

WH

KC FILED

AUG 21 2007

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 vs. )  
 )  
 ROBERT GROEBNER )  
 )

No. 07 **07CR** **541**

Violation: Title 26, United States Code,  
Section 7206(1)

**JUDGE NORGLÉ**

The UNITED STATES ATTORNEY charges:

**MAGISTRATE JUDGE COLE**

1. At times material to this Information:

a. Allstate Insurance Company was a Delaware corporation, with its headquarters in Illinois, and was engaged in the business of providing insurance coverage nationwide, including automobile insurance.

b. As a convenience for automobile insurance policy holders, Allstate operated the "Priority Repair Option" (PRO) program whereby certain auto body repair shops were pre-approved by Allstate to repair vehicles. Auto body shops selected to participate in the PRO program were permitted to write estimates and complete repairs without pre-authorization from Allstate. Allstate typically allowed PRO body shops to fill out less paperwork, usually paid PRO shops in less time than non-PRO shops, and referred customers to PRO shops.

c. Allstate employed damage evaluators, also referred to as re-inspectors, who periodically visited PRO shops and reviewed a representative number of vehicles to ensure estimates were accurate and that cost-effective repairs were being made. Damage evaluators also had authority to increase or decrease the number of referrals, or cars in need of repair, to each shop under their authority.

d. Defendant was a resident of Morton Grove, Illinois, and employed by Allstate. From approximately 1992 to 2002, the defendant was a damage evaluator employed by Allstate.

e. As of 2002, the defendant was assigned a geographic territory that included approximately 21 auto body shops encompassing the PRO shops from Highway I-90 north, from Chicago, Illinois to the far northwest suburb of Antioch, Illinois.

f. In 2001, defendant had demanded and received approximately \$60,000 in cash payments from three owners of auto body shops in the Chicago area, in exchange for the body shops' ability to remain as a PRO shop and to receive the same volume of referrals from Allstate;

2. On or about April 12, 2002, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROBERT GROEBNER,

defendant herein, who, at the time of filing his return was a resident of Morton Grove, Illinois, willfully did make and cause to be made and did subscribe a joint United States Individual Income Tax Return (Form 1040) for the calendar year 2001, on behalf of himself and his wife;

3. The 2002 joint individual income tax return was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service;

4. Defendant ROBERT GROEBNER did not believe that this 2001 joint individual income tax return was true and correct as to every material matter, in that:

a. The tax return under-reported income on line 7 by approximately \$60,000, and under-reported the total tax at line 52 by approximately \$16,829;

In violation of Title 26, United States Code, Section 7206(1).

  
UNITED STATES ATTORNEY