



**PIKE
REPORTING
COMPANY**

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

ALLSTATE INSURANCE COMPANY

V.

JOHN CRUZ

DEPONENT:

ERIKA LOUSBERG

DATE:

JUNE 07, 2022



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Erika Louisberg: Allstate Representative, Manager, Trainer, Mentor, Agency Owner:

Q So that is an application. Would she have sent that application to xxxxxx as stated in the e-mail?

A Well, she might have.

Q Mark that exhibit -- again, you don't have these records for these e-mails?

been handwritten notes and files.

Q Well, we have e-mails here from 2021, '20, '19. Where are those records?

A I didn't have any access to this, John. I literally have no way to run audits on people I've sent to XXXX unless I -- unless I go into each individual customer when I have a list, then I can go into their file and look at the notes.

Q -- XXXXXXXXXXXX In your contract, you stated you could refer business?

A Yeah.

Q To independent xxxxxx

A Yes.

Q Other than the 10 or maybe \$15 gift card you would receive for sending a lead, did you ever receive any other sort of commissions with respect to a referral that you made?

A No.

Q Did you ever receive any other compensation at all?

A No.

Q Did you ever receive any cash

A No.

Q And how many times have you referred business to xxxxxxxx, you, and your staff?

A I'd have to look because, again, I don't remember.