtyPlus.com Review \(RESPA Fraud, Read Warning!\)](#)

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[MyAgentFinder.com \(BoomTown\) Review \(RESPA Fraud, Read Warning!\)](#)

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[RealEstateAgentsITrust.com \(Glenn Beck\) Review \(RESPA Fraud, Read Warning!\)](#)

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[ComeHome.com \(HouseCanary\) Review \(RESPA Fraud, Read Warning!\)](#)

[Lower.com \(Movoto OJO\) Review \(RESPA Fraud, Read Warning!\)](#)

[NAFHomes.com \(New American Funding\) Review \(RESPA Fraud, Read Warning!\)](#)

[ListWithClever.com \(Clever Real Estate\) Review \(RESPA Fraud, Read Warning!\)](#)

[Realtor.com \(ReadyConnect OpCity UpNest\) Review \(RESPA Fraud, Read Warning!\)](#)

[VeteransUnitedRealty.com \(Veterans United Home Loans\) Review \(RESPA Fraud, Read Warning!\)](#)

[RocketHomes.com \(Redfin Partner Program\) Review \(RESPA Fraud, Read Warning!\)](#)

[Zillow.com Preferred \(Flex\) Review \(RESPA Fraud, Read Warning!\)](#)

[HomeLight.com Review \(RESPA Fraud, Read Warning!\)](#)

[EffectiveAgents.com Review \(RESPA Fraud, Read Warning!\)](#)

[HomesForHeroes.com Review \(RESPA Fraud, Read Warning!\)](#)

Ongoing Pay-at-Closing Referral Networks RESPA class actions lawsuits



Real Estate Settlement Procedures Act (RESPA) Section 8(a) and CFPB Regulation X maintain firm prohibitions against kickbacks and unearned fees.

Currently, we have three major RESPA/RICO/fiduciary duty lawsuits posted in federal dockets across the country, led by [Hagens Berman Sobol Shapiro LLP](#) and several other major class-action law firms. The status for all of them (as of June 15, 2026) are pending Motions to Dismiss –

(1) [Zillow Flex](#)

(2) [Rocket Homes](#)

(3) [Veterans United Realty](#)

Geodoma posted Amicus Briefs in all three of these RESPA (putative, for now) Consumer class actions, all in full support of Consumers –

(1) [Taylor v. Zillow, Inc., 2:25-cv-01818 \(W.D. Wash. Oct. 6, 2025\) \(Doc. 7\)](#)

(2) [Waller v. Rocket Companies, Inc., 2:26-cv-10270 \(E.D. Mich. Apr. 10, 2026\) \(Doc. 17\)](#)

(3) [Peyton v. Veterans United Home Loans et al, 2:26-cv-04039 \(W.D. Mo. May 6, 2026\) \(Doc. 35\)](#)

All three of these major Referral Networks Defendants have now invoked (as a futile defense) the 12 U.S.C. 2607(c)(3) and 12 C.F.R. 1024.14(g)(1)(v) broker-to-broker referral exemption that allows payments pursuant to cooperative brokerage and referral arrangements between real estate agents and real estate brokers (**this limited exemption on kickbacks only applies to fee divisions within real estate brokerage arrangements when all parties act in a real estate brokerage capacity.**)

However, in my civil lawsuit with [HomeLight](#), the [United States District Court for the Northern District of California](#) had recently reasoned that [HomeLight](#) acts in a vertical servicer-customer relationship on a different level of the supply chain with +/-28,000 partner agents. The federal court had reasoned that [HomeLight](#) is an “upstream” supplier of paid referrals to “downstream” real estate brokers, as opposed to a real estate broker acting on the same level of distribution, where –

“... [E]ven though HomeLight is a licensed brokerage, in the context of this [referral] agreement HomeLight and agents are not acting as horizontal competitors ...” where “... real estate agents [are] referral platform’s ‘intermediate’ consumers ...” HomeLight, Inc. v. Shkipin, 694 F. Supp. 3d 1242, 1250 (N.D. Cal. 2023)

Also see <https://www.housingwire.com/articles/opinion-broker-to-broker-referral-exemption-does-not-apply-to-agent-matching-platforms/>

HomeLight, Inc. v. Shkipin, 694 F. Supp. 3d 1242, 1250 (N.D. Cal. 2023) (i.e., the servicer-customer designation between the referral platform [HomeLight](#) and +/-28,000 real estate agents) is a cornerstone federal court precedent: this judicial decision plainly precludes RESPA 12 U.S.C. 2607(c)(3) safe harbor applicability for any of the 25% to 40% referral fees shelled out into Referral Networks.

