



PIKE
REPORTING
COMPANY

CIVIL ACTION NO. 1:20-cv-03139-DDD

ALLSTATE INSURANCE COMPANY

V.

JOHN CRUZ

DEPONENT:

BUYER

DATE:

JUNE 07, 2022



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Individual buying Allstate customer personal information.

Q So I have information of all your e-mails should be coming from Allstate and there's literally for 10 years, 11 years, thousands of e-mails.

A Yeah. That's what you'd expect.

Q 6,300 files is probably about 50,000 all the PDFs are all attached with it.

A Yeah.

Q In your e-mails, did it did it or did not include customer's personal information?

A XXXXXXXX, it did. Yes.

Q And did you pay out gift cards to Allstate representatives, for referring business?

A Yes.

Q And did you, or did you not, keep account of your records?

A I don't keep records like that. There could be one in --

Q Did you--

A like the send-out cards.

Q Did you report any of this information to FENRA?

A Nope.

Q To the US Treasury?

A Nope.

Q To Colorado Department of Revenue?

A Nope.

Q To the Attorney General?

A Nope.

Q Any government agency?

A Nope.

Q And how long have you you started your agency in June of 2011?

A Yeah.

Q And the referral business is still going on today, back, and forth, with Allstate representatives?

A It is. Not not frequently, but it is.

Q But it is still taking place?

A Yes.

Q And these are individuals still at Allstate agencies?

A Yes.

Deposition, 47:1-48:8

Buyer continued Deposition: