



**PIKE  
REPORTING  
COMPANY**

**CASE ACTION NO. 1:20-CV-03139-DDD**

**ALLSTATE INSURANCE COMPANY**

**v.**

**JOHN CRUZ**

**DEPONENT:**

**JODI LYNCH**

**DATE:**

**MAY 12, 2022**



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**Jodi Lynch: Allstate Representative, Manager, Trainer, Mentor, Agency Owner:**

- Q** Did anyone in your office, in regard to referrals to Steve XXXXXXXXXXXX, receive gift cards for referrals to Steve XXXXXXXXXXXX?
- A** He had a program of gift cards, and, I think, it was 20- or \$25. Yeah. It probably happened a couple times.
- Q** What e-mail would they use to go on to receive their gift cards?
- A** I don't know. Don't know.
- Q** But they did receive gift cards, correct?
- A** Yeah. I think, there were some gift cards.
- Q** Did you ever report these gift cards to Allstate?
- A** No.
- Q** Did you claim them as income on your tax returns?
- A** I don't know.
- Q** So your staff would receive gift cards from you for referring business to Steve XXXXXXXXXXXX?
- A** They would -- I think, there were e-mails that Steve sent over. He would send over an e-mail and there was a link. And then, the -- I think, that's how it worked. And then, the staff could pick out what they wanted, or the vendor that they wanted.
- Q** And you allowed this? You allowed them --
- A** 25 bucks, yeah.
- Q** You allowed them to receive gift cards for leads referrals, Allstate customers, Allstate leads, Allstate referrals?
- Q** After receiving gift cards from xxxxxxxxxxxxxxxxxxxxxxxxxx xxxxx and giving them to your staff, did you report this income that you gave to your staff in a form of a 1099, a W-2?
- A** Probably not.
- 
- Q** Who authorized you at Allstate to refer business?
- A** I did. There was nothing -
- Q** Is it okay for you to refer business, receive gift cards for that business, and not inform Allstate, or did Allstate know about this?
- A** For 20- or \$25?
- Q** Yes. 20-, \$25 gift card.
- A** I don't think there's anything wrong with that.