Geodoma's Amicus Briefs in all three putative class actions explain that kickback-paying real estate brokers do not wish to compete for consumers with competitive and fair services at all (in lieu of getting spoon-fed referrals from schemes such as [Zillow Preferred \(Flex\)](#) and are perfectly willing to shell out 40% of their RESPA-covered commissions for these referrals.) **Until this blatant RESPA-banned conduct is stopped, our entire real estate industry is engaged in major kickback fraud, with no end in sight.**

In the United States, anyone violating the RESPA's referral fee ban commits a crime 12 U.S.C. 2607(d)(1) with criminal penalties of up to \$10,000 in fines, treble damages, and/or imprisonment for up to 1 year, for each violation. Wire fraud is a FELONY that carries a statutory maximum penalty of up to 20 years in federal prison per count (only when criminally prosecuted by the government – federal prison is not on the table in pending civil Consumer class actions).

For instance, since its inception in 2006 as In-House Realty, [Rocket Homes \(a shell entity administered by Rocket Mortgage\)](#) had collected 35% kickbacks from over 1,000,000 transactions, by self-admission (**\$10 billion RESPA fraud.**)

Since 2012, [HomeLight](#) has collected 25% to 33% kickbacks from over 1,200,000 transactions, by self-admission (**\$17 billion RESPA fraud.**)

Since 2018, [Zillow Preferred \(Flex\)](#) stole over **\$5 billion in RESPA-banned kickbacks** in collusion with over 100,000 Flex partner agents.

Nothing (remotely lawful) can compete with this kind of RESPA/RICO fraud. All these Referral Networks are massive RICO-banned cartels (some of them consist of tens of thousands of co-conspirators.) **Every single year, the mere dozens of these Referral Networks schemes steal an estimated \$15 billion in RESPA-banned kickbacks from about \$100 billion that consumers spend on real estate brokerage fees.**

In terms of the aggregate dollar value, **this is now the largest real estate settlement services fraud in history**, where RESPA-banned kickbacks are derived from the largest single business line item (real estate brokerage fees are consistently the

largest line item expense, when Americans are buying or selling approximately 4,000,000 to 6,000,000 homes every year) and are further scaled online between state borders, across the entire United States.

See <https://www.inman.com/2022/10/07/referral-fees-from-so-called-paper-brokerages-including-zillow-inflate-commissions-by-15b-a-year-ceo>

Even more problematic, is that **almost every single major brokerage in America is engaged in this RESPA/RICO fraud** (it is just as illegal to pay referral fees out into referral platforms under RESPA), with possible co-conspiring brokerages such as: [Anywhere Real Estate Inc.](#), [Douglas Elliman](#), [Berkshire Hathaway HomeServices](#), [eXp Realty](#), [@properties](#), [Windermere Real Estate](#), [Keller Williams](#), [REMAX](#), [Coldwell Banker](#), [NextHome, Inc.](#), [HomeSmart](#), [Compass](#), [John L. Scott Real Estate](#), [CENTURY 21](#), [Realty ONE Group](#), [Vylla](#), [ERA Real Estate](#), [Weichert, Realtors](#), [Better Homes and Gardens Real Estate](#), [Fathom Realty](#), [Intero Real Estate Services](#), [John R. Wood Properties](#), [Worth Clark Realty](#), [Sotheby's International Realty](#), [United Real Estate](#), [Real](#), [Side](#), [Howard Hanna](#), [lpt realty](#), [Jason Mitchell Group](#), [The Corcoran Group](#), [SERHANT.](#), [The Agency RE](#), [Realty Executives International](#), [Engel & Völkers](#), [The Keyes Company](#), [Nest Realty](#), [West USA Realty](#), [HomeServices of America](#), etc.

(Note: Every real estate brokerage mentioned above was explicitly notified about this editorial. Although these real estate brokerages are not required to respond, the author did not receive any formal correction notices or objections. This, in effect, means that none of these real estate brokerages are able to formally address their illegal conduct.)

