

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JASIBEL CANCHOLA, CARLOS OCHOA,
RICHARD CURTIS, and ROBERT SOUZA,
individually and on behalf of all others similarly
situated,

Plaintiffs,

vs.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No. 8:23-cv-00734-FWS-ADS

CLASS ACTION

Hon. Fred W. Slaughter

**If you signed an Allstate R3001, R3001A, R3001S, or R3001C
Exclusive Agency Agreement and were an Allstate agent in
California between March 22, 2020 and March 28, 2025, a class
action lawsuit may affect your rights.**

*A federal district court authorized this notice. It is not junk mail, spam, an advertisement, or a
solicitation from a lawyer.*

**You are not being sued. Please read this entire notice carefully because it explains your
rights and options in the lawsuit.**

You may be affected by a class action lawsuit about whether Allstate Insurance Company (“Allstate”) misclassified its exclusive agents in California between March 22, 2020 and March 28, 2025 as independent contractors. The lawsuit seeks reimbursement of the expenses those agents incurred in running an Allstate agency, selling Allstate insurance products, and servicing Allstate customers in California during that same time period.

What is the lawsuit?

The lawsuit is called *Canchola, et al. v. Allstate Insurance Company*, Case No. 8:23-cv-00734-FWS-ADS and is in the United States District Court of the Central District of California. A copy of the complaint, which sets forth the claims in the case can be found at www.AllStateAgentLawsuit.com.

The Plaintiffs allege that, between March 22, 2020 and March 28, 2025, Allstate structured its relationship with its California exclusive agents as an employer-employee relationship and failed to reimburse necessary business expenses incurred in running an Allstate agency, in violation of California Labor Code section 2802. Allstate denies Plaintiffs’ claims and asserts that it both properly classified its exclusive agents as independent contractors and that it does not owe any reimbursement to Plaintiffs.

The Court has certified this lawsuit as a class action. The Court's Order Certifying the Class can be found at www.AllstateAgentLawsuit.com. In a class action lawsuit, one or more people called "Class Representatives" sue on behalf of other people who have similar claims (the "Class").

The Class includes:

All individuals who signed an Allstate R3001, R3001A, R3001S, or R3001C Exclusive Agency Agreement (the "Agency Agreement"), and are or were Allstate exclusive agents in California at any time between March 22, 2020 and March 28, 2025.

The Court appointed four former Allstate exclusive agents as Class Representatives: Jasibel Canchola, Carlos Ochoa, Richard Curtis, and Robert Souza. They will represent the interests of everyone in the Class. If this lawsuit is successful, there may be tax implications based on the Court's findings. You may wish to consult a tax professional regarding any potential tax implications of this lawsuit.

Who are the lawyers representing the Class?

The Court has appointed the law firms of Crueger Dickinson LLC, Wallace Miller, and Nelson & Fraenkel LLP as "Class Counsel." They are experienced in handling class action and employment cases. You may contact Class Counsel at 1-855-995-0888 to discuss your rights in this litigation.

Why am I getting this Notice?

You are receiving this notice because you could be part of the Class. Allstate's records show that you signed an Exclusive Agency Agreement and that you currently are, or previously were, an Allstate exclusive agent in California who incurred business expenses in running an Allstate agency, selling Allstate insurance products, and servicing Allstate customers in California between March 22, 2020 and March 28, 2025.

What are my options?

You have a choice to make now:

1. Stay in the Class

If you stay in the Class, you will be legally bound by all orders and judgments of the Court, and you won't be able to sue, or continue to sue, Allstate Insurance Company—as part of any other lawsuit—for violations of Cal. Labor Code 2802 based on the alleged misclassification that occurred between March 22, 2020, and March 28, 2025. If you stay in the Class and the Plaintiffs prevail in this lawsuit, you may be entitled to a share in the recovery. **To stay in the Class, you do not have to do anything now.** If you do not request exclusion, you may, if you desire, enter an appearance in this lawsuit through an attorney.

2. Ask to be Excluded

If you do not want to be part of the Class for any reason, you can exclude yourself.

If you exclude yourself, you will not be bound by any legal findings on classification, judgment, or settlement and cannot get any money or benefits from this lawsuit if any are awarded. You will, however, keep any rights to sue Allstate individually for these claims, now or in the future, and will not be bound by any orders or judgments of the Court in this matter.

To ask to be excluded, you must send an “Exclusion Request” in the form of a letter sent by mail, stating that you want to be excluded from *Canchola, et al. v. Allstate Insurance Company*, Case No. 8:23-cv-00734-FWS-ADS. Be sure to include your name and address and sign the letter.

You must mail your Exclusion Request postmarked by September 4, 2025, to: *Canchola, et al. v. Allstate Insurance Company*, Exclusions, c/o A.B. Data, Ltd., P.O. Box 173001 Milwaukee, WI 53217. You may also submit an Exclusion Request form at the website, www.AllstateAgentLawsuit.com, or by email to info@AllStateAgentLawsuit.com by September 4, 2025.

Preservation of Information

You may have to submit evidence of the expenses you incurred for which you are entitled reimbursement if there is any recovery either through settlement or trial. You should, therefore, preserve all documents reflecting your expenses

Where can I access further information?

If you have any questions about the lawsuit or this Notice, please contact Class Counsel at 1-855-995-0888 or contact the Settlement Administrator at 1-866-905-8125, or by writing to: *Canchola, et al. v. Allstate Insurance Company*, c/o A.B. Data, Ltd., P.O. Box 173086 Milwaukee, WI 53217. Contact information and additional case related information can be found at www.AllstateAgentLawsuit.com.

DATE: JULY 21, 2025