

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

ALLSTATE INSURANCE COMPANY

V

JOHN CRUZ

DEPOSITION OF:

DINO DICARLO

DATE:

June 29, 2022





(855) 693-3767 | (720) 738-1300



schedule@vournextdepa.com

Dino Dicarlo: Allstate Representative:

- Q So Allstate's system allows you to send customers personal information through your e-mail, allstate.com, or your staffs, allstate-mail.com, through electronic communication?
- Q Like Ivan xxxxxxx or Steve xxxxxxxxx?
- A If it's secure, then I believe so. I'm not --
- Q Did you get paid a gift card for this referral?
- A I -- I don't recall.
- Q But you don't report your income for -- for gift cards on your tax return, correct?
- A No.
- Q And you don't report to FINRA or the FCC of your outside business, or referring business and getting paid for it, correct?
 MS. ARGENTINE: Objection to form.
- Q Did you report to -- to the FCC, FINRA, your income from gift cards, referrals?
- A No.