By working together as part of an enterprise, and using the interstate wire communications in furtherance of their fraudulent scheme, every RESPA-banned Referral Network conspires with unaffiliated real estate brokerages.

It is unlawful for anyone employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

Pattern of racketeering activity requires at least two acts of racketeering activity committed within ten years of each other. Racketeering predicates are related if they have the same or similar purposes, results, participants, victims, or methods of commission, or otherwise are interrelated by distinguishing characteristics and are not isolated events.

As part of repeated and ongoing conduct, **every Referral Network further violates the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961, et seq. (RICO)** in collusion with various major as well as inconsequential real estate brokerages, with possible co-conspiring brokerages such as:

[anywhere.re](#) [elliman.com](#) [bhhs.com](#) [exprealty.com](#) [side.com](#) [atproperties.com](#) [bhgr.com](#) [century21.com](#) [christiesrealestate.com](#) [coldwellbanker.com](#) [compass.com](#) [corcoran.com](#) [era.com](#) [sothebysrealty.com](#) [windermere.com](#) [kw.com](#) [remax.com](#) [nexthome.com](#) [homesmart.com](#) [johnlscott.com](#) [realtyonegroup.com](#) [vyllahome.com](#) [weichert.com](#) [fathomrealty.com](#) [intero.com](#) [johnrwood.com](#) [worthclark.com](#) [unitedrealestate.com](#) [onerealestate.com](#) [howardhanna.com](#) [lpt.com](#) [thejasonmitchellgroup.com](#) [serhant.com](#) [theagencyre.com](#) [realtyexecutives.com](#) [evrealestate.com](#) [keyes.com](#) [nestrealty.com](#) [westusa.com](#) [homeservices.com](#) etc.

There is no dispute that the 25% to 40% kickbacks exist in these schemes (**most criminals will deny that they were paying or accepting secret kickbacks, whereas ALL Referral Networks generally openly admit that 25% to 40% referral fees are exchanged for RESPA-covered referrals**), therefore, all of this RESPA/RICO fraud relies on a flawed use of 12 U.S.C. § 2607(c)(3) exemption.

(Note: in all three class actions mentioned, Consumers alleged that these Referral Network fees are hidden from them, because this allows for tolling of the one-year statute of limitations under RESPA. Through the doctrine of equitable tolling, courts can extend the one-year cutoff if an affected Consumer can show that the Referral Network actively fraudulently concealed the illegal kickback. An average consumer, of course, does not know that the Referral Network takes an illegal ~40% real estate commission cut for a referral. The author knows this as an industry insider, but an average consumer is much less aware, starting from the fact that most people don't even know what RESPA is, nor should anyone have to know this when trying to buy or sell a home. The general expectation for most

people is for Zillow, Rocket, Veterans United, etc. NOT to defraud them. In this way, these illegal referral fees are hidden from an average consumer, but they are also openly disclosed and admitted to if one knows where to look.)

Under the law, all three lawsuits I mentioned (Taylor et al., Waller et al., and Peyton et al.) must proceed past Motion to Dismiss. The federal courts in all three lawsuits will have to evaluate the 12 U.S.C. § 2607(c)(3) exemption defense as invalid.

There are multiple legal reasons for this, starting from the simple fact that federal courts cannot allow advertising platforms and mortgage lenders to bypass RESPA Section 8(a) with a fraudulent use of RESPA Section 8(c) exemption that relies upon flawed use of shell brokerage entities, as alleged.

For instance, Taylor v. Zillow Preferred (Flex) putative class action Complaint reads

—
“... Zillow ... conduct violates both the plain text of § 2607(a) and its implementing regulation ...”

“... The broker-to-broker referral exemption likewise does not apply, as Zillow does not act as a real-estate broker or perform brokerage functions in these transactions. Its Premier program operates as a referral marketplace that sells and allocate consumer leads, collects contingent “success fees” tied to closed transactions, and performs no brokerage services ...”

For all practical purposes, as soon as broker-to-broker exemption defense fails for Zillow Preferred (Flex) (in the real world, even though Zillow is a licensed brokerage, Zillow is not a bona fide brokerage – Zillow is an advertising platform that serves brokers as advertising customers) the ~40% kickbacks are de facto a \$5,000,000,000 federal crime, specifically because [Zillow Preferred \(Flex\) kickbacks are openly admitted to on Zillow website.](#)

About Referral Networks Reviews

These are genuine, independent, and unpaid editorial reviews for (50) different RESPA-banned Referral Networks. There are no commercial agreements (paid or otherwise) between the author and the reviewed businesses.

Consumers may post helpful, independent comments about these businesses with any sentiment. Referral Networks can never ask to remove legitimate consumer comments. All user comments are protected by the Consumer Review Fairness Act (CRFA), which safeguards people’s ability to share their honest opinions about a business.

About the Author

Dmitry Shkipin operates [Geodoma](#) and is a well-known critic of illegal referral fees charged by so-called “paper brokerages” that organize real estate agents into “referral fee networks” and don’t actually buy and sell property, such as [Opendoor.com Partner Program](#) [mellohome.com \(loanDepot\)](#) [Tomo.com \(Moto Real Estate\)](#) [Better.com Real Estate](#) [OwnUp.com \(dba Own Up, RateGravity\)](#) [FastExpert.com](#) [Offerpad.com](#) [HomePro](#) [AmeriSaveRealty.com](#) [AtClosing.com](#) [Newzip.com \(dba Realeaux\)](#) [HomeAdvantage.com](#) [HomeStoryRewards.com](#) [AgentFixup.com](#) [SOLD.com](#) [LemonBrew.com](#) [ClosingLeads.com](#) [55places.com](#) [Neighborhoods.com](#) [NavyFederalRealtyPlus.com](#) [KelleyBlueBookHomes.com](#) [MyAgentFinder.com](#) [\(BoomTown\)](#) [HomeAndMoney.com \(BoomTown\)](#) [RealEstateAgentsITrust.com \(Glenn Beck\)](#) [RamseySolutions.com \(RamseyTrusted Agent\)](#) [TopAgentsRanked.com \(ReferralExchange\)](#) [UpNest.com \(Realtor.com\)](#) [PLACE.com](#) [HomeGenius.com \(Radian\)](#) [IdealAgent.com](#) [RealEstateAgents.com \(ReferralExchange\)](#) [HomeBuyerConnections.com](#) [AgentPronto.com](#) [Estately.com](#) [ReferralExchange.com](#) [Landed.com](#) [HouseTea.com](#) [HouseWhisper.ai](#) [GetRidley.com \(Ridley\)](#) [TrueParity.com](#) [ComeHome.com \(HouseCanary\)](#) [Lower.com \(Movoto OJO\)](#) [NAFHomes.com \(New American Funding\)](#) [ListWithClever.com \(Clever Real Estate\)](#) [Realtor.com \(ReadyConnect OpCity UpNest\)](#) [VeteransUnitedRealty.com \(Veterans United Home Loans\)](#) [RocketHomes.com \(Redfin Partner](#)

[Program\) Zillow.com Preferred \(Flex\) HomeLight.com EffectiveAgents.com HomesForHeroes.com](#) and similar [sham arrangements](#).

(Note: All responsive Referral Networks mentioned above were explicitly notified about this editorial. Although these Referral Networks are not required to respond, the author did not receive any formal correction notices or objections. This, in effect, means that Referral Networks are unable to formally address their illegal conduct.)

The information presented in these (50) RESPA-banned Referral Networks reviews is 100% accurate and an objective analysis of massive and ongoing RESPA/RICO fraud in the U.S. residential real estate industry.

The so-called “no upfront costs referral networks,” “agent-matching services,” “pay-at-close companies,” and “referral fee programs” are not genuine brokerages acting in a brokerage capacity. (Source: <https://www.housingwire.com/articles/opinion-broker-to-broker-referral-exemption-does-not-apply-to-agent-matching-platforms/>)

Every year, illegal RESPA-banned referral fees from so-called “paper brokerages” inflate real estate commissions by \$15B. (Source: <https://www.inman.com/2022/10/07/referral-fees-from-so-called-paper-brokerages-including-zillow-inflate-commissions-by-15b-a-year-ceo/>)

The full series of reviews for Referral Networks mentioned above <https://litesand.wordpress.com/category/reviews/>

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One thought on “Top 50 Most Harmful RESPA-banned Pay-at-Closing Referral Networks (RESPA Fraud, Read Warning!)”



Erica P

June 19, 2026 at 5:01 pm

Without an active CFPB under the Trump Admin it is on state governments to increase enforcement of consumer financial protection laws.



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